

Appendix 4 – Schedule 4 Forms (Responses to Representations)

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Issue 1	Aberdeen Exhibition and Conference Centre (AECC). AECC Bridge of Don and AECC Rowett North.	
Body or person(s) submitting a representation raising the issue (reference no.)		
59452: Scotia Homes Ltd 48970: Brian Rattray 49471: Bucksburn Community Council 53120: Alex Mitchell 56346: Aberdeen Royal Golf Club 57712: Peter Argyle	57865: Henry Boot Developments Ltd. 57975: Aberdeen Civic Society 58769: Clive Kempe 59367: Neil Rothnie 59805: University of Aberdeen 58123: Kingswells Community Council 58301: Derek Selbie	
Section of the MIR to which the issue relates:	Section 6.4 Aberdeen Exhibition and Conference Centre.	
Planning authority summary of the comments:		
<p>AECC Rowett North 59805, 53120, 58123 – Support for the development of the Rowett as the new location for the AECC, 53120 also on the grounds of the significant economic impact and employment creation such a facility will have on the City and Shire. 49471 – Concern about the lack of engagement with the community council in relation to the proposed development. 59367 – Opposition to the development of the Rowett site on the grounds that the AECC should be in the city centre.</p> <p>Site Boundary 59805, 53120 – Disappointment that the entire site was not included and suggestion that this boundary should be altered.</p> <p>Energy Centre 53120 – Suggestion that the Rowett North site description should also mention the Energy Futures Centre which is proposed. The long term aim of this centre is to make the development carbon neutral.</p> <p>General Support AECC Bridge of Don 57865, 57975 – General support for the identification of the existing site as a mixed use development, and 56346 – support assuming height restriction and engagement with the Royal Aberdeen Golf Club take place. 57865 – Support also on the grounds it forms an important part of the overall relocation of the AECC to Rowett North. 59452 – Opposition to the inclusion of the Henry Booth as the preferred developer as this pre-empts the development plan process. The existing AECC site at Bridge of Don should be the subject of a later bid.</p> <p>Transport <i>Traffic Impact</i> 48970, 49471, 58301 – Concern over the impact the Rowett North site will have on traffic flows in the surrounding area. 57712 – Suggestion that this should be assessed and the required infrastructure detailed as per the planning Circular 6/2013. 48970, 49471 – Suggestion that the existing roads such as Provost Rust and Fraser Drives should be connected to the A96 to relieve traffic congestion.</p>		

Public Transport

58769 – Support for the development of the grounds of its proximity to the railway line.

Summary of the responses by planning authority

AECC Rowett North

59805, 53120, 58769, 58123 – Support for the development at Rowett North is noted and welcomed.

49471 – Concern raised about the lack of engagement is noted however public consultation events will be held in relation to the development framework / masterplan.

59367 – While concern that that the AECC should be located in the city centre is noted the availability of sites of a suitable size to accommodate the AECC is a major constraint. The Rowett north site is close to the AWPR and Aberdeen airport as well as the train station at Dyce.

Transport

Traffic Impact

48970, 49471, 58301 – Concern over traffic impact and suggestions about roads changes are noted, however this will be assessed as part of the masterplan and planning application process. 57712 – Again concern over infrastructure requirements will be assessed as part of the masterplan and Section 75 process.

Site Boundary

59805, 53120 – Agree – the site boundary will be amended to include land previously omitted. This land is already zoned for employment use and will be part of the opportunity site.

Energy Centre

53120 – Suggestion about the inclusion of the energy centre in the description is noted.

General Support AECC Bridge of Don

57865, 57975 – Support for the redevelopment of the existing site is noted and welcomed. 56346 – The public consultation process will allow all interested parties to engage with the process.

59452 – The opposition to the inclusion of the Henry Booth as the preferred developer is noted however this is not a matter to the Local Development Plan to consider.

Planning authority action/recommendation for Proposed Plan

Rezone land at OP28 Rowett North from LR1 Land Release Policy to Specialist Employment Land.

Identify as an Opportunity Site for the development of the Aberdeen Exhibition and Conference Centre and other compatible employment uses. A Masterplan will be required. Parts of this site may be at risk of flooding. A flood risk assessment will be required to accompany any future development proposals for this site.

Issue 2	Alternative Options in Cults, Bielside and Milltimber	
Body or person(s) submitting a representation raising the issue (reference no.)		
57607: Susan Foster 58648: Richard McDonald 59034, 59115: Bancon Homes 59137: First Construction 59673: Scotia Homes 59678: Stewart Milne Homes 59708: Stewart Milne Homes and Mssrs Jaffrey	59739: Mr Deryck Forbes 59781: Binghill Farm 59812: The Countesswells Consortium 59926: Barratt North Scotland 58587 Rubislaw Estates Ltd. 59124 Cults Property Development Company 59809 Mr Michael Robertson 54957: Andrew Thompson	
Section of the MIR to which the issue relates:	Main Issue 1 Greenfield Housing and Employment Allocations (Map 5: Deeside)	
Planning authority summary of the comments:		
<p>B0901 Culter House Road 58587: Site should be identified as an opportunity for residential development in the Proposed Plan. The scoring of the site in the Development Options Assessment Report misrepresented the site in several criteria and should have scored more highly. There is a demand for prestigious properties in the area, and the site would be a natural extension to the existing community at Culter House Road.</p> <p>B0902 Murtle Den Road 58648: Site should be identified as an opportunity for residential development in the Proposed Plan. Development would enhance the character of the area without having an unacceptable visual impact, given the adjacent Oldfold allocation. It would not cause coalescence between Bielside and Milltimber and is in a highly accessible and sustainable location for walking, cycling and public transport. There is high local support for the proposals as evidenced by a petition submitted with the response. 59910: Support this site as undesirable. Development could compound impacts associated with Oldfold and would have unacceptable landscape impacts.</p> <p>B0912 Land at Inchgarth Road 57607: Site should be identified as an opportunity for residential development in the Proposed Plan. The site will deliver much-needed housing and facilitate the provision of local infrastructure and enhanced opportunity for recreation. The scoring in the Development Options Assessment Report was inaccurate on most counts and the score should have been 53.</p> <p>B0915 Contlaw, Milltimber 59708: Object to the failure to include the site as preferred in the MIR. The site has been deemed acceptable by past local plans, and was designated as Green Belt in 2008; circumstances have changed since then, particularly in light of the AWPR which will have a significant impact on the area. This site could provide a sustainable</p>		

extension to Milltimber. Some of the low scores in the Development Options Report are inaccurate because the development would provide facilities and employment on site. None of the constraints highlighted in the report, for example capacity at Cults Academy, are insurmountable.

B0916 Loirsbank Road

59739: Object to the failure of the MIR to identify site as a preferred option for residential development. The site has previously been accepted as being suitable for residential development by officers. It would fit well with the landscape setting and would not lead to coalescence of settlements. It will provide housing choice and help to meet demand in the area.

B0918 Countesswells Community Expansion

59812: Objection to the failure of the MIR to identify B0918 as a preferred site for new development. The infrastructure to be provided at Countesswells will easily be capable of supporting future growth. The issue of landscape impact is refuted given the scale of development going on at Countesswells. The most important landscape features would be respected.

B0921 Foggieton, Countesswells

59673: Object to the undesirable status of this proposal. The site is closely aligned in both location and principle with the allocation at Countesswells. Site fits well into existing landscape pattern and would benefit from the services and community facilities on recently allocated sites. There would be no detrimental impact on the environment. Could assist in delivering medium and long-term housing.
59910: Support as undesirable on the basis of landscape and ecological impacts.

B0922 Land at Murtle Den

59910: Support this site as undesirable, with additional concerns about flood risk.

B0924 Craigton, Thornhill

59926: The site is self-contained and capable of immediate delivery to provide much-needed short-term delivery of housing. None of the issues raised in the Development Options Assessment Report are insurmountable and most are prevalent on all development sites. 59910: Support this site as undesirable.

B0925 Wellwood, Cults

59137: Site should be removed from the Green Belt. This proposal should not have been considered as a bid, but treated as a review of the Green Belt. Some of the assessment work laid out in the Development Options Assessment report is flawed, and the site should have scored more highly for some criteria. Furthermore, the draft Pitfodels Conservation Area Appraisal failed to recognise development that has already been undertaken at Wellwood House, so little weight can be attached to it at this time.

B0930 Deeside Golf Club

59910: Support this site as undesirable, over concerns about further extending development into the Dee Valley.

B0939 Craigton Road, Pitfodels

59034: Site should be identified as an opportunity for residential development in the Proposed Plan. The site offers a logical expansion to recent development in the area. The contribution of the site to the Greenbelt and Green Space Network is limited, and development would create a more defensible Green Belt boundary. The development would be low-density and heavily landscaped, in keeping with the surrounding setting. The site scored well in the Development Options Assessment Report and there are no constraints to quick delivery to meet Aberdeen's housing needs.

B0940 Milltimber South

59115: Site should be identified as an opportunity for business and commercial development in the Proposed Plan. The site scored well in the Development Options Assessment Report, and landscape fit could be solved through design and landscaping. The construction of the AWPR will already result in the loss of key views, and would provide convenient access to the site.

59910: Support as undesirable due to landscape impact and impact on North Deeside Road traffic.

B0946 Contlaw Road, Milltimber

59678: Object to the failure of the MIR to identify the site for residential development. The site has been deemed acceptable by past local plans, and was designated as Green Belt in 2008; circumstances have changed since then and this site forms an obvious extension to the settlement boundary of Milltimber. The AWPR will change the character of the area and provides the opportunity to expand Milltimber. The trees on site are not 'ancient woodland', even so they could be better managed as part of the masterplan for the development. Capacity at Cults Academy could be resolved through planning gain.

B0933 Binghill Farm

59781: Binghill Farm should be supported as an allocation because it is a logical extension to Oldfold and could become an integrated addition, benefiting from services and facilities provided there.

59910: Support this site as undesirable. Concern about the potential to increase run-off and flooding along the Murtle Burn, which passes through Camphill Communities' Murtle Estate.

Land at Station Road

59124: This site should be included in the next Local Development Plan for the development of three large detached residential units. Allocating this land will help provide additional numbers required to meet the strategic housing requirement and add to the range and choice of housing sites available.

Land at Highview House, Countesswells Road

59809: This site should be included in the next Local Development Plan as an opportunity for residential development, of 2/3 houses, through the removal of Green Belt and Green Space Network designation.

Countesswells Road adj. to OP58

54957: This site should be included in the next Local Development Plan as an

opportunity for the development of 5no. detached residential units.

Summary of the responses by planning authority

All Representations relating to Alternative Options Bids in Cults, Bielside and Milltimber

We do not propose to identify these sites as opportunity sites for residential development. Irrespective of the suitability of each site for development, the LDP already provides adequate housing and employment land to meet the allowances set in the Strategic Development Plan. We do not believe there are any over-riding benefits which would justify allocating these sites for development. A small adjustment to the green belt boundary is proposed at Pitfodels which may result in some limited infill development. The scale of this is however, considered insignificant and we do not propose to identify it as an opportunity site.

B0901 Culter House Road

This development would be in an isolated location on the edge of Milltimber, and is not connected by any dedicated pedestrian or cycle routes. Culter House Road being a country road with no pavement which would be dangerous for pedestrians and cyclists alike. The site is also not serviced by public transport, with the nearest bus stops being over 800m away on North Deeside Road. It is likely that the residents of the homes would be car-dependent.

B0902 Murtle Den Road

Development on this site would impact on the surrounding landscape, as the site is very visible from North Deeside Road and helps to visual separation between Milltimber and Bielside. It is considered that Murtle Den Road provides a robust and easily identifiable green belt boundary in this locality and this proposal would breach that.

B0912 Land at Inchgarth Road

This is an area of Green Belt that provides significant visual separation between Garthdee and Lower Deeside and which protects their separate identities. It therefore contributes to the landscape setting of these settlements.

B0915 Contlaw, Milltimber

In terms of the existing settlement of Milltimber this site does not feel well related, and the majority of development would spread further up towards Beans Hill. The settlements along Deeside are contained within the 90m contour line, and this development would go well beyond this up to 115m at Nether Beanshill. Within the school catchment of Cults Academy there are a large number of proposals which would use up any spare capacity there. There would be insufficient capacity to accommodate pupils from this development.

B0916 Loirsbank Road

The site is located near to the River Dee SAC. Development on this site would impact on the surrounding landscape, and any development would only be partially related to the main settlement of Cults. The site also lies within the boundary of the SEPA 1% annual probability flood risk map. Therefore, if this site were to be developed there is a high risk of flooding and drainage problems.

B0918 Countesswells Community Expansion

Development on the expansion sites would lead to loss of woodland and disturbance to designated species and their habitats. Development on these sites would be visually intrusive and would have a detrimental impact on the surrounding landscape which would provide a green backdrop to Countesswells. The Countesswells allocation (OP58) is anticipated to build out at a rate of about 200-250 units per year and is not expected to be complete until post 2020. Adding additional land to the OP58 allocation is not likely to increase house building on this site in the next plan period.

B0921 Foggieton, Countesswells

This site forms part of the Foggieton Local Nature Conservation Site and development would be likely to result in the loss or disturbance of important species and habitats. The site is highly visible in the surrounding landscape and would have a negative impact on the character of the surrounding area. It is isolated from all main transport links.

B0922 Land at Murtle Den

Agree that this site is undesirable and acknowledge additional concerns about flood risk. We do not propose to allocate this site for development.

B0924 Craigton, Thornhill

Development on this site would constitute a substantial but isolated development in the Green Belt, undermining the separation between Cults and Aberdeen. The site is remote from transport links and shopping facilities, so travel would likely be by car. Development of the site also presents significant risks for the two priority habitats on the site. The site was considered and rejected by Reporters following the Examination of the 2012 LDP, in agreement with the Council.

B0930 Deeside Golf Club

Agree that this site is undesirable for development, because the site would significantly intrude on the surrounding landscape of the area. The site is south of the Deeside Railway Line, which provides a buffer between development in Deeside and greenspace. Therefore we agree that this site would encroach unacceptably into the valley area of the River Dee.

B0939 Craigton Road, Pitfodels

This site plays an important role in separating the settlements of Aberdeen and Cults and is therefore an important part of the Green Belt. The site also contains many mature trees and has an established wildlife and recreational function.

B0940 Milltimber South

The development of this site would have an unacceptable impact on the landscape of the River Dee valley, as development would be very prominent from North Deeside Road and from the River Dee. With regards to the AWPR, it is important that this new bypass does not become a development corridor, and proximity to the AWPR does not make a site suitable for development.

B0946 Contlaw Road, Milltimber

Development on this site would have an unacceptable impact on the surrounding

landscape. The AWPR is not a development corridor and proximity to the AWPR does not make a site suitable for development.

B0933 Binghill Farm

We do not propose to allocate this site for development. The site is located above the 95m contour line of the Deeside Valley, which generally marks the northern limit to development for north Deeside settlements; breaching this could lead to sprawling development northwards. The development would be only partially related to the existing settlement of Milltimber, and will not encourage sustainable travel.

New Bid: Land at Station Road, Pitfodells

This site is considered to be unsuitable for residential development, primarily because of the very poor access to the site. There is only one single-track access route, which feeds onto Station Road which has poor visibility and may be dangerous.

New Bid: Land at Highview House, Countesswells Road

This site is not considered to be suitable for development. It would fit poorly into the landscape, being very elevated and prominent. It is also unrelated to any existing settlement and is not served by public transport, so it would be remote from shops and services, meaning that the development would be car-dependent.

New Bid: Countesswells Road adj. to OP58

This site is not suitable for residential development. At present, it is unrelated to existing settlement and is not served by public transport, so it would be remote from shops and services. Although in future it would be adjacent to the new community at Countesswells, the boundary of this development reflects its fit into the landscape and an extension would therefore not be appropriate.

B0925 Wellwood, Cults

Further consideration of this issue has led us to conclude that rezoning this area will have limited impacts on the green belt in this area. The main issue in Pitfodells is to retain the visual separation between Cults and Aberdeen. This area is well screened by roadside trees which are protected by its conservation area status. This will help to maintain the impression of a green buffer between the two settlements along North Deeside Road. Rezoning could allow a small number of houses in this area, but because of the small number, impacts on local schools and facilities are considered insignificant. Conservation area status would also require any proposals to be of high design quality and seek to enhance the visual appearance of the area. Because the green belt value of the land is questionable (it makes a limited contribution to landscape setting and is of no recreational value), it is considered that a rezoning to R1 Residential would be appropriate. This creates a more logical and easily identifiable green belt boundary in this area along the North Deeside Road. We would not propose to identify it as an opportunity site for development due to the insignificant scale of development that's likely to arise.

Planning authority action/recommendation for Proposed Plan

Rezone **B0925 Wellwood Cults** from NE2 Green Belt to R1 Residential.

Issue 3	Alternative Options in Peterculter
Body or person(s) submitting a representation raising the issue (reference no.)	
57035: Mr and Mrs Thain 57448: Alistair Lewis 57471: Sheila Walker 59319, 59315, 59308, 59304, 59284: Mrs D Porter 57381: Mrs D Gray and Others 58682: Parkie Property and Development 57426 Julie Nairn 59042, 59056, 59061, 59102, 59195: Bancon Homes	59670, 59675, 59683 : Stewart Milne Homes 58693: BP North Sea Infrastructure 59831: Mr and Mrs A.N. Ironside/ Midstocket Development Company 59915: Mr Y Thomson 54298: Mr A Mitchell 58812: EMAC Planning 57242: Elspeth Halston 59910 Camphill Communities
Section of the MIR to which the issue relates:	Main Issue 1 Greenfield Housing and Employment Allocations (Map 5: Deeside)
Planning authority summary of the comments:	
<p>B0903 Woodend Site 3 57426: If combined with preferred options B0904 and B0905, this site could deliver additional housing and be a cohesive and well-integrated development that could be delivered immediately as all services are present on site.</p> <p>B0908 Guttrie Hill East 59831: Site should be identified as an opportunity for a sustainable energy refuelling station and ancillary uses, e.g. hotel. Support for sustainable energy is found at every level of planning policy in Scotland and the Council's own Hydrogen project. This site would be the best possible location for this. All ancient woodland has now been removed from this site by previous owners and provides no habitat for protected species. The Development Options Assessment Report confirms its general suitability for development, and the site scored more highly than for preferred options at Peterculter.</p> <p>B0909 Land to the North of Peterculter 58682: This site should be included in the next LDP. The site would not conflict with green belt aims and would have minimal visual impact on the surrounding landscape. Development would help meet demand for housing for the elderly in the area and offers better accessibility than other sites identified as preferred in the MIR. There are no significant built or cultural heritage constraints, or physical or infrastructure obstacles.</p> <p>B0917 Land at Cobblestock, Peterculter 57381: Request that site is included as an allocation in the next LDP. Small-scale development in the south of Peterculter would compliment the sounding character and setting of existing properties on Station Road. The site scored more highly than sites which have been included as preferred options. Many of the constraints listed also face these sites, and could easily be overcome through mitigation measures.</p>	

B0919 Culter House Road

57426: This site should be identified as an opportunity for commercial use. It adjoins a major interchange on the AWPR, and development would provide employment at a location which is viable and sustainable.

B0920 Holemill, Peterculter

59915: Request land at Holemill be allocated for residential/commercial development in the next LDP. The allocation of four sites as preferred options shows an accepted need for more housing in Culter; this site provides further opportunity for this and scored more highly than the preferred options in the Development Options Assessment Report. Traffic issues on the B979 will be abated upon completion of the AWPR, allowing further growth along this corridor. Other identified constraints such as Green Belt, flood risk and natural conservation could be easily mitigated.

Peterculter West Phases 1a, 1b, 2a and 2b

57035, 57448, 57471, 59284: Object to development on this site and support its identification as 'undesirable' in the MIR. The site would have an unacceptable visual and landscape impact, an adverse impact on wildlife and natural heritage and would set an undesirable precedent for future development in the area. There are serious issues regarding access and safety from the local road network for both pedestrians and drivers, and the site is remote from facilities and services in Peterculter. There is inadequate capacity in local sewer and drainage networks, and Culter Academy is forecast to be over-capacity in 2016.

B0927 Land at Woodend Farm, Culter

57426: This site should be identified as an opportunity for small-scale chalet development. There is demand for tourism-related development in the area. The LDP should have a policy relevant to the promotion or development of tourism in Aberdeen.

B0928 Land to the West of Malcolm Road, Peterculter

57035, 57448, 57471, 59315: Object to development on this site and support its identification as 'undesirable' in the MIR. The site would have an unacceptable visual and landscape impact, an adverse impact on wildlife and natural heritage and would set an undesirable precedent for future development in the area. There are serious issues regarding access and safety from the local road network (Malcolm Road) for both pedestrians and drivers, and the site is remote from facilities and services in Peterculter. There is inadequate capacity in local sewer and drainage networks, and flooding is known to be a problem. Culter Academy is forecast to be over-capacity in 2016. The site should remain as green belt.

57426: This site should be identified as an opportunity for residential development. It is without physical challenges and is deliverable. If OP134 comes forward, this site would be a logical extension providing family homes and amenity ground for residents.

B0931 Cadgerford, Westhill

59675: Object to the failure of the MIR to allocate this bid. The site is required to support the expansion of Westhill, to meet high demand for employment space. Smaller sites should be allocated to help meet demand before large sites can be

delivered. Although pipelines and flooding are constraints, much of the site is developable and an FRA will be undertaken. There are no other physical constraints. The Green Belt boundary should not be identified as an impediment to development here, as they should not be used to limit the natural growth of settlements.

58693: The BP Forties pipeline runs 30m to the west of the site and will influence the nature of the development acceptable. Advocate a reference to the pipeline in any future LDP allocation.

B0932 Backhill, Westhill

59670: Object to the failure of the MIR to allocate this site for development. The justification and assessment does not correlate with the bid site in question. The site is required to support the expansion of employment and residential uses at Westhill and help to maintain the competitive advantage of the area. Smaller sites should be allocated to help meet demand before large sites can be delivered. Although flood risk is identified as a constraint, much of the site is developable and an FRA will be undertaken. The Green Belt boundary should not be identified as an impediment to development here, as they should not be used to limit the natural growth of settlements.

B0934 Hill of Ardbeck, Peterculter

59195: Support for identifying this site for a residential development of 61 houses in the next LDP. Careful siting, design and landscaping would protect and enhance the woodland and habitat on site, and contribute to more formal recreational opportunities and managed open space. A mix of site sizes is required, with smaller sites allocated to help meet short-term housing demand.

B0935 Peterculter East

59102: Support for identifying this site as an opportunity for residential development in the Proposed Plan. The site is adjacent to existing development, is well screened from the surrounding area and would consolidate the existing settlement, forming a logical infill site in SE Peterculter. The Development Options Assessment Report was unreasonable to dismiss the site due to its proximity to the SAC, development would be served by appropriate SUDS and any area at risk of flooding would be open space. A mix of site sizes is required to deliver housing in the short term and this site could be delivered quickly.

B0936 Peterculter East Business Park

59061: Support for identifying this site as an opportunity for employment development in the next LDP. Smaller sites are required to be allocated help deliver the required employment land in the shorter term, before strategic sites are delivered. The AWPR will provide almost direct access to this site. It fits well with existing settlements and is a logical infill site and landscaping will provide an appropriate green edge to the settlement. The Development Options Assessment Report did not fully consider the detail of the bid, and the impact of the AWPR is not fully considered. The site is not constrained.

B0935 Peterculter East, B0936 Peterculter East Business Park

59910: Strongly support as undesirable. Development here would have very adverse impacts on the Camphill Estate, leading to increased traffic on roads providing access to the estate which would raise safety concerns for vulnerable pupils. The

landscape impact on the setting of the estate would also be unacceptable.

B0937 Newmill, Peterculter

59042: The site should be included in the Proposed Plan for immediate release as mixed use. Additional, smaller sites like this one will address the need for housing and employment in the short term, before strategic sites can be delivered. This site does not contribute constructively to the Green Belt, and landscape impact would be mitigated.

B0938 Kennerty Farm, Peterculter

59056: Support for allocating this site for residential development in the Proposed Plan. The site does not make a positive contribution to the Green Belt in this location, but forms a logical extension to the settlement. Effective drainage and appropriate landscaping will provide local benefits, and improved access will enhance the Deeside Way for recreation. The site is capable of being delivered quickly to meet short-term housing needs.

Malcolm Road, Peterculter

59683: Object to the failure of the MIR to allocate land at Malcolm Road for residential development. This development would help to support the community at Peterculter as well as Culter Primary School, in a sustainable way. This site is more appropriate than the other sites identified as preferred in the MIR, particularly B0904/B0905. This site is a small infill and a more logical extension to the existing settlement boundary. The site would have adequate access and any impacts on natural heritage or landscape could be mitigated.

New Bid: Peterculter Area, Land to the East of Malcolm Road

54298: Future development in the Peterculter area should be north of the village, and to the east of Malcolm Road. This would relieve traffic pressure in the centre of the village. This site should be included in the next Local Development Plan as an opportunity for housing or business park uses.

New Bid: Land at Murtle Den, Bielside

58812: Green Belt designation should be removed from this site, because it does not justifiably form part of the definable greenbelt. This will allow the development of two detached residential units.

57242: Land identified at Murtle Den Road should be included in the next Local Development Plan as an opportunity for small-scale residential development.

Summary of the responses by planning authority

NOTE – Please see separate Schedule 4 Forms for the 3 sites identified in the Main Issues Report at Malcolm Road, Woodend and Mid-Anguston.

All Representations Supporting Alternative Option Bids in Peterculter

We do not propose to identify these sites as opportunities for residential development. Irrespective of the suitability of each site for development, the LDP already provides adequate housing and employment land to meet the allowances set in the Strategic Development Plan. We do not believe there are any over-riding benefits which would justify allocating these sites for development.

The sites at Peterculter, identified in the Main Issues Report as Preferred Options for residential development, were inserted for the reasons of supporting local housing choice and falling school rolls at Culter Primary School. This does not compromise the overall numerical argument given against allocating further sites for housing.

B0903 Woodend Site 3

We do not propose to allocate this site for development. Development would significantly impact on the surrounding landscape, and it would be very prominent from Culter House Road. The site is very isolated from the existing settlement and local facilities of Peterculter, and is not served by public transport. This would mean that the development would be heavily car dependent.

B0908 Guttrie Hill East

59831: We welcome the ambition to provide a sustainable energy refuelling station to support the wider use of these fuels in transportation. However the location of this development, which would also include business and hotel uses, would form an isolated and unsustainable outpost of development. The proximity of similar facilities within Aberdeen, a short distance from the AWPR, mean that there is insufficient need for a 'service station' type development in this location.

B0909 Land to the North of Peterculter

We do not propose to allocate this site for development. The site is adjacent to the River Dee and Culter Burn SAC and the Culter Burn LNCS which, without mitigation, may result in some loss or disturbance of important species or habitat. Development on the site would also impact on the surrounding landscape and any development would be only partially related to the main settlement of Peterculter. It is isolated from services and facilities and would be car-dependent.

B0917 Cobblestock, Peterculter

We do not propose to allocate this site for development. Development would be likely to impact on the surrounding landscape and any development would only be partially related to the main settlement of Peterculter and its shops and services. Access to the site is also poor.

B0919 Culter House Road

We do not propose to allocate this site for development. Development on this site would significantly impact on the surrounding landscape and any development would not be related to the main settlement of Peterculter.

B0920 Holemill Peterculter

We do not propose to allocate this site for development. The site is located adjacent to the River Dee and Culter Burn SAC and Culter Burn LNCS and may result in some loss or disturbance of important habitats and species. Development would also impact on the surrounding landscape and would be isolated from the services and facilities in Peterculter. This means the development is likely to be car-dependent.

Peterculter West Phases 1a, 1b, 2a and 2b

We do not propose to allocate these sites for development. This site is adjacent to the River Dee and Culter Burn SAC and the Culter Burn LNCS and the development may result in some loss or disturbance of important species or habitat. Development would also be likely to impact on the surrounding landscape and any development

would be only partially related to the main settlement of Peterculter. It is isolated from services and facilities and would be car-dependent.

B0927 Woodend Farm Culter

We do not propose to allocate this site for development. Development would significantly impact on the surrounding landscape and development would be very prominent from Culter House Road. The development would also be isolated from the existing shops and services in Peterculter which would discourage sustainable modes of transport.

B0928 Land to the West of Malcolm Road

We do not propose to allocate this site for development. Development would impact on the surrounding landscape and would be only partially related to the main settlement of Peterculter, being remote from shops and services. The development is therefore likely to be heavily car-dependent. The Culter Burn runs to the west and south of the site and part of the southern area of the site is identified as being at risk of flooding. The Culter Burn is part of the River Dee and Culter Burn SAC and is also an LNCS.

B0931 Cadgerford, Westhill

We do not propose to allocate this site for development. The presence of the BP Forties Pipeline would significantly constrain the proposal; any more than 30 dwellings would be advised against by the Health and Safety Executive. Furthermore, the Brodiach Burn is located to the west of the site, and a significant area of the site is at risk of flooding. The landscape surrounding Westhill is rolling agricultural land and development here would be highly visible. It is part of the open countryside which separates Kingswells and Westhill, and serves a vital green belt function by maintaining their separate identities and landscape settings. This development would be most likely to have a significant impact on services in Westhill, which is in Aberdeenshire.

B0932 Backhill, Westhill

We do not propose to allocate this site for development. There are flooding issues along the Brodiach Burn, which runs along the west edge of the site. Development would also intrude significantly into the rolling agricultural landscape which surrounds Westhill, and helps to maintain the separate identities and setting of Westhill and Kingswells. Therefore this land performs a vital function as Green Belt and it would not be appropriate to allocate this land for development.

B0934 Hill of Ardbeck, Peterculter

We do not propose to allocate this site for development. The site is located within the area covered by the Peterculter LNCS, and there would likely be negative impacts on the conservation of locally important species and habitats. Part of the site is also designated Ancient Woodland.

B0935 Peterculter East

We do not propose to allocate this site for development. Development on this site would have a significant impact on the surrounding landscape and any development would be only partially related to the main settlement of Peterculter and its shops and services.

B0936 Peterculter East Business Park

We do not propose to allocate this site for development. Development on this site would be very prominent from the AWPR corridor and would have a significant impact on the surrounding landscape. Any development would be only partially related to the main settlement of Peterculter and its shops and services.

B0935 Peterculter East, B0936 Peterculter East Business Park

Agree that these sites are undesirable for development and acknowledge the comments made about the impact on the students and residents of the Camphill Estate. Furthermore, development would have an unacceptable impact on the surrounding landscape and be only partially related to the main settlement of Culter.

B0937 Newmill, Peterculter

We do not propose to allocate this site for development. Development would be likely to have a significant impact on the surrounding landscape and may have a negative effect on the species and habitats of the Culter Burn LNCS, which is adjacent to the site. The site would be poorly related to the existing settlement at Peterculter and isolated from shops and services, meaning that it is likely to be heavily car-dependent.

B0938 Kennerty Farm, Peterculter

We do not propose to allocate this site for development. Development would have a significant impact on the surrounding landscape and any development would only be partially related to the main settlement of Peterculter and its shops and services.

Malcolm Road West, Peterculter

The site is located adjacent to the River Dee and Culter Burn SAC and the Culter Burn LNCS which, without mitigation, may result in some loss or disturbance of wildlife habitat or species. Development on this site would also (without mitigation measures) impact on the surrounding landscape. Any development would be unrelated to the main settlement of Peterculter and is likely to be car dependent.

New Bid: Peterculter Area, Land to the East of Malcolm Road

We do not propose to allocate these sites for development. It is a prominent area and would result in a significant intrusion into the landscape. It is also poorly related to the main settlement of Peterculter and would be remote from shops and services, meaning that the development would be heavily car-dependent.

New Bid: Land at Murtle Den, Bielside

We do not propose to allocate these sites for development. The site appears to have significant natural constraints, with steep slopes and waterlogging. The cause of this is unclear. Although Murtle Den is already a residential street, it is poorly related to existing settlement at Bielside and remote from shops and services, meaning that any new development is likely to be heavily car-dependent.

Planning authority action/recommendation for Proposed Plan

Do not allocate any of the bid sites for development in the Proposed Plan.

Issue 4	Bridge of Don
Body or person(s) submitting a representation raising the issue (reference no.)	
57571: Sacha Rossi 59685: Scotia Homes Ltd 59718: Stewart Milne Homes 59796: J McIntosh 59918: M Hickey	59919: J Langler 59921: A Bedawi 56229: Royal Aberdeen Golf Club 59288: Robert Thow 56346: Aberdeen Royal Golf Club
Section of the MIR to which the issue relates:	Main Issue 1: Greenfield Housing and Employment Allocations
Planning authority summary of the comments:	
<p>General Development Proposals 57571 – Generally no comment on development proposed however a request that a statement be included in the plan with regard to development in the safeguarding zone for Perwinnes Radar Installation.</p> <p>Development Bids</p> <p><i>North of the Don Masterplan</i> 59796, 59918 – Developer support for the master plan on the grounds of the need for long term land use zoning to provide a district centre.</p> <p><i>B0202 Mundurno</i> 59718 – Support for this bid on the grounds of housing land supply, limited visual and landscape impact, poor quality of the land in question, location close to Denmore and Berryhill and school capacity.</p> <p><i>B0204 Aberdeen Science and Energy Park Wind Turbine</i> 56229 – Opposition to the bid on the grounds of its impact on the Royal Aberdeen Golf Club and by extension on the tourist and economic impact on the city.</p> <p><i>B0205 Shielhill Farm</i> 59685 – Objection to site B0205 Sheilhill Farm being identified as undesirable due to its location next to OP24/Dubford, the proposed infrastructure upgrades, new primary school and the need to allocate more greenfield sites.</p> <p><i>B0206 Shielhill Quarry</i> 59919 – Support for the development on the grounds that the site should not be identified as a DWS due to the existing degraded nature of the site and the mineral extraction is temporary and can be mitigated for.</p> <p><i>B0208 Land at Old Ellon Road</i> 59921 – Support for the bid on the grounds it will not have a landscape impact and would support the Energetica Corridor.</p> <p><i>B0103 The Spires North</i> 59288 – Support for this bid on the grounds that the existing site needs</p>	

redevelopment and it would complement OP22.

Summary of the responses by planning authority

General Development Proposals

57571 – The comment in relation to safeguarding zone for Perwinnes Radar Installation is noted.

