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Submitted to **Local Development Plan Main Issues Report 2019 Consultation**
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About You

What is your name?

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Arina Nagy-Vizitiu

What is your organisation?

Organisation:
Woodland Trust Scotland

On behalf of:

How can we contact you?

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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?:
N/A

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 have assessed the preferred housing allocations for their impact on ancient woodland and veteran trees using the Ancient Woodland Inventory, the Native Woodland Survey for Scotland and the OS maps at six inches to the mile available on the National L brary of Scotland website.

There are no residential allocations of major concern to the Trust but we would l ke to make comments on the following sites:

B07/02, Raeden (eastern part), 1.48ha for housing: mature trees present on site are also shown on OS historical maps from 1843, therefore it is l kely that the trees are veteran trees. We welcome that the presence of the trees is acknowledged in the issues section with the comment that only a small part of the site may be suitable for housing. We recommend that the trees are surveyed and retained on site, with appropriate Root Protection Areas. If it is considered that the site is appropriate for development then only the part that is considered suitable for development should be listed as a site allocation in the LDP.

B11/01, Garthdee Road, 20 homes: the issues section states that this site is for 'Small housing development in conjunction with community planting/open space provision.' While this sounds positive, we are uncertain what is meant by the community planting/ open space provision and would like this to be clarified in the LDP, and listed as a site specific developer requirement. If tree planting is proposed as part of the open space provision for the site, we would like to see a requirement to plant native tree species as far as suitable for the site conditions, with the plants sourced and grown in the UK.

Question 2 Housing Allowances Beyond 2032

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

Question 3 Brownfield and other Opportunity Sites

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

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 are aware of the NHS Forest Programme with central aims around using nature to improve societal health and wellbeing. We think that any new estate proposals should participate in this programme and incorporate high quality green space which can benefit NHS staff, patients and visitors. Any proposed sites should take into account the need to allocate space for green space, woodland creation and development of community space.

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?:
N/A

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?:
We do not agree or disagree with this approach, but note that in the artist impressions of the intervention areas some landscaping is shown, and would like to see this mentioned directly in the Vision and Development Summary. In particular we would like to see urban tree planting highlighted as part of the development plans for these areas. If these sites are included in the LDP then the landscaping element is an important consideration and should be listed as part of the site specific requirements to set out expectations from the outset and also show that the Council is considering tree planting in these urban intervention areas.
The urban canopy cover across the City is lower compared to other cities and towns in Scotland at 10%. This is according to an iTree Survey* of canopy cover. Opportunities such as these intervention sites should be taken to help support an increase in the tree canopy cover across the city and reap the many benefits that urban forestry brings.

*http://www.urbantreecover.org/wp-content/uploads/2018/03/Canopy-Cover-300.pdf

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?:
N/A

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:
N/A

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?:
N/A

Question 10   Commercial Leisure Uses

Should we continue to direct commercial leisure uses towards existing centres and the beach and leisure area?:
N/A

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?:
One element which can encourage people to live and thrive in urbanised areas is the provision of adequate green space and green infrastructure. The benefits of these are now well recognised and the city authority should consider incorporating trees into the city centre where the infrastructure allows this. The Scottish Forestry Strategy 2019-29 recognises the 'role that urban forests and woodlands can play and the range of benefits that they can provide to urban populations.' There is also an ambition to help support an increase in tree canopy cover across Scotland's town's and cities and through the LDP Aberdeen City has the opportunity to make a contribution to this.

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?:
N/A

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?:
N/A

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?:
N/A

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?:
N/A

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?:
N/A

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?:
N/A

MAIN ISSUE 3 Support for Visitor Attractions

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

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?:
N/A

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?:
Amenity spaces vary across Scotland and usually more deprived areas have lower quality amenity spaces. Permission should not be provided for proposals which do not meet high standards for these spaces. Developers should ensure that what they are building will provide a good quality of life for those who will use it, and also encourage aesthetically pleasing features and spaces for use by communities. Quality external space standards should be concerned with the amount of space as well as the quality of the space. The importance and role of trees in contributing to the quality of greens paces is also widely recognised.

We would like to see trees specified as part of new developments and external space. Our practical guidance on Residential Developments and Trees available here: https://www.woodlandtrust.org.uk/publications/2019/01/residential-developments-and-trees/ might be useful for the Council in developing standards for high 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 cannot agree with this.

Scottish Planning Policy (SPP) states that planning authorities should have their own forest and woodland strategies. The Scottish Forestry Strategy acknowledges the important role of these strategies 'Scotland's planning authorities are also critical in delivering this Strategy through their role in the planning system and the implementation of the supportive framework for trees, forests and woodlands, including the development of local Forestry and Woodland Strategies (Annex B).' The current approach set out in this MIR proposes to incorporate part of existing policy 'NE5 Trees and Woodlands' into proposed policy 'NE3 Protecting our Natural Assets' and we are concerned that specialised tree and woodland policy could be lost within wider policy. If the Council does adopt

the approach of incorporating some policy elements into new policies we would like to see this done in a way where the policy on natural assets has a dedicated section or sub-section for trees and woods which would include the following provisions:

- no further loss of ancient woodland or woodland of high nature conservation value. According to the Ancient Woodland Inventory the City area has a small area of ancient woodland left. Therefore, it is important that this is protected
- development likely to impact area of ancient woodland or areas of woodland which are of high value for nature conservation should be located away from these woodland areas
- ancient trees and veteran trees across the city will be afforded adequate protection
- Aberdeen City's urban forest (which includes street trees, trees in parks, cemeteries, private gardens etc.) will be protected and enhanced, and recognised as an asset to the City
- the City will support the provision in the Scottish Forestry Strategy to increase the canopy cover across Scotland's towns and cities by committing to increase its tree canopy cover from 10% to 15-20% in a phased approach. The 20% figure is recommended by Forest Research as the figure which should be achievable across the UK, and 15% is recommended for coastal areas.

