Response ID ANON-B3JU-DSB1-X

Submitted to **Local Development Plan Main Issues Report 2019 Consultation**
Submitted on **2019-05-10 16:33:35**

About You

What is your name?

Name:
Paul Taylor

What is your organisation?

Organisation:
Scottish Natural Heritage

On behalf of:
Scottish Natural Heritage

How can we contact you?

Email:
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How to Complete

1 Introduction

Section 1 provides a context for the Main Issues Report Do you have any comments in relation to this section?

Do you have any comments in relation to this section?:
We believe the vision should contain more emphasis on the role of the natural environment as a key contr butor to quality of life in Aberdeen. This reiterates one of our pre-MIR comments. Whilst we acknowledge that the vision has to be concise and balanced, it may be possible to draw upon the wording in the proposed SDP vision to help emphasise the important role of the natural environment, i.e.: "…the City Region's unique built, historic and natural environment, which will be protected and, where appropriate, enhanced as a key asset in underpinning a high quality of life and place."

2 Settlement Strategy

Question 1 New Housing Sites

Do you agree with our preferred housing sites? Are there any other sites that would be suitable for housing?:
We agree with the approach you have used in relation to the assessment of the bid sites.

Question 2 Housing Allowances Beyond 2032

Is there a need for us to identify further Housing Allowances or sites for the period beyond 2032?:

Question 3 Brownfield and other Opportunity Sites

Are there any further brownfield or other opportunity sites which would be suitable for redevelopment?:

Question 4 New Healthcare Facilities

Do you have any comments on these sites? Are there any other sites in these areas that we should be considering?:
We agree with the approach you have used in relation to the assessment of the bid sites.

3 Aberdeen City Centre and the Network of Centres

Question 5 City Centre Boundary

Do you agree the Local Development Plan should modify its City Centre boundary to match the City Centre boundary shown in the City Centre Masterplan?:
Yes, it does appear to make sense to strengthen the relationship between the City Centre Masterplan (CCMP) and the Local Development Plan in order to present a coherent approach.

Question 6 City Centre Masterplan Intervention Areas

Do you agree that the City Centre Masterplan intervention areas should be identified as opportunity sites within the Local Development Plan?:
Yes, we would support this, given the benefits that would be achieved if these areas are developed in accordance with the aims of the CCMP.

Question 7 City Centre Retail Core

Should the retail core be reduced to focus on a more compact area of Union Street and the existing shopping centres?:

Question 8 Union Street Frontages

Should the Union Street Frontages percentages be reviewed? Do the current target percentages ensure there is a balance between a strong retail focus and allowing for other uses? What other uses should we allow on the retail core area of Union Street:

Question 9 Out of Town Retailing

Should we direct high footfall uses to existing centres including the City Centre? Should we consider new out of town retail parks? What would the impact of these be on Union Street and the City Centre, and Aberdeen's network of centres?:

Question 10 Commercial Leisure Uses

Should we continue to direct commercial leisure uses towards existing centres and the beach and leisure area?:
Yes, we would support this. We would hope the beach area could remain an attractive environment for people to use for recreation, and note that these uses are considered compat ble with the leisure function of the beach. The provisions contained in policy NC9 of the existing LDP also help in relation to avoiding an unduly adverse effect on the character of the area, or causing negative visual or environmental impacts.

Question 11 City Centre Living

How can we encourage more people to live in the City Centre? Would a document outlining the principles which need to be applied in converting a building into residential use be helpful?:
Although we recognise that this question is largely framed in relation to a discussion about residential use in the city centre, we strongly encourage any opportunities that the LDP may offer to strengthen the city centre as an attractive, welcoming, green and walkable environment, and to maximise the use and quality of the city centre green spaces and their connections to the coast (and to the River Dee and the Don). This improved environment will attract more people to want to live in the city centre.
We acknowledge that the CCMP goes some way to addressing these aspirations.
Please note the Town Centre Toolkit as a useful resource. Its themes of 'Attractive, Active, Accessible' link strongly to the design-led approach set out in SPP and NPF3. Too kit principles such as "Improving greenspace", "Introducing green streets" and "Creating joined-up movement networks" should help the LDP expand on relevant higher tier policies.

MAIN ISSUE 1 Living in the City Centre

Should we include a policy in the Local Development Plan supporting residential development in the City Centre, including the conversion of upper and basement floors of premises to provide residential accommodation?:

Not Answered

Question 12 Residential Development in the City Centre

Are there any other locations within the City Centre where residential accommodation could be provided?:

MAIN ISSUE 2 A 24-Hour City

Should 24-hour activities in Aberdeen be supported and encouraged to grow, especially in the City Centre? Could this be achieved through policy?:

Not Answered

Question 13 Encouraging the Creative Arts

What can we do to support and encourage the creative sector to ensure a range of distinctive experiences so that Aberdeen City Centre is like no other place?:
We recognise that this encouragement of the creative arts would form part of a wider objective to create a more sustainable, attractive and welcoming city centre.