Development Bids

North of the Don Masterplan

59796, 59918 – Support for the master plan is noted, however the scale of the proposal is considerably more than identified in the SDP and as such we are not in a position to support the proposal.

B0202 Mundurno

59718 – Support for this bid is noted. ACC have previously assessed this bid and rejected it on the grounds set out in the Development Options Assessment Report. The site performs green belt functions of contributing to the identity and landscape setting of the city, and of preventing coalescence between Bridge of Don and Potterton. Development on the site would introduce alien elements into a landscape which has the character of open farmland and would diminish the setting of the standing stone and Mundurno Farmhouse.

B0204 Aberdeen Science and Energy Park Wind turbine

56229 – Opposition to this bid is noted.

B0205 Shielhill Farm

59685 – Support for this bid is noted. ACC have previously assessed this bid and rejected it on the grounds set out in the Development Options Assessment Report. This forms part of an area which acts as a green space buffer between Bridge of Don and Potterton and has the green belt function of helping to protect the identity of both areas. Its development would lead to urban sprawl. It is relatively remote from existing facilities and accessibility is poor.

B0206 Shielhill Quarry

59919 – Support for this bid is noted. ACC have previously assessed this bid and rejected it on the grounds set out in the Development Options Assessment Report. The use of this site as a quarry will conflict with the adjacent residential development at Dubford which is now under construction by causing noise and air pollution that is unlikely to be sufficiently mitigated through a buffer or tree screening. The site is also designated as a Local Nature Conservation Site.

B0208 Land at Old Ellon Road

59921 – Support for this bid is noted. ACC have previously assessed this bid and rejected it on the grounds set out in the Development Options Assessment Report. Its prominent location means that any new development would significantly intrude in the surrounding landscape and be highly visible on the approach to Aberdeen from

the A90. It is noted that the site could form an extension to the proposed development of employment uses at Murcar/Berryhill and has the potential to be functionally integrated with this. However this site would extend beyond the 'natural' boundary of OP2 which is the small watercourse valley to the south of this site.

B0103 The Spires North

59288 – Support for this bid is noted. ACC have previously assessed this bid and rejected it on the grounds set out in the Development Options Assessment Report. this site is in an extremely prominent, elevated location that is highly visible from the whole surrounding area, and sits imposingly above the residential development that surrounds it. It is also part of an existing industrial estate, which would present significant land-use conflict with the proposed residential use. It is therefore considered that the existing employment zoning is appropriate.

Planning authority action/recommendation for Proposed Plan

Do not allocate any of the bid sites for development in the Proposed Plan.

Issue 5	Preferred Brownfield Options and Other Proposals	
Body or person(s) submitting a representation raising the issue (reference no.)		
48626: Mustafa Osman 49567: Nestrans 51198: Middlefield Community Council 54193: Ms Maas-Lowit 54238: Aberdeen Renewable Energy Group 54480: Kirsten Morgan 54499: Les Chalmers 55183: Miller Developments 55418: Cults, Bielside and Milltimber Community Council 55909: Valerie Fyfe 57543: Patricia Clarke 57816: Abdul Latif	58012: NHS Grampian 58123: Kingswells Community Council 58301: Derek Selbie 58693: BP North Sea Infrastructure 58769: Clive Kempe 59017: Cove and Altens Community Council 59036: Craigiebuckler and Seafield Community Council 59215: Aberdeen City Council 59236: Telereal Trillium 59444: Charlie's House Appeal 59577: Scottish Government 59703: Hammerson plc. 60338: SEPA 59495: Energy Dawn Ltd	
Section of the MIR to which the issue relates:	Section 2.2 Brownfield Sites and Other Proposals	
Planning authority summary of the comments:		
<p>Denburn and Woolmanhill 48626: The Denburn and Woolmanhill site should be demolished and redeveloped. 48626: Support for a museum on or in Woolmanhill site.</p>		

B0302/B0307 Woodend Charlie House

48626, 59444: Support for Charlie House development at Woodend.

58012, 59444: In relation to flooding issues, the boundary of the site should not be changed as the whole site is required to accommodate infrastructure and landscaping.

60338: Charlie House: site is adjacent to the North Burn of Rubislaw, which can suffer from pollution pressures. Opportunity to deculvert welcome. Would require buffer strips around watercourses & opportunity to restore morphology. Potential for enhancement/maintenance of Green Space Network. Construction SUDS required.

B0105 Raiths Rail Freight Terminal site

49567: Wish to see this site retained for transport in order to preserve the potential for expansion of the rail freight facility.

59703: This site should be rezoned for employment land as it will not be required for any future expansion of the rail freight facility

59577: More detailed consultation needs to be carried out before change of use to employment land. It should be considered that enhancements are being undertaken to the Aberdeen-Inverness route as part of the Scottish Government's Rail Enhancement project.

58301: Could this site provide an opportunity for Aberdeen Airport to receive fuel by rail with sidings at Raiths?

58693: The BP Forties Pipeline runs beneath this site and should be considered in any future planning proposals.

60338: There is already pollution pressure from Pitmedden. Would expect connection to the public sewerage system. Operational SUDS are critical and three levels of treatment may be required. Construction and Environmental Management Plan and construction SUDS required.

B1202 Craiginches Prison

49567, 54499, 54193: Concern over the impact development here would have on the local road network, and highlighting opportunities to improve sustainable and active travel to the site and upgrade Wellington Road.

57543: Any older buildings should be retained as part of any future redevelopment.

60338: Will require a Construction Environmental Management Plan (CEMP) which must include Waste Management Plan which addresses demolition.

Smithfield School

51198: The Smithfield School site has not been included in the list of brownfield proposals even though it is likely to be redeveloped.

B1002 Grove Nursery

59215: Support for the identification of Grove Nursery for social enterprises specialising in nursery, horticulture and/or allotments and other associated uses.

60338: Site will have to connect to the public sewer network. Potential to impact on a number of small watercourses and ponds in the immediate vicinity. Require buffer strips around watercourses. Opportunity to restore morphology of watercourse and deculvert sections. Potential for enhancement/maintenance of green network.

Construction of SUDS required due to the significant risk of downstream amenity impact.

Nigg Bay Solar Farm

54238, 54480, 55418, 57816, 58123, 59036, 60338 : Support the development of a solar farm at Nigg Bay/ Tullos Hill, for various reasons including:-

- shows commitment to renewable energy
- demonstrates feasibility of solar energy in the north of Scotland
- would provide a noticeable difference to the city's energy supply
- would be an appropriate and efficient use of the site
- help reduce pollution and protect the environment

58123, 58769: Unconvinced over the location of the site, for example it appears to be North facing and may be subject to fog

59017: Concern about appearance and impact on residential amenity, e.g. through glare.

59236: Do not support this proposal, for various reasons including:-

- Gimmick that will not produce any significant amount of energy

59577: Concern about the impact of this proposal on the setting of several listed buildings and scheduled monuments - mitigation measures must be included for this.

60338: Connection with public sewer if appropriate; no watercourses. Construction SUDS required.

55905: Talk about using landfill gases for energy but not much happening.

OP32 Dyce Drive

55183: Support the rezoning of land at Dyce Drive from Specialist Employment Area to Business and Industry.

55183: Support the retention of the current LDP land release phasing.

58693: This site is within the inner, middle and outer consultation zones for the BP Forties pipeline and should be considered as part of any future planning proposals. A reference to this should be inserted into the LDP.

OP104 Froghall Terrace

59443: Support for this site remaining as an opportunity site for mixed use development comprising residential and student accommodation, to help to meet Aberdeen's housing needs.

Burnside Drive Travelodge

59495: Request that this site is removed from its current Green Belt designation and included as part of the existing built-up area in the new LDP to reflect the established, existing uses on the site. This would enable a reconfigured and expanded hotel which will be detailed in a forthcoming planning application.

Summary of the responses by planning authority

Denburn and Woolmanhill

48626: This site is identified as an Opportunity Site for mixed use development (OP99). We no longer propose to take this site forward as an Opportunity Site for retail development. The additional retail space required can be met on more suitable sites within the City Centre.

48626: comment noted.

B0302/B0307 Woodend Charlie House

48626, 59444: This development bid will be identified as an opportunity site for a children's care facility in the next LDP.

58012, 59444, 60338: The boundary of the OP site in the Main Issues Report will not be changed from the bid. A Flood Risk Assessment will be required and flooding and drainage issues to be addressed and agreed at planning application stage.

B0105 Raiths Rail Freight Terminal site

49567, 59703, 59577: Both Transport Scotland and NESTRANS support the retention of this site for the future expansion of the rail freight facility. Although there are no immediate plans to do this, it is noted that enhancements are being undertaken to the Aberdeen-Inverness route as part of the Scottish Government's Rail Enhancement project. Furthermore, Aberdeen and surrounds are currently experiencing considerable growth, particularly in relation to employment land and the Council wishes this growth to continue. There are substantial opportunities to develop employment land elsewhere but nowhere else has been identified for rail freight expansion should it be required in future. In this context, it would be prudent to retain the current zoning of Land for Transport and retain the site as an opportunity for rail freight expansion.

58301: View noted. There are currently no plans for Aberdeen Airport to receive aircraft fuel by rail. However, retaining the site as Land for Transport would allow that to happen should the need arise.

58693: The BP Forties Pipeline is marked on the LDP Constraints Map and will be considered by officers in any future planning proposals.

60338: Drainage and sewerage issues would be addressed and resolved at the planning application stage.

B1202 Craiginches Prison

49567, 54499, 54193: The site will be identified in the Proposed Plan as an opportunity for residential and/or mixed use development that is compatible with a residential setting. A detailed transport assessment and traffic proposals will require to be agreed at planning application stage. In addition school capacity issues at Walker Road Primary School will need to be addressed.

57543: The demolition or retention of existing buildings on site will be subject to the detailed planning application. This will need to consider policies such as those relating to granite.

60338: Any request for a Construction Environmental Management Plan (CEMP) will be made at planning application stage as appropriate.

B1002 Grove Nursery

59215: B1002 will be identified in the Proposed Plan as an Opportunity Site for social enterprises, specialising in nursery, horticulture and/or allotments and other associated uses. Given this, together with the presence of the adjacent new household waste recycling centre (HWRC), it is considered that the current green belt zoning on the undeveloped part of Grove Nursery is inappropriate. A rezoning to 'New Community Facilities' (Policy CF2 in the current LDP) would be more suitable. In addition, now that the HWRC has been built, it would be sensible to remove the current 'Opportunity Site' status and rezone this to 'Existing Community Sites and Facilities (Policy CF1 in the current LDP).

60338: Flooding, drainage and sewerage issues will be addressed and resolved at planning application stage.

Nigg Bay Solar Farm

54238, 54480, 55418, 57816, 58123, 59036, 60338: The site at Nigg Bay/Tullos Hill will be identified in the Proposed Plan as an opportunity for a solar energy development.

58123, 58769, 59017: This location was identified as being appropriate for the proposal by renewable energy experts at the Aberdeen Renewable Energy Group (AREG).

59017: Glare is not considered to be an issue. PV panels are designed to absorb, and not reflect, solar energy.

59236: It is estimated that this proposal could generate 5MW of electricity. This is a significant amount which will contribute to the SDP target of meeting the region's electricity needs from renewable sources by 2020.

59236: Mitigation measures, addressing the impact of the development on the environment, including built and cultural heritage, will be identified in the SEA for the Proposed Plan.

60338: Sewerage arrangements will be required to be addressed and resolved at planning application stage.

55905: There are no current plans to harness landfill gases for energy in Aberdeen.

OP32 Dyce Drive

55183, 55183: This allocation will be rezoned in the Proposed Plan from Specialist Employment Area to Business and Industrial Land. This reflects an existing planning consent. The area will remain as an OP site and existing planning consents will not be affected. Existing phasing will also remain the same.

58693: The BP Forties Pipeline is identified on the LDP Constraints Map and will be taken account of by planning officers in determining planning applications.

Smithfield School

51198: The former Smithfield Primary School site is already allocated in the existing LDP (2012) as Opportunity Site 116 for residential development.

OP104 Froghall Terrace

This will be retained as a brownfield opportunity site.

Burnside Drive Travelodge

Agree that this site does not fulfil the function of greenbelt and the Travelodge site should be rezoned as mixed use.

Planning authority action/recommendation for Proposed Plan

Identify the following sites as Opportunity Sites in the Proposed Plan:

- B0302/B0307 Woodend Charlie House (Children's Care Facility)
- B1202 Craiginches Prison (Mixed Use) with the proviso that should residential be proposed, that school capacity issues at Walker Road Primary will need to be addressed.
- B1002 Grove Nursery (Social Enterprises). This land will be rezoned from NE2 Green Belt to CF2 Existing Community Facilities. In addition the OP reference will be removed from the HWRC which is now built, and this part of the site rezoned to CF1 Existing Community Sites and Facilities.
- Nigg Bay Solar Farm

Re-zone OP32 Dyce Drive from Specialist Employment Area to Business and

Industrial Land to reflect the planning consent in place there.

B0105 Raiths Rail Freight will be retained as Land for Transport and reserved for the expansion of the rail freight facility.

Denburn and Woolmanhill will not be identified in the Proposed Plan for retail development. It will be retained as an opportunity site for a mix of uses as identified in the current LDP.

Rezone Aberdeen Airport Travelodge site from green belt to mixed use.

Issue 6	Bucksburn /Dyce
Body or person(s) submitting a representation raising the issue (reference no.)	
49567: Nestrans 55631: Mrs J Cowie 56278: Shell UK Ltd 58301: Derek Selbie	58840: CALA Management Ltd 58977: Aberdeen City Council 59213: Ben Freeman obo Bancon 59822: University of Aberdeen
Section of the MIR to which the issue relates:	Main Issue 1: Greenfield Housing and Employment Allocations
Planning authority summary of the comments	
<p>Land at Dyce Railway Station 49567: Reallocate land zoned as urban green space to land available for transport in order to accommodate a larger car park at Dyce Railway Station.</p> <p>Allocation of BO101: Persley Croft 55631: The site should be allocated as desirable in the MIR</p> <p>Pipelines and development 56278: B0105 Raiths Farm and Dyce Drive (OP40) are in close proximity/ sits on the St Fergus to Mossmorran pipeline. Consultation with HSE and pipeline operator must be undertaken.</p> <p>Road link from Northfield to Forrit Brae 58301: does not have universal support. Will split communities and making sustainable modes of transport less attractive</p> <p>OP26: Craibstone North and Walton Farm 58840: Remove Strategic Land Reserve 2027-2035. Re-allocate this for mixed uses, including residential, educational, commercial and retail.</p> <p>OP31: Greenferns Landward 58977: Support the continued inclusion of this site</p>	

Allocation of BO104: Clinterty

59213: Site should be allocated as desirable

Spatial Strategy: OP30 Rowett South

59822: Support spatial strategy. Request 240 units be moved from phase 3 into phase 2.

Summary of the responses by planning authority

Land at Dyce Railway Station

The existing capacity of the car park at Dyce station is 84 spaces and the current car park is very busy to full by early morning on a daily basis with the impact that there is also a reasonable amount of on-street parking in the vicinity that could be attributed to commuters.

The number of passengers through Dyce rail station has increased by 182% between 2004/05 and 2012/13. With the improvements to the Aberdeen to Inverness rail line now committed, demand is likely to increase in the future. Through the Regional Transport Strategy there is active promotion of the rail park and ride over commuters / shoppers etc. driving into the city centre. Dyce rail station forms a key part of this network. The provision of the car park will encourage and promote this sustainable transport method.

Allocation of BO101: Persley Croft

The site is subject to significant constraints regarding access. The site is considered to be undesirable for development due to its location directly on the A90 trunk road (The Parkway), which is a major transport route. The Parkway severs the site from nearby residential development, services and facilities at Danestone, and would be very difficult and hazardous to cross for pedestrians and cyclists. The Parkway is a robust Green Belt boundary in this area. Considering the plans for development of 7,000 homes and 5ha of employment land at OP12 Grandhome, it cannot be assumed that this road will become a significantly quieter local road post- AWPR.

Pipelines and Development

Consultation with the appropriate body will be undertaken during the planning application stage when the detail of the proposed development have been further investigated.

Road Link from Northfield to Forrit Brae

Access to site will form part of the masterplanning process and is subject to a separate consultation exercise.

OP26: Craibstone North and Walton Farm

The overall vision and spatial strategy of the Local Development Plan is considered to be appropriate and was established following the Examination into the 2012 Local Development Plan. The proposed use allocation of employment or higher education/research fits well with the surrounding uses, and would not impact negatively on adjoining land uses. There is no justified reason for the modification of the proposed from employment land or higher education and research or to alter the time period in which development would take place.

OP31: Greenferns Landward

Welcome the support regarding the allocation of this site.

Allocation of B0104: Clinterty

This site does not score well in terms of accessibility, as there are no existing services in the area. This will make it car dependent. This site could potentially be developed and is free from absolute constraints. However, this site is divorced from Aberdeen and providing attractive linkages, encouraging walking, cycling and public transport, to Aberdeen would be difficult. It would also appear as sporadic and isolated development in the countryside.

Spatial Strategy: OP30: Rowett South

The argument for moving the phase three allocation into phase two, which revolves around the scale of infrastructure required and contributions required to cover this, are sound in terms of planning. In this Proposed Plan the existing phase three land will become phase two and could be released for development if a sound argument can be made that doing so is essential for putting the Plan's strategy into practice.

Planning authority action/recommendation for Proposed Plan

Dyce Railway Station

Change the zoning of land at Dyce Railway Station from Urban Green Space to Land for Transport and identify as an Opportunity Site for an expanded car park with associated SUDS and landscaping. Access to the Formartine and Buchan Way should be retained and enhanced.

Issue 7	Business and Industrial Development
Body or person(s) submitting a representation raising the issue (reference no.)	
49471: Bucksburn Community Council 54480: Kirsten Morgan 55434: Mobile Operators Association 56278: Shell UK Ltd. 56528: Pam Butler 57280: Christine Boylan 57590: Mast-Victims.Org 57612: Richard Johnson 57734: Andrew Jones 57816: Abdul Latif 57894: Aberdeen and Grampian Chamber of Commerce 58693: BP North Sea Infrastructure	57975: Aberdeen Civic Society 58123: Kingswells Community Council 59017: Cove and Altens Community Council 59036: Craigiebuckler and Seafield Community Council 59171: British Airways 59236: Duncan Massey 59452: Scotia Homes 59577: Scottish Government 59699: Scottish Enterprise 57233: John Boylan 59152: Leiths (Scotland) Ltd.
Section of the MIR to which the issue relates:	Chapter 6 'Supporting Business and Industrial Development' including Q14 'Digital Infrastructure'

Planning authority summary of the comments

Digital Infrastructure

49471, 54480, 57280, 57816, 57894, 51823, 59017, 59036, 59236, 57233, 59699: All new developments should provide modern, high speed telecommunications networks when they are built.

57734: Digital infrastructure should not be supported by the Council but paid for by private companies as they see fit.

59452: It is unreasonable for new developments to be required to contribute to digital infrastructure, and this may impede the viability and delivery of schemes.

Telecommunications Policy

55434: The LDP should include a telecommunications policy detailing when proposals for telecoms development/equipment will be permitted.

57590: Telecommunications equipment has serious negative effects on public health and wellbeing. The Health and Safety aspects of new proposals should take priority.

Pipelines

56278, 58693: It is important to ensure pipelines continue to be recognised and protected through LDP policy and are considered in the assessment of new bids. Support keeping policy BI5 as is.

Aberdeen Airport

57612: Policy H8 Housing and Aberdeen Airport should be improved with regards to noise standards to protect and enhance the amenity of residents.

57894, 59171: Policy should support surface access and other infrastructure improvements at the airport, in order to maximise its economic contribution to the region.

Business and Industrial Land

57975: Business and Industrial development should be located in mixed use communities, rather than out-of-town, single-use business parks.

59699: The LDP should allocate more business land, allocate land specifically for office development and restrict the loss of existing business and industrial land to promote growth.

59152 – the bid to expand Aberdeen Gateway (1302) should be rejected in line with previous bid which was rejected by the reporter

Hotel Development

59699: Potential sites/zones for hotel development should be identified in the LDP.

Energetica

59699: Support policies/ proposals to promote the Energetica Corridor in the LDP.

Railway Arches

56528: Support the continued development of railway arches as commercial units for rent by small businesses.

NPF3

59577: The Proposed Plan should be mindful of the proposed national developments as set out in NPF3.

Summary of the responses by planning authority

Digital Infrastructure

49471, 54480, 57280, 57816, 57894, 51823, 59017, 59036, 59236, 57233, 59699, 59452: The Strategic Development Plan states that the roll-out of high-speed broadband throughout the area is vital for the economy as well as bringing social and environmental benefits. World-leading internet access is essential in Aberdeen and the public and private sectors

will need to work together to deliver these improvements. The SDP sets a target for all new development to have the use of modern, up-to-date high-speed telecommunications networks, such as fibre optics. This will be supported through a new policy in the Proposed LDP.

57734: Improvements to digital infrastructure is funded through both public and private investment supported by grants from the Scottish and UK Governments.

Telecommunications

55434: The Proposed LDP will include a new telecommunications policy.

57590: The safety of telecommunications equipment is established at a national level, supported by scientific research and evidence. It would not be appropriate for the LDP to revisit national safety standards and there are no intentions to do so.

Pipelines

56278, 58693: Pipelines will continue to be protected through Policy B5, which will be carried forward into the Proposed Plan with only minimal changes. Pipelines will continue to be part of the Sustainability Criteria for assessing new sites and are already marked on the LDP Constraints Map for consideration by planning officers when assessing development proposals.

Aberdeen Airport

57612: There are no proposals to alter the noise standard in the LDP. The LDP conforms to the guidance set out in Planning Advice Note 1/2011 (Planning and Noise). The Environmental Noise (Scotland) Regulations 2006 provide the basis for minimising noise disturbance at the Airport through the Aberdeen Airport Noise Action Plan.

57894, 59171: The Airport policy in the LDP deals specifically with matters relating to the safety and efficiency of airport operations and developments within the airport's operational area. Surface transport proposals are best dealt with through transportation strategy.

Business and Industrial Land

57975, 59599: The Aberdeen Local Development Plan 2012 has already allocated a significant amount of land for business and industrial development, in line with the Strategic Development Plan (2013). This land is located in mixed use developments as well as single-use business parks. Land is already identified specifically for office development, in the form of Specialist Employment Areas.

59152: Bid 1302 for extension to OP69 (Aberdeen Gateway) was assessed at pre-MIR stage and recommended as undesirable and the Council's position on this remains.

Hotel Development

59699: There are many areas in the city where hotel development is acceptable in principle, as recent planning permissions have shown. It is considered appropriate that applications will continue to be dealt with on a case-by-case basis and we do not propose to introduce a zoning or specific policy provision for hotel developments.

Energetica

59699: Significant land allocations have been made to the area north of the River Don to support the Energetica Corridor concept promoted by Aberdeen City and Shire Economic Future. The Energetica concept seeks to improve the economy and promote the energy industry along the Aberdeen to Peterhead growth corridor. The Plan allocates sites for more than 7,000 homes in this area and 32ha of employment land (in addition to more than 75ha of land already zoned here in the 2008 Aberdeen Local Plan). Proposed road schemes which will provide benefits to this area include the Aberdeen Western Peripheral Route, the Third Don Crossing and Haudagain roundabout improvements. An Energetica Design Guide will be adopted as Supplementary Guidance alongside the Plan in due course.

Railway Arches

56528: The issue of railway arches in commercial use is too specific to warrant policy provision within the LDP. Any relevant planning applications submitted to the Council will be considered on their merits.

NPF3

59577: The Proposed Plan identifies Nigg Bay as an Opportunity Site for the Aberdeen Harbour Expansion, a National Development in NPF3. Strategic Airport Enhancements to Aberdeen Airport are also identified as a national development. These are supported within the existing policy framework of the LDP, to be taken forward through Aberdeen Airport's own Masterplan.

Planning authority action/recommendation for Proposed Plan

The Proposed Plan will contain new policies on Digital Infrastructure and Telecommunications.

Pipelines will continue to be shown on the Proposals Map.

Issue 8

City Centre (Vision and Masterplan. Boundary, Retail Strategy, Union Street Frontages and West End Shops and Cafes Policy)

Body or person(s) submitting a representation raising the issue (reference no.)

47157: Mr Jeremy Wood

48518: Aberdeen Trades Union / Council

48626: Mustafa Osman

49188: Mrs Alison Olsen

49471: Bucksburn Community Council

49567: Nestrans

57734: Andrew Jones

57816: Mr Abdul Latif

57894: Aberdeen and Grampian Chamber of Commerce

57975: Aberdeen Civic Society

58012: NHS Grampian

<p>50066: Kenneth Eddie 51198: Middlefield Community Project 54480: Mrs Kristen Morgan 54499: Mr Les Chalmers 54751: Optimisation Developments Limited 54804: Mr Bill Stalker 55418: Cults, Bielside and Milltimber Community Council 55905: Mrs Valerie Fyfe 56528: Ms Pam Butler 57001: Mr Willie Jaffray 57233: John Boylan 57280: Mrs Christine Boylan 57482: Mr Andrew Findlayson 57543: Mrs Patricia Clarke 57556: Ferryhill and Ruthriestone Community Council 57581: Castlehill and Pittodrie Community Council 57658: Mr Dave Black 57709: Ms Marie Boulton 57712 Mr Peter Argyle</p>	<p>58123: Kingswells Community Council 58301: Derek J Selbie 58313: Old Aberdeen Heritage Society 58397: Mr David Ballock 58601: Ms H Leith 58769: Mr Clive Kempe 59036: Craigiebuckler and Seafield Community Council 59189: John Lewis plc. 59236: Mr Duncan Massey 59317: AVIVA Life and Pensions Ltd 59367: Mr Neil Rothnie 59404: Rockspring Hanover Property Unit Trust 59436: Rockspring UK Value Fund 59535: Scottish Property Federation 59577: Scottish Government 59695: Scottish Natural Heritage 59699: Scottish Enterprise 59703: Hammerson plc. 59758: F & C Reit Asset Management 59798: Standard Life Assurance Limited 60338: SEPA</p>
Section of the MIR to which the issue relates:	Section 3.1, 3.2, 3.3, 3.8, 3.9, 3.10 and 3.11
Planning authority summary of the comments	
<p>Vision and Masterplan 48518, 55418, 57280, 57482, 57581, 57709, 57233, 57712, 57734, 59703 - Agree that work should continue on the City Centre Vision and Masterplan led by Aberdeen City Council. 57280, 57233 - The planned regeneration of the city centre has so far resulted in disappointing and characterless architecture. A City Centre Team should co-ordinate the development of the city centre as an alternative to the present strategy which lacks focus. The team should have a mandate from ACC which informs them that new development must be compatible with our granite heritage and capable of being implemented within a realistic timescale. The team should include Councillors, members of the business community and representatives from city-wide community groups. 59404, 59436 – Support the replacement of the City Centre Development Framework with the Vision and Masterplan. This should be the driving force rather than a reference document. Committed to engaging in the masterplan process. It should be public sector led but private sector interests should be taken into account. 51198, 57975 - Think the implementation of the masterplan should be driven by market demand. 49471 - John Halliday's vision for the city centre is a good start for the Council to work from. The Council should appoint a company to produce an overall concept for the city centre. 57894 – The current framework is not working properly. The new Vision and</p>	

Masterplan must be developed with the input of the City Centre Regeneration Board. Broadly agree with the proposed themes. Suggest an additional theme that deals with transport issues – congestion is a significant problem and should be priority.

58397 – The city centre should be clean and accessible with entertainment, shopping and dining and public spaces which facilitate social interactions.

58769 – Greater value should be given to views and open space.

59535 – Aberdeen needs to enhance its position as a destination if it is to successfully revitalise the city centre. Main thoroughfares such as Union Street should be diversified. The city should improve its tourist offer through more budget accommodation and enhance air links.

59699 – Support the continued development of Grade A offices within the city centre. North Dee is being created as an ‘office hub’ which has potential to be Aberdeen’s Central Business District. The LDP needs to clarify which sites or zones are most suitable for office development in the city centre. Attracting offices needs to be a major part of the strategy for the city centre. North Dee should be a key area of focus for the Vision and Masterplan and promote it as a high quality and well connected office base. Would like to see a specific policy to promote office led mixed use in this area. The themes are led by design. The economy should be the most important theme and design is an important sub-component.

59703 – The Vision and Masterplan is necessary to guide future development in the city centre. It is appropriate that the public sector led implementation is underpinned by private investment. The new document will allow Union Square to be recognised as the central retail and leisure offer in the city.

59758 – The Bon Accord Quarter Masterplan is still relevant however a review is being undertaken. They will engage with the Council following the review. Welcome the opportunity to engage with the Vision and Masterplan.

57712 – A clear vision led by the public sector is necessary to achieve both the maintenance and improvement of the city centre.

57709 - There needs to be a clearer understanding of the different types of uses that the city centre should have.

Theme 1 – Urban Design

57975 – Support importance placed on Urban Design. Masterplan should encourage good and sympathetic development.

58123 – Support the need to balance the historic character with high quality contemporary architecture.

58769 - There have been recent improvements in architecture. Inner city areas are still plagued by ugly sheds. Five storey buildings would be more attractive and make best use of the land. Aberdeen has been spoilt by poorly regulated attic conversions.

57734 – Retain the granite and market it. Ensure all frontages are protected and keep all signage the same.

Theme 2 – Cultural Vision

58301 – Refreshing to see culture recognised. The cultural hub has an east west trend, while retail has a north south axis.

Theme 3 – Union Street

59404, 59436 - There needs to be a focus on improving Union Street and how it operates.

55905 - Union Street would be enhanced if it was kept clean. Allow small businesses use vacant units at a reduced rate. The vacant part of the former E&Ms building should be used for residential development as well as other buildings on Union Street.

57581 - Agree character of Union Street should be preserved. Buildings over four storeys and glass boxes should be discouraged.

57975 – Support importance placed on Union Street.

58123 - Union Street should remain the core of the city centre. Do not support roofing over Union Street.

58397 – The pedestrianisation of Union Street could help breath new life into the city centre - like Belmont Street. This would encourage walking, cycling and the use of public transport and could address the lack of retail demand on Union Street. Must consider the impact this may have on traffic elsewhere. Imperative to involve the blind and partially sighted in the planning process. Three benefits to pedestrianisation: 1. Enhance north / south connections by better links to the Green, 2. Revitalise the west end of Union Street and 3. Opportunity to enhance Castlegate.

54499 - Covering Union Street is a great idea as it provides cover and preserves the street for shopping.

57734 – Landlords are not upkeeping their property on Union Street.

Theme 4 - North South Access

49471, 58301 - There are problems with access to the bus and rail stations. Difficult to solve north south access issues as the connections are difficult and busy.

57581, 58123 - Support development of easier links between bus and rail stations to Union Street by providing escalators.

57280, 57233 - It is hoped by 2035 that pedestrian and transport links are vastly improved with a direct pedestrian link between Union Street and the train / bus station which will have a high speed rail to the airport.

58769 – St Nicholas and Bon Accord should be open 24 hours to allow access from Union Street to George Street – this would help regenerate the area.

58397 - Current routes from Union Street through the Green are inaccessible and uninviting. There should also be more reasons to go there and linger. It is currently underused and could offer much more.

Theme 5 - Links to the Sea

51198, 57975, 59798 – Support importance placed on Links to the Sea.

58301 - The beach is an important part of the city – visitors prefer the beach as they can access retail and leisure without going near the city centre. Trams could link the city centre to the beach.

58769 – Reduce road traffic and make the beach more accessible to pedestrians. The road network is very inefficient.

59798 – The beach could be included within the city centre vision and masterplan.

58397 - The City Centre feels disconnected from the sea. Better signs could improve orientation and wayfinding. The harbour railway could be turned into a cycling/walking path.

57734 – To link the city centre with the beach will never happen – don't force it. Provide a flat rate bus service – people may use that.

Marischal Square

57280, 57233 - Hope former St Nicholas House site will not be replaced by a similar building.

57658 - Marischal Square should be a pedestrian safe space with a play park - not offices or hotel.

58123 - Do not support the development of Marischal Square as a business development with glass box architecture. It should have civic and community uses. Provost Skene's House should be a centrepiece and architecture should be in keeping with Marischal College.

50066 – The development of the former St Nicholas House should allow a view from Broad Street of the existing garden and Provost Skene's House. It should also represent the city's maritime heritage.

Union Terrace Gardens / Denburn Valley

58123 - Union Terrace Gardens should remain as a green space.

58397 – Pedestrianisation should take into consideration Denburn Valley. All traffic should go around city centre and removing Denburn Road would create more green space. This would make the proposed retail site more attractive. Drop in levels could be mitigated by turning the whole Denburn Valley into a green space.

City Centre Boundary

Keep existing boundary as it is

49471, 54751, 55418, 57709, 59367 - Object to the proposed boundary changes.

Reasons for this are: there is no value in reducing the boundary, does not appear to be based on any robust analysis or reasoned argument, the Council should focus on the redevelopment of the city centre rather than defining it, will not encourage development or enhance these areas

54751, 57816, 58301, 57581 - King Street should remain within the boundary.

Reasons for this are: it is the gateway to the city centre, major route into the city centre, the new mosque and community facilities will be located on King Street / Beach Esplanade and will be part of city centre life and Morrisons is the only significant convenience store in the city centre and is used by visitors of the city centre.

49471 - The boundary should contain the train station, bus station, whole of Union Street and smaller streets surrounding Union Street.

59703 – Union Square must be within the city centre boundary.

Reduce the boundary

51198, 58301, 57975, 59404, 59436, 59699, 59703 – Agree that the city centre boundary should be reduced. Reasons for this are: the existing City Centre Business Zone is the city centre, predominantly residential areas should be removed, will free these areas up for suitable development, appropriate to remove areas that do not contribute to the city centre, the boundary should be compact and relevant and provide policy focus.

57734 – Remove the proposed areas from the city centre boundary but only if tight controls are maintained.

57581 – Agree that Castlehill should be removed from the boundary and the area around Mounthooly.

58397 - The residential area of Skene Street should be removed from the city centre boundary.

58301 - Areas to the west of the rail station and north of the harbour are predominantly residential or related to the harbour and should be removed from the boundary.

Increase the boundary

57894 - North Dee should be included within the boundary.

58769 – Removal of the harbour area is a contradiction with the aim to integrate the harbour more. Aberdeen is a city without a centre. The beach and Footdee should be included within the city centre.

59798 – Seems illogical to contract the city centre boundary when the region is going through significant population growth. The boundary should be extended and would help address the current issues with links to the sea.

