

Aberdeen Local Development Plan Review Main Issues Report Response Form 2019

Aberdeen City Council has published a Main Issues Report (MIR) which is part of the process of preparing a new Local Development Plan. It is designed to gather views on specific proposals and sets out options for dealing with the key planning matters facing Aberdeen over the next 20 years such as the location of new housing and employment development, the future of retailing and the City Centre, housing needs and tackling climate change. It also includes a number of potential new policies which would be used in the determination of planning applications.

The MIR has been published alongside a Monitoring Statement and Environmental Report. Copies are available to view at Marischal College, Broad Street. Aberdeen. These, and other supporting documents, are available at: - www.aberdeencity.gov.uk/aldp2022

Everyone now has the chance to comment on the report and associated documents. All comments received will be considered and used to inform the preparation of the Proposed Aberdeen City Local Development Plan. There will be a further opportunity to comment on the Proposed Plan when it is published in early 2020.

The consultation runs from 4 March 2019 to 13 May 2019.

Responses to the published documents can be:

- made online at:- http://consultation.aberdeencity.gov.uk/planning/mir2019;
- emailed to:- ldp@aberdeencity.gov.uk; or
- by post to:- Local Development Plan Team, Strategic Place Planning, Aberdeen City Council, Business Hub 4, Ground Floor North, Marischal College, Broad Street, Aberdeen, AB10 1AB.

Completed response forms should be with us no later than 13 May 2019.



YOUR DETAILS

Name	John Findlay
Organisation (if relevant)	Ryden LLP
On behalf of (if relevant)	Buccmoor LP
Address	
Postcode	
Telephone	
E-mail	

Thank you for taking the time to complete this response form. If you wish to be added to the LDP e-mailing list to be kept informed of our progress in producing the next Local Development Plan, please tick here



If yes, please provide an e-mail address

PRIVACY STATEMENT

As part of the review of the Local Development Plan, Aberdeen City Council (ACC) will offer you several opportunities to submit your views and comments. These opportunities will range from the current consultation stage, the Main Issues Report, where we will ask you to comment on specific proposals and alternatives to the Proposed Plan stage where the set view of ACC has been established.

ACC are legally required to consult at this stage and at Proposed Plan stage. This is set out in the Town and Country Planning (Scotland) Act 1997 (as amended) and supporting regulations. The Environmental Assessment (Scotland) Act 2005 also requires us to consult on a Strategic Environmental Assessment Environmental Report.

By submitting a response to the consultation, you understand that ACC can use the information provided in this form, including personal data, as part of the review of the Aberdeen City Local Development Plan. ACC will not share or disclose any personal data about you to any organization or person unless it is authorized or required to do so by law.

The data controller for this information is ACC. We understand our legal basis for processing this information as Article 6(1)(c) of the General Data Protection Regulation as this is an activity we are legally required to carry out under the Town and Country Planning (Scotland) Act 1997 (as amended) and supporting regulations and The Environmental Assessment (Scotland) Act 2005. The data on the form will be used to inform the preparation of the Proposed Aberdeen City Local Development Plan 2022. At the end of the consultation, where contact details have been provided, the Local Development Plan team will provide you with a respondent number. You may also be contacted about the comments you have made and, as obliged by the Town and Country Planning (Scotland) Act 1997 (as amended) and supporting regulations, the Local Development Plan team will contact you to inform you of the publication of the proposed Aberdeen Local Development Plan in early 2020. If you chose not to provide your contact details, your comments will still be valid but we will not be able to contact you in the future.

Responses will be collated, redacted, summarised and stored electronically or in locked cabinets in Marischal College. All redacted responses will be published, alongside the respondents name (if provided), on the Aberdeen City Local Development Plan website. Contact details will not be made public, but your name and respondent number will be published.

Aberdeen City Council will only keep your personal data for as long as is needed. Data will be kept until the emerging Local Development Plan is itself replaced – this is likely to be around 5 years following its adoption in 2022 – so 2027. Following this, data will be disposed of in a secure manner.

YOUR DATA, YOUR RIGHTS

You've got legal rights about the way ACC handles and uses your data, which include the right to ask for a copy of it, and to ask us to stop doing something with your data. Please contact the Council's Data Protection Officer by e-mailing DataProtectionOfficer@aberdeencity.gov.uk or writing to Data Protection Officer, Aberdeen City Council, Governance, Level 1 South, Marischal College, Broad Street, Aberdeen, AB10 1AB. More information is available at: - https://www.aberdeencity.gov.uk/your-data

YOUR COMMENTS

Which document(s) are you commenting on?	 Main Issues Report Strategic Environmental Assessment Environmental Report Monitoring Statement 		
	nt and the specific Issue, Question, Site, Policy, Map or Table you are ide your comments below and explain your reason for supporting, opposing ic part of the document.		
Please refer to attached Paper Apart.			