Question 14 Proposals for Creative Arts

Are there other buildings or areas within Aberdeen that could accommodate the existing, and support an emerging creative sector for desk-based and studio-based artists?:

Question 15 Percent for Art

To ensure Aberdeen City Centre retains its distinctiveness, should developments with construction costs of £1 million or over be required to allocate at least 1% of construction costs for the inclusion of art projects in a publicly accessible/ visible place or places within the development?:

MAIN ISSUE 3 Support for Visitor Attractions

To support our existing visitor attractions should Aberdeen have a policy about protecting and growing visitor attractions?:

Not Answered

4 Quality Places

MAIN ISSUE 4 Minimum Internal Space Standards for New Residential Development

How can we ensure that new residential development delivers an adequate amount of internal floor space for future occupants?:

Not Answered

Question 16 External Space Standards

Do you think that the amenity spaces currently delivered are of a sufficient quality? Should we strive for a better quality/ quantity of private/ semi-private residential amenity space across the city and refuse planning permission to proposals which do not meet our high standards? What standards would you like to see set for new dwellings, flats, and conversions in respect of quality and quantity of external amenity space?:

Question 17 Natural Environment

Do you agree that the proposed list of policies for Natural Environment gives a clearer and more coherent structure than at present?:
We would be pleased to comment on the proposed wording of any 'new' consolidated policies for the Natural Environment.

Question 18 Food Growing

How can the Local Development Plan support the delivery of food growing projects in the City? Do you think food growing should be included in the next Plan by way of a new policy, or through existing policy and guidance?:
We welcome any actions which the new plan might take to support food growing projects, noting benefits in terms of reduced food miles, and the positive role of gardening in reducing stress levels and increasing physical activity.
We also note that the proposed SDP encourages "Developments should also make it easy for people to access green and open space, including places where people can enjoy nature and take advantage of opportunities for food growing, such as allotments and community orchards."
In terms of resources, it is perhaps worth noting SNH's webpage about growing your own food – see
https://www.nature.scot/professional-advice/planning-and-development/industries-reliant-nature/food-and-drink/local-produce

5 Transport and Infrastructure

Question 19 City Centre Parking

Should we reduce car parking in the City Centre to support the City Centre Masterplan? If so, how?:
Yes, ideally. We note the emphasis in the CCMP report on relocating car movement and encouraging Aberdeen to become a cycling city. We also note the exploration of the parking issue within the CCMP report, and the combination of potential solutions discussed there, as well as some of the more bespoke objectives for parking in relation to different intervention areas. As noted in the CCMP, managing this issue will potentially create a more attractive environment for all.

MAIN ISSUE 5 Electric Vehicle Charging Infrastructure

How best can we encourage the provision of infrastructure to support changes in transport technologies? :
The preferred option seems appropriate in terms of providing infrastructure for this projected modal shift, and ultimately encouraging people to use more environmentally-friendly forms of transport.

Option 2 - Preferred Option

Question 20 Digital Infrastructure

Should high speed broadband be mandatory in all new residential developments with 5 or more units? Do you wish to suggest any other proposed changes to the Digital Infrastructure and Telecommunications Infrastructure policies?:

Question 21 Developer Obligations and Infrastructure Delivery

Do we need to change our approach to securing developer obligations for future development proposals?:

6 Resource and Business Policy

MAIN ISSUE 6 Low and Zero Carbon Generating Technologies and Water Efficiency

Should the requirement of existing Policy R7 be changed?:
We agree that the preferred option would help better support the aims of the Climate Change Act, and encourage the industry to improve.

Option 2 - Preferred Option

Question 22 Low and Zero Carbon Generating Technologies and Water Efficiency

What methodology should the Council use in calculating compliance with Policy R7, specifically how should the target of reducing carbon dioxide levels be calculated?:

Question 23 Solar Farm Developments

Do you agree that Solar Farms should be supported within the Council's policy on Renewable and Low Carbon Energy developments, and should specific guidance be included within Policy R8?:
It could make sense to mention solar within the Council's R8 policy. It could currently be assumed to be supported in the general mention of 'renewable heat and energy generating technologies', and you may decide that is adequate. Whether to include it may largely depend on what the Council might wish to specifically highlight in terms of guidance for that technology.
Note that SNH has produced guidance on natural heritage considerations in relation to solar farms. See
https://www.nature.scot/professional-advice/planning-and-development/renewable-energy-development/types-renewable-technologies/solar-energy

MAIN ISSUE 7 Heat Networks

Should we include a policy in the Local Development Plan supporting the development of Heat Networks within the City?:
We agree that the preferred option would allow greater scope for the development of a coherent heat network plan across the city.

Option 2 - Preferred Option

Question 24 Supporting Business and Industrial Development

Should we carry forward our current policy approach to safeguarding existing business and industrial areas from other development pressures into the next Local Development Plan?:

MAIN ISSUE 8 West End Office Area

Should the policy support a mix of uses in the West End Office Area? If so, what types?:

Not Answered

Additional Documents

Please include comments on other documents below:

Please include comments on other documents below::
In relation to the Strategic Environmental Assessment Environmental Report: Our response on the SEA interim Environmental Report is submitted through the SEA Gateway.

In relation to the Development Bids Assessments: We agree with the approach you have used in relation to the assessment of the bid sites. We do however make further comments in our MIR consultation response letter about some potential inconsistency in applying landscape criteria across the assessments. Also as noted in our related SEA consultation response, we would be happy to explore with you whether there are any opportunities to streamline the SEA and bid assessment processes to look for efficiencies in reporting.