Other comments

49567 - Important to consider the impact changing the city centre boundary may have on parking controls. Consideration should be given to the Regional Parking Strategy.

59699 – A definition of core retail and office areas in the city centre would help promote focus.

57894 – The City Centre boundary and City Centre Business Zone should be the same. The Vision and Masterplan should be one zone identifying areas for different uses.

58397 – Including the proposed Denburn retail opportunity within the City Centre Business Zone is reasonable.

57709 - There needs to be a clearer understanding of the different types of uses that the city centre should have.

Sustainable Urban Mobility Plan (SUMP)

General SUMP

49567, 55418, 57816, 57894, 47157, 57816, 59699 - Support the development of the SUMP. Suggestions for key objectives include: reduction of congestion / traffic, improvement of air quality, pedestrian priority / zones, improving walking and cycling routes, pedestrianisation, rail access, access by car, Aberdeen Harbour, links between the city centre and major business locations.

56528 - Support the aspiration to improve connectivity in the city centre. Can see opportunities with this and continue to engage about how this may be facilitated around the train station.

57709 – We need to be more creative in how we transport people into the city centre.

57556 - The city centre is compact and should be easy to access and navigate by non-motorised transport. Land use and transport planning are currently disjointed e.g. North Dee Business Park. The effect of increased commuting on the community has not been thought about.

57894 – There should either be investment by the Council for better public transport or improvements to car parking and access.

58301 – Major issue is having a busy port in the city centre with limited rail access. A tram to the beach would be an attractive link. Public transport on George Street is hindered due to inconsiderate parking.

Public Transport

51198, 55418, 54480, 59036, 57233, 57816 - Better public transport would help to ease congestion on the roads. Suggestions made were: fares should be more

affordable, increased Park and Ride facilities, competition would bring down costs, Oyster cards, special rates and subsidies.

Motorised traffic and car parking

47157, 55418, 57894, 57709 - More good quality car parking is needed in the city centre. Suggestions made were: car parks in appropriate locations and appropriate opening times.

49188 - Car parking in the City Centre has not been mentioned as an issue.

58769 – The city centre would be better off without through traffic.

58769 – Car ownership is high due to poor public transport provision / value and planning policy. Main roads are not attractive, they should be modelled as streets. There is little to get people out of their cars.

Pedestrians / Pedestrianisation of Union Street

58397 – Pedestrianisation or filtered permeability and regeneration of the Denburn Valley could provide an opportunity to address transport issues. One of the main issues is high car usage – expensive bus tickets need to be addressed.

57975 – Support mechanism to see if designing streets can improve Union Street. Pedestrianisation needs to be considered along with parking, bus routes, pavement dimensions, noise, traffic speed, street furniture, pedestrian permeability and walkable neighbourhoods.

54499 - If pedestrianisation were to happen on Union Street not convinced a combination of pedestrians and buses will work.

57556 - Any proposed pedestrianisation of Union Street needs to be carefully considered regarding the effects on the surrounding areas.

55905 - No need for pedestrianisation of Union Street or Broad Street - infrastructure will not cope. No need to reroute traffic through the Castlegate. The existing route to the beach works.

57894 - Not convinced pedestrianisation of Union Street will improve vitality and will cause further congestion.

58601 – Union Street should not be pedestrianised as it will have a detrimental impact on the vitality of the retail offer on Union Street. Diverting buses away from Union Street will have a negative impact on shops and emissions and energy consumption through the extra distance travelled. There should be more buses to the beach. The former no. 6 bus and open top buses should be reintroduced.

57734 – Raised walkways should be encouraged.

57975 – Union Street needs to be improved. Pavements should be widened and traffic reduced with more pedestrian priority. Street furniture should be reduced and possible parking to the west end of Union Street.

Cycles

57816, 57556, 59036, 57233, 59695 - Cycling provision should be improved in the city centre. Suggestions to do so are: introduce bike hire, review of cycle lanes, a dedicated, cycle way and footpath linking Union Street with Torry and then linking to a route South of the City and further purpose built cycle lanes that segregate cyclists from traffic.

Retail Strategy

49567, 57233, 57280, 57734, 58123, 58301, 59036, 59699, 59703 – Support Option 2.

55905, 59189, 59236, 59404, 59436, 59758 – Agree that city centre should be main location for retail. In particular in the City Centre Business Zone in close proximity to Union Street within the north / south bookends.

59404, 59436 – Generally supportive of Option 2 although further investigation into the land identified is needed driven by the market.

48518, 57543 – Do not support Option 3.

57975 – Do not support any of the options.

59367 – Agree with Option 1.

59189 – Generally agree that land should be identified for retail development in the city centre. However, further investigation is needed which should be informed by the market and the proposed Vision and Masterplan. The Council need to be flexible to ensure the development opportunities are viable and deliverable.

59189 – If Option 2 was not pursued then there would be the potential of retail to locate out of centre impacting on its position as a regional centre.

59577 – The city centre approach should comply with the final Scottish Planning Policy.

Denburn / Woolmanhill

57543, 57734, 58601, 59367 – Opposed to the proposed retail development at Denburn / Woolmanhill. Some reasons for this is that it would detract from Union Street and there will be more competition between existing centres.

57001, 58601, 59236, 55905, 57734 – Woolmanhill would be better suited for other development. Residential, commercial, hotel and cultural uses were suggested.

49567, 58123 – Site identified at Denburn / Woolmanhill is remote from the existing city centre. If this were to be taken forward significant improvements in pedestrian links and careful consideration of car parking requirements would need to be given to ensure this site is accessed primarily by sustainable modes. A hop on / hop off bus was suggested.

55905, 57001 – There is poor transport infrastructure in the Denburn /Woolmanhill area.

58012 – It is important that Denburn / Woolmanhill remains an opportunity for mixed use development due to the many constraints, number of developers and the number of economically viable proposals are limited. Retail would be appropriate as part of a mixed use scheme. Identifying the site only for retail is unviable.

59695 – The Denburn / Woolmanhill site includes a large piece of open space that is not mentioned as an implication. If this site is allocated for retail the green space should be protected and enhanced.

57001 – Any future plans will have to be closely monitored to ensure that the extra traffic does not defeat the principle for the future plans for the Berryden Corridor.

57001 – The existing parking must be incorporated into any future plans for the site.

Aberdeen Market

55905, 58301, 59236 – Welcome the proposed redevelopment of the Market. This would improve access to The Green from Union Street and the redevelopment of the Market will help improve The Green.

55418 – Removing the market would impact on the retailers there and reduce choice for many.

57734 – There should just be internal improvements to the market. The boxy shape is acceptable in its current location.

St Nicholas House site

57734 – St Nicholas House has already been compromised by the multi-use detail released by the Council.

55418 – St Nicholas House development should provide some new retail floorspace.

55905 – Be aware that a large building on the site of the former St Nicholas House will overshadow Marischal College.

Upper / Basement Floors, 73-149 Union Street

57543 – Could the upper or basement floors of Union Street be used for retail? Could they instead be used for residential purposes?

59317 – Struggle to find tenants for 131-141 Union Street. If there is no retail demand on Union Street then another use such as residential should be considered. This should be highlighted in the Proposed Plan.

59404, 59436 - The BHS building could be suitable for leisure, residential and business above the retail.

George Street / Crooked Lane

57734 – Beware of developers wanting to make the George Street site a huge box and covered over.

59758 – George Street / Crooked Lane offers the best option for future retail expansion.

Other sites

57709 – Retail space should be maximised by clearing out the rear of the buildings in the middle of Union Street and making this a shopping centre. Could also explore the use under Union Street.

57975 – New retail should be directed to Union Street and Castlegate.

57734 – Agree that upper floors on Union Street should be used.

55418 – Union Square could be expanded – build on the open car park and relocate car parking to the upper levels.

57543 – Opposed to the extension of existing shopping centres.

57734 – Do not develop Union Terrace Gardens / Denburn Valley.

59436 – Recognise the potential for the Trinity Centre requiring redevelopment as part of wider improvements. Keen to discuss with the Council.

59703 – Union Square should be allocated as the primary retail opportunity site and the preferred location for retail floorspace growth in the city centre, with a recognised capacity of 25,000 sq. m. of additional retail floorspace.

58123 – Support revitalising Union Street through encouraging small retailers. Large scale pedestrianisation and fast, pollution free transport will help this. Planting will help air pollution and make the street more attractive.

General retail comments

54499, 55418, 57734, 59367 – Why do we need more shops? Struggle to occupy the existing units. Should concentrate on enhancing the existing retail areas.

51198, 57233, 57280, 59036 – There should be a covered pedestrian area from Union Square, over the section of Union Street between Bridge Street and Market Street, along Belmont Street and Back Wynd. An easy access from Guild Street should be constructed to encourage train use. High end and high street retailers should occupy the main area with independents, cafes and restaurants occupying the side streets. This then links to existing cultural facilities.

51198 – There are not enough independent shops and lots sell the same things. There should be less charity shops and betting shops in main shopping areas.

57001 – Before more retail is proposed, the west end of Union Street must be improved.

57543 – There is already a large amount of floorspace devoted to retail.

57543 – There should be a limit in Aberdeen as a whole on the total space devoted to retail.

57734 – Business rates should be reduced to get retailers in.

57734 – There should be a policy where retail storage is outwith the city centre and deliveries only take place in certain hours. Gives retailers more space to sell, the public get more space to use, traffic is reduced and there will be aesthetic benefits.

57975 – Support small convenience stores in the city centre.

58769 – Shopping centres break up the city centre. St Nicholas and Bon Accord have broken up George Street and Market Street.

59404, 59436 – Concerned about the allocation of particular sites and the level of new floorspace identified. Consideration must be given to the current situation regarding demand for so much floorspace.

59535 – The pressure to diversify retail units into leisure uses will continue. Enhanced diversity could help to make the centre a more attractive destination and may help to improve the vitality of areas like Union Street.

58123 – Shopping is very spread out and it is essential that all parts are accessible to shoppers. Suggest a hop on / hop off bus service.

59236 – There is a lack of parking which is a major disincentive for people to shop in the city centre. The creation of sufficient parking should be considered.

59577 – Transport Scotland would need to be consulted upon if retail was allocated in edge of centre locations as this may have an impact on the strategic road network.

59699 – A proactive approach to identifying retail sites should be adopted, led by the private sector and managed by the city centre strategy.

59703 – The growth targets for new retail floorspace in the city centre should be at least 35,000 sq. m. New retailers can be attracted to Aberdeen in the right location – Union Square.

59703 – Sites allocated in the MIR for retail development are inadequate. All sites have constraints and are unlikely to be suitable to accommodating significant retail. Union Square is a more deliverable site and Hammerson is committed to improving the existing shopping centre.

59758 – General support for the retail study regarding national trends but concerned about the impact of some of the findings on the city centre. Thought that the premise on sales and densities in the retail Study is too simplistic and concerned that growth projections are too bullish given that much of the report is based on projections. Higher sales densities are positive for the city centre generating higher profit and investment. Increasing the floorspace leads to dilution reducing profitability and discouraging investment. It must be questioned if floor space is expanded will this encourage new retailers or further displace existing retailers. The study fails to take into consideration qualitative issues – quality not quantity is what makes a top retail destination.

59758 – The retail offer in Aberdeen is strong but fragmented and lacks quality – particularly on Union Street. The recommendation to increase floorspace seems to have been arrived at in an arbitrary fashion.

59758 – Concerned about the lack of suitable sites in the city centre to accommodate the proposed level of retail. Concerned that this implies that if the city

centre sites are not deliverable out-of-centre locations should be considered.

59758 – Concerned over the proposed retail floorspace and its impact on the city centre vision. The expansion will have a negative impact on the investment in qualitative issues. If Union Street is improved at the same time as the major retail expansion this will dilute or negate the city centre improvements.

59798 – The scale of proposed new retail should be reviewed to ensure it does not impact on existing retail locations.

60338 – The potential flood risk noted for the proposed new retail sites are not likely to affect the principle of development. However, they may need to consider flood risk in more detail.

59404, 59436 – Support town centre first approach and welcome protection from out-of-centre development.

58769 – One or two storey developments waste land. It is better to build up e.g. department stores

Union Street Frontages

48626, 57556, 57894, 59036, 59189, 59236, 59703, 57280, 57709, 57734, 57975, 59404, 59436 – Support Option 2. Reasons for support are that there will be an increase in footfall, enhance the viability of independent retailers, the retail focus has moved from east / west to north / south. Suggestions for uses that should be encouraged on Union Street are: offices, restaurants, residential, retail and retail services.

59036, 57233, 57280 – The mix of uses should not diminish the character of the west end and does not lead to an overabundance of one use.

58397, 57975 – A mix of uses in the west end of Union Street is inevitable due to the changes in customer behaviour.

57734, 57975, 58123 – Agree that upper levels should be used. Suggestion for uses in upper floors are residential and offices.

57556 - Option 2 is already underway.

59367 – Agree with Option 1 but both Options 2 and 3 have merit.

48518 – Don't agree with any of the options.

55418 – Not clear what other uses could be encouraged on Union Street – need more information before commenting.

55905 – Too many fast food outlets on Union Street.

57556 - An effort should be made to attract retail so long as it is a public space and the whole building is in use rather than tatty temporary shops and dilapidated upper storeys.

57556 – East end of Union Street is likely to attract better quality retail due to proximity to Broad Street redevelopment and Union Square.

59189 – Uses should be appropriate for the city centre and add a positive aspect to the area.

57543 – Shop fronts are not attractive.

57975 – Union Street needs to be improved. Pavements should be widened and traffic reduced with more pedestrian priority. Street furniture should be reduced and possible parking to the west end of Union Street.

57709 – There should be a policy to limit betting shops.

West End Shops and Cafes

55418, 57894, 58301, 57233, 57280, 57709, 57734 – Option 2 is favoured.

55418, 57894 - Argument is not clear / would like to see how it works in practice.

48518 – Don't agree with any of the options.
 59236 – Option 2 or 3 are preferred. Best way to protect is making the business more economically viable. The best ways to do this are: improve access through easier parking, encourage more offices to the area.
 48626 – Protect the independence of the West End shops.
 57894 – New office development to the west will have a positive effect on the West End. This should be considered in the new policy.
 57894 – Review of the impact of parking availability and charges on the west end shops is needed. Thought current arrangements are having a negative impact on business.
 58123 – To revitalise west end cheaper and safer parking is needed. Shops and cafes would benefit from pedestrianisation and hop on / hop off transport along Union Street.
 58301 – The policy footprint should be extended from Great Western Road / Holburn Street to Bon Accord Street / Union Street.
 58769 – Why just the west end?
 59699 – Support a vibrant west end area. Policy should encourage office use. Support Option 2 with additional requirement to enhance small scale office provision.
 57280 – The mix of uses should not diminish the character of the west end and does not lead to an overabundance of one use.
 57734 - Must provide easy transport to the west end and drop business rates.
 57975 – Additional protection is not required. The area proposed on the map is not relevant.

Summary of the responses by planning authority

Vision and Masterplan

48518, 49471, 51198, 54499, 55418, 55905, 57233, 57280, 57482, 57581, 57233, 57280, 57709, 57712, 57734, 57894, 57975, 58123, 58301, 58397, 58769, 59404, 59436, 59535, 59699, 59703, 59758, 59798 - Work on the City Centre Vision and Masterplan has begun since a successful multi-disciplinary team was chosen as the preferred bidder. The Vision and Masterplan will be led by the Council along with the team chosen by the City Centre Regeneration Board. The Vision and Masterplan will take into consideration the five key themes identified in the brief: Urban Design, Cultural Vision, Union Street, North South Access and Links to the Sea. As well as addressing the five themes above, the Vision and Masterplan will also work further on the work undertaken by the Council on a Sustainable Urban Mobility Plan (SUMP) (please see section below on SUMP). The document will also detail what uses we should be encouraging in the city centre and how we can make best use of our open space. A Tall and / or Bulky Buildings policy is being drafted as part of the Local development Plan and the detail of this policy will be taken into consideration through the Vision and Masterplan. It is agreed that the economy in Aberdeen is important and this will be taken into consideration when drafting the Vision and Masterplan – the document will show how development is going to take place rather than only detail aspirations. Once the Vision and Masterplan has been completed it is proposed to be adopted as Supplementary Guidance to the Aberdeen Local Development Plan. It is encouraged that those with a vested interest in the City Centre engage with the masterplanning process.
 50066, 57233, 57280, 57658, 58123 - A planning application was received in May 2014 for the development of Marischal Square. The mixed use development and the

pedestrianisation of Broad Street proposed on this site will be taken into consideration through the City Centre Vision and Masterplan. Marischal Square will be identified as an opportunity site.

58123, 58397 - Union Terrace Gardens will remain designated as Urban Green Space in the Proposed Aberdeen Local Development Plan. Issues regarding level changes and accessibility around the Gardens will be taken into consideration through the Vision and Masterplan.

59699 - It is not thought appropriate to implement a specific policy for the North Dee area. The current Specialist Employment Area designation is thought to be appropriate. This provides opportunities for high end office uses to locate in the city centre where there is high demand for such uses.

City Centre Boundary

49471, 51198, 54751, 55418, 57581, 57709, 57734, 57816, 57894, 57975, 58301, 58397, 59367, 59404, 59436, 59699, 59703 - It is agreed that the city centre boundary should be reduced to provide a better focus for the City Centre Vision and Masterplan. It is proposed that the residential area to the north of the city centre boundary, residential areas to the south of the city centre and the north harbour area should be removed from the boundary. The revised boundary will be shown on the Proposals Map for the Proposed Aberdeen Local Development Plan.

57894, 58397 - The City Centre Business Zone will now be called 'Retail Core' and this area will be reduced to take in the area from John Lewis to the north, Castlegate to the east, Union square to the south and Bon Accord Street to the west. This reflects where major retail development should take place in Aberdeen City Centre.

49567 - It is thought that changing the boundary of the City Centre will have no impact on car parking regulations.

59699 – The primary retail area is already defined in the Local Development Plan under the City Centre Business Zone. It is not thought appropriate to designate certain areas in the city centre for business development (other than the North Dee area as discussed above) as commercial development is something we wish to encourage throughout the city centre. However, the City Centre Vision and Masterplan will take into consideration which uses we should promote in the city centre and where.

Sustainable Urban Mobility Plan (SUMP) and Transport

47157, 49188, 49471, 49567, 51198, 54480, 55418, 56528, 57233, 57280, 57556, 57581, 57709, 57734, 57816, 57894, 57816, 57975, 58123, 58301, 58397, 58769, 59036, 59236, 59695, 59699, 57894 - Work will continue on developing the Sustainable Urban Mobility Plan (SUMP) as part of the City Centre Vision and Masterplan. The SUMP will look at ways of improving access to, and movement within, the City Centre by all modes of transport, with a particular emphasis on facilitating movement by sustainable modes, as well as measures to reduce emissions and improve air quality. Changes likely to be identified in the SUMP include: increased priority for pedestrians and cyclists; improved pedestrian links between key destinations; more and better cycle facilities; improved access for public transport; reducing traffic and congestion in the City Centre by ensuring non-essential traffic is encouraged onto other routes and visitors guided to the most appropriate car parks; and a review of parking in the City Centre. Once the Vision and Masterplan has been completed it is proposed to be adopted as Supplementary Guidance to the Aberdeen Local Development Plan.

54499, 55905, 57556, 57894, 57975, 58397, 58601 – Aberdeen City Council is committed to the pedestrianisation of Union Street, between Market Street and Bridge Street, following implementation of the AWPR. A number of road improvement schemes have been implemented, or will be implemented between now and 2018, such as the Berryden Corridor and South College Street improvements, to support pedestrianisation and to minimise its transportation impact. 51198, 55418, 54480, 57233, 57734, 57816, 58397, 58601, 59036 – all scheduled bus services in the City are run commercially with bus operators responsible for setting route choices and pricing policy. The Council does however, as part of the Local Authority Bus Operator Forum (LABOF), work with operators and other partners on a range of projects to improve the public transport experience for members of the travelling public, through, for example, measures to improve punctuality and reliability of services, the piloting of new ticket types, and improving public transport infrastructure, including new Park and Choose sites.

Retail Strategy

48518, 49567, 51198, 54499, 55418, 55905, 57001, 57233, 57280, 57543, 57734, 57975, 58123, 58301, 58769, 59036, 59189, 59236, 59367, 59404, 59436, 59535, 59577, 59699, 59703, 59758 - Aberdeen City Council, Aberdeenshire Council and the Aberdeen City and Shire Strategic Development Planning Authority commissioned a retail study for the North East region last year. The conclusions of the study show there is potential for developing an additional 30,000 to 35,000 sq. m. floorspace in the City Centre by 2022. This potential is driven by a combination of expenditure growth per capita and large population increases within the catchment area served by the City Centre. It is important that retail opportunities are identified in the city centre as this will reduce pressures to develop out of centre sites which could compete with, and potentially damage to role of the city centre as the regional retail destination. Additional floorspace will also help to prevent expenditure leakage outwith Aberdeen and to other cities in Scotland. Aberdeen City Centre has a low vacancy level compared to other cities across the country but most of these units are not seen as being suitable for most modern retailers.

Land for retail should be allocated in the Proposed Aberdeen Local Development Plan. Crooked Lane / George Street, Aberdeen Market, Upper / Basement Floors 73-149 Union Street and the former St Nicholas House site could accommodate some of this future retail growth. It is also thought that the existing retail stock at the existing main shopping centres could be expanded and / or improved – which will be addressed through the City Centre Vision and Masterplan to ensure flexibility and deliverability. This strategy will focus major retail in the existing City Centre Business Zone.

49567, 55905, 57001, 57543, 57734, 58012, 58123, 58601, 59236, 59367, 60338 – There is little appetite for designating Denburn / Woolmanhill for retail only. The owners have also expressed a reluctance to do so and this would therefore put a question-mark over the viability of such a proposal. We therefore propose not to allocate it for retail development. It will remain zoned as Mixed Use and will remain designated as an Opportunity Site for a mixed use development in which retail could be part of the development.

59695 – The Planning Brief for Denburn / Woolmanhill takes into consideration the Urban Green Space on site. Therefore any redevelopment of the site would need to take this into consideration.

51198 – The Council's powers to protect and promote specialist and independent

stops and cafes are limited and we cannot influence the occupier of individual premises or the type of goods and services they provide.

57734 – The Planning Department have no powers to influence business rates.

59404, 59436 – The Council is committed to supporting the town centre first approach and continues to protect established centres from out-of-centre retail development.

Union Street Frontages

48518, 48626, 55418, 57233, 57280, 57556, 57894, 58367, 58397, 59036, 59189, 59236, 59367, 59703, 57709, 57734, 57975, 59404, 59436, - It is recognised that there needs to be more flexibility regarding Union Street Frontages. A mix of uses (such as retail, commercial, residential etc.) will be encouraged to the west of Union Street when the change of use maintains public space on the ground floor and / or puts the whole building into use. Details of the flexibility will be published in the Union Street Frontages Supplementary Guidance along with the Proposed Plan.

57734, 57975, 58123 – The Council is committed to making better use of the upper floors on Union Street and have identified parts where this should be possible.

55905, 57709 – The Council's powers to refuse fast food takeaways are limited as we cannot influence the occupier of individual premises or the type of goods and services they provide.

57543 – Union Street Frontages assesses the use within the unit rather than how the shop front looks. The Local Development Plan has SG that gives guidance on suitable shopfront design.

West End Shops and Cafes

55418, 57894, 58301, 57233, 57280, 57709, 57734, 57894, 57975, 58769, 59236, 59699 – West End Shops and Cafes Policy will be put into place in the Proposed Local Development Plan. Due to the City Centre Business Zone being reduced it is thought necessary to protect the existing shops and services towards the West End of the city centre. The same protection will be afforded but specialist shops, cafes and offices will be encouraged and major retail will be encouraged in the Retail Core designated in the City Centre. It is agreed that more offices to the west end of the city centre will help make businesses more viable.

48626 – The Council's powers to protect and promote specialist and independent stops and cafes are limited and we cannot influence the occupier of individual premises or the type of goods and services they provide.

57734 – The Planning Department have no powers to influence business rates.

58301 – Do not agree that a policy footprint of Great Western Road / Holburn Street to Bon Accord Street / Union Street is appropriate for this policy as we realise that this area needs to be flexible to encourage a diverse range of uses.

Planning authority action/recommendation for Proposed Plan

Prepare a City Centre Masterplan and Delivery Programme which will incorporate a Sustainable Urban Mobility Plan for adoption as Supplementary Guidance.

Identify opportunity sites as George Street/Crooked Lane, Marischal Square, Aberdeen Market, Upper / Basement Floors 73-149 Union Street as opportunity sites.

Adopt a policy supporting West End Shops and Cafes

Amend guidance on Union Street Frontages to allow greater flexibility of uses

Reduce the City Centre boundary

Retain the current LDP proposals for Denburn and Woolmanhill and not promote the site for retail only.

Issue 9	Climate Change
Body or person(s) submitting a representation raising the issue (reference no.)	
49471: Bucksburn Community Council 50066: Kenneth Eddie 54499: Les Chalmers 55418: Cults, Bielside and Milltimber Community Council 55905: Valerie Fyfe 56278: Shell UK Ltd 56528: Pam Butler 57160: Aberdeen Greenspace Trust 57233: John Boylan 57280: Christine Boylan 57543: Patricia Clarke 57556: Ferryhill and Ruthrieston Community Council 57612: Richard Johnson 57725: Blair Melville 57734: Andrew Jones	57975: Aberdeen Civic Society 57984: SITA UK 58123: Kingswells Community Council 58397: David Ballock 58714: Dandara Limited 58769: Clive Kempe 59036: Craigiebuckler and Seafield Community Council 59236: Duncan Massey 59452: Scotia Homes Ltd 59535: Scottish Property Federation 59672: Stewart Milne Homes 59695: Scottish Natural Heritage 59697: Scottish Water 60338: SEPA 59452: Scotia Homes Ltd
Section of the MIR to which the issue relates:	Main Issue 10, 11, 12 & 13. Section 10.1 – 10.9
Planning authority summary of the comments	
<p>Nigg Solar Farm 49471, 57233, 57280 – Support for the proposed Nigg Solar Farm and 57734 – support but only if it is commercially viable. 59695 – Suggestion that the development would require an assessment of the possible environmental impacts.</p> <p>Biomass 50066 – Support for Biomass heat generation, particularly to reduce costs for the elderly.</p> <p>Energy Mapping and District Heating 51198 – Support for Option 3 – Alternative Option, production of a heat map and requiring developers to connect to a district heating scheme.</p>	

55418, 57984, 58123, 59036 – Support for Option 2 – Preferred Option.
57725 – Support but only on the grounds that connection to a district heating system is optional and 57734 support but not just for major developments.
57233, 57280, 59452, 59452 – Support for Option 1 – Current Approach.
55905 – Support for its use on small developments.
57975 – Concern that energy used by transportation is not being considered.

Water Saving

51198, 57734 – Support for Option 3, Silver for Domestic buildings and BREEAM Level 4 for non-domestic.
57725, 59236, 59452 – Support for Option 1, 55418 – with Option 3 as an alternative.
55905, 57233, 57280, 58123, 59036, 59695, 59697 – Support for Option 2.
59672 – General opposition to the planning system setting targets for water efficiency.

Low and Zero Carbon Buildings

55418, 59695 – Support for Option 1.
57233, 57280, 57734 – Support for Option 2.
57556, 58123 – Support for Option 3.
55905 – Opposition to all the options as none of the options are realistic.
57725, 59452, 59672 – Opposition to the inclusion of a mandatory level of LZCGT in new buildings this is an issue for Building Regulations.
58714, 59452 – A Fabric First approach should be taken rather than a requirement to use LZCGT.
58769 – Support for Carbon Neutrality in buildings.
59236 – Support for low energy buildings but not through the use of LZCGT none of the options are supported.
59535 – Support for achieving energy efficiency through allowable solutions.

Solar Panels

57612 – Suggestion that the roofs of all new houses should be designed and orientated to receive solar panels.

Wind Energy Spatial Framework & Wind Turbines

56278 – Guidance for assessing wind turbines should include guidance prepared by the UK Onshore Pipeline Operator's Association regarding the siting of wind turbines close to high pressure pipelines.
58123 – Turbine Size should be determined in relation to the landscape.
59697 – Scottish water should be consulted on all applications.
59695 – SSSI's have not been included in the constraints map.
59695 – Loch of Skene SPA, Fowlsheugh SPA and Ythan Estuary, Sands of Forvie and Meikle Loch SPA could be noted given the relative proximity to the plan area and the mobility of the species for which these sites have been established to protect.
59695 – It is noted that there is material on the SNH website which could be referenced.

Strategic Infrastructure

56528 – Policy required to allow for the repair / protection of strategic infrastructure such as the railway.

Flood Alleviation

57160 – Greenspaces should be used as natural flood storage areas. Projects such as East Tullos Burn Project should be used as exemplars.

Urban Greening and Urban Fringe.

Support for green planting (57734,58123).

Concern that the level of hard paving and landscaping is caused by the need for car parking (57543)

Ground Source Heating

57612 – Suggestion that new developments are required to install the underground pipework for Ground Source Heat Pumps at the construction stage to future proof developments.

Summary of the responses by planning authority

Nigg Solar Farm

49471, 57233, 57280, 57734– Support for the proposed Nigg Solar Farm is noted and welcomed.

59695 – Suggestion to assess environmental impacts is noted. This is likely to be a requirement of any planning application.

Biomass

50066 – Support for Biomass heat generation is noted and welcomed.

Energy Mapping and District Heating

51198 – Support for Option 3 – Alternative Option. While the support for this option is noted it may not always be practical or indeed possible to connect every development to a heat network.

55418, 57725, 57734, 57984, 58123, 59036 – Support for Option 2 – Preferred Option. Support and suggestions re this option are noted and welcomed.

57233, 57280, 59452, 59452 – Support for Option 1 – Current Approach is noted.

55905 – While the suggestion that this might be appropriate on small developments is noted it may not always be practical or indeed possible to connect smaller development to a heat network.

57975 – Concern over energy use by transportation is noted however this is not directly related to heat mapping.

Water Saving

51198, 57734 – Support for Option 3, is noted, however the Council does not feel that this target is ambitious enough considering the level of emphasis placed on this issue in the Strategic Development Plan (SDP).

57725, 59236, 59452, 55418– Support for Option 1 is noted however this would not satisfy the requirement of the SDP. Similarly the suggestion of Option 3 as an alternative backstop position while representing a significant improvement is not felt by the Council as ambitious enough considering the level of emphasis placed on this issue in the SDP.

55905, 57233, 57280, 58123, 59036, 59695, 59697 – Support for Option 2 is noted and welcomed.

59672 – while opposition to the planning system including water saving requirement is noted, the SDP is clear that the pressure being placed on water abstraction from the River Dee will have a significant impact on the long term development in Aberdeen if left unchecked.

Low and Zero Carbon Buildings

55418, 59695 – Support for Option 1 – Preferred Option, is noted and welcomed. The revised targets while still ambitious are revised down to reflect changes in the target dates of the SDP. While only recommendations, the recent interim report from the Sullivan Panel also suggested that the targets should be reassessed bearing in mind the recent challenges the construction industry has faced. The revised targets set by the Council are also consistent with the targets being set by Aberdeenshire Council, again reflecting the view from the SDP that joint targets should be set across the two local authority areas. This provides greater certainty and consistency for developers in the North East.

57233, 57280, 57734 – While support for Option 2, lower targets of 15% LZCGT in 2016 rising to 20% in 2020 is noted, it is not felt that this target is ambitious enough and would not be in line with the targets suggested by Aberdeenshire Council. The North East is expected to build a significant proportion of the houses to be constructed across Scotland over the next plan period, and due to its strong economy we are of the opinion that the North East must play a leading role in tackling climate change.

57556, 58123 – Similarly while support for Option 3 is noted, we feel that this target would be too onerous on the construction industry during this period of recovery. It would also be in excess of the targets being set by Aberdeenshire Council.

57725, 59452, 59672, 55905 – Opposition to the inclusion of any mandatory targets either on the grounds that such targets are unrealistic or that this is a Building Regulations issue are noted. The Climate Change (Scotland) Act 2009 is clear in its direction that all Local Development Plans (LDP's) "must include policies...designed so as to ensure that all new buildings avoid a specified and rising proportion of the projected greenhouse gas emissions...through the installation and operation of (LZCGT's)". It is accepted that the recent interim report from the Sullivan Panel has suggested some alterations to the approach planning authorities should take. At present these recommendations have not influenced any changes in The Climate Change (Scotland) Act 2009 and therefore cannot influence the LDP process to the extent of removing such targets. SPP does however state in (Par 154) that the planning system should "help to reduce emissions and energy use in new buildings..... by enabling development at appropriate locations that contributes to: Energy efficiency, Heat recovery....". In light of this the Supplementary Guidance will be updated to reflect this.

58714, 59452, 59236 – Support for a fabric first approach is noted. While it is accepted that a Fabric First approach is the preferred option of the development industry and was suggested in the recent Sullivan Panel interim report it does not alter the requirement on local authorities to include a LZCGT's requirement in LDP polices as set out in The Climate Change (Scotland) Act 2009. SPP does place more emphasis on energy efficiency as stated in (Par 154), this has been considered in the current Supplementary Guidance (SG) and will be carried forward into the new SG.

58769 – Support for Carbon Neutrality in buildings is noted and welcomed. It is the aim of the Council to achieve Carbon Neutrality by 2020 in line with the SDP.

59535 – Support for “Allowable Solutions” is noted. The Sullivan Report raised the concept of “Allowable Solutions” as an approach to achieving Net Zero Carbon for some domestic and commercial buildings where it may not be possible to attain this standard on site. In such case an “Allowable Solutions” could be used to offset the short fall. It should be noted however that the Sullivan Report does not identify or give guidance on such solutions but simply identifies the concept as something that “should be investigated and developed”. While changes in SPP certainly seem to place more emphasis on Energy Efficiency, (Par 154) clearly still states that the planning system should “help to reduce emissions and energy use in new buildings..... by enabling development at appropriate locations that contributes to: Electricity and heat from renewable sources”. There has also been no change to The Climate Change (Scotland) Act. Should either of these documents adopt a Fabric First approach, then we will clearly support it, however at this stage the concept is not developed or supported in legislation.

Solar Panels

57612 – While the suggestion that the roofs of all new houses should be designed and orientated to receive solar panels is noted, this must be balanced with the need to create an attractive urban environment. While guidance on passive solar design is proposed in the new Supplementary Guidance on Resources for New Development, some developments including those in or around the existing built environment may not be able to accommodate suitable orientations on all occasions.

