

Aberdeen Local Development Plan Main Issues Report consultation 2019 – response from CCC

This paper sets out the comments from Culter Community Council (CCC) on the **Aberdeen City Local Development Plan (LDP) Main Issues Report (MIR)**, issued for consultation early in 2019.

This response dated 13 May 2019 is submitted for and on behalf of Culter Community Council by Andy Roberts, Planning Liaison Officer.

The sections of this paper are as follows:

Section 1 – what the community of Culter is looking for

Section 2 – comment on proposed development sites, Culter

Section 3 – comment on proposed development sites between Culter and AWPR

Section 4 – comment on questions and issues in main body of MIR

Section 1 – what the community of Culter is looking for

The consistent message we receive from our community is that Culter needs more homes for our local growing families. Sensibly-priced mostly 3-bedroom houses, with some outside space, are the key need.

Discussions with the community on the future of the village cover the following matters:

- Culter has lots of flats, and many of our young people get together and then move into such a flat. When couples decide to have families, flats no longer provide enough space, and that is when the lack of reasonably-priced small houses becomes an issue. A substantial majority of those members of the community who have put forward views see a need for more housing for growing families. The need which our community sees for more small houses - not flats - which real people can afford and which are located within our community.
- there is now a critical need for sites around Culter to be allocated for this type of housing, suitable for growing families to move into as they outgrow flats. During the Examination of what is the current Aberdeen Local Development Plan (LDP), the Reporter deleted nearly 70% of housing allocation in the area.
- there is currently just one site available in Culter in the LDP which is able to provide more than a handful of new homes, OP51. Planning have not been willing to allow more than 50 homes on this site, so similar-sized or larger opportunities will be needed both during the current Plan period and with further sites in the 2022-2027 time period.
- we have heard a suggestion (not from our community) that there is no need for development locally as there is sufficient land for housing allocated in other areas of the city. We do not accept that sites elsewhere are credible alternatives. There is a very strong sense of community in Culter, drawing from the days of the mills and previously, and continuing to the present day. People born

and bred here generally have a strong desire to bring up their own families in the village. Sites in Milltimber are in a much more expensive area than Culter and will be beyond the means of most local families. Other sites are further away and not on direct bus routes from Culter, and therefore travel times will be too great to maintain the closeness of contact with family and friends critical to maintaining a sense of community.

- there is a growing realisation that more retirement housing could enable some of our older people to move to somewhere smaller and easier to look after, and thereby continue living independently with the support of their extended families.
- there is no wish to see schemes on the scale of Oldford or even Countesswells, but more on the scale of perhaps 100 houses in total every few years.
- growth will of course increase loadings on schools and health services, but we would expect modest growth as proposed above not to cause major stress on these services, and the rates of growth may even stay within the current ranges of uncertainty in the predicted levels of demand growth.
- there is some interest in getting a modest business park, to provide a different type of employment locally. Should local folk compete successfully for those jobs, the reduced commuting would be good both for the individuals and for the environment. The question is whether there is any commercial demand for such space, with the primary regional employer (oil industry) continuing to operate at a steady level. Without that demand, no-one will fund business space, and empty industrial units would be a major blemish on the landscape.
- specific wishes for Culter are: improvement of the village centre (in particular, more parking to help the shops and make meeting people easier, and we need to see what opportunities the opening of the AWPR will bring); and fast broadband throughout (about a quarter of Culter still has wired broadband materially slower than 4G).
- there are uncertainties around what improvements will be needed in other infrastructure: roads and paths; water supply and drainage; management of flood risk; power; and broadband.

The challenge for Culter is to identify appropriate sites for the modest levels of growth desired. Culter is quite densely built-up, so brownfield sites are generally small, and new sites will generally need to extend the village and that means they will be in the Green Belt. Proposed sites which are not contiguous with the village, or have poor transport links, or have a major impact on the visual character of the area, or are difficult to service, or do not have well-resolved proposals, will still not be supported by Culter Community Council. We are looking for sites which have clear proposals for sensible development which will benefit the community, and for which there are credible solutions to major issues.

Section 2 – comment on proposed development sites, Culter

The majority of sites within the Culter CC area are in our view not suitable, and we say this conscious of the tension between this view and the strong wish for capacity to allow sensible provision of homes for our growing families.