We don't have comments on anything else, other than to refer back to our pre-MIR comments which offered more general advice on natural heritage in relation to the LDP. We feel those comments are still relevant to this consultation.

Additional Files

If you have further information you would like to provide you may upload it here.:
No file was uploaded

Local Development Plan Team
Aberdeen City Council

By email only to ldp@aberdeencity.gov.uk

Date: 10 May 2019
Our ref: CPP155003

For the attention of Sandra Omondi, Planner, Aberdeen City Council

Dear Sandra

Aberdeen Main Issues Report (MIR) 2019

Thank you for the opportunity to comment on the Aberdeen City Main Issues Report (MIR) 2019.

As background to our comments, please note our earlier pre-MIR consultation comments from May 2018. Those previous comments had outlined a number of key issues, which we feel are still relevant to this consultation. For example, we had recommended that priorities for the next Aberdeen Local Development Plan should be:
- increasing Aberdeen's quality and connectivity of green infrastructure as a key part of quality of place;
- greening the city; and
- implementing the green network.

We had also recognised improving active travel and climate change mitigation as priorities.

We have provided answers to your current consultation questions via your online consultation hub, and these same answers are included at <u>Annex A</u> of this response letter.

Thank you also for sending us the electronic shape files for all the bid sites. We have reviewed those in relation to a range of natural heritage interests on our GIS system. We have also at the same time considered the related appraisals contained in your bid assessment report and SEA Interim Environmental Report.

We agree with the approach you have used in relation to the assessment of the bid sites in terms of the use of the (almost completed) Aberdeen Landscape Study to inform this work. As you know SNH has had ongoing input to this detailed and robust Landscape Study. We have been involved over a number of years at all stages as part of the Study Steering Group.

We feel that it is for the Council to interpret the findings of its own Landscape Study, rather than us providing a 'check' for each of the individual assessments. We would however flag a potential issue regarding the consistency, quality and content of the landscape criteria in the bid assessments. We will provide some separate more detailed explanation to help illustrate this point, and would be happy to discuss it further with you. It is possible you may find it helpful to look again at what these criteria are hoping to capture in the assessment and how they are being used.

As noted in our related SEA consultation response, we would also be happy to explore with you whether there are any opportunities to streamline the SEA and bid assessment processes to look for further efficiencies in reporting.

Where the site assessments find that there are significant natural / cultural / landscape features that contribute to the identity of a site – then we believe it would be appropriate to include some mechanism to ensure the sensitive development of that site. This should be an important factor in deciding the need for deployment of site briefs/ strategic design frameworks in relation to particular sites. The mechanism may be a detailed masterplan, a site brief, or a strategic framework (where, for example, areas are adjacent to the Council boundary and ideally there needs to be consensus with the Shire regarding the approach adopted). Again, we do not think it is necessary for us to get involved in commenting upon what type of mechanism should be used in any area – this decision can helpfully lie with the Council, using the evidence provided within your own detailed Landscape Study. The appropriate mechanism will need to be proportionate in relation to the context of the site, the findings of your assessment and the scale of change proposed. Furthermore there is of course substantial Scottish Government guidance (e.g. Designing Places) that can be followed and any advice we give would only replicate this.

We note that there are a number of mitigation measures identified in the accompanying SEA Interim Environmental Report to address possible negative environmental effects from particular site allocations. We recommend that these are brought through into the Proposed Plan as specific developer requirements.

We welcome the Council's assessment findings on bid sites, and are content with the sites that have been selected to take forward. Whilst we have not commented in detail on individual sites, based on our own review exercise we would in particular support the Council's assessment of the following bid sites as being categorised as 'undesirable':

- B01/02 Land Adjacent to Site OP21 Rowett South
- B02/10 Mundurno, Bridge of Don
- B02/11 Newton of Mundurno
- B02/13 Shielhill North and South
- B02/14 Shielhill South
- B02/17 Berryhill Farm (3)
- B02/19 Perwinnes
- B06/02 Land at Lord Hays Grove (Ph 2)
- B07/01 Land Adjacent to Cornhill Road
- B09/01 Culter House Road Phase 2
- B09/05 Site at East Lodge, Culterhouse Road
- B09/06 Contlaw, Milltimber
- B09/07 Albyn Playing Fields
- B09/08 Countesswells
- B09/10 Friarsfield North
- B09/11 Land at Culter House Road
- B09/12 Craigton Road South (1)
- B09/13 Craigton Road South (2)
- B09/14 Craigton Road South (3)
- B09/21 Countesswells Settlement Expansion
- B09/22 Land at West Craigton, Peterculter
- B09/23 Hillhead of Pitfodels

B09/26 Huxterstone, Kingswells
B09/27 OP112 Contlaw Road
B09/46 Malcolm Road, Peterculter
B10/03 North East Countesswells Phase 1
B13/12 Wellington Road East

We would appreciate an opportunity to provide further comment on these sites if for some reason they subsequently come forward as part of the Proposed Plan.

Finally, a key issue in the SEA Interim Environmental Report is the potential effect of increases in physical abstraction on the qualifying interests of the River Dee Special Area of Conservation (SAC). No Habitats Regulation Appraisal (HRA) is available at this MIR stage. We would encourage the early commencement of HRA prior to the preparation of the Proposed Plan, and we would be pleased to assist you in that process. The advice we have provided on this issue in both our 5 April 2019 consultation response to the Aberdeenshire Main Issues Report and our 18 April response to the Aberdeen City and Shire Proposed Plan HRA may provide a useful starting point to considering some of the issues to assess, and help guide your own approach to HRA for the River Dee SAC.