Wind Energy Spatial Framework & Wind Turbines

56278 – The suggestion that guidance on on-shore wind turbines should include guidance prepared by the UK Onshore Pipeline Operator's Association is noted.

58123 – Issues around turbine size are noted and while the size of a turbine is largely determined by the applicant, its appropriateness in relation to the landscape is determined through the planning process and inappropriate turbines will be refused.

59697 – The request that Scottish Water should be notified of applications is noted.

59695 – The comment that the SSSI's have been omitted from the constraints map is noted. This will be amended.

59695 – The suggestion of including a number of Special Protection Areas' outside the jurisdictional boundary of the City Council will be considered however it is noted that a number of these are significantly removed from the city.

59695 – The availability of material on the SNH website is noted.

Strategic Infrastructure

56528 – Depending on the work to be undertaken and its location, the repair of strategic infrastructure such as trainlines may not require planning consent.

Infrastructure providers or operators have the opportunity to request the safeguarding of land through the Local Development Plan process. Policy T1 – Land for Transport, currently has a number of routes safeguarded.

Flood Alleviation

57160 – Suggestion that greenspaces should be used for flood storage is noted.

Currently suds ponds are often incorporated into green spaces particularly on larger developments.

Urban Greening and Urban Fringe

57734, 58123 – The support for green planting is noted.

57543 – While the pressure on parking is certainly a factor in the loss of gardens and landscaping to hard paving, the loss of these green spaces has a detrimental affect on many aspects of the environment. These spaces aid to slow down surface water run off and maintain biodiversity across the city.

Ground Source Heating

57612 – The suggestion that new developments should install pipework for Ground Source Heat Pumps at the construction stage to future proof developments is noted. While the cost of installing this infrastructure at the construction phase would be less it would never the less increase the overall cost of housing. It should also be noted that many sites would not be large enough to accommodate horizontal pipework and vertically bored pipework is significantly more expensive.

Planning authority action/recommendation for Proposed Plan

The proposed Nigg Solar Farm will be identified in the plan.

Prepare Supplementary Guidance on Heat Mapping/Heat Networks.

Include requirements for water saving technologies in Supplementary Guidance.

Update the current Supplementary Guidance on Low and Zero Carbon Generating Technologies to reflect SPP's requirement for Energy Efficiency in new developments.

Supplementary Guidance on Wind Turbine developments will be updated as will the Onshore Spatial Framework to address changes in SPP.

Issue 10	Existing Allocations and Other Issues in Deeside	
Body or person(s) submitting a representation raising the issue (reference no.)		
56278 Shell UK Ltd. 57209 Culter Community Council 58648 Richard MacDonald 59034, 59115 Bancon Developments Ltd 59081 Murtle Den Residents Association	59152 Leiths Scotland Ltd. 59812 Countesswells Consortium 59910 Camphill Communities 59926 Barratt North Scotland 59673 Scotia Homes	
Section of the MIR to which the issue relates:		
Planning authority summary of the comments		
General comments on land supply 58648, 59034, 59115, 59812, 59926: There is an over-reliance on large sites in the LDP which face complex infrastructure requirements and will only be delivered only		

long-term timescales. Smaller sites are required to meet short-term housing need at these can be met through allocating further sites in Deeside.

59673: There is an over-reliance on brownfield sites.

General comments regarding Peterculter

57203: The development of the AWPR provides the opportunity for a strategic re-think of how Culter and its environs may be developed in future years. There is an urgent need for smaller family homes in Culter, causing difficulties for young couples and families wanting to buy a home in the area. These homes are needed to make the village more sustainable, and should be planned in a co-ordinated way rather than through ad-hoc developments. A review of infrastructure needs to be carried out, especially in relation to drainage, sewerage and flooding. The strip of land to the west of the AWPR, currently within the Culter, Bielside and Milltimber CC area should be designated as part of Culter CC.

OP62 Oldfold

59910: Further development in Phase 2 of the Oldfold allocation raises a number of concerns for the Camphill Community estate. It could increase flood risk in the Murtle Burn and place pressure on existing sewerage systems, potentially leading to intrusive infrastructure works on the estate. Any new junctions on the A93 should not make conditions for pedestrians worse.

59081: The Green Belt boundary of the Oldfold allocation is flawed. A change is proposed, that would allow the construction of 3 further houses on Murtle Den Road. The GB boundary here is fragmented and devoid of strong visual or physical landscape features and should be amended.

OP58 Countesswells

59812: The employment land requirement on OP58 Countesswells (currently 10ha) should be reduced. There is already a very generous supply of employment land in Aberdeen City and Shire. Low-density, Class 5 and 6 uses would be undesirable for a new residential community, and a reduction in the requirement would promote smaller-scale, high-density town centre employment developments which will be of greater benefit to the community as a whole.

OP56 North Lasts Quarry

59152: Support the continued identification of the quarry at North Lasts, as a site safeguarded for mineral extraction. It provides an essential service supplying the construction industry in the North East.

58693: The BP forties pipeline is coterminous with the boundary of this existing allocation. Recommend that reference is made to the pipeline if the allocation is carried forward.

Pipelines

56278: Notes the presence of pipelines in close proximity to many of the preferred and alternative options. Any allocations must highlight the presence of the pipeline and stress the need for new development to be undertaken in accordance with Health & Safety Executive PADHI+ Guidelines.

Summary of the responses by planning authority

General comments on land supply

58648, 59034, 59115, 59812, 59926: Large, strategic-scale housing sites form an important part of the LDPs ambition to create sustainable, mixed communities (see Schedule 4 on Main Issue 1: Greenfield Housing and Employment Allocations). The majority of these sites are subject to approved Development Frameworks and Masterplans. More detailed comments on housing land supply are given in the Schedule 4 on Greenfield Housing.

59673: Brownfield sites form just 16% of Aberdeen's established housing land supply, compared to greenfield sites which make up 84%. Therefore, we do not agree that there is an over-reliance of brownfield sites to meet Aberdeen's housing needs.

General comments regarding Peterculter

57203: Comments noted.

Compared to most suburbs and settlements around Aberdeen, Peterculter has a varied range of houses and flats but it is acknowledged that younger people and families can have difficulties gaining access to these in the current market. We propose to allocate a further housing site at Malcolm Road. This is of a scale that it will be required to provide a mix of housing sizes as well as affordable housing. In addition there are other existing housing sites in Peterculter which have still to be developed as well as generous housing allocations for Aberdeen as a whole. These will provide further choice, help to address affordability and may even help to free up some of the existing housing stock as people and families either up or down size within Aberdeen.

Community Council boundary changes are not a matter for planning, although they can be altered by the Council. Suggest contacting the Community Council Liaison Officer to discuss further.

OP62 Oldfold

59910: Phase 2 of Oldfold will be a continuation of development currently underway for Phase 1. Issues regarding flood risk, impact on infrastructure and access arrangements have been addressed through the Development Framework and Masterplan for the whole site and will be subject to further scrutiny through detailed planning applications.

59081: The boundary at Oldfold is considered robust and was established following the Examination into the 2012 Local Development Plan.

OP58 Countesswells

59812: We do not propose to change the employment land allocation for Countesswells which was established in the 2012 LDP. It supports the requirement for sustainable mixed use communities established by the Strategic Development Plan.

OP56 North Lasts Quarry

59152, 58693: OP56 will be carried forward into the Proposed Plan, safeguarded for mineral extraction. The existing reference to the pipeline will be carried forward in the entry for OP56 in the Opportunity Sites Schedule.

Pipelines

56278: Pipelines are shown on the LDP Constraints Map, with their consultation zones. Existing policy BI5 states that the Council will take full account of advice from

the HSE on planning applications within consultation zones. Both of these elements will be carried forward into the Proposed Plan.

Planning authority action/recommendation for Proposed Plan

Carry forward existing OP56 North Lasts Quarry allocation, retaining the reference to the pipeline.

Carry forward existing LDP Constraints map and Policy BI5, retaining references to pipelines and consultation with HSE.

Issue 11	Design (including City Centre Design Questions)	
Body or person(s) submitting a representation raising the issue (reference no.)		
53467: Mr Ronald Leith 57233: John Boylan 57734: Andrew Jones 57816: Mr Abdul Latif 58012: NHS Grampian 58123: Kingswells Community Council 58301: Derek J Selbie 58397: Mr David Ballock 58769: Mr Clive Kempe 59036: Craigiebuckler & Seafield Community Council 59189: John Lewis PLC 59236: Mr Duncan Massey 59367: Mr Neil Rothnie 59404: Rockspring Hanover Property Unit Trust 59436: Rockspring UK Value Fund 59535: Scottish Property Federation 59699: Scottish Enterprise 48518: Aberdeen Trades Union/Council 49471: Bucksburn Community Council 54480: Mrs Kirsten Morgan 55418: Cults, Bielside & Milltimber Community Council	55905: Mrs Valerie Fyfe 27280: Mrs Christine Boylan 57543: Mrs Patricia Clarke 57725: Mr Blair Melville 57975: Aberdeen Civic Society 58313: Old Aberdeen Heritage Society 58601: Ms H Leith 59452: Scotia Homes Ltd 59577: Scottish Government 59672: Stewart Milne Homes 59695: Scottish Natural Heritage 51198: Middlefield Community Project 54804: Mr Bill Stalker 56528: Ms Pam Butler 57556: Ferryhill & Ruthrieston Community Council 57709: Ms Marie Boulton 57975: Aberdeen Civic Society 49471: Bucksburn Community Council 58313: Old Aberdeen Heritage Society	
Section of the MIR to which the issue relates:	Section 3.4, 3.5, 3.6, 3.7 and Section 8. Design, Placemaking and the Designated Built Environment	
Planning authority summary of the comments		
Q2a CC Design quality		

57816; 59236; 59404; 59436; 58123; 58397; 49471; 48518; 49471; 51198; 54480; 55418; 57975 : support
59036; 57280; 51198; Support, yet must retain the district nature of Aberdeen and the Granite Architecture/ complement the existing buildings
59189: support, yet if too prescriptive or if impacts on viability it may become a deterrent to investors.
59699: strict design policies may restrict development.

Q2b How to achieve this

58397: demolish Trinity Centre, blocks access to the Green and an unattractive building. Policy and good street furniture design will enhance design.
59036; 57280: reject retrograde 1960s architecture
59367: a separate city centre design policy is not needed
49471: City Centre Masterplan is required and development will follow this
51198: more input from professionals
55418: ensure what is approved is built
57709: location and heritage should be taken into consideration
57975: ensure new development is proportionate and does not represent over-development

Q17 Better Design Quality

58123; 48518; 57975 ; 59036; 59236; 59452; 58769; 54480: support
58769; 59695: needs to apply to the whole city

Q17b How to achieve this

Context

58769: better use of land space needed- higher density buildings with quality open spaces in all designs. Don't let Aberdeen become a granite parody of itself
49713: assessment should include wider aspects, including natural development.
57734: There needs to be a city wide strategy on design which also has strong focus on amenity
58123: visually appealing should be added to the list of successful places
58397: the historic environment should not be interpreted as a restriction on development.
59695: design matters should include climate change and sustainability, place making should include green infrastructure

Methodology

55418: standards should be clearly available
57725: An agreed methodology for assessing quality has to be provided.
59672; 57725: national approach needs to be taken with an agreed methodology

Process and procedures

54480: have concerns about the political process at committee and delegated powers of conservation section
55905: suggestions for the city centre by the people ignored
57280; 57233: There needs to be organised liaison with communities before designs are submitted.
58123; 59036: liaison with local people redesign/local knowledge needs to be listened to

59236: can be subjective
57280; 57975; 58123; refused permission that does not meet our standards.
59367: do not allow design to be watered down after consent has been granted
57734: Design, placemaking and built environment is being separated off from the rest of the policies and then it can more easily be ignored to keep developers and the voting public happy
57975: training of officers on design
58123: if staff are under pressure, hire more staff
58397: Historic trails such as leafing the Green should be encouraged

Q3: Contemporary Architecture

54480: Support
59367: Support, should draw on examples in other cities
57233; 59036; 59236, 59535; 57280; 58397: Welcome contemporary design that accentuates the existing.
48518: Disagree, should not be encouraged in the City Centre
57233; 59036; 57280; 57816; 55418: World Wide design competitions should be held.
57734: The contemporary clashes with the classic and will become out of date, and the materials will fail.
58397: Six qualities of successful places good starting point, more prescriptive planning tools required - height restriction, envelope limitation and requirements for certain materials
58769: allow contemporary design not in the vernacular
57709: location also important. Go beyond glass boxes
57975: do not remove granite buildings. Property owners should be given incentives to enhance and conserve existing stock. Vacant sites can be used for contemporary building.

Q4: Tall/bulky buildings

54480; 58123; 58769; 59236; 59577; 59577: Support
56528: Concern policy may restrict development
57975: Bulky buildings should not be supported

A - appropriate locations

57233; 59036; 57280: outwith the City Centre if they sit well with existing landscape and are visually attractive.
58123: A high rise area, separate to Union Street, and developed in a cluster, if attractive and imaginative could be acceptable. North Dee or West End of Union Street could be possibilities.
59236: These buildings should not be excluded from any City Centre location, west end of Union Street, area between Union Street and Skene Street, Palmerston and Denburn are particularly suitable
57556: North Dee, Riverside Drive, Railway
57709: Tall interesting buildings in the City Centre, bulky buildings in business and industrial land
49471: Bulky building should be in industrial estates, and visual impact should be minimal
48518: should be more in the City Centre
58769: If used as offices these could release housing stock currently used as offices

space.

B - inappropriate locations

57233; 59036; 57280: in the city centre

54804: Surrounding Marischal

57556: where out of keeping, where light and amenity will be diminished

57556: Excessive height in the City Centre

C – assessment criteria

57233; 59036; 57280: Visibility of historic buildings

57816; 56528: context of its merit.

58012: should not be restricted to a particular locations, materials, context, use of building , economic rational

51198; 55418: context, impact on light, access, proximity to public transport, landscaping.

56528: design quality, local character, identity, views, vistas and placemaking

57709: Location and impact

57975: context, density, height, materials and use

58769: located close to public transport hubs and supermarkets, shadows and views

58123: Greater variety of skyline shapes and materials needed

57543: Vistas

57734: Development should not be about trying to maximise the height of the building. Materials should match the surroundings. Heights should vary, false chimney pots and castellated upper levels can be asked for. Should be single use.

59577: SG set out areas where such buildings could be located or a set of principles on their location e.g. preservation of important vistas

49713: do not support skyscrapers for housing

5a: Streetscape manual

57233; 59036; 57280; 58313; 55418, 57816; 58301: should be produced. Consider surfaces, access for all, easy to clean, attractive, use good quality materials, and should consider street furniture, lighting, tree and planting, road signs (rationalisation) , traffic control measures, CCTV, satellite dishes and public art, litter collection, possibilities for social interaction and cultural activities, and linking transport nodes.

59404; 59436: Support will provide a better environment for users and encourage inwards investment

49471, 57543: should pull together information on walks, more fixed street maps

57709: Impeding masterplan and advancing technology may make this redundant at present

57975: pedestrian priority in the City Centre, re- open routes, ensure strong north to south links, improve access from the railway station.

54480: Don't close Broad Street

Q5b: Wayfinding

57233; 59036; 57280: can be improved by creating accessible footpaths and creating more cycle ways. Market Street could be improved through a dedicated cycle way and footpath linking to the south.

57734: simple is better. Rationalise signage. Ensure the surfaces used are appropriate for weather as polished surfaces can be dangerous.

58301: use a common surface, accessible for all. Level difference between Union Street and The Green need to be overcome.

58769: have a 20mph speed limit in the CC. Tree planting in car parks, scrap maintenance of flowerbeds, hanging baskets and tree lined streets

59236: Wide pavements to allow seating and public art. Pavements from Union Square/Train station are inadequate and need to be reconsidered to ensure there is access for all.

Q18: Design Statements

57816; 57975, 58313; 58397; 59036: Agree

57543: Design statements should be submitted for single houses and upwards

57734: Should apply for every application, would need to be proportionate regarding scale. Important to consider texture, materials, skyline height, landscaping, contributions to plant/maintain green verges

57975: Statements are useful in most cases and should show the progression of design

57233; 59036: Support. Statement should be requested for any development over 5 buildings. There is no instance where a design statement would not be useful.

Statement would need to outline developments response to site, setting, access, design principles and concepts, how context has influenced design, local policy requirements, consultation and how consultation has shaped development.

55418: Support, agree with range of projects as outlined in section 8.3

57975: Design statements should be required for all development over 10 units or 0.5ha. 5000m² threshold for commercial developments is too high, reduce this.

49471: Support. Statements should be required with major developments, not required for change of use or house extensions, may be required for single new properties.

57975: should include how a proposal relates to surroundings, in terms of form, function, density, materials, use and public realm, justification of why the proposal is not mixed use/have a mix of house types, energy use in terms of siting, layout and built envelope should be included.

58123: Support, and in particular if the proposal is on Green Belt or Green Space Network

59695: should include green infrastructure components, and demonstrate how development will be energy efficient regarding solar orientation and shelter.

59236; 59452; 59672: disagree. They should only be required where legislation states

59367: not relevant unless planners understand architectural design issues

57725: no objection in principle to design statements if they are proportionate and form a consistent and objective basis for decision making. Place Standard may be more appropriate for smaller sites. Scottish Government is proposing a Place Standard therefore it is not appropriate for individual authorities to provide these tools.

58769: not useful if they turn Aberdeen into a parody. Sprawl and 1.5 storey buildings have ruined Aberdeen.

Conservation Areas

Planning Applications in Conservation Areas

53467: Should be dealt with by a specialist team. Modifications need to be made to

the scheme of delegation. Officer with relevant conservation experience should deal with applications. Notification procedure need to be modified. New SG required on HMO applications, traffic and parking, work to roads, advertisements and signs and shopfronts

Design

57233: Needs to be organised liaison with local community before designs are submitted

58123: Councillors should visit all contentious sites

Windows and Doors in Conservation areas

53467: support the guidance of repair and restore. Enforcement, education and persuasion needs to be more forthcoming.

Amenity

53467: Privacy and Light should have standards

External Devises

53467: The placement of CCTV equipment and satellite dishes need to be closely controlled and enforcement action taken where required.

Shopfronts and advertisements in Conservation Areas

53467: Welcome the policy to reinstate and restore traditional shopfronts.

Enforcement should be taken where necessary.

Sculptures in Conservation Areas

53467: unclear if planning permission is required. Guidance is needed.

Supplementary Guidance

Temporary Buildings

58601: Stronger policy required. SG only gives guidance, which is vague and needs to be clear and unequivocal. Replacement permanent buildings on site of temporary buildings with conditions on landscaping should be refused. SG appears to look favourably on replacing existing temporary structures with new permanent ones.

Historic environment

59577: proposed an SG on the wider issues relating to the historic environment.

Summary of the responses by planning authority

Q2a CC Design quality

The support for this policy is noted and welcomed. The requirement for better design quality is not intended to dilute the existing character of Aberdeen, but will complement it. The policy will be flexible, and innovative buildings of an outstanding design quality will be welcomed. Good design should not be viewed as a burden to investors, as not all buildings need to be landmark buildings, but all developments should be well designed.

Q2b How to achieve this

The comments received on how to achieve higher design quality have been welcomed. It is noted that good design is required throughout the city, and not just in the city centre. The City Centre Vision and Masterplan, and the proposed design policies of the local development plan will look to incorporate many of the comments received. There are no plans to demolish the Trinity Centre, however areas of the city can be identified as opportunity sites for future redevelopment.

Q17 Better Design Quality

The support for this topic has been noted and welcomed. As has the indication that better design quality needs to apply to the whole city.

Q17b How to achieve this

The suggestions on how to better achieve design quality have been noted. The suggestions relate to 'context' have a strong focus on amenity and open space. The links to green infrastructure, climate change and sustainability and open space will be more readily highlighted in the design policies. The amenity policy will also be strengthened. The 6 criteria of a successful place are Scottish Government criteria taken Scottish Planning Policy (SPP). The concept of visually appealing would appear to fall within a number of the 6 categories already outlined, safe and pleasant, welcoming, and distinctive. We agree that the historic environment should not be interpreted as a restriction on development. Adaptive reuse of buildings, and schemes that work with the historic environment lead to an increase in the distinctiveness of an area.

Methodology

The policy and supplementary guidance will outline what is expected with developments. A prescriptive approach is not appropriate, as this will limit innovation in design. However, guidelines will be expected to be followed. The Scottish Government has produced a number of guidance documents to assist in the development of successful places, Designing Places, Creating Places, Designing Streets and Planning Advice Note: Design Statements. Further to this a Place Standard assessment tool is proposed to be agreed, as is outlined in Creating Places. It would be expected that the national tools will provide overarching guidance and more local, context specific tools and guidance would still be required. Therefore, policy and supplementary guidance on better quality design and Aberdeen would still be required.

Process and procedures

Design, placemaking and built environment are at the forefront of the Scottish Government's thinking. These policies are not being separated off. Each policy issue has its own section within the local development plan, and are required to be read in conjunction with one another. This will continue in the proposed plan. Liaison with communities is required for major applications, as part of the pre-application process, for all other applications consultation with the community council is a statutory process. During these consultation periods comments are welcomed.

The democratic process and delegated powers process in place is legislated at a national level. We agree that applications that do not meet our standards should be refused, and the non-material variation of applications once permission has been granted should be used responsibly.

The perception of what is aesthetically pleasing can be subjective, however good design can be outlined by a number of principles, as is shown by the Scottish Government and their focus on creating successful places.

The suggestion to hire more staff and for more training of elected members and officers is welcomed, but is an issue outwith the remit of a local development plan.

The suggestion to encourage more historic trails is noted and discussed further under the wayfinding section. The comments received at consultation events are fed back to Council officers and Elected members through the committee process. Not all comments received are implemented.

Q3: Contemporary Architecture

The support for contemporary architecture and the notion that this should complement the existing is noted and welcomed. The architecture should fit the context of Aberdeen, drawing on examples from other cities may produce 'anywhere architecture' which is not specific to its location, setting and context. Looking to other cities for inspiration is welcomed, however the end design must relate to Aberdeen.

The disagreement on this issue is noted as is the comment stating the contemporary clashes and the materials will fail. For Aberdeen to remain a flourishing city we must ensure it is attractive, innovative and welcoming. Complementing the historic environment with modern, contemporary buildings, techniques and materials can achieve this, while also enhancing the existing. Areas that are owned by the local authority can encourage the use of design competitions, for sites not in Council ownership this would be more difficult to encourage. The design policies are not intended to be prescriptive. Sites will still be expected to follow the masterplanning process, therefore briefs, frameworks and masterplans will be developed and adopted, and more detail on design, materials, heights etc. will be expected to be outlined. Aberdeen will not lose its granite city status though the removal of granite buildings. A huge percentage of the city is built in granite. The removal of granite is discussed within the granite issue. We encourage the reuse of vacant and derelict land, and brownfield sites. Funding streams regarding enhancing and conserving existing stock are available, and these are outlined on the Council's website.

Q4: Tall/bulky buildings

The support of the policy is welcomed. The policy is not intended to be prescriptive therefore it should not restrict development. The non-support for bulky buildings is noted. Marischal College is an example of a bulky building yet due to its sub-division, detailing and design it sits well within its environment.

A - appropriate locations

The suggested location for the placement of tall/bulky building has been noted. Area outlined as places where these should be located include a clusters to the west end of Union Street, North Dee area, railway, area between Union Street and Skene Street, Palmerston and Denburn. Other locations suggested include outwith the City Centre, and that bulky buildings should be located in industrial estates.

B - inappropriate locations

The suggested locations where it would be inappropriate to place tall and bulky buildings have been noted.

C – assessment

The suggested assessment criteria outlined in the representations have been noted and welcomed. Many of the suggestion relation to general design principles, which all developments, including tall and/or bulky buildings will have to adhere to and will be inputted in policy. Criteria relating specifically to tall and/or bulky buildings will be outlined in the policy. The policy is not intended to be prescriptive regarding the details. The SG will outlined area within the City Centre where tall and/or bulky buildings may be acceptable. Single use is not encouraged.

5a: Streetscape manual

The comments received on what a streetscape manual should include are welcomed. The relationship between the city centre vision and masterplan have been noted and agreed with. The production of the streetscape manual will be postponed until the City Centre Vision and Masterplan document has been produced. Public realm guidance will be produced in the relevant supplementary guidance. Hard and soft landscaping will be discussed within the landscaping policy and supplementary guidance. There are a number of city centre walks outlined in the core paths plan. The aim of the streetscape manual is not for the production of walking maps. Increasing accessibility and permeability of the City Centre is most likely to be discussed within the City Centre Vision and Masterplan and Sustainable Urban Mobility Plan. The decision regarding the pedestrianisation of Broad Street will be taken on the pending planning application for the redevelopment of Marischal Square.

Q5b: Wayfinding

The suggestions in how to improve wayfinding in the city have been welcomed. These comments will be fed into the City Centre Vision and Masterplan process, and the Sustainable Urban Mobility Plan.

Q18: Design Statements

The comments of support have been welcomed and noted. The requirement for where a design statement is required shall be outlined in the supplementary guidance. The criteria of what is expected within the design statement will also be outlined. It is expected that the design statements will be proportionate and not onerous. They will be an aid to understanding the design process and decisions made.

The comments disagreeing with the use of design statements have been noted. National guidance and standards are localised through local policy and supplementary guidance at present. It is not expected that the introduction of Place Standards will remove the localised element as areas of Scotland are distinctive from one another, have different contexts and settings. Innovative and contemporary design is encouraged; a granite parody would not be supported.

Conservation Areas

Planning Applications in Conservation Areas

Applications in conservation areas and on listed buildings are subject to consultation with a dedicated conservation team and, where appropriate, with Historic Scotland. Upskilling officers across the development management section is preferable to only having a small number of staff competent in dealing with applications in conservation areas. There is already existing guidance on HMO applications, traffic and parking, work to roads, advertisements and signs and shopfronts. This is being review as part of the proposed plan and will be modified where appropriate. Councillors take the decision to carry out a site visit at committee.

Windows and Doors in Conservation areas

The supportive comments are welcomed and noted. Matters of enforcement are at the discretion of the enforcement team.

Amenity

The design policy which covers amenity is to be reworked as part of the proposed plan process.

External Devises

This issue is covered through the Management Plan for all conservation areas. Matters of enforcement are at the discretion of the enforcement team.

Shopfronts and advertisements in Conservation Areas

There is supplementary guidance on shopfront and advertisements. This will be reworked/edited/as part of the proposed plan to give further guidance on what is deemed acceptable in conservation areas and on listed buildings.

Sculptures in Conservation Areas

Planning permission would be required if the public art has an impact on the special character and appearance of the conservation area. Specific supplementary guidance on this topic is not required.

Supplementary Guidance

Temporary Buildings

The supplementary guidance is being reworked as part of the proposed plan process.

Historic environment

The existing TANS are being reworked as part of the proposed plan process.

Planning authority action/recommendation for Proposed Plan

Update design policies and relevant supplementary guidance and technical advice notes, including tall buildings, landscaping, design statements, shopfronts and advertisements and historic environment.

Look to incorporate links to green infrastructure, climate change and sustainability and open space in the design policies. The amenity policy will also be strengthened.

Issue 12	Granite
Body or person(s) submitting a representation raising the issue (reference no.)	
48518: Aberdeen Trades Union/Council 49471: Bucksburn Community Council 51198: Middlefield Community Project 53467: Mr Ronald Leith 55418: Cults, Bielside and Milltimber Community Council 55905: Mrs Valerie Fyfe 57233: John Boylan 57280: Mrs Christine Boylan 57482: Mr Andrew Finlayson 57543: Mrs Patricia Clarke 57709: Ms Marie Boulton 57734: Andrew Jones	57846: Mr Abdul Latif 57975: Aberdeen Civic Society 58012: NHS Grampian 58123: Kingswells Community Council 58261: Torry Community Council 58313: Old Aberdeen Heritage Society 58397: Mr David Ballock 58769: Mr Clive Kemp 59036: Craigiebuckler and Seafield Community Council 59236: Mr Duncan Massey 59367: Mr Neil Rothnie 59577: Scottish Government

Section of the MIR to which the issue relates:	Section 8.4: Demolition of Traditional Granite Buildings
Planning authority summary of the comments	
<p>Q19a - Criteria</p> <p><u>Support the approach</u></p> <p>49471: Support, demolition should be the last resort 55418; 57233:57280; 57709; 57734; 57816; 57975; 58313; 58397; 59036; 59236; 48518: Support 58012: criteria should include where the demolition would assist in the regeneration of the wider area 59577: tailored criteria that aid the decision maker in defining the merits of each building</p> <p><u>Disagree with the approach</u></p> <p>59367: The existing approach should remain</p> <p>Q19b - Replacement</p> <p>55418; 57233; 57543; 57816; 58123; 58769; 59036; 51198; 55905; 57280; 59236: Support 49471: principle and other public elevations 57734: Pseudo granite and re-use 57975: Existing policy is good 58397: reuse on any elevation, concrete could be used as a replacement material 59236: should not discourage innovative design</p> <p>Retain</p> <p>57482; 57543; 58261: granite buildings should be retained rather than replaced</p> <p>Granite Store</p> <p>57734: Designated salvage site for granite should be proposed</p> <p>Public Realm</p> <p>53467: Setts placed too far apart, laid inappropriately with loss of camber and inappropriate materials used to bond them. Replacement of setts with inappropriate materials that detract from the character and appearance of the conservation area. Works in conservation areas should be carried out in the traditional way. If a lack of skills, training should be provided.</p>	
Summary of the responses by planning authority	
<p>Q19a - Criteria</p> <p><u>Support the approach</u></p> <p>The comments of support are noted and welcomed. The criteria will be tailored to aid the decision maker, the criteria is yet to be determined. The SHEP test was included as an example to guide understanding. The 'regeneration of the wider area' as a criteria will be considered.</p> <p><u>Disagree with the approach</u></p>	

The comment disagreeing with the approach has been noted. The aim of the updated policy is to provide provision for the assessment of the demolition of granite buildings, presently there are no criteria outlined within the policy. The guidance will give officers a clearer assessment tool when assessing applications of this nature. The proposal to refocus the reuse of granite within the wider scheme, rather than within the principle elevation, is in response to an awareness that other elevations, not only the principle elevation, may be in the public domain, and an awareness that the reused granite may be better suited within landscaping due to the design and material proposed in the new development. The majority of respondents were supportive of the approach.

Q19b - Replacement

The approach to reuse granite on other areas rather than the principle elevation is supported. The use of other materials will not be prescribed to allow for creative design. The policy will not discourage innovative design.

Retain

The initial principle of the granite policy is to retain granite buildings, this will not change. The criteria will be use to assess applications for demolition of buildings, and will provide a stronger approach than at present. Further justification will be expected.

Granite Store

The Council has a granite store. The accessibility of this store to the general public and the reuse of the material is constrained by resource issues.

Public Realm

Works to the public realm by the Council and other service providers are subject to permitted development right in many instances. Granite features such as setts should be protected and preserved. City Centre Vision and Masterplan will investigate public realm.

Planning authority action/recommendation for Proposed Plan

Asses the viability of developing a criteria for the granite policy.

Issue 13	Greenfield Housing and Employment Land	
Body or person(s) submitting a representation raising the issue (reference no.)		
48518: Aberdeen Trades Union/Council 49567: Nestrans 54952: Bancon Developments Ltd. 55174: William Tawse Ltd 55418: Cults, Bielside and Milltimber Community Council 55905: Mrs Valerie Fyfe	59036: Craigiebuckler and Seafield Community Council 59124: Cults Property Development Company Ltd. 59288: Mr Robert Thow 59367: Mr Neil Rothnie 59389: Mr John Souter	

<p>56278: Shell UK Ltd 57233: John Boylan 57280: Mrs Christine Boylan 57381: Mrs D Gray and Others 57482: Mr Andrew Finlayson 57607: Ms Susan Foster 57665: Nicola & Bill Brodie 57709: Ms Marie Boulton 57725: Mr Blair Melville 57734: Andrew Jones 57894: Aberdeen and Grampian Chamber of Commerce 57975: Aberdeen Civic Society 58012: NHS Grampian 58123: Kingswells Community Council 58301: Derek J Selbie 58323: Macaulay Development Trust 58563: The Grandhome Trust 58648: Mr Richard McDonald 58714: Dandara Limited 58738: Mr Arnold Strachan 58769: Mr Clive Kempe 58989: Mr Ben Freeman</p>	<p>59443: Telereal Trillium 59452: Scotia Homes Ltd 59535: Scottish Property Federation 59577: Scottish Government 59672: Stewart Milne Homes 59697: Scottish Water 59699: Scottish Enterprise 59721: Stewart Milne Homes 59765: University of Aberdeen 59781: Binghill Farm 59796: Mr J McIntosh 59801: ANM Group Ltd 59809: Mr & Mrs M Robertson 59915: Mr Y Thomson 59918: Mr M Hickey 59919: Mr J Langler 59921: Mr A Bedawi 59923: Drum Kingswells Business Park Ltd. 59926: Barratt North Scotland 59929: Barratt North Scotland 60338: SEPA 60678: RSPB</p>
<p>Section of the MIR to which the issue relates:</p>	<p>Section 2.0, 2.1, 2.2 & Main Issue 1.</p>
<p>Planning authority summary of the comments</p>	
<p>Greenfield Housing and Employment Land <i>Support for Option 1 – Preferred Option,</i> 48518, 49567, 55418, 55174, 56278, 57482, 57709, 58012, 58123, 58301, 58563, 59036, 59697, 59699, 60338, 60678 – Support shown for Option 1, to carry over the existing allocations and not allocating additional land and 49567, 55418 – for the release of Phase 2 housing sites in Peterculter. 56233, 57734, 59036 – Support also on the grounds of lack of transport infrastructure and on increasing densities. 57280 – Support also on the impact of new developments on traffic.</p> <p><i>Support for Option 2 – Alternative Option,</i> 57894, 58733, 59765, 59809, 5972, 59721, 58323 – General support for Option 2, to release additional land and 57381, 58323, 59124, 59452, 59801, 59915, 59919, 59921, 59926, 59926, 54952 – on the grounds that more small and medium sites are required as larger sites take time to deliver and 57607, 57894, 58714, 59535, 59923 – on the grounds of the demand for additional housing. 57725 – Support also on the grounds of the demand for additional housing, the need in SPP for a generous supply (10-20%), experience that across Scotland 25-30% of allocations never deliver housing. 59781, 59796, 59918, 59923, 54952 – Support for Option 2 on the grounds that house completions are significantly behind the expected completions in the Housing Needs and Demand Assessment, Housing Land Audit and Local Development Plan. Concern that the delay in delivering housing is having an impact on the economy of</p>	

the north east.