B0902 - OP52 Malcolm Road 1.5 ha, 8 homes

CCC does not seek to have this site removed from the LDP. We note that this is the one site in Culter categorised as “Desirable” in the draft Main Issues Report.

That said, if the site were brought forward as a new proposal at this point, it falls far short of Policy H3 housing density and even the reduced densities the Planning Authority tends to look for at this time; there is limited access for pedestrians and cyclists; we believe it has limited capacity in infrastructure (drainage, power and communications); and it will put some pressure on education and healthcare services. Community feedback is neutral.

B0903 - West Craigton Farm 4ha, 150 homes

CCC considers this proposal to be particularly inappropriate.

The site is in the Green Belt; it interrupts the Green Space Network; it exceeds the 100-unit ceiling for Green Belt developments; it is significantly beyond the existing village; at this stage there is no clarity on whether effective access for vehicles, pedestrians and cyclists can be delivered; we believe there is significant lack of capacity in infrastructure (drainage, power and communications); a development of this scale will put major pressure on schools (although the applicant declares that it would have no impact on capacity at Culter Academy!) and healthcare services. Community view is that this site is undesirable.

B0916 – Craigton 1.9ha, 20 homes

CCC considers this proposal to be inappropriate, but if insufficient other sites are found, this is a better proposal than most of the others, because it is on a main road, it borders existing housing sites on two sides, it would have limited visual impact, and is of modest size.

The site is in the Green Belt; it interrupts the Green Space Network; it falls far short of Policy H3 housing density; there is limited access for pedestrians and cyclists; we believe there is limited capacity in infrastructure (drainage, power and communications); and it will put some pressure on education and healthcare services. Community views are mixed.

B0922 - Land at West Craigton 6.2ha, 70 homes

CCC considers this proposal to be inappropriate.

Building in this location would form a very-prominent extension to the village. There is substantial risk that once planning permission was granted, a conventional house-builder could bring unbearable commercial pressure to bear to sell on the site, and this would be close to unavoidable if the Blaircara operator were to fail, or be bought-out. Our community finds the concept attractive, but the site too far out. We note that

the site has been assessed in MIR Appendix 3 as though all of it is to be built upon, and that building to be conventional residential or retirement housing; the proposal seems to us to be more akin to a Camphill-like campus with significant services on-site, and would be only on the higher land on the northern part of the site. The site is in the Green Belt; it interrupts the Green Space Network; it falls far short of Policy H3 housing density, although one can argue whether the policy applies strictly to this sort of development; there is very-limited access for vehicles and for pedestrians and cyclists; we believe there is a significant lack of capacity in infrastructure (drainage, power and communications); pressure on education and healthcare services might be limited because of the nature of the proposed accommodation.

B0928 - Land west of Malcolm Road 1.3ha, 10 homes

CCC considers this proposal to be inappropriate.

The site is in the Green Belt; it falls far short of Policy H3 housing density; it is not contiguous with the existing village, and would increase the sense of ribbon development up Malcolm Road; there is limited access for pedestrians and cyclists; we believe there is limited capacity in infrastructure (drainage, power and communications); some pressure on education and healthcare services. Community view is against this proposal.

B0934 - Kennerty Farm 3.6ha, 25 homes

CCC considers this proposal to be particularly inappropriate.

This is a really difficult site, because it is serviced by a narrow road which is single track in places including the bridge into Culter, providing very-limited access for vehicles and for pedestrians and cyclists, and with no prospect of public transport. Development would need to be managed around the water main running across the site. The site is in the Green Belt; it interrupts the Green Space Network; it falls far short of Policy H3 housing density; it is contiguous with the existing village but an outlier; we believe there is limited capacity in infrastructure (drainage, power and communications); it would create pressure on education and healthcare services. Community view is strongly against this proposal.

B0935 - Newmill Hill 5.4ha, 50 homes

CCC considers this proposal to be particularly inappropriate.

This site would have a major impact on the approach to Culter along the main road from the west, exacerbated by the gap between this site and the first continuous housing. The site is in the Green Belt; it interrupts the Green Space Network; it falls far short of Policy H3 housing density; there would be very-limited access for pedestrians and cyclists; we believe there is limited capacity in infrastructure (drainage, power and communications); and it will put significant pressure on education and healthcare services. Community view is against this proposal.