PAPER APART

Representations to the Aberdeen City Local Development Plan 2019 Main Issues Report on behalf of Buccmoor LP in relation to Site No: B0204 Aberdeen Innovation Park and in response to Question 24 – Supporting Business and Industrial Development.

Introduction

On behalf of Buccmoor LP, objection is taken to the failure of the Main Issues Report (MIR) to consider the introduction of increased flexibility in terms of Policy B2 – Specialist Employment Areas, to permit an increased range of uses on the Aberdeen Innovation Park. The range of uses considered acceptable were specified in the Development Bid. These were considered supportive and/or ancillary to the primary use of the Park for Class 4 Business Use and included Class 1 Shops; Class 2 Financial, Professional and Other Services; Class 3 Food and Drink; Class 8 Residential Institutions; Class 10 Non Residential Institutions; and, Class 11 Assembly and leisure.

Also, as regards Campus One, which has the greatest number of available plots, the Bid contended that residential use should be considered for part of that site. Objection is, therefore, taken to the failure of the MIR to consider that option. It is contended that part of that site, as highlighted in the indicative masterplan attached at Appendix 1, should be re-zoned and identified as an opportunity site for residential development in conjunction with the adjoining land at Balgownie Playing Fields owned by the University of Aberdeen. The site is capable of providing a mixed tenure development with the emphasis on affordable housing with the funds realised from the sale of the land enabling further business development on the Innovation Park.

This representation requires to be considered in conjunction with the Development Bid submitted for the Innovation Park at pre-MIR stage. That Bid, was submitted as an expression of interest for greater flexibility to be considered in term of the range of acceptable uses that would be permitted on the Park. It sought for specific mention to be made in Policy B2 – Specialist Employment Areas as to the range of supporting uses that would be acceptable in such areas. The submission, particularly in relation to Campus 1, should also be considered in the context of the submissions on behalf of the University of Aberdeen relative to the adjoining land at Balgownie Playing Fields.

This representation comprises two key components. The first relates to the range of supporting and ancillary uses that should be acceptable on the Park. This requires a change to Policy B2 to provide greater clarity on the range of uses acceptable and to take a more welcoming and positive approach as regards supporting and ancillary uses. The second seeks the re-zoning of part of Campus 1 to permit residential use and for that part of the site, immediately adjoining Balgownie Playing Fields, to be identified as an opportunity site for residential development.

Background

The MIR advises that the Aberdeen LDP will share the main aims of the proposed SDP. These include:

- The provision of a strong framework for investment decisions which help to grow and diversify the regional economy in a sustainable manner; and,
- Promoting the need to use resources more efficiently and effectively whilst protecting our assets.

Having regard to the above, the MIR is structured around three themes, among them a prosperous economy with specific emphasis on resource and business policy.

Whilst Buccmoor LP are fully supportive of the main aims of the proposed Plan they are not convinced that the response to their Development Bid is conducive to satisfying those aims. To achieve the aims set out above Policy must encourage development. Despite extensive marketing of the Innovation Park 3.0 hectares remains undeveloped. Between 1985 and 1997 some 7.2 hectares were developed. However, between 1998 and 2009 only 3.5 hectares were developed and there has been no new development since then, other than a change of use of some technology units on the Park to a nursery and a café. There are currently 5 undeveloped sites on Campus 1 of the Park.

Circumstances have changed significantly since the establishment of the Park in the mid-1980s. Since its inception the majority of development undertaken at the Innovation Park has been carried out by the public sector, or with assistance from the public sector, principally Scottish Enterprise. This is a reflection of the user and occupier restrictions that apply to the Innovation Park which have created, and continue to create, an impediment to securing private sector funding and investment for development at the Park. This has been compounded by the downturn in the economy of the North East as a consequence of the oil price crash. There is also a glut of new Class 4 Office Development on the market, particularly within the city centre and peripheral Greenfield sites in close proximity to the strategic road network, and new AWPR in particular. These further deflect interest from the Innovation Park as a location for Class 4 Business Use.

In order to compete with those other locations and attract investment to the Park encouragement should be given to alternative uses which are either supportive of, or ancillary to, Class 4 Business Use. This would enhance the facilities available on the Park for the benefit of employees and generally improve the vibrancy of the Park. Such uses could be developed either as new build or through a change of use of existing buildings within the Park.

Supporting Uses

The MIR at Section 6.3 deals with supporting business and industrial development. It advises that current Policy aims to safeguard existing Business and Industrial areas across the city from other development pressures. Whilst Buccmoor are generally supportive of this approach it must be recognised that a range of other uses will be acceptable on business and industrial land where they are supportive of, or ancillary to, the primary use of that land.