54952 – Support also on the grounds that the shortfall from larger sites should be reallocated to smaller sites to try and achieve the house completions required to satisfy the SDP.

General Issues.

55905 – General objection to the use of greenfield sites, brownfield sites should be developed first.

58989 – Objection to both options, the 2009-2016 housing supply is not being met and this is driving away investment in the short term, the delivery of housing is will not satisfy the population growth projections.

Objection to Option 1, sites allocated in 2012 have yet to deliver housing and the greenbelt has been allocated based on land that was left over from the 2012 plan the function of this designation was not robustly assessed.

Objection to Option 2, Demand is now not in 5-10years, concern that investment is moving overseas, rebalance the larger allocations by reducing Phase 1 to a figure closer to there expected delivery and re allocated the remainder to smaller sites of under 100units.

59672 – There is a need for additional small sites as the first phase target will not be met by the existing large sites, the HLA shows that there will be a shortfall of 8,938 units and the reporter to the SDP has stated that there is a need for a mix of sites. Concern about the impact on the economy and on the housing market of not allocating more sites.

59577 – This submission raised some concern over the clarity of the MIR in terms of how figures are presented. Dates at the end of the plan 2030/2035, do not correlate with the SDP. There was also concern that there may be a shortfall of 576units over the period to 2030/35, that brownfield capacity is not clearly identified and the figures appear to fall short of the SDP target. It was also suggested that Table 1 and 2 should identify sites that are constrained until delivery of the AWPR and concern raised that a number of the large sites will not deliver the units identified in the period to 2016.

Brownfield

59443 – General support for Brownfield sites.

59367 - The definition of brownfield land and sites should be redefined as distinct, particularly within any Green Belt area. This would include previously developed ground e.g. farm curtilages and encourage more development.

Greenfield Development

55905 – General objection to the development of greenfield sites.

Specific Comments

55174 – Specific support for – OP3 Berryhill

58323 – Specific support for – South Field in Craigiebuckler

56278 – Concern that pipeline constraints were not taken into account in the assessment of Raiths Transport Interchange and Dyce Drive and that this constraint should be considered.

Summary of the responses by planning authority

Support for Option 1

48518, 49567, 55418, 55174, 56233, 57280, 57734, 56278, 57482, 57709, 58012, 58123, 58301, 58563, 59036, 59697, 59699, 60338, 60678 – The support shown for Option 1, to carry over the existing allocations and not allocating additional land is noted and welcomed. The Aberdeen City and Shire Strategic Development Plan 2014 has recently been through examination and its proposal to not allocate additional land, but to roll over the allocations into the next plan, has been accepted by the reporter. The reporter's conclusion stated *“Drawing all of these matters together, I conclude that the scale and distribution of growth provided for in the housing allowances is appropriate and sufficient, in accordance with the requirement of paragraph 117 of Circular 6/2013.”*

The Council agrees with these conclusions. There are some cases dealt with in other Schedule 4 documents where we have accepted the case for releasing further housing areas. However, these are of a relatively minor scale and are not regarded as having a significant impact upon the spatial strategy or the Strategic Development Plan housing allowances.

Support for Option 2

57894, 58733, 59765, 59809, 5972, 59721, 58323, 57381, 58323, 59124, 59452, 59801, 59915, 59919, 59921, 59923, 59926, 59926, 54952, 57607, 57894, 58714, 59535, 59781, 59796, 59918, 57725 – The support shown for Option 2, to release additional land is noted. Many of the suggested reasons for the release of additional land such as, the delay in delivery of sites, the number of large sites being too high and the overall target being unambitious are dealt with in the sections below. The examination of the SDP also addressed these issues and it was found that there was no requirement to allocate additional land. One exception to this is made at Malcolm Road, Peterculter – the reasons behind this are explained in a separate Schedule 4 Form for that site.

Shortfall in current MIR figures

59577 – Concern over the clarity of figures in the Main Issues Report is noted. The 'shortfall' of housing in the 2027-35 period is beyond the lifetime of next LDP which we would anticipate adopting in 2016. We are not required to identify any land for this period (see Circular 6/2013 – Table 1, p20), but have done so to aid a longer term perspective given by the Strategic Development Plan. Identifying sites for a further 576 homes, if required at that time and based on the next SDP, can be done in the next LDP.

Brownfield

It is agreed that it would have been helpful to include a table of sites and figures for brownfield sites. Our 2013 Urban Capacity Study identifies between 5628 to 7157 units through a mixture of planning consents and various estimates of the capacities of the remaining sites. Anticipating future brownfield development further into the future (i.e. over a 14-year period), beyond what we have already identified, is difficult. Aberdeen is fortunate in not having large areas of vacant or derelict land compared to most cities. We have however updated the 2013 study to inform the proposed plan and this shows that further potential sites continue to come forward. We are confident that more, as yet unidentified sites will emerge and receive planning consent during the lifetime of the 2016 LDP. Much of this will be driven by the buoyant housing market here.

While the suggestion that sites constrained by the AWPR should be identified is noted, the AWPR is just one of a number of constraints which could impact on the delivery of a site. We anticipate adopting the next LDP in autumn 2016 and opening the AWPR in spring 2018. The Council therefore do not feel that highlighting these sites over other sites for such a relatively short timescale is of any particular benefit.

Deliverability of allocated sites, particularly the larger ones, within the timeframe of the SDP phases

59577, 57381, 58323, 59124, 59452, 59801, 59915, 59919, 59921, 59926, 59926, 54952, 59781, 59796, 59918, 59923, 54952 – Concern over the delivery of some of the larger sites is noted however this issue was addressed in the examination of the SDP.

It is not going to be possible to deliver the full 16,500 homes first phase allowance in the next 2.5 years. The SDP recognises that front loading the allowances in the way it does means it is unlikely that all of them will be delivered in the timescales. Indeed, generous allowances are made on top of the housing requirement with additional generosity provided by the existing supply (requirement for the AHMA is 14,202 from SDP figure 10 – supply plus allowances for this period is almost double at 27,818 from SDP Schedule 1). Paragraph 4.24 of the SDP explains that, due to this generosity, “we cannot expect all the new homes to be built within the relevant plan period. This makes sure the plan can cope with higher levels of demand than we currently expect.”

The SDP’s targets for new house building look likely to be met ahead of schedule – with the 2014 Housing Land Audit indicating that completions will be at their long-term average this year, moving to over 3,000 completions in 2015. These are ahead of the targets set out on page 33 of the SDP for 2,500pa by 2016 and 3,000pa by 2020.

Rates of completions and reallocating housing allowances to smaller sites

59781, 59796, 59918, 59923, 54952 – While concern over the delivery of some of the larger sites is noted, the SDP’s targets for new house building look likely to be met ahead of schedule. The Draft 2014 Housing Land Audit indicates that completions will be at their long-term average this year, moving to over 3,000 completions in 2015. These are ahead of the targets set out on p33 of the SDP for 2,500pa by 2016 and 3,000pa by 2020.

54952, 59672 – The suggestion that larger sites which will not deliver their full Phase 1 allowance in the current Phase, should have this shortfall re allocated to new sites, is noted. It is recognised that this suggestion is not that this shortfall should be removed from these sites, but rather re scheduled to a later Phase. In effect the shortfall would then become an additional allocation to make up for the initial delay. To redistribute allowances based on an initial delay to the start of a site, would remove the certainty which the plan aims to provide and could impact on the deliverability of larger sites. This would also be contrary to the SDP which is clear in its allocations for all Phases up to 2035. This would therefore not be in the interests of proper planning and sustainable development.

General Issues

55905, 59443 – The support for Brownfield sites is noted and it is the councils aim to take advantage of brownfield opportunities when ever possible. It should be noted that of the housing allowances in the SDP for Aberdeen City, over 25% are brownfield. The level of housing required to meet population targets and the housing

targets set out in the SDP cannot however be achieved by the use of Brownfield sites alone.

58989 – The concern raised that neither Option 1 or 2 address the immediate demand for housing land is noted. The suggestion that additional land needs to be allocated immediately cannot be addressed through this plan process.

49567, 55418 – Support for the release of Phase 2 housing sites in Peterculter is noted.

Specific Site Issues

55174 – Specific support for – OP3 Berryhill is noted.

58323 – While the specific support for South Field in Craigiebuckler is noted the site is identified as CF1 – Existing Community Sites and Facilities. As such any development related to this facility should come forward through the planning application or Masterplanning process.

56278 – Concern that pipeline constraints were not taken into account in the assessment of Raiths Transport Interchange and Dyce Drive are noted. It is not intended to bring this site forward as employment land.

Planning authority action/recommendation for Proposed Plan

No changes are proposed.

Issue 14		Gypsy Travellers	
Body or person(s) submitting a representation raising the issue (reference no.)			
49188	Mrs Alison Olsen	51260	Ms Doreen Smith
49471	Bucksburn Community Council	51271	Mr Tommy McKay
49804	N Lomax	51274	Colin Mcqueen
50101	Mr Ian Powell	51275	C McKay
50781	Ms Susan Robertson	51281	Ms Shirley Nicol
50823	Mr Bert Taylor	51283	Ms Michelle Forth
50844	Ms Louise Wright	51287	Alice Pearce
50854	Duncan B Ross	51289	D Duncan
50858	Kathleen Frisken	51294	Douglas Symon
50858	Kathleen Frisken	51298	Mr Jonny Gregor
50862	Mr James Munro	51301	S Holdsworth
50867	Gary Polson	51303	Ms Lesley Leil
50873	John C Kirton	51306	Steven Morrison
50873	John C Kirton	51314	Mr Allan Sleigh
50885	Mr David Wallace	51315	Mr Doug Leiper
50888	Mr Richie Todd	51318	Mr George Innes
50892	Chris Polson	51321	Ms Isla Stewart
50895	Mr John Dickson	51324	Ms Joan Davidson
50901	Mr Joe MacInnes	51325	Mr Andy McIntosh
50956	J C Fraser	51326	Sandy Campbell
50961	Mr Michael Rivett	51380	Ms Diane Lyon
50965	Mr Ian Smith	51382	Ian M Cowling

50968	Ms Pam Burns	51389	Mr John Souter
50991	Mr Dean Birnie	51398	Ms Carol Souter
50998	Trevor A Slater	51404	Mr John Harwood
51002	Mrs Patricia Dickson	51405	Alexander J Shepherd
51009	Mr Yule	51410	Mr Colin McQueen
51014	George W Slater	51417	Mr Liam Rivett
51019	Mr Alistair Lyon	51422	Mr Gary Robb
51022	Mr Conor Brand	51425	Mr Scott Robb
51026	Mr W Davidson	51431	Deborah Milne
51030	Mark Kean	51438	N McQueen
51048	S Bruce	51440	Mr John Gibson
51048	S Bruce	51445	Mr Garry McLennan
51053	Mr Charles Rae	51446	L McLennan
51059	Ms Yvonne Sangster	51454	Ida R Innes
51067	Mr Alan Williamson	51459	Mr Ally Pope
51087	Ms Pat Forbes	51467	Ms Angela Ewen
51170	Mr Danny Birch	51469	George Gault
51191	Mr David Wright	51475	Mr George Innes
51198	Middlefield Community Project	51484	Mr Stephen Marr
51202	Ms Natalie Ferguson	51486	W. G. Anderson
51206	Margaret Rae	51488	B McIntosh
51207	Ms Margaret Bruce	51490	K Sangster
51210	Mr Dennis Bruce	51492	Mr Chris Murdoch
51212	G Morrison	51493	B Leslie
51219	Irene O'Neill	51497	Carol Dawson
51224	J Paterson	51815	Mr Anthony Broadfoot
51252	Mr Raymond Holt	51827	Miss Helena Broad
51258	G Smith	51848	Mrs Fiona Carroll
51878	Ms Jennifer McKessick	57627	Friends of Howes Road
52073	Mrs Rita Edwards	57635	Mr Donna Dugan
52298	Ms Kathleen Hepburn	57658	Mr Dave Black
52525	Tracey Smith	57668	Mr Graeme Sim
52703	Margaret A P Smith	57697	Mrs Sue Cameron
52736	Ms Tracey Jackson	57734	Andrew Jones
53136	Ms Wilma Smith	57816	Mr Abdul Latif
53264	Ms Fiona Clark	57845	Mrs Mary Lamberty
53543	Mr Johnny Street	57860	Mrs Clark
53559	Mr Stirton Kevin	57868	Leslie Stockan
54233	Mrs Ann Webster	57891	Mrs Eleanor Stockan
54281	June and William Mennie	57910	Mary Rainnie
54286	L Alexander	57914	Lee Clark
54289	Steven Brown	58123	Kingswells Community Council
54499	Mr Les Chalmers	58755	EnerMech Group Ltd.
54510	Mr Sandy McEwan	58906	Ms Heather Wilson
54896	Mr Joe Russell	59017	Cove and Altens CC
55336	Mr W Webster	59036	Craigiebuckler and Seafield CC
55349	Marion Grant	59236	Mr Duncan Massey
55418	Cults, Bieldside & Milltimber CC	49804	Ms Nicola Lomax
55591	Andrew J I Dalziel	48518	Aberdeen Trades Union/Council
55644	Heathryfold Circle Anon. Res		

55905 55922 56138 57019 57113 57128 57150 57155 57174 57210 57233 57271 57280 57312 57317 57394 57416 57418 57421 57422 57442 57482 57562 57574 57597 57601 57613	Mrs Valerie Fyfe Mr Allan Skinner Miss Emma Sharkey Heather A Wilson Mr Kris Elliott Mr Paul Leslie Mr Michael Molden Mr David Middleton Mr Dawn Stout Mr Elizabeth Stout John Boylan Mr Graeme Sim Mrs Christine Boylan Ms Donna Law A C J Bruce Nigg Community Council Ms Margaret Simpson Mrs Ogston Steven Ogston Mr Paul Hamish Ogston Mr Theresa Dines Mr Andrew Finlayson Mr Martin Ross Ms Karen Raitt Mr Karin Morland Mrs Elaine Kirton Mr Carol Slessor		
Section of the MIR to which the issue relates:	Question 16		
Planning authority summary of the comments			
<p>Howes Road</p> <p>General Support 51827, 55418, 57658, 57816, 59036, 58123 – Support was shown for the development but only if rigorously monitored by Aberdeen City Council (ACC), Police Scotland and if waste disposal facilities are provided to prevent fly tipping. 49188 – Respondent would support the allocation of a halting site if this gave greater powers to control how the sites are used and ensure that they are used, however the respondent feels this is unlikely.</p> <p>General Objection 48518, 51815, 55922, 51283, 57482, 57734, 57697, 57668, 57601, 57597, 57574, 57562, 50781, 51087, 51087, 51170, 51467– There were a number of general objections to the development at Howes Road.</p>			

Concentration of Sites

49471, 57174, 57210, 57627, 49188, 51252 – Respondents noted that there was too great a concentration of proposed Gypsy Traveller (G/T) sites within the Bucksburn/Newhills area and this was not appropriate. This is particularly the case as services are already stretched within the area.

Inappropriate location

49804, 49188, 51252, 57627, 49188, 49471, 54896, 57019, 57128, 57128, 57174, 57442, 57868 – Suggestions that the proposed site is in an inappropriate location being close to a residential area and business development. G/T's generally prefer sites remote from built up residential areas due to clashes between the communities.

Proximity to the School

51252, 51191, 51454, 52298, 52703, 52736, 54233, 54510, 54896, 55349, 55905, 56138, 57019, 57128, 57174, 57210, 57442, 57562, 57574, 57613, 57868, 57891, 58906 – Grave concern was raised by the majority of respondents that the site is located in such close proximity to the Heathryburn School and Nursery. It was not felt that this was appropriate.

Roads and Traffic

49804, 51807, 52736, 54510, 55349, 57019, 57128, 57174, 57210, 57613, 57627, 57635, 57845, 57860, 57891, 58906 – Objection on the grounds of the poor standard of roads in the area and the likely impact of a development such as this. Specific concern was raised about the movement of vans and caravans in and out of the site and how this would impact on local residents and emergency access.

Proposed Greenferns Development

51807, 51198, 52073, 54281, 55336, 55905, 57019, 57174, 57210, 57442, 57574, 57613, 57627, 57845, 57860, 57868, 57891, 58906, 58755 – Many of the submissions noted that the site is within the Greenferns Development Framework area and is contrary to the plan. There is concern that the Greenferns development is for a mixed use sustainable community and that this might be jeopardised by the development of a G/T site in this location. It was also suggested that the Greenferns development would help to bring badly needed services to the Northfield area and again these might not get developed. There was also opposition on the basis that the Greenferns DF states that all uses will require to be compatible, and this use is not compatible with the existing EnerMech's global headquarters.

House Prices

49804, 51807, 53264, 54896, 55336, 55349, 57019, 57128, 58906, 49804 – There was also concern over house prices and the impact that a G/T site would have on the Northfield area. This was particularly concerning as the Northfield area had not benefited from the substantial rise in property values that many parts of Aberdeen had enjoyed.

Environmental Impact

49804, 57271, 57317, 57416, 57418, 57421, 57422, 51807, 51467, 52703, 54233, 54499, 54510, 54896, 55905, 56138, 57019, 57128, 57174, 57210, 57442, 57442,

57613, 57627, 57845, 57910, 58906, 59017, 49804 – Significant concern was raised over the impact of the development on the general environment of the area. These comments were broken into those on Fly-tipping and waste management and those on the natural environment itself such as wildlife.

The issue of fly-tipping and the condition that illegal encampments sites are left in was noted, with concern that the surrounding area would be polluted if the site was allowed to proceed.

In terms of the natural environment concern was raised that the site is adjacent the Bucksburn Valley Local Nature Conservation Site and has an abundance of wildlife including deer. The siting of a G/T site in this location would have a negative impact on these features.

Site Selection Process

51170, 55905, 57174, 57210, 57271, 57312, 57613, 57627, 57845, 57868, 57891 – A number of submissions raised concerns over the selection process for the site. It was noted that Howes Road was not the preferred site and other sites such as at Hazelhead scored higher. Suggestion was made that this was a political decision.

50101, 57914 – Also suggestion that the council did not instruct the officers to identify this site but instead to search for alternative sites and that the MIR is inaccurate.

Lack of consultation

51198, 55336, 57174, 57210, 57394, 57627, 57891 – Cited a lack of consultation with the travelling community about the identification of the site. It was suggested that as Gypsy/Travellers were not involved in the sites selection they may not be interested in using the site.

56138, 57627 – Similarly other submissions mentioned the lack of consultation with the community in the Howes Road area. It was felt that the site was being imposed on them.

Security anti social behaviour

49804, 51467, 52703, 54510, 55349, 57019, 57128, 57174, 57210, 57442, 57574, 57601, 57613, 57668, 57868, 57891, 58906, 49804 – There were a significant number of submissions concerned about security and anti social behaviour both in and around the site. There was also concern over possible clashes between the communities particularly due to its location next to the school. Instances of tension between school children at a temporary illegal encampment at Hazelhead were cited.

57574, 57668 – Also mentioned the possible impact on the Golf course. Reference was made to a newspaper article citing another course which was in close proximity to a Gypsy/Traveller site and was damaged by quad bikes.

Impact on Amenity

52298, 54233, 54499, 54510, 56138, 57019, 57128, 57174, 57210, 57442, 57574, 57613, 57627, 57891, 58906, 49804 – Concern that development will have a negative impact on the amenity of the area. Respondents noted that the site is used by the public for walking, is part of the access to the Bucksburn Valley core path network, is identified as an NHS Health Walking Routes and is adjacent to a designated LNCS.

Bye-law

57233, 57280, 57442, 59036 – Strong support for the development of a Bye-law to prevent illegal encampments. Suggestion also that sites should not be allocated until such time as the Bye-law is in place.

Appropriateness of the site

53543, 54510, 54896, 55905, 56138, 57019, 57174, 57210, 57233, 57442, 57613, 57627, 57860, 57868, 57891 – A significant number of submissions also noted that the site is not historically used by G/T's. Guidance on G/T accommodation states that sites should be located where travellers have historically stopped and are likely to stop again.

57271, 57312, 57233, 57280, 57482, 59017, 59036 Concern was also raised about the size of the site. It was noted that it is not large enough to accommodate the size of encampments currently being seen in Aberdeen. As such a site, even if allocated, may not be used. This also ties in with the previous point of the lack of historically use of the site.

Funding

54233, 49804, 57910 – Concern raised over the maintenance of the site and funding that maintenance, 59236 – suggested that a deposit should be taken to prevent damage and dumping and 57442 – raised concern was about where the funds to develop the site would come from.

Petition Letter

A standard letter was submitted by a large group of residents in the area objecting to the development. Their issues while similar to many of the other comments have been grouped below.

Opposition to this site on the grounds of, insufficient consultation, the site previously being identified as undesirable and has only been used on one previous occasion by G/T. Not complying with Policy or Supplementary Guidance, being contrary to the Greenferns - OP39 Masterplan which states "create a space where people can live and work without relying on private transport" and the need to maintain and improve access to natural areas (Bucksburn and the wider countryside) its proximity to Heathryburn School and Auchmill Golf Course, the identification of other sites in the LDP, one of which is in close proximity, and that identifying the site would reduce the existing house values 50823, 50844, 50854, 50858, 50862, 50867, 50873, 50885, 50888, 50892, 50895, 50901, 50956, 50961, 50965, 50968, 50991, 50998, 51002, 5109, 51014, 51019, 51022, 51026, 51030, 51048, 51053, 51059, 51067, 51202, 51206, 51207, 51210, 51212, 51219, 51224, 51258, 51260, 51271, 51274, 51275, 51281, 51287, 51289, 51294, 51298, 51301, 51303, 51306, 51314, 51315, 51318, 51321, 51324, 51325, 51326, 51380, 51382, 51389, 51398, 51404, 51405, 51410, 51417, 51422, 51425, 51431, 51438, 51440, 51445, 51446, 51469, 51484, 51486, 51488, 51490, 51492, 51493, 51497.

Summary of the responses by planning authority

General Support

51827, 55418, 57658, 57816, 59036, 58123 – The general support for the Howes Road is welcomed and concern over the maintenance of the site is noted. The purpose of identifying such sites is to allow proper facilities and services can be put in place to ensure the site is properly operated and maintained.

General Objection

48518, 51815, 55922, 51283, 57482, 57734, 57697, 57668, 57601, 57597, 57574, 57562, 50781, 51087, 51087, 51170, 51467 – The general objection for the Howes Road is noted.

Location of the site

49471, 57174, 57210, 57627, 49188, 51252 – Concern over the concentration of sites in the area is noted. While a site is identified within the Newhills development its exact location has not yet been identified nor the time frame for its delivery. The selection process for the site also examined this issue. In relation to services the Newhills and Greenferns developments, like all new developments, are required to contribute to any deficit in services cause by these development.

49188, 51252, 57627, 49188, 49471, 54896, 57019, 57128, 57128, 57174, 57442, 57868 – While concern over the proximity of the site to residential areas is noted it is important that G/T sites are located close to services. In most cases this will inevitably lead to the site being in relative proximity to some residential areas. The site chosen was west of existing communities and surrounded by new opportunity sites allowing the development to be landscaped and incorporated in the relevant masterplans and development frameworks, these discussions are ongoing.

51252, 51191, 51454, 52298, 52703, 52736, 54233, 54510, 54896, 55349, 55905, 56138, 57019, 57128, 57174, 57210, 57442, 57562, 57574, 57613, 57868, 57891, 58906 – Concern over the proximity to the school is noted however the G/T community need access to these services making the site more sustainable for a deprived section of the community.

51807, 52736, 54510, 55349, 57019, 57128, 57174, 57210, 57613, 57627, 57635, 57845, 57860, 57891, 58906 – Concern over roads and traffic is noted. These issues would have to be examined as part of any planning application for the development of the site.

51807, 51198, 52073, 54281, 55336, 55905, 57019, 57174, 57210, 57442, 57574, 57613, 57627, 57845, 57860, 57868, 57891, 58906, 58755 – Concern over the impact of the Greenferns Development Framework is noted. Like the introduction of the special needs school the introduction of the G/T may require an update to the existing Development Framework.

51807, 53264, 54896, 55336, 55349, 57019, 57128, 58906, 49804 – The impact on houses prices is noted. The site in question is surrounded by opportunity sites OP45, 35 & 39, and as such it is these sites which are likely to be impacted. New residents of these developments will be aware of the G/T site prior to purchasing.

Environmental Impact

57271, 57317, 57416, 57418, 57421, 57422, 51807, 51467, 52703, 54233, 54499, 54510, 54896, 55905, 56138, 57019, 57128, 57174, 57210, 57442, 57442, 57613,

57627, 57845, 57910, 58906, 59017, 49804 – Concern over the impact of the development on the general environment of the area is noted. The purpose of identifying specific G/T sites is to provide facilities such as waste facilities to prevent many of the issues raised in submissions. Management of the sites will be crucial function and this is specifically required in current supplementary guidance.

Security anti social behaviour

51467, 52703, 54510, 55349, 57019, 57128, 57174, 57210, 57442, 57574, 57601, 57613, 57668, 57868, 57891, 58906, 49804 57574, 57668 – Concern over security and anti social behaviour is noted. These issues affect both the settled and travelling communities and are an issue for the police service. However by identifying sites such as this the aim is to help to integrate the communities and prevent tensions arising.

Appropriateness of the site

53543, 54510, 54896, 55905, 56138, 57019, 57174, 57210, 57233, 57442, 57613, 57627, 57860, 57868, 57891 – While concern is noted that the current site was not historically used by the G/T community, many of the sites that were historically used are inappropriate. As such sites were selected based on an agreed set of criteria.

57271, 57312, 57233, 57280, 57482, 59017, 59036 – Concern over site size is noted. The purpose of forming smaller sites was to allow individual groups to use sites which were easier to manage. This was done in consultation with the traveling community.

Funding

54233, 49804, 57910, 59236, 57442– Concern over site maintenance is noted. Issues around site management and maintenance of sites are detailed in current supplementary guidance. The funding of sites is also covered in policy and supplementary guidance with specific sites identified to provide contributions to the provision of other G/T sites.

Bye-law

57233, 57280, 57442, 59036 – Support for the Bye-Law is noted, this is currently being progressed by the Council with the Scottish Government.

Site Selection Process

51198, 55336, 57174, 57210, 57394, 57627, 57891 56138, 57627 – A lack of consultations with the communities involved was raised. While this concern is noted the selection process involved both members of the community and the G/T liaison officer.

51170, 55905, 57174, 57210, 57271, 57312, 57613, 57627, 57845, 57868, 57891 – The validity of the selection process was questioned. A number of sites were presented to committee on the 21st of August 2013 and members instructed officers to proceed with the Howes Road site. The report which went to committee showed that Howes Road scored higher than the other sites and was therefore most appropriate.

50101, 57914 – The suggestion that the council were not instructed to progress with the development of this site is noted. Minutes of the council meeting on the 21st of August 2013 instructed officer of the council to:-

(a) instruct officers to progress the establishment of a short-term halting site at Howes Road;

(The minutes of the meeting are available on the council website).

50823, 50844, 50854, 50858, 50862, 50867, 50873, 50885, 50888, 50892, 50895, 50901, 50956, 50961, 50965, 50968, 50991, 50998, 51002, 5109, 51014, 51019, 51022, 51026, 51030, 51048, 51053, 51059, 51067, 51202, 51206, 51207, 51210, 51212, 51219, 51224, 51258, 51260, 51271, 51274, 51275, 51281, 51287, 51289, 51294, 51298, 51301, 51303, 51306, 51314, 51315, 51318, 51321, 51324, 51325, 51326, 51380, 51382, 51389, 51398, 51404, 51405, 51410, 51417, 51422, 51425, 51431, 51438, 51440, 51445, 51446, 51469, 51484, 51486, 51488, 51490, 51492, 51493, 51497 – The concerns raised in the standard letter submitted by several members of the public is noted. The issues raised in these submission have been covered in the responses above.

Planning authority action/recommendation for Proposed Plan

Further to instruction at the full council meeting on the 21st of August 2013 Howes Road site should be identified in the plan as a location for a Gypsy/Traveller site. This site is in addition to those already identified in the plan.

Issue 15	Aberdeen Harbour Expansion	
Body or person(s) submitting a representation raising the issue (reference no.)		
48626: Mustafa Osman 48970: Brian Rattray 49471: Bucksburn Community Council 49567: Nestrans 54193: Ms Maas-Lowit 55177: Sport Scotland 55418: Cults, Bielside and Milltimber Community Council. 55450: George Clark 55591: Andrew Dalziel 57233: John Boylan 57280: Christine Boylan 57482: Andrew Finlayson 57543: Patricia Clark 57581: Castlehill and Pittodrie Com. Council 57709: Marie Boulton 57734: Andrew Jones 57894: Aberdeen and Grampian Chamber of Commerce	57975: Aberdeen Civic Society 58123: Kingswells Community Council 58250: John Rose 58261: Torry Community Council 58397: David Ballock 58711: Aberdeen Harbour Board 58769: Clive Kemp 59036: Craigiebuckler and Seafield Com. Council 59179: Scottish Wildlife Trust 59236: Duncan Massey 59367: Neil Rothnie 59535: Scottish Property Federation 59577: Scottish Government 59695: Scottish Natural Heritage 59697: Scottish Water 59699: Scottish Enterprise 60338: SEPA 60678: RSPB	Issue 7 Aberdeen Harbour Expansion, p36
Planning authority summary of the comments		

Principle of Harbour Expansion

48626, 49471, 54193, 59577, 59699: Support the principle of expanded harbour facilities for Aberdeen.

58397: Measures promising economic growth should not be immune from scrutiny. Proposals should not be allowed if the impact on the natural environment is too great, even if they would deliver economic benefits.

Preferred and Alternative Options:

48970, 49567, 55418, 55591, 57233, 57280, 57581, 57709, 57734, 57894, 57975, 59036, 59236, 58711: Support the principle of the Preferred Option, creating a new deep water harbour facility at Nigg Bay.

58123: Support concentrating future growth on the existing harbour estate.

58711: Concentrating future growth on the existing harbour estate is not a viable alternative.

Green Belt Policy Designation

58711: The proposal does not impact on Green Belt objectives and its status as essential infrastructure means it is compatible with Green Belt policy. That said, Green Belt status should be removed from the site and the Green Space Network amended.

Access and Impact on Transport Infrastructure

49567, 55450: Support the primary access to the new facilities being taken from the Coast Road, via Wellington Road through the Altens Industrial Estate.

49567, 55418: A full and detailed examination of transport access requirements and impact should be undertaken as part of the planning process, to ensure good routes into and out of the development.

54193, 58250, 55450, 55591, 57734: Concern over the amount of traffic generated by this development along with other new developments nearby, and the impact of this on the local road network and its users, including pedestrians and cyclists.

Access arrangements would have to preserve residential amenity of residents in Burnbanks/Cove.

57482: Design of infrastructure must be in place before Harbour works commence.

Drainage

59697: The development will result in a significant increase in water demand.

Upgrades will be required because the existing water main at Nigg Bay will be unable to cope with the proposed flows.

Impact on Leisure, Recreation and Access

55177: Consideration must be given to the impact of the proposals on local sports, leisure and recreational facilities and informal networks.

55418, 57709: Consider using tunnels if access routes detract significantly from green space and public access.

Impact on Natural and Historical Environment

57543, 58123, 56261, 59179: This development will lead to a significant negative impact on the natural and historic environment, including the Nigg Bay SSSI. It is

difficult to see how this can be avoided, although efforts should be made to ensure the natural environment is not damaged or lost.

60678: Biodiversity enhancements should be sought when developing new infrastructure schemes.

Environmental Assessments

59695: EIA and SEA should consider the impact of the development on Bottlenose Dolphins, a qualifying feature of the Moray Firth Special Area of Conservation.

60338: Flood Risk Assessment will be required and the Environmental Impact Assessment should also examine flood risk.

60338: Studies should be undertaken as to impact on Aberdeen Bathing Water and on the quality and amenity of the bathing beach.

Masterplan

57894, 59535, 59695: A Masterplan for the new harbour area should be prepared, covering:-

- Access via all modes of transport
- Linkages between Nigg and existing harbour
- Facilities required to maximise potential for renewables
- Opportunities for local regeneration
- How to balance a mix of uses
- Links to existing business locations
- Enhancing the green space
- Allocation of more employment land in the area
- Improvement of Tullos Industrial Estates

58711: A masterplan that deals with wider social and economic benefits should not be a pre-requisite for delivering the planned harbour expansion at Nigg Bay. The development should also stand along unencumbered by the delivery of any surrounding development planned by other parties.

Development of Existing Harbour Estate

58711, 58769: It is unlikely that mixed use development will be acceptable on land within the existing operational harbour area. However this may change once the new facility at Nigg Bay is operational. There may be an opportunity to redevelop parts of the existing harbour waterfront around the City Centre and Footdee for more pedestrian-friendly uses.

Summary of the responses by planning authority

Principle of Harbour Expansion

48626, 49471, 54193, 59577, 59699, 58711: The principle of an expansion to Aberdeen Harbour has been established at a national level by the National Planning Framework 3, on the grounds of strengthening its key role in supporting the economy of the north east. The impact of the proposal of the environment will be scrutinised through a full Environmental Impact Assessment and Appropriate Assessment, with mitigation and compensatory measures identified as appropriate.

Preferred Option and Alternative Options

48970, 49567, 55418, 55591, 57233, 57280, 57581, 57709, 57734, 57894, 57975, 59036, 59236, 58711, 58123: The identification of Nigg Bay as the preferred option

was arrived at following extensive scoping and consultation exercises by Aberdeen Harbour, and represents the most satisfactory solution in terms of land-use planning, the operational requirements of the harbour, and supporting the continued economic growth of the North East. In particular, it is unlikely that the existing access arrangements for the harbour would be able to accommodate expected future growth in large and unusual loads needing to be transported to and from the harbour. NPF3 specifically mentions Nigg Bay for the expansion. Therefore we propose to identify Nigg Bay as an opportunity site for a new deep water harbour facility.

Green Belt

58711: Green Belt and Green Space Network designation will be removed from the site. It will be zoned as B5 Aberdeen Harbour and identified as an opportunity site.