B0938 - Lover's Walk 2.4ha, 12 homes

CCC considers that this proposal should be rejected without hesitation. After all the efforts which had to be made over a number of years to secure the future for Lovers' Walk along the south side of this site, it would

be a travesty to allow even limited development on this site. Development here would have a huge impact on the rural feel of both the Deeside Way and Lover's Walk alongside this site. Twice as many members of our community responded on this proposal as on any other proposed site in Culter, and their reactions were unanimous – every single person objects strongly to this proposal.

The site is in the Green Belt; it interrupts the Green Space Network; it falls far short of Policy H3 housing density; there is already very-limited access for vehicles because of already-permitted development on the sole access road; we believe that there is limited capacity in infrastructure (drainage, power and communications); and it would put some pressure on education and healthcare services.

B0945 - Shepherd's Retreat 6.5ha, glamping

CCC considers that this proposal is appropriate. Community view is that this is an attractive scheme to increase tourism locally.

The site is in the Green Belt but the proposal would not create a permanent built-up area; there is very-limited access for vehicles other than via AWPR and for pedestrians and cyclists, although cycle and footpath routes to Culter avoiding roads could probably be created; there is a possible lack of capacity in infrastructure (drainage, power and communications); there would be a little pressure on healthcare services.

B0946 - Malcolm Road Peterculter 6.6ha, 59 homes

CCC considers this proposal to be inappropriate, but if insufficient other sites are found, this is a better proposal than most of the others, because it is on a main road, it would adjoin the existing village, it would have limited visual impact, and could provide some much-needed small houses.

The site is in the Green Belt and is classified as Ancient Woodland; it interrupts the Green Space Network; it falls far short of Policy H3 housing density; there is very-limited access for pedestrians and cyclists; we believe there is a significant lack of capacity in infrastructure (drainage, power and communications); the site would put significant pressure on education and healthcare services. Community view is neutral.

Further site which may be brought forward

We understand that another site may be brought forward, which would be large enough to accommodate an annual increase of perhaps 2-4% in Culter's total housing stock for a few years. We understand the site is already partly developed, and is contiguous with the village. Subject to clarity on the proposal, CCC could support the inclusion of this site into the LDP.

Section 3 – comment on proposed development sites between Culter and AWPR

Our overarching view is that none of these sites should be developed, and instead put focus on brownfield sites, and sites nearer the centre of Aberdeen.

The sites reviewed in this section lie between the eastern side of Culter and AWPR. All these sites conflict with the presumption against development in the green corridors between communities. Development of any of these sites would serve the AWPR CJV well, as each would muddy responsibility for remediating all the aquifer/ drainage/ watercourse and natural environmental damage they have visited upon our region. Given the limited total numbers of extra homes which need to be provided-for in the forthcoming LDP, there is no obvious case for allowing any of these sites to go forward.

B0906 – Contlaw 800 homes

CCC considers this site to be completely inappropriate.

The site is not required for delivery of the SDP housing objectives; it lies in the Green Belt; it exceeds the 100-unit ceiling for Green Belt developments; it lies above the 90-95m contour ceiling for major developments; it falls far short of Policy H3 housing density; it conflicts hugely with the intent to preserve green corridors between communities; it conflicts with the intent to avoid development at AWPR junctions; there is very-limited access for vehicles other than via AWPR and for pedestrians and cyclists; it would generate huge pressure on schools and on medical support.

B0907 – Albyn Playing Fields 100 homes

CCC considers this site to be inappropriate. Of all the sites in this corridor between Culter and AWPR, it is not the worst, as it does adjoin Culter and is opposite housing on the south side of the main road.

This site would lead to very-visible infill between Culter and Milltimber; it lies in the Green Belt; it is in the Green Space Network; it conflicts with the intent to preserve green corridors between communities; it conflicts with the intent to avoid development at AWPR junctions; it would cause significant pressure on schools and medical support.

B0911 – Land at Culter House Road 100 homes

CCC considers this site to be inappropriate. Of all the sites in this corridor between Culter and AWPR, it is not the worst, as it lies on a road undergoing extensive development to the east of AWPR and also lies out of sight of the A93 main road.