The MIR acknowledges that support facilities can make an important contribution to the city's employment areas and advises that current Policy supports this approach. Whilst Policies B1 and B2

do make some provision for supporting uses, that support is heavily caveated and if strictly applied by Development Management Teams can stifle much needed investment in business and industrial areas.

The use of the term "...may be permitted" and the requirement that such facilities should be aimed "primarily" at meeting the needs of business and employees within the business and industrial area are ambiguous. They can lead to conflicting interpretations and it is contended that Policy should be reworded to provide a stronger and more positive commitment to such uses. The supporting text to Policy could provide examples of uses, similar to those set out in the Development Bid, that would be permissible within B1 and B2 Policy Areas.

It must also be accepted that certain uses will inevitably reach beyond the business and industrial areas for their customer base. As presently worded the Policy is overly restrictive in this regard and, as highlighted above, leads to ambiguity in interpretation. In any event, new alternative uses will help to regenerate, particularly the older, business and industrial areas and it is in the interests of business and industrial parks and the businesses themselves that they are successful, viable, and competitive and provide a service for customers both on and outwith the Park. The introduction of a range of supporting uses, if permitted through Policy, would help achieve economic growth and contribute to the shared aims of the LDP and SDP to provide a strong framework for investment decisions to help grow and diversify the regional economy whilst promoting the need to use resources more efficiently and effectively.

As intimated in the Development Bid, rigid land use zoning is no longer appropriate or fit for purpose in many instances and Plans need to be more flexible to allow quicker decision making, which will assist job creation and employment retention. A more flexible approach to land use planning requires to be taken by the Development Plan to ensure guidance is clear for investors and decision makers, and to enable decisions to be made more quickly. This will encourage more investment in the North East economy with consequential benefits for employment creation and economic growth.

Campus One Residential Potential

The majority of undeveloped land lies on Campus One of the Innovation Park. Campus One occupies the land to the west of the Park bound to the south by existing residential development and to the west by the former Balgownie Playing Fields. Given the lack of interest for business use it is considered that the plot to the south west of Campus One, along with the adjoining land owned by The University of Aberdeen, should be identified as an opportunity site for residential development.

The plot, as highlighted on the aerial photograph attached at Appendix 1, enjoys a mature landscape setting and as a consequence, is relatively secluded. Residential use would not conflict with the existing Class 4 Business Uses to the north and east and would complement the existing residential developments on Balgownie Drive.

Residential development as proposed would assist with the regeneration of the Innovation Park and, in particular, could cross-fund the development of small scale business units on the vacant plot to the east. These 'starter units' would introduce new occupiers to the Park which, if those businesses were

successful, may look to relocate and expand within the Park. The development of the adjoining land for housing would essentially constitute enabling development.

Developed in conjunction with the University land to the west the site could provide for a range of house types and tenures with a higher than normal percentage, or indeed all, made over to affordable housing subject to a suitable partner being found. This would contribute greatly to satisfying an unmet need in this part of the City in proximity to an existing business location and within walking distance of public transport services. Access could be provided from Balgownie Drive, or from Campus One itself as shown on the indicative masterplan. Longer-term access could be taken from the adjoining Balgownie Playing Fields to the north should they eventually be developed for housing as advocated through separate Development Bids submitted on behalf of the University of Aberdeen.

The conjoined site is considered capable of accommodating around 120 units with circa 40 occupying the Campus One land. The indicative Masterplan, attached at Appendix 1 highlights the capacity of the site to accommodate development. The assessment of the site within the MIR further indicates that education capacity is available within the Bridge of Don area to accommodate additional residential development. Indeed, there are no infrastructure constraints to the development of the site for residential use.

Campus One is already allocated for development within the extant LDP 2017. It is unfortunate that no interest has been expressed in the undeveloped plots for employment uses. In such instances, it is imperative that consideration be given to alternative uses for that land. Encouragement is given to the redevelopment of 'brownfield' sites and Scottish Planning Policy at paragraph 103 advises that "...where existing business sites are underused, for example where there has been an increase in vacancies, reallocation to enable a wider range of viable business or alternative uses should be considered, taking careful account of the potential impacts on existing businesses on the site".

Use of the vacant land for residential purposes would make efficient use of an existing resource and help to grow and diversify the regional economy whilst acting as enabling development for further business development on the Park. The existing businesses within the Park are well established and the reallocation of the land to the south west for residential purposes would not prejudice their continued operation. The introduction of a residential use adjacent to the Park would also assist in attracting supporting and/or ancillary uses to the Park to the benefit of employees on the Park and the adjacent residential areas.