As noted in our pre-MIR comments, an additional site which will need to be considered in HRA is the Ythan Estuary, Sands of Forvie and Meikle Loch Special Protection Area (SPA). The proposed marine extension to this site extends down to Aberdeen, just north of the Dee. Please see SNH's Sitelink for further details.

Concluding remarks

I hope that these comments are helpful. However please do get in touch if you would like to discuss further. Should you have any queries, in the first instance please contact Paul Taylor on [redacted] or at [redacted] We look forward to continued liaison with you as you work towards production of the draft Proposed Plan.

Yours sincerely

[By email]

Darren Hemsley
Operations Manager - Tayside & Grampian

Encs: Annex A – SNH's comments on MIR consultation questions

Annex A – SNH's comments on MIR consultation questions

MIR questions	SNH comment
1 Introduction This section gives background and context to our Main Issues Report, as well as an indicative timeline of future stages in the preparation process of the Local Development Plan	
Section 1 provides a context for the Main Issues Report. Do you have any comments in relation to this section?	We believe the vision should contain more emphasis on the role of the natural environment as a key contributor to quality of life in Aberdeen. This reiterates one of our pre-MIR comments. Whilst we acknowledge that the vision has to be concise and balanced, it may be possible to draw upon the wording in the proposed SDP vision to help emphasise the important role of the natural environment, i.e.: "...*the City Region's unique built, historic and natural environment, which will be protected and, where appropriate, enhanced as a key asset in underpinning a high quality of life and place.*"
2 Settlement Strategy The Aberdeen LDP 2017 allocated land for housing and employment over two phases in line with the Aberdeen City and Shire SDP 2014. This section sets out housing allowances for Aberdeen City in line with the Proposed SDP 2018.	
Question 1. New Housing Sites Do you agree with our preferred housing sites? Are there any other sites that would be suitable for housing?	We agree with the approach you have used in relation to the assessment of the bid sites.
Question 2. Housing Allowances Beyond 2032 Is there a need for us to identify further Housing Allowances or sites for the period beyond 2032?	No comment.
Question 3. Brownfield and other Opportunity Sites Are there any further brownfield or other opportunity sites which would be suitable for redevelopment?	No comment.
Question 4. New Healthcare Facilities Do you have any comments on these sites? Are there any other sites in these areas that we should be considering?	We agree with the approach you have used in relation to the assessment of the bid sites.

MIR questions	SNH comment
3 Aberdeen City Centre and the Network of Centres Aberdeen City Centre, the regional centre for the North East of Scotland, plays a major role in the commercial. economic, social, civic and cultural life in Aberdeen and beyond.	
Question 5. City Centre Boundary Do you agree the Local Development Plan should modify its City Centre boundary to match the City Centre boundary shown in the City Centre Masterplan?	Yes, it does appear to make sense to strengthen the relationship between the City Centre Masterplan (CCMP) and the Local Development Plan in order to present a coherent approach.
Question 6. City Centre Masterplan Intervention Areas Do you agree that the City Centre Masterplan intervention areas should be identified as opportunity sites within the Local Development Plan.	Yes, we would support this, given the benefits that would be achieved if these areas are developed in accordance with the aims of the CCMP.
Question 7. City Centre Retail Core Should the retail core be reduced to focus on a more compact area of Union Street and the existing shopping centres?	No comment.
Question 8. Union Street Frontages Should the Union Street Frontages percentages be reviewed? Do the current target percentages ensure there is a balance between a strong retail focus and allowing for other uses? What other uses should we allow on the retail core area of Union Street	No comment.
Question 9. Out of Town Retailing Should we direct high footfall uses to existing centres including the City Centre? Should we consider new out of town retail parks? What would the impact of these be on Union Street and the City Centre, and Aberdeen's network of centres?	No comment.
Question 10. Commercial Leisure Uses Should we continue to direct commercial leisure uses towards existing centres and the beach and leisure area?	Yes, we would support this. We would hope the beach area could remain an attractive environment for people to use for recreation, and note that these uses are considered compatible with the leisure function of the beach. The provisions contained in policy NC9 of the existing LDP also help in relation to avoiding an unduly adverse effect on the character of the area, or causing negative visual or environmental impacts.