The site is in the Green Belt; it lies in the Green Space Network; it conflicts with the intent to preserve green corridors between communities; it conflicts with the intent to avoid development at AWPR junctions; there is limited access for vehicles other than via AWPR and for pedestrians and cyclists; it would cause significant pressure on schools and medical support.

B0929 – Guttrie Hill West 5 homes

CCC considers this site to be completely inappropriate.

This site lies In the Green Belt; it is in the Green Space Network; development would be suburbanisation of the Green Belt; it conflicts with the intent to preserve green corridors between communities; it conflicts with the intent to avoid development at AWPR junctions; it has poor access for pedestrians and cyclists

B0930 – Guttrie Hill East

CCC considers this site to be completely inappropriate. It is the wrong site for this type of development, which should be at the A944 junction.

The site lies In Green Belt; it conflicts with the intent to preserve green corridors between communities; it conflicts with the intent to avoid development at AWPR junctions; is there any realistic prospect of anyone being prepared to operate the site?

B0939 – Peterculter East 1 100 homes

CCC considers this site to be completely inappropriate.

The site is adjacent to Camphill, with residents who are very sensitive to disturbance in their surroundings; there is an archaeological site in the centre of the field; it would have a major impact on the semi-rural feel of Deeside Way; the site is susceptible to flooding; the site lies in the Green Belt; it is in the Green Space Network; it falls far short of Policy H3 housing density; it would be very-visible infill between Culter and Milltimber; it conflicts with the intent to preserve green corridors between communities; it conflicts with the intent to avoid development at AWPR junctions; it would create significant pressure on schools and medical support.

B0940 – Peterculter East 2 30 homes

CCC considers this site to be completely inappropriate.

This is a subset of Peterculter East 1 with building on the western half of the land east of Pittengullies Brae and between the Deeside Way and the Camphill estate.

The site is adjacent to Camphill, with residents who are very sensitive to disturbance in their surroundings; there is an archaeological site in the centre of the field; it would have a major impact on the semi-rural feel of Deeside Way; the site is susceptible to flooding; the site lies in the Green Belt; it is in the Green Space Network; it falls far short of Policy H3 housing density; it would be very-visible infill between Culter and Milltimber; it conflicts with the intent to preserve green corridors between communities; it conflicts with the intent to avoid development at AWPR junctions; it would create significant pressure on schools and medical support.

B0941 – Peterculter East 3 50 homes

CCC considers this site to be completely inappropriate.

This is a subset of Peterculter East 1, and appears to be building on the eastern half of the land west of Milltimber Brae and between the Deeside Way and the Camphill estate.

The site is adjacent to Camphill, with residents who are very sensitive to disturbance in their surroundings; there is an archaeological site in the centre of the field; it would have a major impact on the semi-rural feel of Deeside Way; the site is susceptible to flooding; the site lies in the Green Belt; it is in the Green Space Network; it falls far short of Policy H3 housing density; it would be very-visible infill between Culter and Milltimber; it conflicts with the intent to preserve green corridors between communities; it conflicts with the intent to avoid development at AWPR junctions; it would create significant pressure on schools and medical support.

B0943 – Milltimber Farm 70 homes

CCC considers this site to be completely inappropriate. This site is contingency for remedials to the Milltimber Brae junction.

This proposal would lead to very-visible infill between Culter and Milltimber, losing the last green space between the two communities on the south side of A93; the site lies in the Green Belt; it is in the Green Space Network; it conflicts with the intent to preserve green corridors between communities; it conflicts with the intent to avoid development at AWPR junctions; it would destroy the semi-rural feel of a stretch of Deeside Way; it falls far short of Policy H3 housing density; it would cause significant pressure on schools and medical support.

Section 4 – comment on questions and issues in main body of MIR

Question 1 - New Housing Sites

The list of Preferred Housing Sites makes no provision for Culter. There is a strong sense of community in Culter, with families who have lived in the village for generations. The strong desire in Culter is the ability of our growing families to stay in the village connected with their relatives, and the ability of our older folk to continue living independently in their own homes because of the support available from their extended families. The current lack of development sites around the village is a material threat, because the rest of Lower Deeside is far more expensive, and places further off take so long to get to – especially by public transport. The sites currently in the LDP, combined with Planning’s aversion to the density of housing required by Policy H3 on the sole site of any scale, mean that no new building at scale has been possible since 2012.