Summary

In summary, Buccmoor LP contend that, while supportive of the continued safeguarding of existing Business and Industrial areas from other development pressures, a more welcoming approach is needed to supporting and/or ancillary uses on Business and Industrial Land. The Policy wording at present is ambiguous and would benefit from a more positive approach. The range of uses set out in the Development Bid should be encouraged through Policy. This should specifically include Class 1

Shops; Class 2 Financial, Professional and Other Services; Class 3 Food and Drink; Class 8 Residential Institutions; Class 10 Non Residential Institutions; and, Class 11 Assembly and leisure.

It is further contended that there should be an acceptance that certain uses will draw customers from beyond the Business and Industrial Parks themselves. That will benefit employees of the Business Park and residents of nearby housing areas.

Given the continued lack of interest in the undeveloped plots on Campus One, it is contended that the plot to the south west of Campus One should be re-zoned for residential use and the site identified in the proposed Local Development Plan as an Opportunity Site for Residential Development in conjunction with the adjoining land owned by the University of Aberdeen.

Appendix 1 Indicative Masterplan



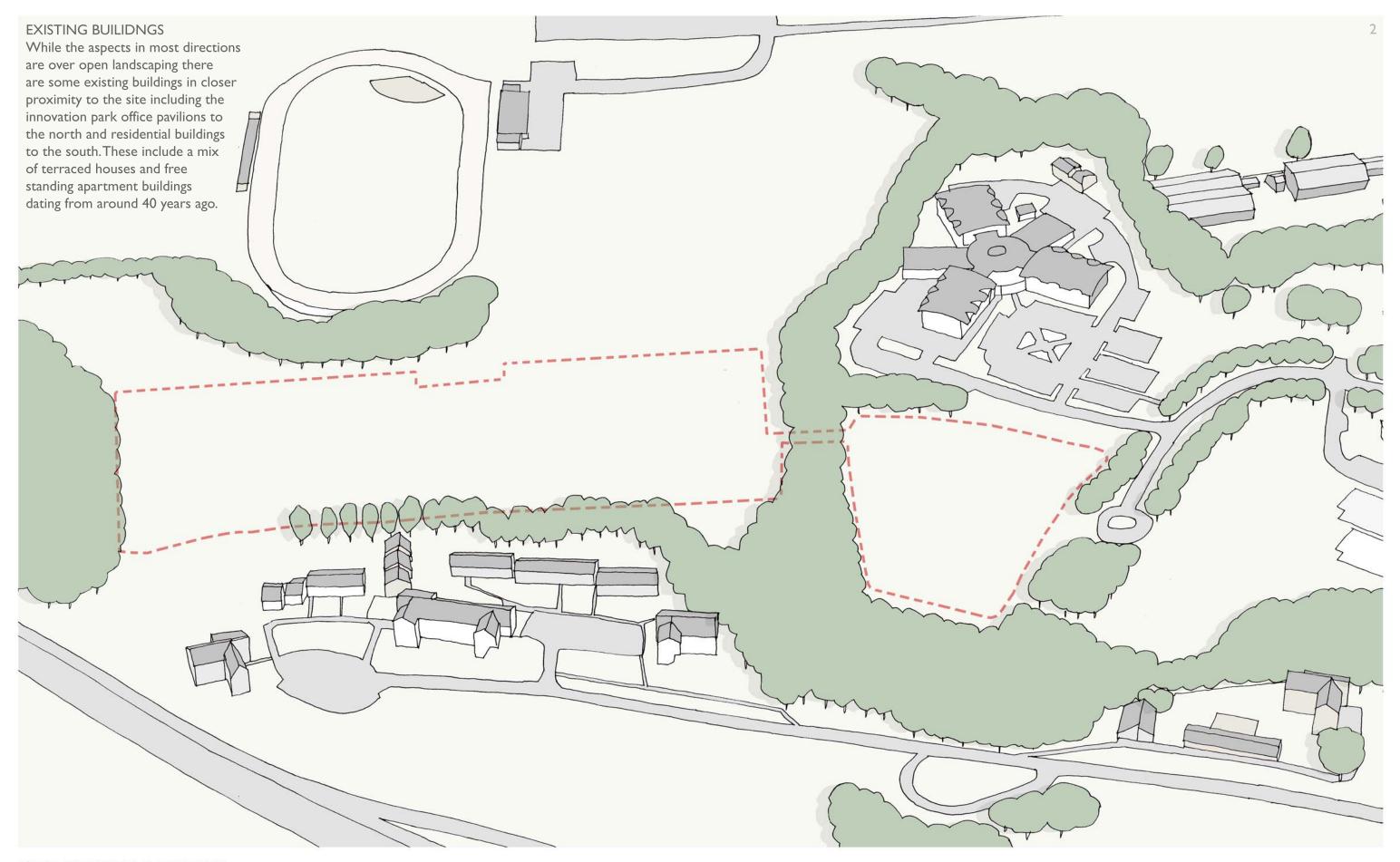
LOCATION

The site sits in a very green setting to the north of central Aberdeen close to the A92 which links with Bridge of Don.