MIR questions	SNH comment
Question 11. City Centre Living How can we encourage more people to live in the City Centre? Would a document outlining the principles which need to be applied in converting a building into residential use be helpful?	Although we recognise that this question is largely framed in relation to a discussion about residential use in the city centre, we strongly encourage any opportunities that the LDP may offer to strengthen the city centre as an attractive, welcoming, green and walkable environment, and to maximise the use and quality of the city centre green spaces and their connections to the coast (and to the River Dee and the Don). This improved environment will attract more people to want to live in the city centre. We acknowledge that the CCMP goes some way to addressing these aspirations. Please note the Town Centre Toolkit as a useful resource. Its themes of 'Attractive, Active, Accessible' link strongly to the design-led approach set out in SPP and NPF3. Toolkit principles such as "Improving greenspace", "Introducing green streets" and "Creating joined-up movement networks" should help the LDP expand on relevant higher tier policies.
MAIN ISSUE 1. Living in the City Centre Should we include a policy in the Local Development Plan supporting residential development in the City Centre, including the conversion of upper and basement floors of premises to provide residential accommodation? Option 1 - Current Approach Option 2 - Preferred Option Option 3 - Alternative Approach	No comment.
Question 12. Residential Development in the City Centre Are there any other locations within the City Centre where residential accommodation could be provided?	No comment.
MAIN ISSUE 2. A 24-Hour City Should 24-hour activities in Aberdeen be supported and encouraged to grow, especially in the City Centre? Could this be achieved through policy? Option 1 - Current Approach Option 2 - Preferred Option	No comment.
Question 13. Encouraging the Creative Arts What can we do to support and encourage the creative sector to ensure a range of distinctive experiences so that Aberdeen	We recognise that this encouragement of the creative arts would form part of a wider objective to create a more sustainable, attractive and welcoming city centre.

MIR questions	SNH comment
City Centre is like no other place?	
Question 14. Proposals for Creative Arts Are there other buildings or areas within Aberdeen that could accommodate the existing, and support an emerging creative sector for desk-based and studio-based artists?	No comment.
Question 15. Percent for Art To ensure Aberdeen City Centre retains its distinctiveness, should developments with construction costs of £1 million or over be required to allocate at least 1% of construction costs for the inclusion of art projects in a publicly accessible/ visible place or places within the development?	No comment.
MAIN ISSUE 3. Support for Visitor Attractions To support our existing visitor attractions should Aberdeen have a policy about protecting and growing visitor attractions? Option 1 - Current Approach Option 2 - Preferred Option	No comment
4 Quality Places The prosperity of place is linked to the quality of the built environment, which in turn is realised through the placemaking process. Placemaking is a holistic, multidisciplinary and collaborative approach that required a real understanding of the value of place, context and the needs of end users.	
MAIN ISSUE 4. Minimum Internal Space Standards for New Residential Development How can we ensure that new residential development delivers an adequate amount of internal floor space for future occupants? Option 1 - Current Approach Option 2 - Preferred Option Option 3 - Alternative Option	No comment.
Question 16. External Space Standards Do you think that the amenity spaces	No comment.

MIR questions	SNH comment
currently delivered are of a sufficient quality? Should we strive for a better quality/ quantity of private/ semi-private residential amenity space across the city and refuse planning permission to proposals which do not meet our high standards? What standards would you like to see set for new dwellings, flats, and conversions in respect of quality and quantity of external amenity space?	
Question 17. Natural Environment Do you agree that the proposed list of policies for Natural Environment gives a clearer and more coherent structure than at present?	We would be pleased to comment on the proposed wording of any 'new' consolidated policies for the Natural Environment.
Question 18. Food Growing How can the Local Development Plan support the delivery of food growing projects in the City? Do you think food growing should be included in the next Plan by way of a new policy, or through existing policy and guidance?	We welcome any actions which the new plan might take to support food growing projects, noting benefits in terms of reduced food miles, and the positive role of gardening in reducing stress levels and increasing physical activity. We also notethat the proposed SDP encourages "Developments should also make it easy for people to access green and open space, including places where people can enjoy nature and take advantage of opportunities for food growing, such as allotments and community orchards." In terms of resources, it is perhaps worth noting SNH's webpage about growing your own food – see https://www.nature.scot/professional-advice/planning-and-development/industries-reliant-nature/food-and-drink/local-produce
<u>5 Transport and Infrastructure</u> The public sector, at both local and national level, funds most major pieces of inftastructure. These schemes are essential for the delivery of the spatial strategy in both Aberdeen City and Aberdeenshire.	
Question 19. City Centre Parking Should we reduce car parking in the City Centre to support the City Centre Masterplan? If so, how	Yes, ideally. We note the emphasis in the CCMP report on relocating car movement and encouraging Aberdeen to become a cycling city. We also note the exploration of the parking issue within the CCMP report, and the combination of potential solutions discussed there, as well as some of the more bespoke objectives for parking in relation to different intervention areas. As noted in the CCMP, managing this issue will potentially create a more attractive environment for all.
MAIN ISSUE 5. Electric Vehicle Charging Infrastructure	The preferred option seems appropriate in terms of providing infrastructure for this projected modal shift,

MIR questions	SNH comment
How best can we encourage the provision of infrastructure to support changes in transport technologies? Option 1 - Current Approach Option 2 - Preferred Option	and ultimately encouraging people to use more environmentally-friendly forms of transport.
Question 20. Digital Infrastructure Should high speed broadband be mandatory in all new residential developments with 5 or more units? Do you wish to suggest any other proposed changes to the Digital Infrastructure and Telecommunications Infrastructure policies?	No comment.
Question 21. Developer Obligations and Infrastructure Delivery Do we need to change our approach to securing developer obligations for future development proposals?	No comment.
6 Resource and Business Policy Section 3F of the Town and Country Planning (Scotland) Act 1997 introduced a requirement for LDPs to include a policy on Low and Zero Carbon Generating Technologies (LZCGT). The Scottish Government have set out, through SPP and NPF3, the requirement for the planning process to actively support the development of heat networks across the country. Maintaining a ready supply of employment land in the right places is vital to Aberdeen retaining its position as a competitive and sustainable business location.	
MAIN ISSUE 6. Low and Zero Carbon Generating Technologies and Water Efficiency Should the requirement of existing Policy R7 be changed? Option 1 - Current Approach Option 2 - Preferred Option Option 3 - Alternative Option	We agree that the preferred option would help better support the aims of the Climate Change Act, and encourage the industry to improve.
Question 22. Low and Zero Carbon Generating Technologies and Water Efficiency	No comment.