Further in on Lower Deeside, we support the suggested refusal of most of the further housing development proposals until the existing approved developments are closer to completion and the better infrastructure needed to support further development has been implemented.

Question 2 - further housing allowance for the period beyond 2032

There is no need to provide for housing beyond 2032 at this point. Monitoring progress on approved sites will enable a decision for the next LDP on whether to include further sites or not.

Question 3 - any further Brownfield or other Opportunity Sites suitable for redevelopment

We are aware of the possibility of a new site being proposed for housing – see the end of Section 2 above.

Question 4 – New Healthcare Facilities

Timely delivery and then operation of the medical facility included in the planned development at Countesswells is really important, given the huge quantities of housing currently being built on the west side of the City.

Question 5 – alignment of the boundaries in LDP and CCMP

We support simplification, and if aligning these boundaries helps then we support this.

City Centre Masterplan

The intention to deliver significant improvements in the City centre is applauded. That said, there appear to be gaps in the proposals.

Page 21 sets out that Denburn car park is to go, without any replacement in that area; this will make it harder for people to reach the new retail and employment space created on its site, and areas currently served by the car park - the centre part of Union Street, and the theatre, art gallery and Music Hall. These are outcomes which would not help the vision of making the centre more vibrant and of encouraging the arts.

The entire section on CCMP would benefit from having an overview of which parts of the proposals can be expected to be delivered in what timescales, particularly in light of foreseeable levels of commercial

demand (especially in the retail sector, with the challenges being seen all over UK), and the ability to deliver each site in light of matters including control of land. For the overall plan to be a success, it is not just the final outcome, but also how well the city centre will function at each stage over the period of 10 years or more it will take to deliver that outcome.

The proposals to pedestrianise significant stretches on and around Union Street could potentially deliver more-attractive public realm. It would be great to see detail on what methods of access to the centre will be introduced to make up for the loss of these central roads – and introduced before the roads are closed. Public transport would be appealing from an environmental perspective, and in reducing numbers of vehicles; when will a robust plan be available for how a transition to a far-higher use of buses (or trams, were they to be contemplated) could be delivered? Most of the City's suburbs have been greatly expanded over the past 50 or more years, based on a pervasive assumption that private (car) transport will be used.

The North Dee office district again looks attractive. How do we get to a truly working solution? Are there credible expectations of demand for the same amount of office space again as the entire oil industry here took up from 2008 onwards? The space will be sufficient for some 12000 workers. Maybe as many as 10% could travel by car, given the amount of parking being provided. Some can use the train, if they live in Inverurie or Stonehaven, and some will live close enough to walk or cycle. That appears to leave maybe 5000 or more people to get in by bus each day – that is 100 completely-full buses at each end of every working day, solely for this site.

The CCMP section would be compelling if it showed that we have a set of credible choices for how to deliver each part of this huge and immensely-complicated project, those choices providing resilience as the inevitable issues arise. This overall delivery scheme has of course to address both (i) the intended built environment and in parallel (ii) the cultural and mode-of-transport shifts which mean that people will actually use the new places in the numbers expected.

Question 6 – City Centre Masterplan Intervention Areas

We have no view on this question. We suspect that the ability to develop each of the sites shown in this section of the MIR, and the potential pace of delivery in each case, will be affected far more by how many people have control of parcels of land within each site, than by whether the site as a whole is designated as an Opportunity Site.

Question 7 – City Centre Retail Core

Retail has been emptying out of the western half of Union Street for years; now we are seeing the physical retail sector shrinking rapidly all over Britain; taken these trends together, aiming for a reduced retail core sounds eminently sensible. This does of course throw up the question of whether the pedestrianisation of Union Street is actually a realistic objective any more.

Question 8 – Union Street Frontages

We suggest the core issue here is the viability of a large retail area. If there continues to be the demand, then retail premises will be taken up. If demand does fall, then premises will lie empty unless a change of use is allowed. Empty shops are unattractive and send a message of 'struggling' over an area. We suggest

other uses should be encouraged in such cases, in order to have buildings occupied. Appropriate uses would be business hubs, leisure, or residential; but do please limit gambling and fast-food premises.