ACCESS ROUTE

BALGOWNIE DRIVE

BRIDGE OF DON

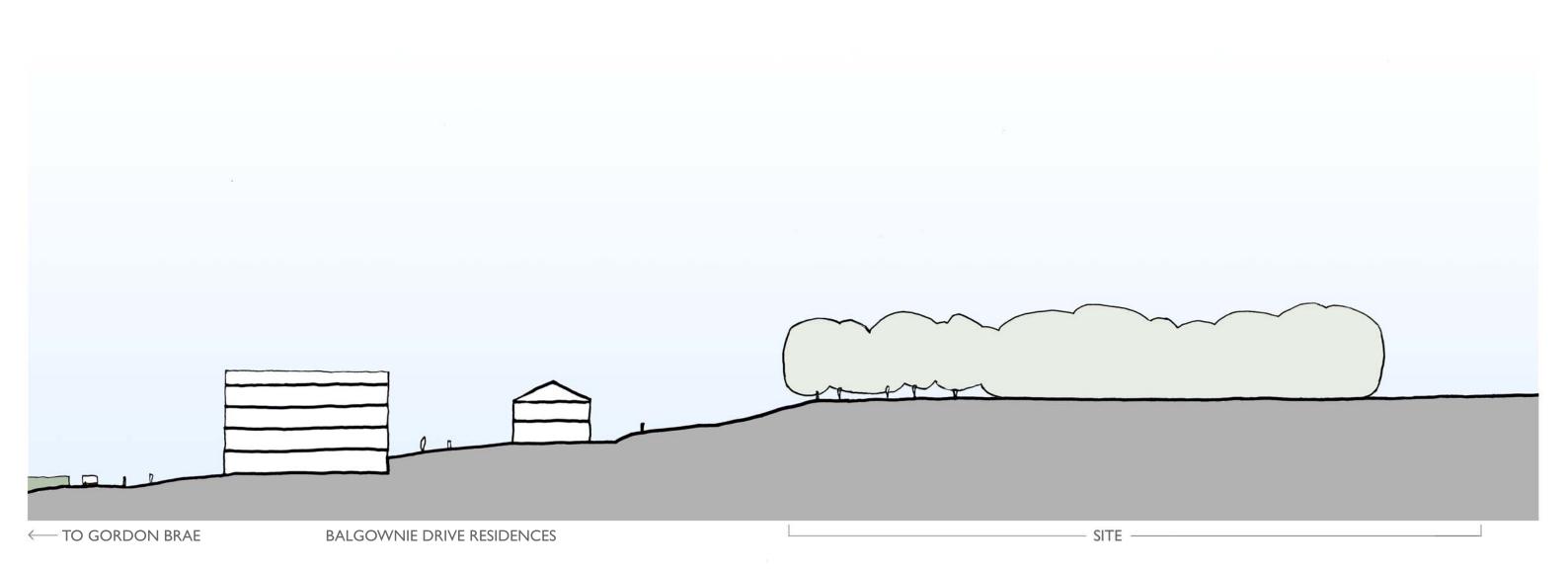


SITE SURROUNDINGS

VISUAL IMPACT

The existing buildings close to the site are generally low and vary between two and four storeys. The taller residential buildings lie to the south but as they are relatively compact on plan and, as the topography falls away in that direction, they would not be significantly impacted in visual terms. The Innovation Park buildings lying to the north are commercial use, and so have higher floor to floor heights than the existing residential buildings, butthey are only two storey structures with relatively low, curved roof forms so do not present tall built forms. The proposed design is based on new family housing, with potentially a mix of tenures, using two and three storey scale of buildings so there will be minimal visual impact when looking towards the city centre or looking back across the site from afar.

The far views looking from the south have the strong tree line in the foreground and would not be greatly affected by the low scale of buildings proposed.



LEVELS/TOPOGRAPHY

The open setting offers excellent amenity to the site for potential residential use especially looking south where the existing topography falls away creating opportunities for far reaching views back across the city centre. The smaller eastern part of the site falls to the south, opening up excellent view opportunities, while the western part is generally flat east to west and very gently sloping north to south.