Impact on Transport Infrastructure

49567, 55450, 55418, 54193, 58250, 55591, 57734, 57482: A detailed appraisal of access options has already been carried out by Aberdeen Harbour. A full and detailed transport assessment will require to be carried out prior to the development. This will need to be agreed by Council transportation and roads teams before construction commences.

Drainage Arrangements

59697: We will expect Aberdeen Harbour to work with Scottish Water to ensure the proposed water supply and drainage arrangements are satisfactory to all parties before commencing development.

Impact on Leisure, Recreation and Access

55177: Consideration will be given to the impact of the proposals on local sports, leisure and recreational facilities and informal networks through the Masterplanning and planning application process.

55418, 57709: Detailed access and transport arrangements are yet to be decided.

Impact on Natural and Historic Environment

57543, 58123, 56261, 59179: Although negative impacts will not be wholly avoided, efforts will be made to mitigate the impact of the development.

60678: The potential to seek biodiversity enhancements is already covered in existing policy NE8 Natural Heritage. This will be carried over into the Proposed plan.

Environmental Assessment

59695: SEA for the Proposed Plan will consider impacts on these species. The requirements for an EIA will be agreed between the applicant and the planning authority at planning application stage.

60338: A statement will be inserted into the plan requiring Flood Risk Assessment. Any studies into the impact on Aberdeen Bathing Water will also be agreed at planning application stage.

Masterplan

57894, 59535, 59695: A masterplan for the new harbour will require to be prepared. The specific requirements for this and what it will address will be agreed at a later

stage. This will address only the harbour development itself, and not the wider area. The OP site will be identified as a 'standalone' development for the purposes of the LDP.

Development of Existing Harbour Estate

58711, 58769: Acknowledge the constraints to developing the existing harbour operational area. Any future planning proposals for this area will be considered on their merits.

Planning authority action/recommendation for Proposed Plan

Identify Nigg Bay as an Opportunity Site for new deep water harbour facilities. It will be zoned as B5 Aberdeen Harbour. A masterplan will be required.

Issue 16	Housing Needs, Affordable Housing, Private Rented Accommodation, Housing for Older People and Particular Needs, Housing in Multiple Occupation, Serviced Apartments, Housing Mix, Housing Density, Regeneration.	
Body or person(s) submitting a representation raising the issue (reference no.)		
48518: Aberdeen Trades Union/Council 48626: Mustafa Osman 49471: Bucksburn Community Council 50066: Kenneth Eddie 51198: Middlefield Community Project 53467: Ronald Leith 55418: Cults, Bielside and Milltimber Community Council. 55905: Valerie Fyfe 57160: Aberdeen Greenspace Trust 57233: John Boylan 57280: Christine Boylan 57543: Patricia Clarke 57709: Marie Boulton 57725: Blair Melville 57734: Andrew Jones 57816: Abdul Latif 57975: Aberdeen Civic Society	58012: NHS Grampian 58123: Kingswells Community Council 58261: Torry Community Council 58313: Old Aberdeen Heritage Society 58714: Dandara Limited 58769: Clive Kempe 59036: Craigiebuckler and Seafield Community Council 59236: Mr Duncan Massey 59367: Neil Rothnie 59452: Scotia Homes Ltd 59535: Scottish Property Federation 59672: Stewart Milne Homes 59699: Scottish Enterprise 59765: University of Aberdeen 59923: Drum Kingswells Business Park Ltd. 59577: Scottish Government	
Section of the MIR to which the issue relates:	Main Issue 8 & 9. Section 7.1,7.2,7.3,7.4,7.5	
Planning authority summary of the comments		
<p>Housing Needs and Affordable Housing 51198, 57709, 57233, 57280, 57725, 58012, 59036, 59236, 59452, 59765, 57975 – Showed general support for Option 2 – Preferred Option, of allowing flexibility in the policy approach. 55418 – Also showed support for Option 2 but only if an overall target of 25% can be</p>		

maintained.

58261 – Again showed support for Option 2 but raised concern about the existing level of social housing in Torry.

59535 – Support for Option 2 also shown on the basis that there is significant portion of the population whose annual income is too great to qualify for AH but still cannot access the housing market.

58123, 57734 – Supported Option 1 – Current Approach on the grounds that it creates balanced communities.

57816, 57280 – Suggested a general need for more Affordable Housing.

57734 – Stated council owned land such as the AECC should be 100% affordable.

55905 – Raised concern that the cost of low cost home ownership is still too high.

57734 – Suggestion that all residents including students should pay council tax and this should be ring fenced for social housing.

58714 – Supported Option 3 – Alternative Option, suggesting that this option does comply with SDP as sustainable mixed communities are a larger issue than just housing.

59672 – Support also for Option 3 but only if more detail of the approach to be taken is supplied.

58769, 59367 – Opposition was also shown to Option 3 on the grounds it will create ghetto's, 59577 – and that it does not comply with the SDP.

59765 – Suggested that students and key workers should be eligible for affordable housing and where the university develops land for student accommodation this should be allowed as an alternative to affordable housing.

59577 – Raised concern about the lack of information in the MIR on the affordable housing requirement in the area. This should be gathered from the Housing Needs and Demand Assessment and figures introduced into the proposed plan.

Ring-Fencing of Affordable Housing Contributions

58012 – There was a request that Affordable Housing or commuted sums agreed as part of the redevelopment of NHS sites be targeted for key workers and students housing.

48626 – Supported the provision of more council houses.

Private Rented Accommodation.

49471, 57816, 57233, 57280, 57725, 59036, 59236, 59367 – Suggested that some form of support should be given to Private Rented Accommodation.

57543 – Also suggested support for the private rental sector but only on the basis that it is of quality and well managed.

51198 – There was a suggestion that guidance was required on how private rented accommodation should be managed.

48518, 55418, 57734, 58769, 57975 – Opposed any support for private rented accommodation.

59672 – Suggestion that the only way to relieve pressure on the private rental market is to allocate more land.

59535 – Finally a suggestion that the council should enter a partnership with private developers to develop private rented accommodation on council owned land.

Housing for Older People and Particular Needs.

48626 – Suggested that there was a need for more than 10% housing for the elderly and 55418 – suggested that a target of 25% would be more appropriate.

51198 – Suggested that there was a need for better design standards to create more attractive accommodation for the elderly.

57709 – Proposed that all allocated sites over 30 units should include an allocation for this group Older People and Particular Needs.

55905, 57233, 57280, 59236 – Supported Option 2 – Preferred Option, of setting a target of 10% on sites of 50 units or more.

58123 – Also supported Option 2 but suggested there was a need to consider bungalows and 57734 – suggested that the target should apply to developments of 20 units and above.

57725, 57975 – Opposed the suggestion that a target should be applied as the demand is not known in advance and customers have the opportunity to request changes.

58714, 59452, 59672 – Supported the current approach Option 1, on the grounds that all houses are required to be adaptable under Building Standards.

58769 – Proposed the need for greater mixed communities in particular keeping the elderly within the community.

Serviced Apartments, Houses in Multiple Occupation and Temporary Accommodation.

Serviced Apartments

50066 – Showed general support for Serviced Apartments.

Houses in Multiple Occupation

53467, 58313 – Concern over the high concentration of HMO's in certain areas of the city such as Old Aberdeen particularly due to the university. Licences for HMO's should be limited and Section 75's for new developments in conservation areas should stipulate that they cannot be subsequently turned into HMO's.

58313 – Also suggested that the proliferation of HMO's is contrary to the council's aim of creating sustainable mixed communities.

58313 – Suggested that HMO's and Serviced Apartments should not be included in the same supplementary guidance and HMO's should have their own Overprovision Policy.

Temporary Accommodation

56999 – Proposed a need for serviced and temporary accommodation to service the Mon-Fri accommodation pressure caused by the oil and gas industry.

Housing Mix and Density.

55418, 57975 – Supported the idea of creating a greater housing mix.

57975 – Also suggested that the housing density of 30units /ha should be applied rigorously across the city.

Regeneration

57160 – Suggested that regeneration projects should include improvements to open space done with the community.

58261 – Suggested that communities need to be consulted on policies around regeneration, particularly the communities affected or the policy should be deleted.

Summary of the responses by planning authority

Housing Needs and Affordable Housing

57816, 57280 – The general support for more Affordable Housing is welcomed and noted. It is the Council's aim throughout the plans and policies to maximise the delivery of Affordable Housing.

48626 – Similarly the support for more council housing is noted again it is the Councils aim to provide council housing where possible and where funding allows.

Support for Option 2 – Preferred Option.

51198, 57709, 57233, 57280, 57725, 58012, 59036, 59236, 59452, 59765, 57975 – The comments of support are noted and welcomed. The aim of this approach is to provide flexibility in how affordable housing is delivered, with an aim of increasing the overall level of affordable housing being provided.

55418 – It is the aim of the Council to achieve the highest level of affordable housing possible; however it may not always be achievable to deliver 25% on all sites. It is felt that by introducing flexibility a greater overall percentage can be achieved.

58261 – Concern about the existing level of social housing in Torry is noted. It is the aim of the Council to take a balanced approach to the delivery of affordable housing across the city when ever possible.

59535 – Concern over the income limits to accessing affordable housing is noted. The aim of providing more affordable housing across the city is also to relieve pressure on the property market for those who do not come under the remit of the affordable housing sector.

Support for Option 1 – Current Approach.

58123, 57734 – The comments of support are noted. While suggestions that the current approach provides balanced communities are appreciated the current approach does allow for off site provision of affordable housing and commuted payments in lieu of affordable housing. The creation of balanced mixed communities is a complex issue and while affordable housing is certainly part of that process, the allocation of sites, development framework, master planning and planning application process all work together to try and create the best communities possible. It is however imperative that we maximise the delivery of Affordable Housing and it is felt that more flexibility would aid in that process.

57734 – While the suggestion that the AECC site is designated for 100% affordable housing is noted, this would however run contrary to the Councils aim of creating mixed communities. The delivery of the new AECC development must be part funded by the Council. Income lost from this site would need to be found elsewhere. Any site will never the less be required to provide 25% affordable housing.

55905 – Concern that the cost of low cost home ownership is too high is noted.

57734 – The suggestion that students should make some contribution to council tax is noted. The Council are aware of the financial pressure students are under and do not feel that adding an additional burden would be worthwhile. Further – this is an issue which cannot be addressed through the Local Development Plan.

Support for Option 3 – Alternative Option.

58714 – Support for this option is noted and while the submission argues that this option would comply with the Strategic Development Plan, we are still strongly of the view this option does not comply with its objective of providing sustainable mixed communities.

59672 – Again while support was shown based on more information being provided

of the approach to be taken, we are strongly of the view this option does not comply with the Strategic Development Plan and therefore should not be advanced.

58769, 59367 – Opposition to Option 3 is noted and welcomed.

59577 – We would agree that this option will not comply with the Strategic Development Plan.

59765 – The submission that key workers and students should be eligible for affordable housing is noted. The suggestion that student accommodation should be allowed as affordable housing is not supported. 58012 – A similar submission that affordable housing or commuted sum payments from NHS's sites should be ring fenced for key workers and students is not supported. We note that students are already exempt from council tax and to exclude sites which are owned by educational institutions or the NHS from a requirement to provide more general affordable housing, would largely only benefit students and workers of these institutions to the detriment of other low paid workers.

59577 – Concern about the lack of figures on affordable housing is noted. It was our aim to keep the Main Issues Report concise and to a reasonable length.

Private Rented Accommodation

49471, 57816, 57233, 57280, 57725, 59036, 59236, 59367 – The support for policies to help Private Rented Accommodation is noted.

57543, 51198 – While suggestions that any supportive policies should also include management criteria are noted, the management of Private Rented Accommodation is largely a matter for the open market. There are however significant health and safety requirements which landlords must comply with.

48518, 55418, 57734, 58769, 57975 – Opposition to any support for private rented accommodation is noted.

59672 – While the suggestion that additional land should be allocated to relieve pressure on the private rental market is noted the Strategic Development Plan has shown that there is sufficient land allocated.

59535 – The suggestion that the Council should enter a partnership with private developers is noted. The Council is currently setting up a company to help deliver 2000 affordable housing units.

Housing for Older People and Particular Needs.

48626, 55418 – Suggestions that more than 10% housing for the elderly is required is noted. There are however, competing demands for many types of housing and setting a target too high in one area may have negative impacts on other areas of need.

51198 – Suggestion that better design is noted and design has been identified as a main issue in another Schedule 4.

Support for Option 2 – Preferred Option.

55905, 57233, 57280, 59236 – Support for Option 2 – Preferred Option, is noted and welcomed, 58123 – Supported Option 2 and while all building types are considered Bungalows are difficult to justify in the city area due to the high demand for housing.

57734, 57709 – Lowering the target below 50 units would likely be difficult for developers to manage and would not offer the sense of community that 5 or more units would offer.

57725, 57975 – Opposition to a target is noted.

Support for Option 1 – Current Approach.

58714, 59452, 59672 – Support for this approach is noted.

58769 – Support for keeping the elderly within the community is noted.

Serviced Apartments, Houses in Multiple Occupation and Temporary Accommodation

Serviced Apartments

50066 – Support for serviced apartments is noted.

Houses in Multiple Occupation

53467, 58313 – Concern over HMO's is noted. There are currently approximately 1,050 HMO's across the city. The Council's housing section that manages HMO licensing has recently undertaken an analysis in light of the Scottish Government's introduction of guidance around overprovision of HMO's. Their findings, which went to committee, stated there was not an overprovision, and there was at this time, no need for additional guidance.

In terms of the planning system, of the approximate 1,050 HMO's licences only 10% required planning permission, meaning 90% never pass through the planning process. This is because planning permission is only required where more than 5 bed spaces in an HMO are proposed. In light of this it is not felt that the preparation of supplementary guidance around HMO's would be of benefit and if overprovision does become an issue, it should be dealt with through the licencing process.

Temporary Accommodation

56999 – Support for temporary accommodation is noted however this is an issue for the housing market and one which it appears is being addressed through the development of serviced apartments.

Housing Mix and Density

55418, 57975 – It is the aim of the Council to achieve a mix of house types on all sites and uses where appropriate.

57975 – The suggestion that 30units/ha should be applied rigorously across the city is noted, it is not however possible or appropriate to have a blanket approach to density. Some areas close to services and transport nodes can clearly accommodate a much higher density where other sites due to landscape or other features may suit a lower density. Larger sites should provide a mix of high, medium and low density. It is however the aim of the Council to achieve an average density of 30units/ha.

Regeneration

57160, 58261 – Suggestion of improved community engagement is noted. It would always be the Council's intention to fully consult local communities on any regeneration proposals or masterplans.

Planning authority action/recommendation for Proposed Plan

Revised supplementary guidance will be prepared on affordable housing to examine ways to make the system deliver more units through a greater degree of flexibility.

To support both the Housing Mix and requirements of Older People and People with Particular Needs, the current policy on housing mix will be strengthened to require 1

and 2 bedroom units on developments over 50 units. This will apply to both market and affordable housing. In terms of adaption, under building regulations all new houses are required to be adaptable for Older People and People with Particular Needs.

Issue 17	Infrastructure and Transport	
Body or person(s) submitting a representation raising the issue (reference no.)		
47157 – Mr Jeremy Wood 48626 – Mustafa Osman 48644 – Mr Alan Watson 48970 – Mr Brian Rattray 49471 – Bucksburn Community Council 48471 – Nestrans 49567 – Nestrans 49783 – Ian Mitchell 51198 – Middlefield Community Project 54194 – Ms MAAS-LOWIT 55177 – SportScotland 55418 – Cults, Bieldside and Milltimber Community Council 55905 – Ms Valerie Fyfe 57160 – Aberdeen Greenspace Trust 57233 – John Boylan 57280 – Ms Christine Boylan 57394 – Nigg Community Council 57427 – Mrs Jyll Skinner 57709 – Ms Marie Boulton 57725 – Blaire Melville 57734 – Andrew Jones 57816 – Abdul Latif 57894 – Aberdeen and Grampian Chamber of Commerce 58123 – Kingswells Community Council	58012 – NHS Grampian 58601 – Ms H Leith 58769 – Mr Clive Kempe 59036 – Craigiebuckler and Seafield Community Council 59236 – Mr Duncan Massey 59367 – Mr Neil Rothnie 59452 – Scotia Homes Ltd 59535 – Scottish Property Federation 59577 – Scottish Government 59672 – Stewart Milne Homes 59695 – Scottish Natural Heritage 59697 – Scottish Water 59699 – Scottish Enterprise 59923 – Drum Kingswells Business Park Ltd. 60678 – RSPB 59695 – Scottish Natural Heritage 53467 – Mr Ronald Leith 50066 – Kenneth Eddie 54193 - Ms MAAS-LOWIT 55591 – Andrew J I Dalziel 58397 – Mr David Ballock 57875 – Aberdeen Civic Society 59017 – Cove and Altens Community Council	
Section of the MIR to which the issue relates:	5.2 – Infrastructure Provision; 5.3 Sustainable and Active Travel	
Planning authority summary of the comments		
Infrastructure provision 58769 - Higher density development reduces infrastructure costs. 58769 - Tax all car parking (for office and retail) and use the money to subsidise public transport and improve the infrastructure for public transport 57975 – a greater mix of house types and control of future development would help to support existing infrastructure 57233, 57280, 57394, 59036, 59367 – essential infrastructure should be in place before any development takes place		

49471, 55418, 57894, 59697, 59699 – infrastructure projects should be better coordinated

59535 – the key pinch points (Bridge of Dee and Haudigan) should be prioritised.

59535 – the feasibility of a growth corridor to Aberdeen Airport should be explored

59695 – any infrastructure around the River Dee SAC needs to have no adverse impact on its integrity during and after construction

59695 – green infrastructure (landscaping) is an important part of any development and any delay to its completion could have a negative impact on amenity

53467 – any works in and around Old Aberdeen need to take account of the sensitivities of the area and should ideally undo the damage caused already to lessen the impact on the Conservation Area

56066 – environmentally friendly alternatives to gas should be incorporated into development at the outset and be future proofed

59017 – the new plan needs to take account of the infrastructure requirements for current and proposed traffic of the Cove/Loirston Area

47157 – increase width of Wellington Road to 4 lanes when Craiginches closes

54193 – Torry Academy should remain in the community as, 54193 – the proposed location is not good.

55177, 57725 – the new school at south of the City should be optimised for school & community uses and demographics & school roll

54193 – there should be no further building until traffic management issues in the Cove area are addressed

55177 – existing sports pitches reuse/replacement needs consideration against SPP

47157 –access onto A96 needs to be improved by dualling the road

48970, 49471 – the future development in the Bucksburn area will add to existing issues

48970, 49471, 55905 – plans need to be put in place around Haudigan to release pressure off existing network

55177 – new school at OP45 requires mitigation from nearby golf course

57725 – the new school at Greenferns should be optimised for the demographics and school roll

54418 – access to the Airport needs to be improved and traffic separated from business/AECC traffic

47157 –the Langstracht should be dual-carriageway up to the bus gate

47157 – ban right turn into union square from Market Street to help alleviate some of the traffic concerns

54418, 58012 – the level of health services and delivery needs to be made clear

54418, 55709 – improved link between A93 and Garthdee/Inchgarth Rd required

57394, 55709, 57816 – a more strategic overview is required of the network to take account of the cumulative effect of proposals and ensure infrastructure is fit for purpose

57734 – unsure of the real benefits of electric charging points

58123 – the AWPR will not benefit those using radial routes in and out of the City Centre

58123 – incentives for using rail (including freight) should be increased

Sustainable and Active Travel

48626, 57816, 58123, 57709, 59036, 59695, 59699, 58397 – there is a need to improve cycle lanes throughout the City

57233, 57280, 55709, 59695, 59397 – dedicated cycle routes in new development should be separate from vehicular roads
49471, 57427, 56066 – there should be sufficient cycle/pedestrian routes where a new school is proposed in a development
49471, 57427, 59699, 60678 – new housing schemes should incorporate facilities which are easily accessible on foot/cycle
49567, 59695 – need to connect local and strategic active travel network to support the SDP and the Regional Transport Strategy
49567 – specific objectives need to be identified and included in LDP
55177 – new paths should consider sport as well as active travel
55177 – recreational and community uses should be part of an integrated joined up network
57160 – some of ACC budget should be targeted to sustainable and active travel
57427 – sustainable and active travel will help best achieve the vision and objectives of the new Aberdeen Local Development Plan
57427, 59699 – new cycle facilities should be planned from the outset of any project, 57975; 58397 and should be given priority over vehicular routes
57975 – pedestrian priority measures should be put in place within walkable neighbourhoods
57816 – the use of bus lanes for car sharing should be investigated
51148, 55709, 57734, 58123, 56066 – introduce monorail/electric buses to connect communities and improve congestion, but 57734 – trams are too restrictive to be considered
48626, 51198, 54193, 54418, 57233, 57734, 58123, 58601, 59036, 59367, 55591 – there is a need to review cost and increase frequency of buses
59236 – additional city centre car parks would help to service retail, leisure and office developments to enhance viability and accessibility
59236 – central/strategic parking facilities would enable a park and walk or park and bike approach
57816, 58397 – park and ride facilities need to be expanded
59923 – housing, employment and retail should be located closer together
58397 – the city's 'walkability' needs to be enhanced
57734 for car clubs, should be investigated
58601, 50066 – consideration should be given to new bus routes to make the city easier to navigate

Policy

57394 – current infrastructure guidelines are out of date
57725, 59672 – clear policy is required in relation to infrastructure requirements, justification and costs to help the development industry
58012 – current policy I1 should be reworded to include healthcare facilities
59577, 59672 – the role of the STF needs to be clarified and made clear
49567 – wording of interventions to be delivered through STF should be consistent with SDP
58012 – improvement to Developer Contribution SG and Action Programme required for proposals outwith Masterplan zones.
49471, 55418, 57894 – developer contributions should be more timely to support infrastructure improvements
57725 – clarity is required in relation to negotiation of Developer Obligations and S75 to speed the process up

58123 – developer obligations needs to be increased
59452 – Policy I1 should be included in the emerging LDP
59452 – Policy LR2 should encourage mixed use developments through the Masterplan process.
59452 - There should be a policy on mixed use development and then a policy on mixed use development which addresses car parking problems as per Aberdeenshire LDP MIR.

General comments

48644 – developers should not be allowed to access sites over ‘sensitive’ areas
57734 – Aberdeen’s ‘air quality issues’ are not sufficiently bad to require mitigation

Summary of the responses by planning authority

Infrastructure provision

There are policies and guidance in place at local, regional and national level to ensure that development mitigates against its impact and all development is expected to conform to these. In many circumstances, planning conditions are imposed on grant of permission to ensure work is undertaken at a certain stage of development.

It is clear that the existing transport network requires an element of upgrading above and beyond planned improvements such as the Third Don Crossing and AWPR. Developers are therefore required to provide the necessary transport infrastructure to mitigate the impact of development, both through the Strategic Transport Fund (STF) for larger schemes, and via developer contributions for more localised improvements.

As Roads Authority, the Council has an ongoing programme of infrastructure and maintenance works which is delivered on a priority basis and where funding allows. The Council also works with key partners such as Nestrans and the Scottish Government to eliminate pinch points throughout the City – both the Bridge of Dee and Wellington Road are subject to current studies, while traffic modelling is underway to identify traffic management improvements in the City Centre and to understand the impact of Broad Street pedestrianisation. The Scottish Government has also committed to improvements at the Haudigan Roundabout following implementation of the AWPR.

Electric charging points enable residents to adopt an emission-free mode of independent transport, therefore are one of the initiatives that the Council promotes and encourages to reduce transport’s carbon footprint in Aberdeen. There are policies and guidance in place to ensure that developments have adequate provision of open space and again proposed developments are expected to conform with these.

In respect to school allocations, the location of such are generally agreed by the Education, Culture and Sport Committee and subsequently these are fed into any relevant Masterplan for a site. The schools would be designed with the school roll forecasts in mind.

With regards to health services, information about what is required is contained within the current Action Plan which will be reviewed as the next ALDP progresses. Further discussions take place through the planning application process in relation to Developer Obligations.

Comments specifically made regarding rail incentives and car parking are noted.

Sustainable and Active Travel

Aberdeen City Council recognises that high quality facilities that enable and encourage people to walk, cycle or use public transport for a variety of journey purposes (including work and education trips, utility trips and for recreation) must be delivered in tandem with new development and therefore works with developers to ensure that the appropriate infrastructure is in place to enable this from the very first day of occupation.

Developers are required to ensure that new developments are accessible by walking, cycling and public transport and that the internal layout of developments also favours these modes. There are policies in place (including Designing Streets and Cycling by Design) which new developments are required to adhere to, that promote pedestrian and cycle friendly design and aim to ensure that the needs of those on foot or bike take precedence over those driving motor vehicles. The Council also supports the concept of mixed use communities that reduce the need for travel.

The Council appreciates that it has responsibility for the current transport network and that a series of improvements and additions are required to ensure Aberdeen City becomes a more welcoming place to pedestrians and cyclists. Such improvements are therefore being delivered on a priority basis and as funding allows. The Council recognises that active travel infrastructure must be connected and integrated to allow seamless journeys across the City and longer-distance journeys to and from Aberdeenshire. The ALDP will therefore align with the aspirations of the SDP and the Regional Transport Strategy in respect to a long-distance active travel network.

Aberdeen has a dense public transport network, consisting of a wide-range of bus services and a limited rail service, which connects residential neighbourhoods with areas of employment, education, leisure and retail. Although routes, frequencies and prices are the responsibilities of private operators, the Council works with operators and other partners to improve the punctuality and reliability of services, to improve public transport infrastructure, to promote public transport services and to pilot new initiatives. New development will necessitate the expansion of the current network and the Council works with developers and public transport operators to ensure new developments can be served by public transport wherever possible. In terms of new public transport solutions, the Council is introducing a fleet of hydrogen buses to the City, while a study is underway to look at innovative ways of linking new developments by public transport.

With regards to Park and Ride, the City currently has 2 sites, with a third at Dyce due to open in 2015. Improvements are due to take place at the Kingswells facility in 2015 to allow a better flow of buses through the site, and hence an increase in the number of services, while opportunities to expand the Bridge of Don facility will be

considered as part of the redevelopment of the AECC site. Throughout the wider region, the Ellon Park and Ride continues to expand, a new site is planned for the A90 at Schoolhill, south of Aberdeen, and a series of smaller Park and Ride 'hubs' are being developed by Aberdeenshire Council, initially along the A947 corridor.

It is unlikely that the Council will open up bus lanes in the City to Car Club vehicles or car sharers as this would dilute the benefits of such facilities for bus users and thus contradict the Council's aspirations to encourage a modal shift to public transport.

The City Centre is already very congested and tight on space. In the event that an appropriate area of land becomes available, it is unlikely that a new car park would be the preferred option. The introduction of new car parking facilities within the City Centre would contradict the Council's aspirations to promote sustainable modes of transport, especially within the City Centre, which is currently one of three Air Quality Management Areas (AQMAs) in Aberdeen, where the volume of particulate matter (PM) detected is of a level that could be harmful to human health. Other AQMAs are in place on Anderson Drive and Wellington Road.

Policy

One of the main reasons for a local plan review is to ensure that all policies and guidance are up-to-date and fit-for-purpose and the review of proposed ALDP (2016) will ensure that and which will include the introduction of any new policies and guidance which are deemed necessary.

Planning authority action/recommendation for Proposed Plan

Continue to identify existing transport infrastructure improvements.

Identify new transport projects to be delivered through the Strategic Transport Fund as outlined in the Main Issues Report.

Issue 18	Kingswells	
Body or person(s) submitting a representation raising the issue (reference no.)		
50066: Kenneth Eddie 56278: Shell UK Ltd 58123: Kingswells Community Council 58687: Mrs S Barrack 58755: EnerMech Group Ltd 58977: Aberdeen City Council	59150: Bancon 59679: Scotia Homes Ltd 59720: Stewart Milne Homes 59923: Drum Kingswells Business Park Ltd 59929: Barratt North Scotland	
Section of the MIR to which the issue relates:	Main Issue 1: Greenfield Housing and Employment Allocations	
Planning authority summary of the comments		
Countesswells		

50066: This will be problematic.

Greenferns OP45

58755: EnerMech wish to expand their current operation up to 10ha. Would like to include areas C and I of the Greenferns Development Framework in to their campus.
58977: Support the continued inclusion of the site.

Greenferns OP39

58977: Support the continued inclusion of the site.

All BIDS in the Kingswells and Countesswells area

58123: Agree with the undesirable status of all BIDS in the Kingswells and Countesswells area.

Maidencraig: B0301

58687: Site should be allocated desirable.
59150: Site should be allocated desirable.

Prime Four: B0308/B0309/B0310

56278: agree with allocation of undesirable. St Fergus to Mossmorran pipeline close to sites. If allocated, consultation must be undertaken.
59923: Site should be allocated as desirable. The marketable supply outlined in the Employment Land Audit 2013 doubles the actual figure.

Kingswells East: B0305

59679: Site should be allocated as desirable.

Huxterstone/ Gillahill/Derbeth: B0303

59720: Sites should be allocated as desirable.

Newton East: B0306

59929: Site should be allocated as desirable.

Summary of the responses by planning authority

Countesswells

Countesswells is subject to the masterplanning process. The process will highlight high level issues that need to be addressed.

Greenferns OP45

Welcome the support of the inclusion of the site. The development framework for Greenferns, and the Aberdeen Local Development Plan outlined that 10ha of employment land within the site is expected. Expanding EnerMech's existing business/industrial units on site could be a viable way of delivering this.

Greenferns OP39

Welcome the support of the inclusion of the site.

All BIDS in the Kingswells and Countesswells area

Welcome the agreement of the undesirable status of these sites. The overall vision and spatial strategy of the Local Development Plan is considered to be appropriate

and was established following the Examination into the 2012 Local Development Plan.

Maidencraig: B0301

This proposal would include an area of land that has previously been developed and the development would be closely linked to the new community identified in the extant Local Development Plan at Maidencraig. The Den of Maidencraig (LNCS) is an important feature that runs along the boundary of this site with the Maidencraig site. Any development in this area may increase the risk of flooding and increase the area of land at risk from flooding. The visual impact and impact on the historic environment would be minimal and the development of previously developed land is a plus point that would result from this development. Nevertheless, it is considered that there is no over-riding benefits arising from this site which would justify allocating it for development, given that sufficient allocations are already made to meet the SDP allowances.

Prime Four Allocations

Welcome the agreement of the undesirable status. Should applications be forthcoming HSE would be a consultee in the planning application process.

Regarding changing the status of the site to desirable.

B0308 – phase 6&7

Development on this site would intrude on the surrounding landscape, especially from the Kingswells bypass. This site has 5 no. consumption dykes and on the boundary with the existing allocation is the scheduled monument and category B listed consumption dyke. This provides a robust green belt boundary to the development to the south. There is a buffer between the consumption dyke and the existing allocation to protect its setting and this would require to be mitigated similarly. The West Hatton Local Nature Conservation Site (also Ancient Woodland) runs along the northern and eastern boundaries of this site. There is currently insufficient capacity at Kingswells Primary School to accommodate further pupils arising from residential developments.

B0309 – phase 4

The principle of development in this area is accepted. What is being assessed here is whether a mix of employment, retail and leisure would be more suitable than the employment allocation in the Plan at present. Consent has already been granted for a hotel within OP40 as a supporting use that would create new employment opportunities and contribute towards the mix of uses in the local area. A retail development in this location has the potential to have a wide catchment given its prominence and location on the new AWPR junction. It is considered that small scale retail development that would support the employment development and that could serve residents in Kingswells may be appropriate, but there is no justification for a larger retail use.

It is considered that there is no quantitative deficiency of convenience (supermarket) provision. It is accepted that new communities such as Countesswells may require retail elements that would meet day to day and occasional main food shopping requirements. However, such provision should be made within a more convenient

location in Countesswells itself in order to reduce the need to travel from there.

B0310 – phase 5

The expansion of the business park to the west of the existing business park is supported. The existing business park has been built out very successfully, with exceptional demand for office space within this location. Part of the currently zoned land at Prime 4 is constrained due to difficulties in providing a suitable road access to the land to the west of the veterinary clinic. In order to continue to accommodate the high demand for employment space there, the Plan shows an extension to the site which will be bound by the AWPR when built. An extension would capitalise on the already buoyant situation within the business park. The landform to the south of the site, from the A944, rises steeply to a natural plateau providing a logical location for an extension to the existing development which lies on the same elevation. Access to the proposed extension would be located off the existing road infrastructure built for the phases 1-3. The Proposed Plan will contain the requirement for this extension to be masterplanned. A TIA will be required. In addition, adequate buffer zones for the Quaker burial ground and the woodland will need to be identified in the masterplan.

Kingswells East: B0305

The site sits just below Newpark Hill and occupies a significant position within the landscape. It is visible from Old Kingswells, many parts of new Kingswells and the surrounding area to the south, east and west. The site is especially visible from the A944. Its development would encroach into the open countryside which separates Kingswells from Aberdeen. As the current school roll stands there would be no primary school space to accommodate the expected children from this development. 80 dwellings alone would not be able to support a new school.

Huxterstone/Gillahill/Derbeth: B0303

All three sites were considered during the examination into the 2012 LDP. The reporter concluded that their green belt status was justified by reasons of protecting the setting of Kingswells and preventing encroachment into the countryside that separates Kingswells from Aberdeen. In addition there is no primary school capacity at Kingswells.

Newton East: B0306

Although small, the site contributes to maintaining the open setting between Kingswells and Aberdeen. Development on this site would have a negative impact on landscape and views and Kingswells Primary School is at capacity so any additional pupils generated by this development which would compound this situation.

Planning authority action/recommendation for Proposed Plan

OP45 Greenferns Masterplan/Development Framework - EnerMech wish to expand their current operation – this should be incorporated into Opportunities Schedule for OP45.

Identify land to the west of Prime 4 Business Park as an opportunity site for the Park's expansion. Masterplan required.