Question 9 – Out of Town Retailing

We believe retail (and other facilities) must remain concentrated in existing centres. New out-of-town retail centres present a huge risk of reducing footfall in the centre to the point where it ceases to work both for the public and for the operators of businesses. It is crucial to get transport into and out of the centre right, for Aberdeen to have a future as a city.

Question 10 – Commercial Leisure Uses

Directing most commercial leisure uses towards existing centres is a key component of keeping the city alive (see also Question 9 above), although sports/leisure are probably better distributed throughout the suburbs as well as in existing centres, as people use them daily and want the shortest-possible journey.

Main Issue 1 - Living In The City Centre

We support Option 2, including support for residential accommodation in policy.

Question 11 – City Centre Living

We believe the primary requirements are employment (note that the completely-dominant employer at present, the oil industry, is overwhelmingly out-of-centre apart from projects offices); actually-affordable housing; effective transport; and an attractive and vibrant city centre.

Question 12 - other locations within the city centre where residential accommodation could be provided

No suggestions to offer.

Main Issue 2 - A 24 Hour City

We support Option 2, encouraging the evening and night-time economy.

Question 13 – Encouraging the creative arts

This is a wonderful aim. It will be a challenge, in the absence of the populations of big cities (which provide larger pools of talent, and larger audiences, both of which tend to breed both quality and quantity of arts). How do we learn from those who have grown arts beyond the norm for places of their size – how did Edinburgh grow the Fringe? Molde(Norway) the jazz festival? Austin (USA) its creative environment?

Question 14 - Other buildings or areas within Aberdeen that could support an enlarging creative sector

No suggestions to offer.

Question 15 – Percent for Art

The intent is great. Perhaps a more-successful solution would be to make over the money to a civic organisation, which could curate works across the city's buildings and deliver a changing programme in each location, rather than placing the burden on developers for whom this is not a core skill.

Main Issue 3 - Visitor Attractions

We support the intent of attracting more visitors to the city, and a policy which achieves that would be welcome. We would like to see the details of such a policy before it is implemented.

Main Issue 4 - Minimum Internal Space Standards for New Residential Development

Option 2 feels like the humane way to proceed, but it carries the risk of disadvantaging the less well-off, who could be priced out of the market. Developers will only – can only – build out schemes when they make an adequate return, so if they are forced to provide more area per dwelling, they will charge commensurately more.

Question 16 – External Space Standards

As with internal space standards, the challenge is balancing the delivery of pleasant places and keeping costs sensible. The closer in to the centre, then generally the higher the cost of providing external space, and the greater the likelihood of pricing out especially those of limited means.

That said, we believe that all significant new developments should provide amenity spaces of similar standard to the best delivered recently, and make provision for maintenance into the future.

Question 17 - proposed list of policies for natural environment

We do not have a view on whether the proposed list will provide an improvement.

Question 18 – Food Growing

A possible policy would be to require delivery of land suitable for food-growing as part of larger schemes. This would be hugely challenging in the city centre: the commercial impact of keeping a meaningful area of land free of buildings, and located to get a reasonable amount of sunlight and rain, would force up the purchase or rental price of every house or flat substantially, if it didn't make the site uneconomic to develop at all.

Question 19 – City Centre Parking

We fear that simply reducing parking in the city centre will reduce numbers going into the centre – destroying any chance of achieving one of the main stated aims of making the centre more vibrant. Introduce alternative means of access which people actually find attractive to use, and then – and only then – parking can be reduced. We have a city where those who travel into the centre do so from areas largely developed since cars became commonplace, and which are therefore spread out to the point that bus routes are unpleasantly far away for most, and use of cars is the unthinking norm even for many on limited means. A major cultural shift, as well as a far-more comprehensive public transport system than we have today, are probably pre-requisites to getting people out of their cars.

Main Issue 5 - Electric Vehicle Charging Infrastructure

Option 2 will help those who have a car used predominantly for commuting around town switch to electric. That said, we need to recognise that take-up of electric vehicles will lag most of the UK, because anyone who routinely travels out of town will suffer crippling range anxiety until the Shire and places further afield also have credibly-comprehensive charging arrangements. These areas are thinly populated and with long travel distances, so will be the last places to attract the required investment for charging infrastructure.