SITE ANALYSIS

ACCESS

There is only one vehicular access point which can be formed using a new connection to the existing roundabout lying to the east of the site. This is a relatively new roundabout and, subject to detailed checking, should be able to give full car, service vehicle and emergency vehicle access.

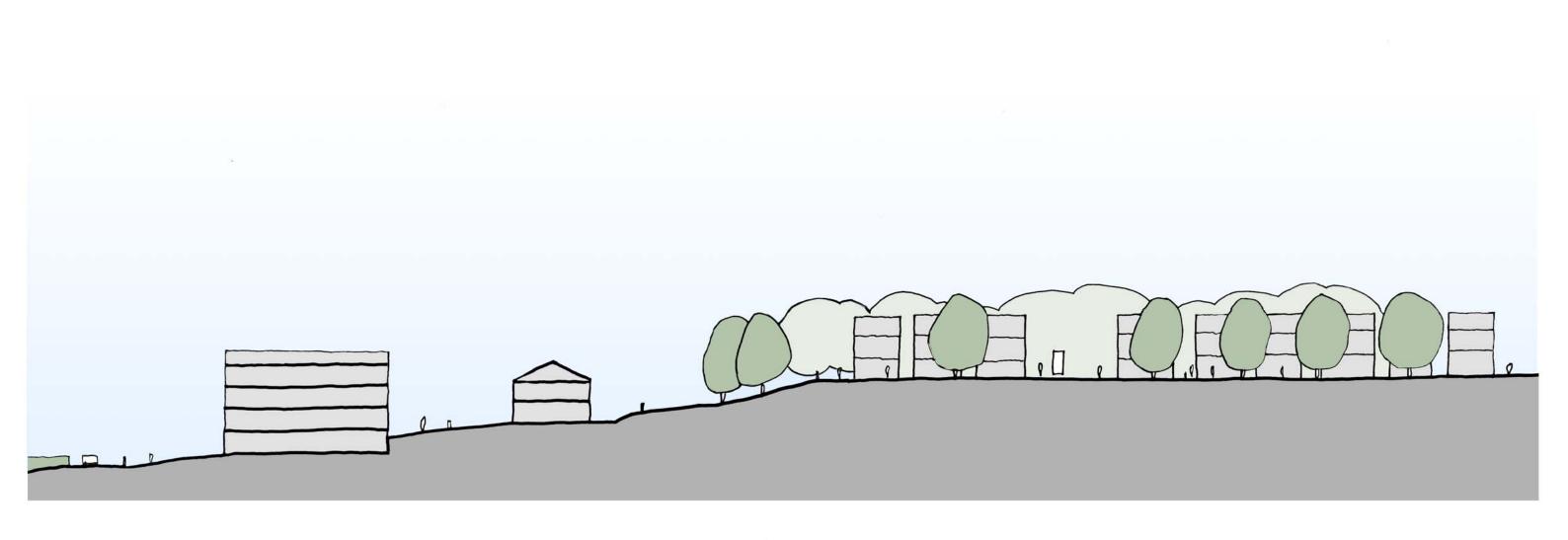
There will also be additional pedestrian and cycle access points. The maximum number of new houses is likely to be less than 200 and therefore the single access point should be acceptable for emergency access.



STREETS/MOVEMENT/HOUSE DESIGNS

HOUSE DESIGNS

The final typology and mix of house types will need to be developed in more detail, in line with a detailed brief in due course, however the outline pattern of streets indicated will enable a variety of house types to be developed to meet market and general demand. The provision of family housing over the site will therefore be able to be realised once subsequent design detail is progressed. This further design stage will also factor in Aberdeen housing standards for instance garden sizes, front-to-front and back-to back house spacing, parking arrangements and general amenity provision across the site.



LANDSCAPE

The green, heavily landscaped, setting and sloping topography offer huge opportunities to develop a well-designed residential development structured by the landscaped setting. This will give the development the potential to have a strong landscaped character by using the basic principles of well-designed spaces buildings and streets.



KEY DESIGN PRINCIPLES

A central design principle with new housing in strongly landscaped settings such as this is the external presentation of the development and the relationship between private and public spaces. The indicative street design illustrated is based on having shared surface streets around the perimeter of the site for access. These shared surfaces have a primary function of enabling safe pedestrian, cycle and car access to the houses along with service and emergency vehicles. Another key advantage with this arrangement is it enables the perimeter houses to face outwards and therefore present frontages to the surrounding landscaping, rather than private back garden spaces. This will enable a high quality place to be created with all houses facing the surroundings enabling the rear, private, gardens to be enclosed thereby creating a clear delineation between private and public space.