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Issue 19	Altens, Loirston and Cove
Body or person(s) submitting a representation raising the issue (reference no.)	
59725 Mr Ian Stephen 58738 Mr Arnold Strachan 59017: Cove and Altens Community Council	
Section of the MIR to which the issue relates:	
Planning authority summary of the comments	
<p>Please note that comments relating to the sites at Altens East/Doonies and the East Tullis Gas Holder are dealt with in the Waste Schedule 4.</p> <p>B1304 Rigifa 59725: with regards Issue 1 (Greenfield Housing and Employment Allocations), Option 2 (release further greenfield land to increase supply) is preferred. Site B1304 should be allocated for employment use.</p> <p>New Bid: Mains of Charleston, Nigg 58738: The proposed sites at Mains of Charleston should be identified as opportunities for development in the next Local Development Plan. This could be for a range of uses including commercial, retail, transport and/or employment. The boundaries for Masterplan Zone 11 (Charleston Area) should be amended accordingly.</p> <p>Hareness Road/Altens Farm Road 59017: Concerns regarding infrastructure capacity at Hareness Road/Altens Farm Road, with new development and proposed development.</p>	
Summary of the responses by planning authority	
<p>Greenfield Housing and Employment Allocations We do not propose to identify these sites as opportunities for residential development. Irrespective of the suitability of each site for development, the LDP already provides adequate housing and employment land to meet the allowances set in the Strategic Development Plan. There is no numerical justification to allocate further housing sites and we do not believe there are any over-riding benefits which would justify allocating these sites for development.</p> <p>B1304 Rigifa We do not propose to allocate this site for development. It forms part of a larger development bid that was submitted during the preparation of the 2012 LDP (Option 13/07). It was assessed as being undesirable due to the proximity of Blackhills Quarry, with much of the site falling within the 250m exclusion zone. This constraint is still relevant as the quarry is still in operation.</p>	

New Bid: Mains of Charleston, Nigg

We do not propose to allocate this site for development. The LDP already provides adequate housing and employment land to meet the allowances set in the Strategic Development Plan. There is no numerical justification to allocate further sites and we do not believe there are any over-riding benefits which would justify allocating these sites for development.

Hareness Road/Altens Farm Road

The detailed cumulative and individual requirement for infrastructure relating to sites are assessed and analysed during the planning application stage.

Planning authority action/recommendation for Proposed Plan

No action

Issue 20	Preferred Option at Malcolm Road East	
Body or person(s) submitting a representation raising the issue (reference no.)		
49630 Gillian Deverux 49713 Forestry Commission Scotland 49748 G. Devereux 54346 Sophie Lafon 54887 Florian Petellier 57035 Mr and Mrs Thain 57209 Culter Community Council 57606 David Mair 57933 Allan Chalmers 58255 Elizabeth and Ian Porter 58850 Kenny Clubb	59267 D Porter 59389 John Souter 54952 Bancon Developments Ltd. 57448 Alistair Lewis 57471 Sheila Walker 57713 Robbie Joss 57759 Robert Brew 59695 Scottish Natural Heritage 60338 SEPA 49188 Alison Olsen	
Section of the MIR to which the issue relates:	Main Issue 1: Greenfield Housing and Employment Allocations (Table 3: Preferred Development Options at Peterculter)	
Planning authority summary of the comments		
<p>Support for the Site: 57209: Would not be adverse to this development if it was entry-level family homes, and safe vehicular and pedestrian access could be provided, and drainage systems were upgraded. 57606, 59389, 58850, 57713: There is a need for good quality family accommodation to help sustain small businesses and the primary school. The proposal would also have benefits including affordable housing provision and supporting local businesses. 59606, 59389, 58850: This site scored highly in the assessment criteria, and appears to offer no value left in its current state. Of the areas identified for</p>		

development, this represents the most appropriate and the bid should be viewed favourably. It represents a natural extension to the settlement of Peterculter. 58850: Many of the issues identified in the Development Options Assessment Report, such as natural heritage, landscape impact and access are not considered to be constraints to delivery and overall the site is highly suitable for development.

Objection to the site on the following grounds:

Access and the Local Road Network

49630, 49748, 54887, 57933, 54346, 58255, 59267, 54952, 57448, 57471 : Access to and from the site from Malcolm Road would be very dangerous for both cars and pedestrians, especially children walking to school when there is not currently a pavement. The new development would result in an increase in traffic on this road.

Natural Heritage and Nature Conservation

49630, 49713, 49748, 57933, 54887, 57035, 58255, 59267, 57448, 59695: Although it has been cleared, the site has protected status as Ancient Woodland. The inclusion of the site contradicts the principle of safeguarding areas of trees and woodlands identified for their natural heritage value. Ancient woodland should be protected and enhanced. The site is also a habitat for other important and protected species of flora and fauna and is an area of valuable green space network.

59695: If there are overriding socio-economic reasons why more housing is necessary at Peterculter, thorough mitigation/compensation measures should be identified.

Visual and Landscape Impact:

49630, 49748, 57933, 54887, 57035, 58255, 59267, 54952, 57448, 57759, 49188: The elevation is high and the development intrude significantly into the landscape, being prominent and visible from the western approach to Culter. It would erode the current definition between the built-up area of Culter and the countryside.

Flood Risk and Drainage Issues:

49630, 49748, 54246, 54887, 57035, 58255, 59267, 57448, 57471, 57759: This area of Malcolm Road has been subject to severe flooding in recent years. There are serious issues with natural drainage on the site and existing culverts near the site are prone to blocking. There is no or limited mains sewerage capacity and may not be able to cope.

60338: Would be required to connect to the public sewer. Has the potential to have a polluting impact on the River Dee SAC and a habitat survey would be required, along with provision of SUDS and Buffer Strips.

Impact on Schools and Services

49630, 49748, 57933, 54887, 59267, 57759, 49188: Cults Academy is full and cannot support any more pupils, being forecast to exceed capacity in 2019. This problem is likely to worsen given the amount of proposed development in the Cults area.

58012: The development of these homes will negatively impact the provision of healthcare facilities in the area, which would not be able to accommodate the additional patients without proportional mitigation. Developer contributions will be required.

Distance from local services, facilities and employment

49748, 57933, 54887, 57035, 58255, 59267, 54952: The site is not within walking distance of local facilities or employment opportunities and there are inadequate public transport services. This will increase car use.

Mix of Land Uses

49748, 54887: The surrounding area is already predominantly residential, and further development of residential uses in this location is unlikely to contribute to a better mix of land uses.

Numerical Justification

54346, 54887, 57035: The LDP already identifies a generous supply of housing land, in line with the SDP, and there is no justification to allocate further housing sites.

Discrepancy in housing numbers:

54346, 54887: The Main Issues Report refers to 71 houses to be built on the site, whereas the Development Options Report refers to 55 houses. This difference should be explained.

Summary of the responses by planning authority

The original Malcolm Road East development bid was for 55 units. However the site that was inserted at the request of Councillors included an additional small parcel of land to the south west between Malcolm Road and Bucklerburn Road. This would increase the capacity of the site to approximately 71 houses

This site was included as a preferred option in the LDP Main Issues Report. This was despite an initial assessment of the Churchill Homes site which concluded that the site was 'undesirable'. However, the representations received have led officers to re-evaluate these conclusions. The primary reasons for including the whole site (i.e. the Churchill Homes site and the smaller area being promoted by Mr Souter) in the Main Issues Report was that it provided further housing opportunities in Culter and would help to support the local primary school. These points are considered valid and it is worthwhile noting that the local community council would not be opposed to providing family housing on the site.

In respect of environmental and landscape impacts, it has to be accepted that the main body of woodland was cleared some years ago, although trees around the edge of the site have been retained. Despite its elevated position, these trees, along with further supplementary planting should provide adequate screening of the site from the surrounding area. This will in turn reduce any landscape impacts arising from housing development there. It is also noted that the proposers would intend to avoid those parts of the site with the steepest slopes.

It is proposed that pedestrian access into Culter could be provided through the Bucklerburn area. This should provide safer and more direct access to facilities in Culter than an access along Malcolm Road itself. Drainage and run off issues along Malcolm Road are noted. Any development here would be likely to include drainage impact assessments and the implementation of SUDS schemes as appropriate in order to alleviate such issues.

It is acknowledged that there are capacity issues at Cults Academy with forecasts

indicating the school going over capacity in 2019. However, the housing numbers attributed to the Cults Academy catchment include those houses proposed in Countesswells. It is intended that this area will be removed from the Cults Academy catchment thereby relieving some of the pressures on Cults. Despite this it is recognised that school rolls in the Academy are likely to remain high and this limits on the amount of extra development which the catchment will be able to absorb.

On balance however, we would conclude that there are sufficient grounds for releasing this site for housing development. We consider the capacity of the site to be around 71 dwellings. This is of a relatively modest scale and is not considered to be a significant departure from the overall Strategic Development Plan housing allowances for the period 2016-26.

Planning authority action/recommendation for Proposed Plan

Include Malcolm Road as an opportunity site for 71 houses.

Issue 21	Preferred Development Option: Mid Anguston	
Body or person(s) submitting a representation raising the issue (reference no.)		
51111: Harry Millar 52284: Amanda Nicol 54346: Sophie Lafon 54532: Roydan MacLennan 54598: Terence Fullerton 55477: C Macleod 55616: David Low 56246: Iain Pettigrew 56264: Kathryn Coates-Walker 56274: Stefanie Jane Robertson 57013: Linda Bradley 57075: Ian Cocker	57209: Culter Community Council 57212: Linda Kelman 57498: Georgina Crighton 57558: Frances Millar 57684: Nicola Hector 57703: Timothy Blasdale 58542: Juliet Macleod 58815: Kenny Clubb, Churchill Homes 54952: Bancon Developments 55713: Robbie Joss 59695: Scottish Natural Heritage 60338: SEPA	
Section of the MIR to which the issue relates:	Main Issue 1: Greenfield Housing and Employment Allocations (Table 3: Preferred Development Options at Peterculter)	
Planning authority summary of the comments		
<p>Support for the site 57075, 57684, 55703, 58815, 57713: Support the development of 8/9 houses in this location, on the following basis:</p> <ul style="list-style-type: none"> • Development would remove the disused sheds and improve the look of Mid Anguston, with a high calibre homes using new design methods and materials; • The development would bring more families to the area, cater to demand for larger homes and provide improved housing choice; • It would help support local services and facilities including Culter Primary 		

School and existing utilities

57075: Support for the proposed development, however no further development should be allowed at this location.

58815: The site is serviced with electricity, BT and mains water. Roads are adopted, streetlights are in place, refuse is collected and a school bus already services the area.

58815: Access to the site is not a major issue; local road networks are suitable.

Treatment in Main Issues Report

55477, 57558: Questions the justification for including the site as a Preferred Option. It was assessed as being 'undesirable' in the Development Options Report, and was rejected by the Scottish Government Reporter during the examination of the 2012 LDP.

55477, 51111, 52284: Unsatisfied with the fact no alternative option was presented to the preferred sites.

Object to the site being identified as a Preferred Option, on the grounds of: Transport & Local Road Network

51111, 52284, 54532, 54598, 55477, 55616, 56246, 56264, 56274, 57013, 57209, 57212, 57498, 57558, 58542: Access would be seriously inadequate, along narrow and dangerous local roads. An increase in traffic on this road as a result of the development would increase hazards for both drivers and pedestrians.

54598, 57212 The road maintenance costs associated with this development would have to be met through the Council's Roads budget.

Landscape Impact

51111, 52284, 54346, 54532, 54598, 54952, 55477, 55616, 56246, 57013, 57209, 57212, 57558, 58542, 59695: Development will not fit with the landscape and will intrude significantly into an area of natural beauty, diminishing views and vistas.

52284, 54346, 54598: This development would set an unwelcome precedent for the further building on the Green Belt and urbanisation of the area, reducing access to open and green spaces.

Pedestrian and Cycle Connections to Facilities and Employment

51111, 52284, 54346, 54598, 54952, 55477, 56246, 56264, 57013, 57209, 57498, 58542, 59695: Pedestrian, cycle and public transport connections to and from the site are inadequate and in places lacking completely, meaning that the site has poor accessibility to local facilities and would be car dependant and less sustainable as a result.

Primary School, Housing Choice & Chicken Sheds

51111, 52284, 54346, 54598, 55477, 55616, 56246, 56264, 57212, 57558: Disagree with the justification given for including the sites as Preferred Options. There is no guarantee this development will produce enough children to make a difference to the primary school roll. There is no evidence it will not increase housing choice in Culter or lead to a better mix of land uses.

54532, 56246: There are already a number of properties of a similar type to the proposed for sale in the area, suggesting a lack of demand.

54952: Even if we accept these justifications, there were bids submitted that are better placed to deliver these benefits.

54598, 57212: The hazards of the chicken sheds are not a legitimate justification - if they are dangerous, they should simply be removed.

Utilities Infrastructure

51111, 52284, 54532, 55477, 56246, 57013, 60338, 57558: There is no mains sewerage in the area, and will be very difficult to provide for the new development.

54532: Ground disturbances and building work could have a damaging effect on the local water supply for houses and farms, and individual septic tanks present a risk of contamination.

60338: Some form of upgraded mains drainage would be required. A survey of existing water features would be required, along with SUDS provision.

Watercourse and Flood Risk

51111, 52284: An intermittent watercourse runs through the middle of the site. Concerned that this may be from the disused quarry at the top of the hill and that development in this location may be liable to flooding.

Impact on Wildlife and Natural Heritage

52284, 54346, 54532, 54598, 56246, 56274, 57212, 57558, 59695: Concern about the impact of development on important species and habitats present on and around the site, such as Red Kites, Ancient Woodland, Bats, Barn Owls and badgers, some of which are protected by law.

59695, 60338: A Habitat Survey and mitigation measures would be required.

56274: The site is adjacent to Anguston Quarry which is a haven for wildlife.

Numerical Justification

52284, 55477: The LDP has already allocated enough land to meet the housing requirements set out in the Strategic Development Plan. Therefore there is no numerical justification for this proposal.

Impact on Schools and Services

54346, 57212: There is no extra capacity at Cults Academy.

58012: The development of these homes will negatively impact the provision of healthcare facilities in the area, which would not be able to accommodate the additional patients without proportional mitigation. Developer contributions will be required.

Policy Designation/Green Belt

54346, 54598, 54952, 57013, 57209, 57212, 57498, 57558, 58542: Site is currently identified as Green Belt, is in agricultural use and should remain so. Development would not be acceptable according to current Green Belt Policy.

Balance of Land Uses

54346: Development is unlikely to contribute to a better mix or balance of land uses in the area as the land use is already predominantly residential.

Summary of the responses by planning authority

We acknowledge both opposition and support for site. However, the original

assessment of the site as 'undesirable' is in this instance still considered to be sound. Any development on this site would be unrelated to existing settlement and would have major accessibility issues. Access to the public transport network is over 2km away from this site and accessibility to existing employment opportunities and local facilities is very poor. It would be car dependent as a result.

Treatment in the Main Issues Report

55477, 57558: The site was included as a Preferred Option in the Main Issues Report on the grounds of providing housing choice in Culter and supporting the falling rolls at Culter Primary School.

55477, 51111, 52284: We acknowledge there was no formal 'alternative' given to allocating these sites. This does not prevent people making representations on individual elements or sites within each option, as has happened in this case. However care will be taken in future to ensure that such an option is included.

Planning authority action/recommendation for Proposed Plan

Do not allocate the site for residential development in the Proposed Plan.

Issue 22	Natural Environment	
Body or person(s) submitting a representation raising the issue (reference no.)		
49713: Forestry Commission Scotland 48970: Brian Rattray 49471: Bucksburn Community Council 53467: Ronald Leith 55177: Sport Scotland 57160: Aberdeen Greenspace Trust 57233: John Boylan 57280: Christine Boylan 57482: Andrew Finlayson 57734: Andrew Jones 57816: Abdul Latif 58012: NHS Grampian 58123: Kingswells Community Council 58397: David Ballock	58769: Clive Kempe 59036: Craigiebuckler and Seafield Community Council 59179: Scottish Wildlife Trust 59452: Scotia Homes 59695: Scottish Natural Heritage 59809: Mr and Mrs Robertson 60338: SEPA 60678: RSPB 55418: Cults, Bielside and Milltimber Community Council 55905: Valerie Fyfe 57556: Ferryhill and Ruthrieston Community Council 59173 – Greyhope Bay Project	
Section of the MIR to which the issue relates:	Chapter 9 and Q20 'Natural Environment'	
Planning authority summary of the comments		
<p>Current policy approach 55177, 57734, 57816, 58012, 59179, 59452, 60678, 55418, 49713, 60338, 57482: Support retention of the existing Policy and Supplementary Guidance, with updates and minor amendments in some cases and with the input of relevant key agencies. 58769, 49471: Aberdeen is weak on protecting the natural environment and the</p>		

current policy approach is failing.

Trees and Woodlands

48970, 49471: Current policy has failed to protect areas of trees and woodlands, with areas being cleared to make way for development.

53467: Applications for works to trees owned by the Council should go through the same consultation process as for trees owned by others.

49713: Updated policy and SG on trees and woodlands should reflect the principles of the national Control of Woodland Removal Policy.

49713, 49471: Policy should also be stronger on preventing and enforcing against illegal tree actions.

49713: The SG needs to be updated to include references to criminal investigations where illegal activity is suspected, planning approval should be suspended to allow for an investigation.

Gardens and Landscapes

53467: Gardens and landscapes which contribute to the local historic environment and the character of Conservation Areas should be given special protection.

Natural Heritage

57160, 60678, 58769: Policy should aim for new developments to increase habitat creation, biodiversity and the conservation value of our open spaces.

57160, 58397: There should be strong protection, improvement and enhancement for Local Nature Conservation Sites

58123: Essential that species surveys are carried out at the appropriate time of year.

59695: No reference to badgers in Policy NE8, or other species which are specially protected. However note that they are mentioned in the TAN and support upgrading this to SG.

59695: We recommend that paragraph 3 of Policy NE8 should be amended to read "except in situations of imperative overriding public interest, with no alternative solutions."

59695: We recommend that paragraph 4 of Policy NE8 could be amended by adding "including Annex I habitats and Annex II species (EC Habitats Directive) and the habitats of Annex I birds (EC Birds Directive)".

59695: This policy should also include protection against invasion of non-native species as a result of development activity.

60338: The Water Environment (Controlled Activities) (Scotland) Regulations 2011 have now been amended and should be updated accordingly.

60388: Support further text in SG on the objectives of the River Basin Management Plan with a clear statement on preventing deterioration in the Water Environment.

Open Space and Green Infrastructure

58012: Some of the areas identified as GSN and Urban Greenspace are incorrect. Provision should be made within Policy NE3 for sensitive development of land within the NHS estate.

58123: Protect green spaces generally and not just those with special designations

58397: Green infrastructure should be integral to new developments and not simply an 'add-on'

60338: The delivery of the GSN could include the enhancement of river, loch and wetland habitats, improvement of water quality, increasing flood storage. Blue

features such as SUDS schemes, watercourse corridors and natural flood management measures can also be considered part of the green network.

Green Belt

57233, 57280, 55905, 59179, 59036: Agree with the principles behind the Green Belt policy, principally that loss of the green belt should be discouraged, but concern that these do not seem to be adhered to.

59809: Green Belt policy should be more flexible to allow for development of land associated with single houses, no longer used for agriculture.

Flood Risk Management

57816: Developers should be required to consider flooding in development proposals.

60678: Flood risk management, including SUDS should focus on habitat creation and biodiversity, not just hard engineering solutions.

60338: Individual site allocations must make plain the various planning requirements in relation to flood risk management.

60338: The SFRA should be revised for the Proposed Plan, using more local and historical information, as well as the 0.5% annual flood risk probability map.

60338: The responsibility for assessing different types of flooding lies with different people; would like to comment on appropriate text for this.

60388: SG should recognise a requirement towards both committed water treatment works as well as those under construction.

60388: There are no preferred sites for which the principle of development appears to be compromised by flood risk. Requirement for FRA should be stated for certain sites. Some alternative sites would be objected to if they were included in the LDP: B0916 Loirsbank, B0926 West Cults Farm, B0928 Land to W of Malcolm Rd.

Climate Change

55905: Human influence on climate change is much less than is being posited - the Council have been very presumptuous by allocating two spaces for electric cars at Duthie Park.

Upper Deeside Nature Centre

57566: Support for the development of a centre near Wellington Suspension Bridge, to promote tourism, education and nature conservation. It will help to promote sustainable tourism, and will provide modern recreational and educational facilities. The site will enhance the landscape of the area.

Greyhope Bay

59173: Bid site B1201 should be identified for a visitor centre. Many of the issues raised in the Development Options Assessment Report can be addressed at detailed application stage.

Soil Protection

59695, 60338: Recommend a new policy on protecting carbon-rich soils, particularly peat, especially given the significant negative impact on soil identified by the Strategic Environmental Assessment for the plan.

Construction Environmental Management Plans

60338: There should be a requirement for Construction Environmental Management Plans in policy and SG to address the mitigation for environmental impacts during the construction phase of a development.

Summary of the responses by planning authority

Current Policy Approach

55177, 57734, 57816, 58012, 59179, 59452, 60678, 55418, 49713, 60338, 57482: We propose to carry forward the same broad approach and principles from the existing LDP into the Proposed Plan, with some minor updates and wording changes. Key Agencies will be engaged and consulted on the content of these policies.

58769, 49471: View is noted. The key is balancing the requirements for growth against the constraints of the environment. Current and past plans have attempted to direct growth to those areas which cause least damage to the environment at both a local level (through avoiding designated sites for example) and global level (by reducing the need to travel as much as possible).

Trees and Woodlands

48970, 49471, 49713: Policy in the Proposed Plan will take forward the same approach and principles as the current plan. The policy wording will be strengthened to enable planning officers to implement and enforce it more effectively, and updated Supplementary Guidance will refer to new and updated policy and legislation.

53467: The process for advertising and consulting on works to trees owned by the Council is defined by national statute and we do not propose to go further than the law requires.

49713: Depending upon the nature of any illegal activity, enforcement action can be taken. This would involve the Forestry Commission in cases of more extensive woodland felling.

Gardens and Landscapes

53467: The contribution of all areas of green and open space, including gardens and landscapes, are given consideration through Conservation Area Appraisal documents, which are currently being prepared for each conservation area.

Natural Heritage

57160, 60678, 58769: Updated Natural Heritage policy will stipulate that all new developments are required to enhance biodiversity.

57160, 58397: Local Nature Conservation Sites will continue to be protected through Natural Heritage Policy. They will also feature on the Proposals Maps.

58123: Natural Heritage SG states that species surveys should be carried out at the appropriate time of year and gives guidance for different species.

59695, 60388: Policy and Supplementary Guidance will be updated to include reference to new or updated policy and legislation as appropriate. Better links to the objectives of other plans and strategies will also be made.

Open Space and Green Infrastructure

58012: Any areas identified as being incorrect will be amended. The wording of Policy NE3 Urban Green Space has been amended to improve clarity and ensure

planning officers are able to implement it as intended.

58123: All areas of public green space are currently protected through policy NE3, not just those that are designated as such on the proposals map.

58397: The current policy approach supports green infrastructure as an integral part of new developments. This is also achieved through the Masterplanning process.

60338: SG includes guidance about the multiple benefits of Green Space Network. 'Blue' features are already identified as features of the Green Space Network (such as the two rivers and Loirston Loch).

Green Belt

57233, 57280, 55905, 59179, 59036: The principal approach of current Green Belt Policy will be retained. The policy will be strengthened through a statement requiring high quality design in the Green Belt.

59809: It is not deemed appropriate to make Green Belt policy more flexible to allow development in large residential curtilages. This could have a significant impact by creating small, isolated and car-dependent settlements within the Green Belt especially where demand is high (e.g. Deeside)

Flood Risk Management

57816: Developers are already required to consider flood risk in development proposals, according to Policy NE6 'Flooding and Drainage' which will be carried forward.

60678: New SG on 'Flooding and Drainage' will emphasise the multiple benefits (e.g. biodiversity, recreation) which can and should be considered when designing flood risk management measures, such as SUDS.

60338: Individual site allocations will state the various planning requirements in relation to flood risk management. Strategic Flood Risk Assessments will be revised and improved for the Proposed Plan, using the new 0.5% annual flood risk probability map. SEPA and other key agencies will be consulted on the draft policy and SG.

Climate Change

55905: View noted. Council LDP policy is based on the principle that land-use planning can help to mitigate and adapt to the effects of climate change.

Upper Deeside Nature Centre

57566: There are no plans to identify any land for this use within the LDP. Allocated Opportunity Sites are required to have a realistic chance of being deliverable.

Greyhope Bay

59173: Bid 1201 for a tourist centre, and viewing point was assessed at pre-MIR stage and recommended as undesirable. This remains the Council's position.

Soil Protection and Construction Environmental Management Plans (CEMPs)

59695, 60338: There is very little carbon rich soil within Aberdeen City and therefore provision within the LDP specifically for carbon-rich soils is not deemed appropriate in this case. However appropriate provision will be made for the protection of soils in general. The requirement for CEMP/construction method statements will be considered in Supplementary Guidance.

Planning authority action/recommendation for Proposed Plan

Maintain existing policy approach, with minor updates and wording changes.

Issue 23

Old Aberdeen

Body or person(s) submitting a representation raising the issue (reference no.)

53467 – Mr Ronald Leith

58313 – Old Aberdeen Heritage Society

Section of the MIR to which the issue relates:

No specific reference in the MIR

Planning authority summary of the comments

Conservation Area Boundary

53467 – Boundaries of the Old Aberdeen Conservation Area should be extended. Dunbar Street (east side) down to King Street and St Machar Drive (north side) to Harrow Road should be included. The area includes fine granite buildings and makes more sense than the current boundary. The scale of existing houses is important to the setting and the gardens of these houses are important as they contribute to the approach to the Conservation Area. If these areas are not included within the Conservation Area more planning permissions will be granted and will alter the character of the area.

Policy Zoning for Old Aberdeen City Council

53467 – Concerned about the current zoning of the area at the heart of Old Aberdeen. The current designation does not reflect the character of the area. Having the area zoned as CF1 is inappropriate as it poses a risk to the future protection of the historic and community character. The current zoning is directed towards the promotion of new or extended institutional uses. Although the policy has a caveat which offers protection to other uses in the area, it clearly favours institutional uses. The last paragraph of the policy should remain as is. Specific reference should be made to the central part of Old Aberdeen and should give it equal weighting in description and consideration. The policy should also state that when changes are proposed which could affect the historical, architectural or cultural character of the area or the vitality of the community, then these should have priority. The current policy has the potential to contribute to the de-population of Old Aberdeen and have other negative effects on character and community. Old Aberdeen should have a unique zoning – recognition of its distinctive historical, aesthetic, cultural and community identity should be in the LDP. The new policy should state that the Council will refuse any more applications for a change of use from residential to institutional.

58313 - Concerned about the current zoning of the area at the heart of Old Aberdeen. The University and the community of Old Aberdeen should not be zoned together as they are two separate entities. If the zoning is to remain the last paragraph of the policy must also remain. Suggest that future planning applications for change of use from residential to institutional should be refused to protect the nature of the existing community.

Residential Zoning

58313 – West side of Kings Crescent should be zoned as Residential rather than Mixed Use as this area is entirely residential. This zoning should also be extended to the east side of Spital from the St Peter’s Street junction to St Peter’s Gate junction.

Summary of the responses by planning authority

Conservation Area Boundary

53467 – The boundary for Old Aberdeen Conservation Area has been assessed through the recent Old Aberdeen Conservation Area Appraisal and Management Plan. The Conservation Area Appraisal and Management Plan was out for consultation in April / May 2014 and any boundary changes were addressed through this process.

Policy Zoning for Old Aberdeen

53467, 58313 – The University has been an integral part of Old Aberdeen for centuries and the character of the area and many of its unique and historical buildings owe much to the University’s presence. This area of Old Aberdeen is zoned as CF1: Existing Community Sites and Facilities to reflect the use and ownership of many these properties and what the Council deem as appropriate in terms of future development. The zoning of Old Aberdeen is historical and will remain as CF1 with the policy wording remaining unchanged. We think that the last paragraph of Policy CF1 provides protection to the character and vitality of existing communities within the area.

53467 – It is not thought appropriate to have a unique policy for Old Aberdeen. Old Aberdeen is covered by a Conservation Area and has a number of Listed Buildings which give it ample protection towards inappropriate development.

Residential Zoning

58313 – It is not thought appropriate to designate King’s Crescent as Residential due to the mixed use nature of Froghall Terrace and Froghall Road. It is not thought appropriate to designate the east side of the Spital from St Peter’s Street as this is also mixed use in nature. However, it is accepted that the east side of the Spital to Merkland Road, which is currently zoned as mixed use is predominantly residential. We propose to rezone this area to Residential from Merkland Road to Orchard Street.

Planning authority action/recommendation for Proposed Plan

Rezone the east side of the Spital from Mixed Use to Residential from Merkland Road to Orchard Street.

Issue 24**Other Issues Raised in Representations**

Body or person(s) submitting a representation raising the issue (reference no.)

48626 Mustafa Osman 50066 Kenneth Eddie 57894 Aberdeen and Grampian Chamber of Commerce	58397 David Ballock 59489 Rhona MacCallan 59699 Scottish Enterprise 59910 Camphill Communities
Section of the MIR to which the issue relates:	N/A
Planning authority summary of the comments:	
<p>Consultation 48626: There is no point in holding public consultations if referendums are ignored.</p> <p>Public Spaces and Civic Society 57894: The city should encourage DIY urbanism, grassroots civil society, and short-term experimentation with vacant spaces and Council-owned property. This could range from installations, performances, semi-permanent street furniture, pop-up projects etc. The city should provide better tools to help residents shape their surroundings and participate actively in planning.</p> <p>Vision and Objectives for the LDP 59699: The vision and objectives of the LDP should be ambitious and emphasise the high growth and international profile of the oil and gas sector and other key industries such as tourism, food and drink, creative industries and two universities. The LDP must seek high quality environments, good transportation links, and continued economic growth in the city. 57894: The LDP should be assessed according to whether it is simple, transparent, supports economic growth and is equitable for business.</p> <p>Equalities Impact Assessment and Health Impact Assessment 59910: The preparation of the next LDP should take cognisance of the impacts of development options on special needs children and adults served by Camphill Communities.</p> <p>Social Issues 50066: There needs to be innovative solutions for care of the elderly to help improve health, wellbeing and quality of life for the elderly in Aberdeen.</p> <p>Other points 59489: Aberdeen city council have missed many opportunities which could have been gained from the oil and gas revenues. Aberdeen is now a piecemeal city enter lacking cohesion and forward planning. Connecting Union square with the rest of the centre of the city has to be an expensive but essential programme.</p>	
Summary of the responses by planning authority	
Consultation	

58626: Comment noted. The Council is required by law to consult the public on the preparation of the Local Development Plan, and the feedback we receive helps to inform the final contents. At the formal Examination stage, any unresolved representations have to be put before independent reporters for consideration. Their findings are binding on the Council.

Public Spaces and Civic Society

58397: The use of vacant spaces for temporary events or installation is not a matter dealt with by the local development plan.

Vision and Objectives for the LDP

59699: The Vision and Objectives for the LDP is set by the Strategic Development Plan. It emphasises the knowledge economy and high value markets, the quality of the environment and quality of life. We propose to carry this vision forward unchanged into the Proposed Plan.

57894: There is no formal ‘assessment criteria’ for the LDP. Its form and content is informed by national guidance and its remit concerns how land should be used in future. We are always willing to try new means of engaging with the public. During the Main Issues consultation we carried out a youth engagement with the City’s secondary schools and a planning toolkit with the community councils for the first time. We feel both of these worked well and are always happy to get suggestions for other innovative means of engagement.

Equalities Impact Assessment and Health Impact Assessment

59910: The Proposed Plan will be accompanied by an Equalities and Human Rights Impact Assessment.

Social Issues

50066: General social issues relating to the health and wellbeing of the population are not directly within the remit of the Local Development Plan. We do, however have policies protecting general amenity and access to outdoor spaces and core paths and others promoting sustainable (and healthy) modes of transport such as walking and cycling. The will also be SG addressing air quality and noise issues.

Other points

59489: Comment noted. The lack of connectivity between the city centre and Union Square is acknowledged and is one of the issues that a City Centre Masterplan will look to address.

Planning authority action/recommendation for Proposed Plan

No changes

Issue 25	Retail Outwith the City Centre
Body or person(s) submitting a representation raising the issue (reference no.)	

<p>48518: Aberdeen Trades Union / Council 48626: Mustafa Osman 49471: Bucksburn Community Council 51198: Middlefield Community Project 54480: Kristen Morgan 54751: Optimisation Developments Limited 55418: Cults, Milltimber and Bielside Community Council 57001: Mr Willie Jaffray 57233: John Boylan 57280: Mrs Christine Boylan 57394: Nigg Community Council 57482: Mr Andrew Findlayson 57482: Mrs Patricia Clarke 57709: Ms Marie Boulton 57712: Mr Peter Argyle 57734: Andrew Jones 57816: Mr Abdul Latif 57975: Aberdeen Civic Society 58123: Kingswells Community Council 58563: The Grandhome Trust 58734: Aldi Stores Limited 58769: Mr Clive Kempe</p>	<p>59017: Cove and Altens Community Council 59036: Craigiebuckler and Seafield Community Council 59189: John Lewis PLC. 59236: Mr Duncan Massey 59260: TESCO 59404: Rockspring Hanover Property Unit Trust 59436: Rockspring UK Value Fund 59577: Scottish Government 59672: Stewart Milne Homes 59699: Scottish Enterprise 59742: European Development Holdings 59745: Cyan Properties 59758: F & C Reit Asset Management 59795: ASDA Stores Limited 59798: Standard Life Assurance Limited 59801: ANM Group Ltd. 59805: University of Aberdeen City Council 59812: The Countesswells Consortium 59923: Drum Kingswells Business Park Ltd.</p>
<p>Section of the MIR to which the issue relates:</p>	<p>Chapter 4</p>
<p>Planning authority summary of the comments</p>	
<p>Q9: Retail Parks 49471; 57233; 57280; 57709; 57734; 57816; 59036; 59795; 59798: Support. 51198: Unsure, if not on public transport routes these are hard to access. 55418: Support, providing it would not impact on neighbourhood centres and local shops. 57975: Retail Parks are out-of-centre developments and should only be protected if they fit in with the neighbourhood they are located. Retail Parks that are not successful should be allowed to change use to mixed use. 58123, 58769: No new retail park should be developed at the Haudagain roundabout until traffic issues have been addressed. 59189: Retail Parks have their part to play but the utmost protection should always be given to the City Centre. 59436: Protection should not be given to Retail Parks – the network of centres and sequential approach provides retail parks with adequate protection. 59795: Supports the classification of retail parks as commercial centres. 59798: There should be appropriate protection to the Boulevard and Denmore Road retail parks.</p>	

Q10: Review the Network of Centres

48626: Support local communities.