Question 20 – Digital Infrastructure

High-speed broadband capability should be mandatory in all new residential developments. What proposals can Aberdeen City bring to bear on the telecoms providers to upgrade the service between individual sites and web portals? A quarter of Culter still has wired broadband far poorer than 4G.

Question 21 – Developer Obligations and Infrastructure Delivery

Concentrate on two things. Build a way of establishing together with communities a clear set of desired infrastructure improvements, so that as development schemes go through the planning process, the city has a clear shopping list and as a result obligations are negotiated each of which will part-fund bigger projects. Seek a change in national policy to simplify the delivery of projects, for instance by making it practical to use the obligations from sites started 4 years apart for the same project.

Main Issue 6 - Low and Zero Carbon Generating Technologies and Water Efficiency

We support Option 2, aligning with the aims of the Climate Change Act and encouraging the construction sector to improve the technology they use.

Question 22 - policy R7 on Low and Zero Carbon Generating Technologies and Water Efficiency

A response requires specialist knowledge which we do not have.

Question 23 - Solar Farms

Solar farms should be supported by policy. Policy should direct developers towards the technologies which provide best utilisation of funding at the time, whether that be solar, wind, heat pumps, or other technologies yet to become commercial.

Main Issue 7 - Heat Networks

These are a brilliant idea in compact cities with a high degree of public control over housing, and therefore the ability to mandate the use of the system and to finance the infrastructure in a way which keeps the housing so supplied with heat affordable. We support Option 2. Option 3, requiring use of heat networks, could lead to inefficient use of funding – although a requirement on developers to assess the best solutions for their sites would be useful.

Question 24 - policy approach to safeguarding existing business and industrial areas

We agree it is sensible to continue the policy of safeguarding existing business activity from other development pressures.

Main Issue 8 - West End Office Area

We support Option 2, encouraging a mix of uses.

Question 25 – Affordable Housing

We encourage the City to enforce the current 25% level of affordable housing, and refuse to allow developers to negotiate lower figures. In addition, developments including a higher percentage should be encouraged and supported.

National policy struggles when faced with the level of income inequality we have in Aberdeen. A house a developer can legitimately offer as Affordable in say the Oldfold development in Milltimber, is probably twice the price which our growing families in Culter could ever contemplate paying. Truly affordable housing probably requires a fundamentally different approach, providing housing aligned with incomes rather than with the market prices of property.

Question 26 – Private Rented Accommodation and Build to Rent

We would not want to see policy providing incentives for Build to Rent, unless the ensuing rents can also be controlled.

Main Issue 9 - Inclusive Housing Mix

We believe Option 3, with the City providing more-detailed guidance on methodology, is the only avenue providing enough clarity. Policy needs to be set in a way which avoids pricing the intended occupants out of the market.

Main Issue 10 - Residential Care Facilities

The need for Residential Care space will probably grow faster than the natural growth in provision, so encouragement via Option 2 looks appropriate – but will the requirements on transport, design and amenity actually constrain development?

Main Issue 11 - Student Accommodation

We support Option 2, setting new policy for student housing. The key will be balancing the levels of requirements with the rentals which can realistically be expected from students.

Main Issue 12 - Houses In Multiple Occupation

We support as a minimum, Option 2, setting new policy for HMOs. On the policy data points for percentage limits, boundaries and thresholds for planning permission we support as a minimum, Option 2 in each case. These options may not be sufficient to meet the overriding objective of ‘sustainable mixed communities’ in all local areas, so there may be a need to set tighter limits on percentages, size of zones, and trigger point for planning permission either across the city or at least in those areas which attract the highest densities of HMOs at present.

Question 27 – Community Planning

Our view is that Community Planning and the use of the LOIP are still far too immature to fit with the 5-10 year view of land-use planning required for the LDP. We suggest that a sensible objective would be to observe how the two processes interact over the coming years with the aim of achieving alignment of Community Planning, and planning of the built environment, in the 2027/2032 iteration of the LDP.

Question 28 - Changing Places Toilets

We believe that policy addressing the provision of public access to toilets, including ‘changing places’, should be broader than just for land-use planning.

AJR