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Name	John Findlay
Organisation (if relevant)	Ryden LLP
On behalf of (if relevant)	Buccmoor LP
Address	
Postcode	
Telephone	
E-mail	

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YOUR COMMENTS

Which document(s) are you commenting on?	 Main Issues Report Strategic Environmental Assessment Environmental Report Monitoring Statement 			
Please indicate the document and the specific Issue, Question, Site, Policy, Map or Table you are commenting on. Please provide your comments below and explain your reason for supporting, opposing or commenting on this specific part of the document.				
Please refer to attached Paper Apart.				

PAPER APART

Representations to the Aberdeen City Local Development Plan 2019 Main Issues Report on behalf of Buccmoor LP in relation to Site No: B0205 Aberdeen Energy Park and in response to Question 24 – Supporting Business and Industrial Development.

Introduction

On behalf of Buccmoor LP, objection is taken to the failure of the Main Issues Report (MIR) to consider a flexible approach to the range of uses permitted on the Aberdeen Energy Park. Specifically, it should fall under Policy Zoning B1 – Business and Industrial Land and that Policy itself should be amended to encourage an increased range of ancillary and supporting uses on Business and Industrial Land.

This representation requires to be considered in conjunction with the Development Bid submitted for the Energy Park at the pre-MIR stage. That Bid, requested that the Policy zoning of the original phase of the Energy Park be changed from Policy B2 – Specialist Employment Areas, to Policy B1 – Business and Industrial Land to ensure a consistent Policy approach across the Energy Park. Presently, the original phase of the Park falls under a different Policy designation from that of the extension area (LDP Opportunity Site OP3), which is zoned as Policy B1 Business and Industrial Land.

The Bid further sought additional flexibility in terms of the range of acceptable uses that would be permitted on the Energy Park. In this respect it requested that specific mention be made in Policy as to what uses would be acceptable. These were set out in the Development Bid and included Class 1 Shops; Class 2 Financial, Professional and Other Services; Class 3 Food and Drink; Class 10 Non Residential Institutions; and, Class 11 Assembly and leisure

The Assessment of the Development Bid, which accompanied publication of the MIR, considered it likely that the introduction of new uses would erode the specialist nature of the Business Park over time. It acknowledged that the oil downturn had a negative impact on demand for Class 4 office space, but considered it was the same for industrial uses and, having regard to the quality of the Business Park, considered the specialist employment zoning to be appropriate. Accordingly, the Development Bid was deemed "undesirable".

The site assessment fails to recognise the anomaly in Policy designation between the existing Park and the consented expansion area. It further fails to recognise that the range of uses proposed were likely to be of a scale which would be supportive of and ancillary to the primary business and industrial uses. It sought a more positive approach to such uses rather than any expectation that these would become the primary uses on business and industrial land. The Development Bid highlighted a number of examples of appropriate uses and scale which had been granted on business and industrial land. However, this was the exception rather than the rule and it is considered that more encouragement could be given to such uses to enhance the facilities available on Business Parks for the benefit of employees and generally improve the vibrancy of such locations.

Policy Designation

The MIR advises that the Aberdeen LDP will share the main aims of the proposed SDP. These include:

- The provision of a strong framework for investment decisions which help to grow and diversify the regional economy in a sustainable manner; and,
- Promoting the need to use resources more efficiently and effectively whilst protecting our assets.

Having regard to the above, the MIR is structured around three themes, among them a prosperous economy with specific emphasis on resource and business policy.

Whilst Buccmoor LP are fully supportive of the main aims of the proposed Plan they are not convinced that the response to their Development Bid is conducive to satisfying those aims. The Development Bid advised that the site had been marketed extensively for 25 years yet despite a relaxation on user restrictions at the Park by the Planning Authority, it was still proving difficult to find occupiers in the current market. Development on the Park has been slow compared to other industrial sites in the city and the nearby Aberdeenshire towns of Westhill and Portlethen. Some 12.2 hectares of land were developed at the Energy Park between 1990 and 2013, much of it with the support of Scottish Enterprise, but there has been no new development since that time. There are currently three undeveloped sites at the Park and the Park extension area, for which Planning Permission in Principle has recently been renewed, remains undeveloped. The designation of the Park under Policy B1 Business and Industrial would increase the range of uses acceptable on the Park. This could be further enhanced, as discussed below, through a relaxation of Policy to encourage supporting and ancillary uses and to specify the nature of those uses, as set out in the Development Bid.

The assessment of the Bid suggests that the economic downturn has also had a negative impact on industrial uses, which has slowed the rate of development. This is not disputed. However, it stands to reason that if the range of uses acceptable on the Park are increased then the prospects of securing development are enhanced. The original concept of the Energy Park is no longer relevant. At the time of its original development its focus was the oil and gas industry hence its original title, the "Offshore Technology Park". Thirty years on that sector has been the subject of massive change and in recent years there has been a significant contraction in the sector. Whilst it will remain a key plank of the North East economy for the foreseeable future, the emphasis of economic bodies in the North East is now on seeking greater diversification of the economy away from a dependence on the oil and gas sector. It is, therefore, prudent, in order to enable that diversification and satisfy the aims of the Development Plan, to broaden the range and nature of uses permissible on the Park.