Forestry is relevant to Aberdeen City and urban forestry is now recognised more widely for the benefits that it can provide to urban landscapes and populations. This has now become a priority in the new Scottish Forestry Strategy 2019-29 which states that expansion of the woodland cover in Scotland can be helped by encouraging an increase in the urban tree canopy cover across our towns and cities. This brings with it multiple benefits such as: maintaining and expanding green networks across Scotland's city regions, providing a landscape framework for sustainable urban development, making urban communities more attractive places for people to live and work in, providing more opportunities for children to play and learn in forests and woodlands, particularly in urban areas.

Therefore, we would like the planning authority to consider how it will incorporate its forest, woodland and tree strategy as part of the LDP. Aberdeen City should ensure that existing policy provisions and supplementary guidance in relation to trees and woodlands are maintained in the next LDP. The Aberdeenshire area has its own forestry strategy and a way to comply with the SPP recommendation is that the City area could consider preparing its forestry strategy together with Aberdeenshire.

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?:
N/A

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?:
N/A

MAIN ISSUE 5 Electric Vehicle Charging Infrastructure

How best can we encourage the provision of infrastructure to support changes in transport technologies? :
N/A

Not Answered

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?:
N/A

Question 21 Developer Obligations and Infrastructure Delivery

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

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?:
N/A

Not Answered

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?:
N/A

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?:
N/A

MAIN ISSUE 7 Heat Networks

Should we include a policy in the Local Development Plan supporting the development of Heat Networks within the City?:
N/A

Not Answered

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?:
N/A

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?:
N/A

Not Answered

7 Affordable Housing

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?:
N/A

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?:
N/A

8 Sustainable Mixed Communities

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?:
N/A

Not Answered

MAIN ISSUE 10   Residential Care Facilities

How should the Local Development Plan cater for proposals relating to Residential Care Facilities?:
N/A

Not Answered

MAIN ISSUE 11 Student Accommodation

How can the Local Development Plan cater to proposals relating to student accommodation?:
N/A

Not Answered

MAIN ISSUE 12 Houses in Multiple Occupation

How can the Local Development Plan support sustainable mixed communities, with regards to HMOs?:
N/A

Not Answered

Percentage limit of HMOs in each area:

Please explain why you chose your answer:

Geographical boundary of each area:

Please explain why you chose your answer:

Threshold for when planning permission is required for a HMO:

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?:
N/A

Question 28 Changing Places Toilets

Should large new developments that require public access provide Changing Places toilets? What types of venues should provide them?:
N/A

Appendix 1 Proposed Draft New Policies

Policy D2 Amenity

Do you have any comments on the policy?:
N/A

Policy D5 Advertisements and Signage

Do you have any comments on the policy?:
N/A

Policy D8 Shopfronts

Do you have any comments on the policy?:
N/A

Policy D9 Windows and Doors

Do you have any comments on the policy?:
N/A

Policy H4 Housing Mix and Housing for Particular Needs

Do you have any comments on the policy?:
N/A

Policy H8 Residential Care Facilities

Do you have any comments on the policy?:
N/A

Policy H9 Student Accommodation Developments

Do you have any comments on the policy?:
N/A

Policy H10 Houses in Multiple Occupation

Do you have any comments on the policy?:
N/A

Policy NC9 City Centre Living

Do you have any comments on the policy?:
N/A

Policy NC10 24-hour City

Do you have any comments on the policy?:
N/A

Policy NC11 Visitor Attractions and Facilities

Do you have any comments on the policy?:
N/A

Policy NC12 Public Art Contribution

Do you have any comments on the policy?:
N/A

Additional Documents

Please include comments on other documents below:

Please include comments on other documents below::
Onshore Windfarm Spatial Framework
Table 1 should include ancient woodland as a habitat that should be protected from onshore windfarm development. Scottish Planning Policy states that '216. Ancient semi-natural woodland is an irreplaceable resource and, along with other woodlands, hedgerows and individual trees, especially veteran trees of high nature conservation and landscape value, should be protected from adverse impacts resulting from development. Tree Preservation Orders can be used to protect individual trees and groups of trees considered important for amenity or their cultural or historic interest.'
In addition to this the ancient woodland area present within the City boundary should be identified in Figure 4 – Landscape and Environmental Constraints. Ancient woodland is an irreplaceable resource and therefore development of these areas is inappropriate. For this reason ancient woodland is likely to pose a constraint to onshore windfarm development.

Additional Files

If you have further information you would like to provide you may upload it here.:
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