MIR questions	SNH comment
What methodology should the Council use in calculating compliance with Policy R7, specifically how should the target of reducing carbon dioxide levels be calculated?	
Question 23. Solar Farm Developments Do you agree that Solar Farms should be supported within the Council's policy on Renewable and Low Carbon Energy developments, and should specific guidance be included within Policy R8?	It could make sense to mention solar within the Council's R8 policy. It could currently be assumed to be supported in the general mention of 'renewable heat and energy generating technologies', and you may decide that is adequate. Whether to include it may largely depend on what the Council might wish to specifically highlight in terms of guidance for that technology. Note that SNH has produced guidance on natural heritage considerations in relation to solar farms. See https://www.nature.scot/professional-advice/planning-and-development/renewable-energy-development/types-renewable-technologies/solar-energy
MAIN ISSUE 7. Heat Networks Should we include a policy in the Local Development Plan supporting the development of Heat Networks within the City? Option 1 - Current Approach Option 2 - Preferred Option Option 3 - Alternative Option	We agree that the preferred option would allow greater scope for the development of a coherent heat network plan across the city.
Question 24. Supporting Business and Industrial Development Should we carry forward our current policy approach to safeguarding existing business and industrial areas from other development pressures into the next Local Development Plan?	No comment.
MAIN ISSUE 8. West End Office Area Should the policy support a mix of uses in the West End Office Area? If so, what types? Option 1 - Current Approach Option 2 - Preferred Option Option 3 - Alternative Option	No comment.
7 Affordable Housing The affordability of housing in Aberdeen remains a significant challenge for a significant percentage of the population	

MIR questions	SNH comment
and continues to be raised as a priority through consultations.	
Question 25. Affordable Housing Do you agree with the Local Development Plan's current affordable housing approach being carried forward? What other measures could the Council consider in order to assist with the delivery of affordable housing units via the Plan? Should the threshold of not applying affordable housing requirements to developments smaller than 5 units remain in place?	No comment.
Question 26. Private Rented Accommodation and Build to Rent Are there ways that the Local Development Plan can facilitate Build to Rent development, through policy?	No comment.
8 Sustainable Mixed Communities Scottish Planning Policy states that where a demand is identified through the Housing Need and Demand Assessment, policies should be put in place to meet it through the provision of suitable hosuing. The HNDA 2017 for Aberdeen City and Aberdeenshire finds that the growth rate of the 'pensionable age' group (ages 65-68) for 2014-39 is 20%, and growth for the age 75+ age group is around 65%.	
MAIN ISSUE 9. Inclusive Housing Mix (Housing for the Elderly and Accessible Housing) How can the Local Development Plan ensure a greater mix of housing types is achieved in new developments? Option 1 - Current Approach Option 2 - Preferred Option Option 3 - Alternative Option	No comment.
MAIN ISSUE 10 . Residential Care Facilities How should the Local Development Plan cater for proposals relating to Residential Care Facilities? Option 1 - Current Approach	No comment.

MIR questions	SNH comment
Option 2 - Preferred Option Option 3 - Alternative Option	
MAIN ISSUE 11. Student Accommodation How can the Local Development Plan cater to proposals relating to student accommodation? Option 1 - Current Approach Option 2 - Preferred Option Option 3 - Alternative Option	No comment.
MAIN ISSUE 12. Houses in Multiple Occupation How can the Local Development Plan support sustainable mixed communities, with regards to HMOs? Option 1 - Current Approach Option 2 - Preferred Option Option 3 - Alternative Option Percentage limit of HMOs in each area -- Please Select – Option 1 - Preferred Option (15%) Option 2 - Alternative Option (20%) Option 3 - Alternative Option (25%) Please explain why you chose your answer Geographical boundary of each area -- Please Select – Option 1 - Preferred Option (Ward Boundaries) Option 2 - Alternative Option (Intermediate Data Zones) Option 3 - Alternative Option (Small Data Zones) Please explain why you chose your answer Threshold for when planning permission is required for a HMO -- Please Select – Option 1 - Preferred Option (6 or more people in a flat, 6 or more people in a house)	No comment.

MIR questions	SNH comment
Option 2 - Alternative Option (3 or more people in a flat, 6 or more people in a house) Option 3 - Alternative Option (All applications regardless of number of residents) Please explain why you chose your answer	
Question 27. Community Planning Is there anything else that the Local Development Plan can do to support the objectives of the LOIP or the aims of Community Planning?	No comment.
Question 28. Changing Places Toilets Should large new developments that require public access provide Changing Places toilets? What types of venues should provide them?	No comment.
Appendix 1 Proposed Draft New Policies This section shows draft policies which are new to the 2022 LDP, or policies that may have changed from the current 2017 LDP. Policies which are not listed in Appendix 1 will likely be carried forward from the current 2017 LDP.	
Policy D2. Amenity Do you have any comments on the policy?	No comment.
Policy D5. Advertisements and Signage Do you have any comments on the policy?	No comment.
Policy D8. Shopfronts Do you have any comments on the policy?	No comment.
Policy D9. Windows and Doors Do you have any comments on the policy?	No comment.
Policy H4. Housing Mix and Housing for Particular Needs Do you have any comments on the policy?	No comment.
Policy H8. Residential Care Facilities Do you have any comments on the policy?	No comment.