The Park, which is in two parts, the original and expansion area, is in single private ownership yet different Policies are applicable to each part of the Park. Policy B1 – Business and Industrial Land applies to the expansion area, identified as Opportunity Site OP3 in the extant LDP, whilst Policy B2 – Specialist Employment Areas apply to the area of the original Park. Specialist Employment Areas are

primarily restricted to Class 4 Business uses in order to maintain a high quality environment. However, to reflect the planning permission on the original Park and the subsequent relaxations to that, an exception is made to Policy to acknowledge that a mix of Class 4 (Business), Class 5 (General Industrial), and Class 6 (Storage and Distribution) uses will be considered. The only caveat to this is that it must be demonstrated that the proposed uses can co-exist with existing and adjoining uses without eroding the amenity of the Park. It is contended, however, that such a restriction is unnecessary and that the Park could satisfactorily operate under the terms of Policy B1 – Business and Industry without detriment to the amenity of the Park.

The Park is set within a now mature landscape with strategic landscaping encompassing the remaining development plots. The setting of the Park, existing occupiers, and the immediate environment are, therefore protected. Accordingly, it is considered that the additional constraints imposed by Policy B2 – Specialist Employment Areas are unnecessary. In any event, Policy B1 – Business and Industrial Land, under which the site should be designated, itself imposes safeguards. It advises that low amenity 'bad neighbour' uses must have regard to surrounding uses and their potential impact on the environment and existing amenity.

On the basis of all of the above, therefore, it is contended that the Aberdeen Energy Park and its expansion area should be designated under Policy B1 – Business and Industrial Land. This will ensure a consistent Policy approach across the entire Energy Park.

Supporting Uses

Section 6.3 of the MIR deals with supporting business and industrial development. It advises that current Policy aims to safeguard existing Business and Industrial areas across the city from other development pressures. In response to Question 24, Buccmoor would confirm that they are supportive of a Policy which continues to safeguard existing business and industrial areas. That said, however, there must be a recognition that a range of other uses will be acceptable on business and industrial land where they are supportive of, or ancillary to, the primary use of that land.

The MIR acknowledges that support facilities can make an important contribution to the city's employment areas and advises that current Policy supports this approach. Whilst Policies B1 and B2 do make some provision for supporting uses, that support is heavily caveated and if strictly applied by Development Management Teams can stifle much needed investment in business and industrial areas.

The use of the term "...may be permitted" and the requirement that such facilities should be aimed "primarily" at meeting the needs of business and employees within the business and industrial area are ambiguous. They can lead to conflicting interpretations and it is contended that Policy should be reworded to provide a stronger and more positive commitment to such uses. The supporting text to Policy could provide examples, similar to those set out in the Development Bid, of uses that would be permissible within B1 and B2 Policy Areas. This included Class 1 Shops; Class 2 Financial, Professional and Other Services; Class 3 Food and Drink; Class 10 Non Residential Institutions; and, Class 11 Assembly and leisure

It must also be accepted that certain uses will inevitably reach beyond the business and industrial areas for their customer base. As presently worded the Policy is overly restrictive in this regard and, as highlighted above, leads to ambiguity in interpretation. In any event, new alternative uses will help to regenerate, particularly the older, business and industrial areas and it is in the interests of business and industrial parks and the businesses themselves that they are successful, viable, and competitive and provide a service for customers both on and outwith the Park.

Summary

In summary, for all of the reasons set out above, Buccmoor contend that the entire Aberdeen Energy Park, both the original and the expansion area, should be designated under Policy B1 – Business and Industrial Land rather than the current zoning under Policy B2 – Specialist Employment Areas.

They further contend that, whilst supportive of the continued safeguarding of existing business and industrial areas from other development pressures, a more welcoming approach is needed to supporting and/or ancillary uses on business and industrial land. The Policy wording at present is ambiguous and would benefit from a more positive approach. The range of uses set out in the Development Bid should be encouraged. This should include Class 1 Shops; Class 2 Financial, Professional and Other Services; Class 3 Food and Drink; Class 10 Non Residential Institutions; and, Class 11 Assembly and leisure

It should be further accepted that certain uses will draw customers from beyond the Business and Industrial Parks themselves. That, however, can only benefit the regeneration of those area and add to the vibrancy and attraction of existing business and industrial areas.