MIR questions	SNH comment
Policy H9. Student Accommodation Developments Do you have any comments on the policy?	No comment.
Policy H10. Houses in Multiple Occupation Do you have any comments on the policy?	No comment.
Policy NC9. City Centre Living Do you have any comments on the policy?	No comment.
Policy NC10. 24-hour City Do you have any comments on the policy?	No comment.
Policy NC11. Visitor Attractions and Facilities Do you have any comments on the policy?	No comment.
Policy NC12. Public Art Contribution Do you have any comments on the policy?	No comment.
Additional Documents If you have any comments on our other documents, including the; •Strategic Environmental Assessment Environmental Report; •Monitoring Statement; •Brownfield Urban Capacity Study; •Strategic Flood Risk Assessment; •Onshore Windfarm Spatial Framework; •Development Bids Assessments; or •anything else please include these below.	
Strategic Environmental Assessment Environmental Report	Our response on the SEA interim Environmental Report is submitted through the SEA Gateway.
Monitoring Statement	No comment.
Brownfield Urban Capacity Study	No comment.
Strategic Flood Risk Assessment	No comment.
Onshore Windfarm Spatial Framework	No comment.

MIR questions	SNH comment
Development Bids Assessments	We agree with the approach you have used in relation to the assessment of the bid sites. We do however make further comments in our MIR consultation response letter about some potential inconsistency in applying landscape criteria across the assessments. Also as noted in our related SEA consultation response, we would be happy to explore with you whether there are any opportunities to streamline the SEA and bid assessment processes to look for efficiencies in reporting.
anything else	No comments, other than to refer back to our pre-MIR comments which offered more general advice on natural heritage in relation to the LDP. We feel those comments are still relevant to this consultation.
Please include comments on other documents below:	
Additional Files Please select a file to upload. If you have further information you would like to provide you may upload it here.	No comment.

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Sandra Omondi
Strategic Place Planning
Aberdeen City Council
Business Hub 4
Marischal College
Aberdeen
AB10 1AB

10 May 2019

Our ref: CEA154024

Dear Ms Omondi

Environmental Assessment (Scotland) Act 2005
01388 Environmental Report (interim) – Aberdeen City Local Development Plan,
Main Issues Report

I refer to your Environmental Report (ER), sent to the Scottish Government SEA Gateway on 28th February 2019. In accordance with Section 15(2) of the Environmental Assessment (Scotland) Act 2005, Scottish Natural Heritage has considered the report in its role as a Consultation Authority under the above Act. Our main comments are set out below for this interim ER, with detailed comments provided in the annex to this letter.

The interim Environmental Report is easily accessible and clear. We note that most of the policies and some of the land allocations have been carried forward from the 2017 LDP. This assessment focusses on the 12 main issues identified in the Main Issues Report, along with 12 new policies and the site allocations. Each of the individual policies will be fully reassessed at Proposed Plan stage. We are happy with this approach.

Overall, subject to the comments below, we are content with the assessment process carried out to date. As SEA is very much an iterative process, we will be happy to work with you as it progresses through to the assessment of the Proposed Plan.

We have provided more detailed comments on the assessment and content at Annex A below.

I hope that these points are of assistance to you. If you have any queries please contact Paul Taylor on 01738 458846 or at paul.taylor@nature.scot.

Yours sincerely

[By email]

Darren Hemsley
Operations Manager - Tayside & Grampian

Encs: <u>Annex A</u> – SNH's detailed comments on the Interim Environmental Report

cc   SNH SEA Gateway: ██████████████████
     SEPA SEA Gateway: ██████████████████
     HS SEA Gateway: ███████████████

<u>**Annex A**</u> **- SNH's detailed comments on the Interim Environmental Report**

01388 Environmental Assessment (Scotland) Act 2005
Environmental Report – Aberdeen City Local Development Plan, Main Issues Report

<u>Detailed comments:</u>

Non-Technical Summary (NTS)
We think it could be helpful to the reader if the NTS included a sentence on what the assessment focussed on, for example, the 12 Main Issues identified in the Main Issues Report, the 12 new policy areas and the site allocations. In describing the environmental challenges in the NTS we think it is also important to note the pressure from all new development on the River Dee as a result of water abstraction.

Relevant state of the environment – baseline data
We note that the changes to the baseline in the absence of the LDP would be those assessed against the 2017 LDP. We are content with the potential findings, although there would seem to be a need to explain the wording under the biodiversity topic in Table 5.2. It currently reads "This includes the loss and fragmentation of habitats caused by unplanned development promoted by the Strategic Development Plan and Local Development Plan". Is it possible there is a typo here? If not some explanation of what unplanned development is likely to be promoted by these plans may be necessary.

At Appendix 3 we think it would be worth naming the four SSSIs that occur in the Aberdeen City area. At Appendix 4, Map 5, we think that it would perhaps be better to retitle this as 'European sites' and include both the River Dee SAC, and the Ythan Estuary, Sands of Forvie and Meikle Loch (extension) SPA. The latter site is not shown on any of the Appendix 4 maps at the moment, and this is an oversight.

Table 5.3 provides a useful identification of the potential environmental problems and implications for the LDP. In particular, we welcome the recognition in both the Water and Material Assets topics of the potential challenge of additional development increasing the need for abstraction and its likely effect on the River Dee interests. This is particularly relevant when considering mitigation measures.

Assessment of Main Issues
We are happy with the identification of alternatives in terms of the Main Issues. The framework for assessing the environmental effects is thorough and we have no further comments on the effects arising from the 12 Main Issues.

Assessment of Policies
We note that there may be some minor updates to existing policy areas which are not the subject of the Main Issues. In terms of the natural environment, these are reported in the MIR in section 4.4. The wording of the proposed consolidated policies has yet to be provided so it is difficult to provide meaningful comment on their likely significant effects, although we note that the MIR suggests that no significant changes to those policies are proposed.

We note that Appendix 9 of the Environmental Report, which considers the impacts of the policies, repeats the same narrative for policies relating to: 'NE2 Green and Blue Infrastructure'; 'NE3: Protecting our Natural Assets' and 'NE4: Water Environment'. We would question whether such repetition is intended / correct. Also, in relation to that same text, we suggest that the benefits of improved green and blue infrastructure will have positive *direct* as well as indirect impacts.

Positive biodiversity effects are reported in terms of policies (such as 'NC1: Town Centre First' and 'NCX(11): Visitor Attractions and Facilities'), as a result of avoiding adverse effects. This is perhaps over-estimated and should be recorded as neutral. Where, in terms of NC1 for example, there may be some opportunities for enhancement of green networks, there would need to be specific measures included in the mitigation column, such as developer requirements to incorporate good design principles for enhanced green networks into their development proposals in order for this to be recorded as positive.

Site assessments

There has been a considerable amount of work carried out in the assessment of the site allocations in both the Environmental Report and the development options assessment report. We note in the introductory narrative to the development options assessment it is considered that the SEA findings, on their own, do not tell you whether a site is suitable for development. We agree that the environmental factors are only one aspect.

There are occasions where the read across between the SEA findings and reporting in the bid assessment is not clear or is inconsistent. For example, in the assessment tables in Appendix 5.1 of the ER, sites B0313, B0401, B0402, B1101 have no reference to landscape or cultural heritage considerations but these elements are picked up in the MIR bid assessments. As we have also indicated in our response to the related MIR consultation, there seems to be some inconsistency in the treatment of landscape considerations in the bid site assessments.

We would be happy to explore with you, for the next iteration of the assessment at Proposed Plan stage, whether there are any opportunities to streamline the SEA and bid site assessment processes and look for efficiencies in reporting. It would be good for us to better understand the issues you are dealing with so that we can assist if possible. We have recently made very similar comments in relation to the SEA for the Aberdeenshire Main Issues Report, and so it might well be worth having a joint discussion with the Shire and the other consultation authorities (if desirable).

Proposed Mitigation measures

As you have stated, one of the key benefits of the SEA process is to help to identify mitigation measures to avoid potential adverse effects arising from proposed development allocations. We welcome the measures in Section 6.4 of the ER which details proposed mitigation measures to address plan impacts. We expect that the Council will wish to ensure that there is good read across between that mitigation (as set out in Table 6.2) and the more specific proposed mitigation measures that are tied to allocation sites.

We recommend that it will also be important that mitigation measures for site allocations are incorporated into the Proposed Plan as specific developer requirements.

Monitoring

The monitoring plan detailed in Table 6.3 is helpful, but to be effective, the proposed remedial actions that could be taken if monitoring reveals problems need to be more attributable and actionable. For example, should the monitoring reveal a negative impact on habitats and species as a result of development pressure, the action to review the supplementary guidance on open space and greenspace networks will not address the issue in the immediate or short term. We recommend that remedial action could include a hierarchy of possible responses, from requiring immediate response as part of the development management process, to short term/ long term review of guidance.

Habitats Regulations Appraisal (HRA)

We note that the HRA will be prepared to accompany the Environmental Report for the Proposed Plan. Of particular concern is the potential effect of increases in physical

abstraction on the qualifying interests of the River Dee Special Area of Conservation (SAC). We would encourage the early commencement of HRA prior to the preparation of the Proposed Plan, and we would be pleased to assist you in that process. The advice we have provided on this issue in both our 5 April 2019 consultation response to the Aberdeenshire Main Issues Report and our 18 April response to the Aberdeen City and Shire Proposed Plan HRA may provide a useful starting point to considering some of the issues to assess, and can hopefully help guide your own approach to HRA for the River Dee SAC. An additional site which will need to be considered in HRA is the Ythan Estuary, Sands of Forvie and Meikle Loch Special Protection Area (SPA). The proposed marine extension to this site extends down to Aberdeen, just north of the Dee. Please see SNH's Sitelink for further details.

Cumulative Synergistic and Secondary Environmental Effects
It is not clear from the narrative, why it is considered that the infrastructure topic will have a neutral effect on biodiversity.