49471; 57816; 59798: Support.

49471: review should take place post AWPR.

54571: Object to the re-designation of Rousay Drive as a District Centre. A review on the whole network needs to be undertaken.

55418: Unclear why this is required.

57233; 57280; 59036: Continuous review required.

57734: review existing before allocating new.

57975: Review needs to be done as some are too small. A mixed use style of street frontage scaled to suit the community would be the best solution. This could then expand as required to suit the requirements of the community.

58563: Allocating Grandhome Town Centre as a Retail Centre will ensure that uses are delivered appropriate to the local catchment and will address deficiencies across the city.

58734: Support the sequential test to make sure new retail is located in the most appropriate locations in accordance with the network of centres. Agree the city centre should be afforded priority for major retail development with the rest of the network offering more localised services and shops to cater for the needs of the nearby community. Aldi is often located within such areas – a pragmatic approach which recognises the specifics of business models and minimum retailer requirements in terms of adequate profile and operational needs is essential to ensure that this does not prejudice investment into local areas.

59236: Review of centres is not necessary as it has already been undertaken by the Retail Study. Support Danestone remaining as a District Centre and Rousay Drive being designated as a District Centre.

59260: Woodend Hospital Annex should be updated in the plan – it is now developed as retail and is no longer available for housing.

59436: No need to review centres as it currently reflects SPP.

59699: The hierarchy of centres should focus on the city centre and other defined town centres because it supports concentrating retail rather than diluting it.

59798: Renationalisation would allow greater focus on the large centres. Request Beach Boulevard is identified as a district centre due to locational benefits and mix of uses. Denmore Road should also be identified as a district centre. This would acknowledge its place in the hierarchy and allow further expansion to meet identified needs.

59923: Prime Four should be identified as a sub-regional commercial centre supporting a mix of uses serving the West of Aberdeen.

Main Issues 6: Retail Centres Outwith the City Centre

55418: Support option 2 the preferred option if there is expressed public need.

57712: Support preferred option 2. Agree with the proposed supermarket at Newhills.

54751: Object the definition of the sites and the sites. Souter Head Road does not fit the criteria.

54751: Object to the omission of Former Summerhill Academy as an opportunity site.

54751: The reasoning for the opportunities in Table 6 appear to be linked to the volume of new housing proposed, and the desirability of establishing new mixed used centre. The development of the housing will be at a slower rate than assumed in the retail study.

57734: Support preferred option 2, yet have a single use - food.

57975: Retail should be allowed near the areas of population and workplaces. Surprised at low level of proposed retail in new settlements. Existing areas in the city such as Cove, Bridge of Don and Kingswells are poorly served. Retail should not be the only use considered but general workspace should be allowed.

58563: Supportive of Option 2, specifically Grandhome. However, object to the level of floor space identified. The figure is significantly below what is proposed within the PPP application and does not align with the Masterplan / Development Framework. Request that table is amended to reflect this.

58734: Aldi are under represented in Aberdeen. The LDP should ensure the necessary planning framework is in place to encourage growth in business like Aldi. Generally welcome the findings of the Retail Study and welcomes that there is significant demand for both convenience and comparison floorspace across the city – Aldi could help address this demand. The future floorspace is welcomed – it is essential that policies emerge in respect of new convenience provision within the LDP still allow for additional opportunities in the short term when need can be demonstrated. There are a number of pockets in the city where range and choice is more limited and could be improved.

58769: Out of town shopping is attractive to developers because of costs. Now impossible to find DIY materials in the city centre. At least three floors of affordable housing should be stipulated above new retail.

59189: Allocating sites outwith the city centre is concerning. This must be managed appropriately to ensure adequate protection for the city centre. Support Option 2 as it continues to support the city centre.

58123; 59236; 59672, 59742: Support Option 2.

59260: There is a retail deficiency in Zone 29N, not Zone 29. New retail opportunities should be directed towards areas with existing poor retail opportunities not to areas with recent investment such as Lang Stracht.

59436: Concerned about new comparison retail allocations outwith the city centre. Recognised there are opportunities for convenience retail in expansion areas. Appropriate to allocate retail in expansion areas only where it can be demonstrated that there will be no impact on the city centre. Would ensure new retail floorspace only provided for local needs.

59742: Object that B0201 was not identified for retail use. It should be identified for non-food retail to replace the existing retail which is soon to be replaced by a supermarket. The Denmore Road Retail Park should be allocated as a District Centre. Concerned of the loss of non-food retail in the area, there is a need for this to serve the community and Bridge of Don is poorly served by comparison retail. Provision of non-food retail in this site will have no impact on other centres. Site is able to take direct access from A90 – retail could be accommodated with only minor improvements to the road network. There will be replacement sports facilities at Balgownie as well as a new indoor sports facility. The site could still accommodate the planned recycling centre.

59758: Retail commitments outwith the city centre total some 40,000 sq. m. and 50% of that is suitable for comparison – this is a very significant figure. A robust sequential approach should be taken to ensure the consolidation of the city centre before any out of centre options are considered. Request a policy that prevents proposals for comparison retail being brought forward prematurely in the identified out-of-centre locations and suggest that a direct link between new comparison retail floorspace and the phasing of the proposed large scale residential development should be added to the LDP. Concerned Grandhome is noted as having 7,500 sq. m. of retail floorspace whilst the planning permission includes 20,000 sq. m. Would like clarification that figures in MIR are the maximum figures.

59798: Support the identification of Denmore Road as a committed retail opportunity. It should be identified as a district centre.

59801: B0947 Huxterstone was submitted for retail / commercial / business development. It is in the right location to meet unserved demand for convenience retail in the west of Aberdeen and would meet the requirements of the Retail Study. The site is located by two major roads and is easily accessible to a large population. This gives clear advantage over a site at Countesswells which does not yet exist. Sitting separate from a large development improves deliverability. Impacts on landscape can be mitigated through careful design and the development scored highly in the assessment criteria.

59805: Support the proposal to develop a town centre in Newhills. The Development Framework made provision for a neighbourhood centre but this may not have the profile or accessibility a supermarket operator would expect. Part of Rowett North should also be identified for retail development, accommodating a supermarket. It could also accommodate a range of ancillary uses. Developers are working to ensure that both sites are equally accessible from and across the A93.

59812: Support the allocation of additional retail – particularly in Countesswells as it will help strengthen the community and promote a more sustainable travel pattern. It is requested that the retail requirement for the west of Aberdeen is located with Countesswells. This is essential to creating a viable and vibrant retail core and supports a mixed use community. Alternative sites (such as Maiden Craig) would be less desirable because of the existing retail provision. An allocation at Prime Four would result in more trip generation and an unacceptable shortage of new

development in the new community.

59923: Prime Four could achieve the retail floorspace required for the west of Aberdeen by 2020. The existing settlement of Kingswells can already provide the critical mass needed for many retailers, whereas Countesswells will not be able to for many years. Retail should be located close to where people live and work.

57394: Supermarket required for Nigg, Loirston, Cove & south of the City. Discard Souter Head Road as an opportunity site, in favour of Wellington Circle Makro.

57482: Welcome the identification of a deficiency. Souter Head Road should be discarded and an alternative site investigated. The site is constrained.

59017: There is no progress on Souter Head Road since allocated and at present there is no likelihood of the site coming forward. There is an urgent need to identify an alternative site that is deliverable in the future. There is a lack of suitable retail facilities in the south of the city – there has been large scale development but no retail. The impending housing development makes it even more important to identify a site asap – this will assist with the green travel plan and congestion by decreasing the need for long journeys from the area to use supermarkets. A site could become available in the future at the existing Makro which would help satisfy demand for retail in the area.

59745: Object to the MIR failing to identify site B1309 as a preferred option for a supermarket. The site is more deliverable than the allocated Souter Head Road. There is no prospect of this site being developed. Request that B1309 replaces OP76. Makro unit is currently leased until 2015. The site is central and benefits from existing access infrastructure, car parking and service access as well as access by foot and cycle. The site has a storage and distribution consent which could permit conversion to a less desirable use. The supermarket would also lead to 250 new jobs and no losses associated with the redevelopment of OP76. The supermarket will provide competition and choice for the existing residents and new residents in Cove and Loirston. Will reduce expenditure leakage and is unlikely to have an adverse impact on stores in the peripheral area. The site scored highly in the development option assessment.

Q11: Very Large Scale Single Retail Unit

48518: in the City Centre.

49471: to the north of the City.

51197: On a public transport route.

54480; 57233; 57280; 59036; 59236: near the AWPR.

55418: Denburn Area. Must include equivalent amount of reasonable priced parking spaces.

55418: Union Square could be expanded.

57543: assumption that permission would be granted.

57712: SDPA should be taking this forward.

57734: not in City Centre. Possibly Wellington Road/Tullos/Westhill/South of City - possibly integrate with the football stadium.

57816: out of town.

57975: Depends on the retailer. If it is a department store it should be located in the City Centre but if it is IKEA it should be out-of-centre.

58123: Strongly object to any large scale retailer being located on the AWPR. This would blight the countryside, slow traffic at key junctions and increase congestion. Kingswells cannot accommodate any more traffic.

58563: Grandhome could accommodate large scale retailers in its town centre or business park which would be attractive, sustainable and accessible that could be masterplanned in advance. It has the potential to encourage walking within Grandhome.

58769: Location depends on product type and frequency of visit. If it is IKEA put it on a route with public transport. There is an opportunity to put low cost housing above the unit.

59189; 59436: All retail developments should be subject to the same assessment and no retail should receive beneficial treatment based on size. Any major retail proposal should be in keeping with the sequential approach.

59189: A new retailer should consider the floorspace identified in new retail centres in the city.

59436: If a clear vision for the city centre is established that takes into account the aspirations of large retailers appropriate for city centre locations, they should be guided towards the city centre. Some bulky goods retailers are not appropriate and should be guided to other appropriate locations in the hierarchy of centres.

59577: The location of any such facility should be in accordance with SPP, located within an appropriate catchment area and be accessible by all modes of transport. Transport Scotland would request the opportunity to input to such strategies.

59758: Concerned regarding this. Does this floorspace fit in with the retail study or is it additional floorspace? There are limited numbers of retailers who would construct a unit of this size in Aberdeen. The need for such a development is without any planning justification. The MIR seems to rule out the city centre for such development yet some of the sites identified in the retail study within the city centre are of a similar scale. It there were to be a policy or a site allocated there would require a more robust justification.

59923: Prime Four would be suitable for this due to its high level of accessibility.

Summary of the responses by planning authority

Question 9 – Retail Parks

49471; 51198; 55418; 57233; 57280; 57709; 57734; 57816; 57975; 59036; 59795; 59798; 59189; 59436; 59795; 59798: Retail Parks are currently not afforded protection through the sequential approach and are vulnerable to the pressures of out-of-centre retail development. Scottish Planning Policy includes retail parks under the category of 'Commercial Centres' and these will be next in the hierarchy of centres after neighbourhood centres. There are currently five retail parks established in the city centre that will be added to the hierarchy of centres. These are: Denmore Road, Kittybrewster, Lower Berryden, Beach Boulevard and Garthdee. All of these retail parks are located on established public transport routes and relate

well to the surrounding communities. Protecting retail parks from out-of-centre development will not have an impact on neighbourhood centres and local shops because retail parks will be after neighbourhood centres in terms of the retail centre hierarchy and what retail parks offer is a different function to both neighbourhood centres and local shops.

58123; 58769: The STAG2 Appraisal for the Haudagain improvements established a 'ceiling' for any development here that would not be detrimental to the junction improvement. In addition, as part of any masterplan and subsequent planning application, the applicant will need to demonstrate that the scale of development is acceptable in this location, that it could be served by walking, cycling and public transport, and that there is no net detriment on the road network, via the usual Transport Assessment.

Question 10 – Review the Network of Centres

48626; 49471; 55418; 57233; 57280; 57734; 57816; 57975; 58563; 58734; 59036; 59236; 59436; 59699; 59798: The network of centres will be rationalised through a review of the Hierarchy of Centres Supplementary Guidance along with the Proposed Plan. This will allow greater focus on the larger centres throughout the city. This follows on from the recommendations by the Retail Study but takes this further by including the review of neighbourhood centres. It is thought delaying this post AWPR will not have any merit. All remaining local shops will be protected through the 'Local Shops' policy. The hierarchy of centres will continue to be reviewed as part of the development plan process but it is not proposed to add anymore centres to the hierarchy at this moment in time – this includes the proposed centres at Grandhome, Newhills and west of Aberdeen. These will be established as centres in the hierarchy once they are developed and brought into use.

54571; 59260: Rousay Drive will now be designated as a District Centre as the superstore is now complete and brought into use.

59798: It is not thought appropriate to designate the Beach Boulevard Retail Park as a district centre. The Retail Park is a grouping of three or more retail warehouses with associated car parking rather than having a variety of forms. Therefore, it is seen to function more like a retail park rather than a district centre. Regarding Denmore Road, there is no supermarket to anchor a district centre at the present time. If the planning permission has been fulfilled and the supermarket is complete and brought into use the site may be allocated a district centre through the development plan process. There are no proposals for this though.

59923: It is not thought appropriate to identify Prime Four as a sub-regional commercial centre. Prime Four will be designated as a 'Specialist Employment Area' with ancillary facilities aimed primarily at meeting the needs of business and employees within the site.

Main Issue 6 – Retail Centres Outwith the City Centre

55418; 57712; 54751; 57734; 57975; 58123; 58734; 58769; 59189; 59236; 59672; 59742; 59260; 59436; 59758; 59798; 59812: Although committed retail opportunities have been taken into consideration, it has been identified that there are a number of further retail deficiencies which should be addressed. Therefore, the Local Development Plan will identify sites outwith the city centre for retail development. These will be identified in Newhills Expansion Area, Zone 29N – West Aberdeen / Countesswells and Grandhome (Phase 2). A new town centre will be created within Newhills Expansion Area comprising approximately 4,000 sq. m. GFA supermarket,

3,500 sq. m. GFA other comparison with local shops and retail services. Retail development in Zone 29N (in one or more location) is needed to address the deficiency identified through the retail study. This should include approximately 5,500 sq. m. GFA convenience, 1,500 sq. m. GFA comparison with local shops and retail services. A new town will be created with Grandhome (Phase 2) comprising approximately 4,000 sq. m. GFA, 3,500 sq. m. GFA other comparison with local shops and retail services. Planning applications proposing 2,500 sq. m. GFA or more of retail floorspace will be required to submit a retail impact assessment.

54751: There are a number of committed retail opportunities across the city that have either been allocated through the existing Local Development Plan or have planning permission. Souter Head Road is explicitly allocated in the plan as a retail opportunity (see Appendix 2 of the existing Local Development Plan). Former Summerhill Academy is omitted from the list of committed sites as it is not allocated in the plan as a retail opportunity (see Appendix 2 of the existing Local Development Plan).

57394; 57482; 59026; 59017; 59745: Souter Head Road is identified in the current Local Development Plan for retail development. It is noted that there has been recent substantial investment to the current hotel that is located on the Souter Head site. No progress has been made in establishing a retail use on the site and the hotel use is considered complimentary to the surrounding business areas. Therefore, the Proposed Local Development Plan will remove the site as an opportunity for retail development. There is potential to accommodate suitable retail development, serving local needs, within the identified retail centre stated in the Loirston Development Framework instead of the Souter Head Road site. This will help to anchor a viable village centre for Loirston whilst still providing a convenient location to meet the needs of the wider area.

58563; 59758: The Grandhome Development Framework states that the new town centre in Grandhome will include 25,000 sq. m. of mixed use which includes some retail potentially including convenience shopping, local supermarket, gym, cinema and hotel. The figures stated in the Main Issues Report will restrict the floorspace for the supermarket and the comparison retail floorspace. Through the detailed planning application for phase 2 of the development a retail impact assessment will be required to assess the impact of the mixed use retail (including gym, cinema and hotel) proposed.

58769: Planning is not able to stipulate what kind of Class 1 retail will be provided in a unit (i.e. DIY). It is unlikely that affordable housing would be deliverable or desirable if it were to be developed above new retail floorspace.

59742: The updated Aberdeen City and Aberdeenshire Retail Study does not identify any quantitative deficiency of convenience retailing other than in some of the larger expansion areas identified around Aberdeen. This, together with the open class one consent which is present to the north of this site, also on Denmore Road, suggests that there is no need for further convenience or general comparison retail provision on this site.

However, the open class retail consent to the north could threaten the existing bulky goods outlets there, including the B and Q, which are used by residents on the north of the City. If the bulky goods uses on the existing commercial centre on Denmore Road are displaced, consideration should be given to this site for the development of bulky goods retailing in order to maintain the diversity of the retail offer in Bridge of Don. Conditions should be imposed restricting uses to bulky goods retailing. The

pitches lost should be replaced by new or upgraded pitches which are of comparable or greater benefit in Bridge of Don.

59758: Policy RT5 – Retail Development Serving New Development Areas within the existing Plan states that retail within the new development areas must be masterplanned. Therefore, retail development will be appropriately phased along with the residential development.

59801: It is not agreed that development option B0947 – land at Huxterstone - should be identified for retail use. Retail in this location would be highly accessible by private motor but would not encourage more sustainable modes of transport. The retail location would have a large catchment area and is likely to have significant impacts on existing retail areas including the City Centre. At present there would only be support for retail development that is directly associated with new development areas. This site is not within any development area and would be serving a catchment wider than that of Countesswells. The development would also impact on the strong Green Belt boundary that is present.

59805: It is not thought appropriate to identify part of Rowett North for retail development (i.e. supermarket). A supermarket has been identified for the Newhills Expansion Area as part of a town centre as it will support the new residential development. Retail at the Rowett North site will be severed from the residential area to the south.

Question 11 – Very Large Scale Single Retail Unit

48518; 49471; 51197; 54480; 57233; 57280; 55418; 55418; 57543; 57712; 57734; 57816; 57975; 58123; 58563; 58769; 59189; 59436; 59577; 59758; 59923: Due to future development in Aberdeen, it is now more likely that very large scale retailers may wish to locate within Aberdeen. It is recognised it will be very difficult to accommodate this within the city centre. However, a sequential approach would be used to find the most suitable site for this kind of development and if a site outwith the city centre was deemed the most suitable a Retail Impact Assessment would be required to support the planning application.

59758: A very large scale retail unit would be additional to the floorspace detailed in the Retail Study both within the city centre and outwith.

Planning authority action/recommendation for Proposed Plan

Retail Parks

Retail Parks will be protected through the same policy as town, district and neighbourhood centres and through the Hierarchy of Centres Supplementary Guidance.

Review of Retail Centres

A review of the Retail Centres will be undertaken through the Hierarchy of Centres Supplementary Guidance. Rousay Drive will be designated as a District Centre.

Retail Centres Outwith the City Centre

Town centres will be identified in Newhills Expansion Area and Grandhome (Phase 2). The town centre in Newhills Expansion Area will identify floorspace of approximately 4,000 sq. m. GFA for a supermarket and 3,500 sq. m. GFA for other comparison plus local shops and retail services. The town centre in Grandhome

(Phase 2) will identify floorspace of approximately 4,000 sq. m. GFA for a supermarket and 3,500 sq. m. GFA for other comparison plus local shops and retail services. The mixed use retail element of the town centre (gym, cinema, hotel etc.) as approved by Planning Committee on 28 May 2014 may make up the remaining 17,500 sq. m. GFA dependant on results of the Retail Impact Assessment submitted with the detailed planning application.

Retail floorspace of 5,500 sq. m. for convenience and 1, 500 sq. m. for comparison will be identified in Zone 29N but no site has been favoured.

Souter Head Road is no longer identified as a retail opportunity on grounds that the site is undeliverable. There remains a need for a supermarket to the south. There is potential to accommodate suitable retail development, serving local needs, within the identified retail centre stated in the Loirston Development Framework instead of the Souter Head Road site. This will help to anchor a viable village centre for Loirston whilst still providing a convenient location to meet the needs of the wider area.

Identify a new commercial centre at Denmore Road, Bridge of Don with the following conditions; If the bulky goods uses at the existing commercial centre at north Denmore Road are displaced, this site can be developed for bulky goods in order to maintain the retail offer in bridge of Don. Conditions will be imposed restricting uses to bulky goods retailing. Pitches lost should be replaced by new or upgraded pitches which are of comparable or greater benefit in Bridge of Don.

Very Large Scale Single Retail Unit

No site will be allocated for a large scale single retail unit.

Issue 26	Waste
Body or person(s) submitting a representation raising the issue (reference no.)	
57709 – Ms Marie Boulton 57984 – SITA UK 59236 – Mr Duncan Massey 59548 – ACC Waste and Recycling Service 6033 – SEPA 55905 – Mrs Valerie Fyfe 57233 – John Boylan 57280 – Mrs Christine Boylan	58123 – Kingswells Community Council 58769 – Mr Clive Kempe 59036 – Craigiebuckler and Seafield Community Council 51198 – Middlefield Community Project 55418 – Cults, Bielside and Milltimber Community Council 57734 – Andrew Jones
Section of the MIR to which the issue relates:	Issue 13: Recycling and Energy
Planning authority summary of the comments:	
Policy 57984 - Policy R3 to be updated to take account of SPP and SDP.	

57984 - Reference to Best Practical Environmental Option should be replaced with an emphasis on movement of waste management up the hierarchy.
57984 - clarification sought re submission of details for land restoration in R3.
60338 – supports changes proposed to policies.
60338 – new policies required for waste management and new sites should cover all waste sites.

Options for Sites

55418, 57233, 57709, 58123, 59036, 60338, 55418, 55905, 57280, 57734 – Support Option 1 and/or a single purpose built facility in one location is preferred.
51198 Support Option 2.
57984, 59548 also but shouldn't preclude smaller sites for flexibility.
57984, 59548 - supportive of intention to identify new waste management facility sites.
57984 - options need take account of commercial and industrial waste.
58123 - backs development of refuse-derived fuel plant but should be in place before 2022.
58123 – refuse-derived fuel plant should use highest possible technology to minimise harmful gases.
58123 - refuse-derived fuel plant should be located to avoid fallout to residential or coastal areas.
58123 - refuse-derived fuel plant should be well screened.
57984 - three sites identified in ALDP Policy R4 are already in similar use.
57984 - OP70 is not large enough.
57984, 595484 - bid submitted to extend OP70.
57984 - LDP should be clear on aspirations of SDP re new waste facilities to be located in Strategic Growth Areas, 57984 - which should be explicit.
58769, 59236, 60338, 51198 – option two preferred.
59548 – OP70 is the only and best option.
59548 – replacement site for Bridge of Don household recycling should be found.

Existing facilities

58123 – poor management of existing recycling facilities discourages use.
58123 – underground collection should be considered for in communal recycling facilities.
58769 – communal facilities work well.
58769 – concern with lack of safe disposal facilities for long-life lightbulbs.

Summary of the responses by planning authority

Policy

One of the main reasons for a local plan review is to ensure that all policies and guidance are up-to-date and fit-for-purpose. The review of the current ALDP which leads onto the proposed 2016 ALDP will ensure that and will introduce of any new policies and guidance which are deemed necessary. We agree with 57984 that reference to Best Practical Environmental Option should be replaced with an emphasis on movement of waste management up the hierarchy.

Options for sites

Although the preferred option is for a purpose built facility in one location, the Council

has found that there is not the land available to facilitate this, hence why the second option of smaller sites would not be precluded. However, in doing so it is recognised that having a cluster of facilities in one general location would be preferable to a wider spread of facilities. This would reduce transportation impacts and costs. Part of the analysis which the Council has undertaken relates to available locations, access arrangements, size and proximity to other sensitive uses such as residential in order to inform the best possible site. In respect of energy from waste, proximity to a wide range of heat and power users is essential (for instance domestic and commercial users demand heat and power at different times). Also, the exercise included looking for a replacement site for the Bridge of Don household recycling facility. Having looked at around 30 potential sites around the city, we have concluded that the best site options for the waste facilities required are as follows;

Altens East/Doonies – this area is already identified in the current LDP for waste facilities. It can accommodate the need for a materials recycling facility, refuse derived fuel plant and a depot for the collection fleet to replace the one at Kittybrewster. However, to do so it will need to be expanded slightly. The boundary is therefore extended to the east towards the coast road. This has been done in recognition that the coast road will need to be widened in order to accommodate the requirements of the new harbour at Nigg Bay. Sufficient space has therefore been reserved for this widening. In addition, a small triangle of land to the west of the site can also be included in the site. This is a small area sandwiched between the site and the employment land at Peterseat. As a result it does not serve any green belt function.

East Tullos Gas Holder and the Council's household waste and recycling centre – the gas holder site was subject to a development bid and is available for development. The adjacent recycling centre is owned by the Council. The industrial setting makes the site suitable for an energy from waste facility. In addition it is close to a wide range of users of heat and power. There are numerous businesses and offices around the site and the Council flats at Balnagask may be suitable for district heating, as would the school at Tullos. There may be potential to extend the heat network into the city centre or even the new harbour in future. The site is also close to Altens East/Doonies and this will minimise the impact of vehicle trips between the two facilities.

AECC at Bridge of Don – this can accommodate a household waste and recycling centre. This is to replace the current facility at Scotstown Road which is not considered fit for purpose. A masterplan for the AECC site will decide the exact location. The current 2012 LDP identifies a site at Denmore Road for this facility but it has not been delivered. This proposal will therefore be removed.

51198 – Support for Option 2 is noted however it is not felt by the Council that having several widespread locations for waste facilities would be environmentally or financially beneficial, particularly from a transportation point of view.

Existing facilities

The Council wish to ensure that these facilities work well and are fit-for-purpose and the comments are welcomed. New household waste recycling facilities are far better managed, larger and offer a wider range for recycling than old ones. The new facility at Grove Nursery is an example of a modern high quality facility which will be

replicated at the AECC site at Bridge of Don. We agree that underground storage of waste and recycling material has advantages and this will be promoted in Supplementary Guidance.

Planning authority action/recommendation for Proposed Plan

Expand Altens East/Doonies OP site to accommodate a material recycling facility, RDF Plant and collection depot.

Identify East Tullos Gas Holder and HWRC site for an energy from waste facility.

Identify the AECC site at Bridge of Don for a HWRC.

Update detailed policy and supplementary guidance wording to accommodate underground storage of waste and recycling materials.

Issue 27	B0905 Woodend Site 1 and B0904 Woodend Site 2, Peterculter	
Body or person(s) submitting a representation raising the issue (reference no.)		
54499 Les Chalmers 58890 Kenny Clubb 59367 Neil Rothnie 54952 Bancon Developments Ltd 57759 Robert Brew	59695 Scottish Natural Heritage 60338 SEPA 57426 Julie Nairn 58012 NHS Grampian	
Section of the MIR to which the issue relates:	Main Issue 1: Greenfield Housing and Employment Allocations (Table 3: Preferred Development Options at Peterculter)	
Planning authority summary of the comments		
<p>Note of Update It should be noted that, since the representation period for the Main Issues Report ended, respondent 58890 Mr Kenny Clubb from Churchill Homes has written to the Council stating that information has come to light which has resulted in the site being deemed undeliverable, and therefore wishes to remove their submission for both sites with immediate effect. The respondent will therefore not be promoting this site for inclusion within the proposed local plan.</p> <p>Support for the site 59367, 57426: Support the inclusion of the sites as preferred development options. The site is suitable for development because it is in close proximity to other proposals on Malcolm Road and sits well within the existing settlement. The sites could deliver housing in the short-term, allowing families to move into the area and for the existing farm buildings to be cleared.</p> <p>Objection to the sites on the following grounds: Reporter's Report</p>		

54952: The previous Reporter's Report on the site roundly rejected these sites on the grounds of access, visual impact and isolation from existing settlements. Nothing has changed in the interim to make these sites acceptable and they should not be considered anew.

Access

54952, 54499: Vehicular access to and from the site is poor; difficult and dangerous.

Natural Heritage and Wildlife

59695: These sites have a potential impact on woodland, including Ancient Woodland, the Green Space Network, LNCS and should be undesirable as a result. If these sites are taken forward for overriding socio-economic reasons, thorough mitigation/compensation measures should accompany the allocations.

Visual and Landscape Impact

54952, 57759: The site would be an obtrusive protection into the countryside, and will blue the boundary between the existing settlement and the Green Belt, leading to pressure for more development north of the village.

Isolation from existing settlement

54952: The development would be remote and isolated from existing services and is likely to encourage car use, making it unsustainable. There are no pedestrian footpaths connecting the site with the village of Culter.

Drainage and Flooding

54952, 60338: Drainage is an issue and there is concern about the proposal is to install a private treatment plant rather than connect to mains drainage.

57759, 60338, 54499: The southern end of Bucklerburn Road is subject to flooding and development of housing is likely to exacerbate this problem. A Drainage Assessment will be required and SUDS should be incorporated.

Impact on Schools and Services

57759, 54499: Cults Academy does not have enough places to accommodate the extra pupils generated by further housing development in Lower Deeside, and is forecast to be at capacity in 2019.

58012: The development of these homes will negatively impact the provision of healthcare facilities in the area, which would not be able to accommodate the additional patients without proportional mitigation. Developer contributions will be required.

Summary of the responses by planning authority

We acknowledge both opposition and support for site. The site was included into the Main Issues Report as a Preferred Option on the grounds of providing housing choice in Culter and supporting the falling rolls at Culter Primary School. However, the site is considered to be unsuitable for residential development due to its relative remoteness from services, facilities and public transport. This will make the development entirely car dependent.

Planning authority action/recommendation for Proposed Plan

Do not allocate the site for residential development in the Proposed Plan.

Appendix 4a: Addendum

Issue 28	Further Representations relating to Howes Road, Persley Croft, Charleston (OP78), Blackhills of Cairnrobin, Land at Souter Head Road/Loirston (Supermarket) and Guttrie Hill West	
Body or person(s) submitting a representation raising the issue (reference no.)		
50977 – Stewart, M 50850 – Milne, L 50986 – Farrer 51021 – Sangster 51246 – Smith 51387 – Fraser, M	51414 – Kirton, J Jnr 51831 – Anon 57467 –Cameron, Craig 57584 – Northfield Community Council 58016 – Anon 56399 – Cowie, G&A 59826 – Hermiston Knight Frank 59828 - Ironsides	
Section of the MIR to which the issue relates:	Question 16 – Gypsy Travellers & Main Issue 1: Greenfield Housing and Employment Allocations	
Planning authority summary of the comments:		
<p>Howes Road General Objection 351831 General objection to the development at Howes Road.</p> <p>Concentration of Sites 351831 Respondent noted that there was too great a concentration of proposed Gypsy Traveller (G/T) sites within the Bucksburn/Newhills area and this was not appropriate. This is particularly the case as services are already stretched within the area.</p> <p>Proximity to school 358016, 51246 Grave concern was raised by the majority of respondents that the site is located in such close proximity to the Heathryburn School and Nursery. It was not felt that this was appropriate.</p> <p>Roads and Traffic 358016, 37584 Objection on the grounds of the poor standard of roads in the area and the likely impact of a development such as this. Specific concern was raised about the movement of vans and caravans in and out of the site and how this would impact on local residents and emergency access.</p> <p>Proposed Greenferns Development 358016, 357467, 357467, 37584 Many of the submissions noted that the site is within the Greenferns Development Framework area and is contrary to the plan. There is concern that the Greenferns development is for a mixed use sustainable community and that this might be</p>		

jeopardised by the development of a G/T site in this location. It was also suggested that the Greenferns development would help to bring badly needed services to the Northfield area and again these might not get developed. There was also opposition on the basis that the Greenferns DF states that all uses will require to be compatible, and this use is not compatible with the existing EnerMech's global headquarters

House Prices

37584

There was also concern over house prices and the impact that a G/T site would have on the Northfield area. This was particularly concerning as the Northfield area had not benefited from the substantial rise in property values that many parts of Aberdeen had enjoyed.

Environmental Impact

351831, 358016

Significant concern was raised over the impact of the development on the general environment of the area. These comments were broken into those on Fly-tipping and waste management and those on the natural environment itself such as wildlife.

The issue of fly-tipping and the condition that illegal encampments sites are left in was noted, with concern that the surrounding area would be polluted if the site was allowed to proceed.

In terms of the natural environment concern was raised that the site is adjacent the Bucksburn Valley Local Nature Conservation Site and has an abundance of wildlife including deer. The siting of a G/T site in this location would have a negative impact on these features

Site Selection Process

57467, 37584

A number of submissions raised concerns over the selection process for the site. It was noted that Howes Road was not the preferred site and other sites such as at Hazelhead scored higher. Suggestion was made that this was a political decision.

Lack of Consultation

57467

Cited a lack of consultation with the travelling community about the identification of the site. It was suggested that as Gypsy/Travellers were not involved in the sites selection they may not be interested in using the site.

Impact on amenity

58016

Concern that development will have a negative impact on the amenity of the area. Respondents noted that the site is used by the public for walking, is part of the access to the Bucksburn Valley core path network, is identified as an NHS Health Walking Routes and is adjacent to a designated LNCS.

Bye-law

57467

Strong support for the development of a Bye-law to prevent illegal encampments. Suggestion also that sites should not be allocated until such time as the Bye-law is in place.

Appropriateness of the site

58016, 57584

A significant number of submissions also noted that the site is not historically used by G/T's. Guidance on G/T accommodation states that sites should be located where travellers have historically stopped and are likely to stop again.

Funding

357467

Building the site will take away funding for homeless people

Petition letter

350986, 51387, 51414, 50850, 51021, 50977

A standard letter was submitted by a large group of residents in the area objecting to the development. Their issues while similar to many of the other comments have been group below.

Opposition to this site on the grounds of, insufficient consultation, the site previously being identified as undesirable and has only been used on one previous occasion by G/T. Not complying with Policy or Supplementary Guidance, being contrary to the Greenferns - OP39 Masterplan which states "create a space where people can live and work without relying on private transport" and the need to maintain and improve access to natural areas (Bucksburn and the wider countryside) its proximity to Heathryburn School and Auchmill Golf Course, the identification of other sites in the LDP, one of which is in close proximity, and that identifying the site would reduce the existing house values

Allocation of BO101: Persley Croft

56399

The site should be allocated as desirable in the MIR

Phasing of Charleston (OP78)

59826

Bring forward the phasing to phase 2 (2024-2030) to ensure a sufficient supply of marketable employment land.

Blackhills of Cairnrobin

59826

Site should be included as employment land. Health and Safety Executive does not set specific sand off zones for blasting. Landscaping will be provided.

Land at Souter Head Road, Altens/Loirston (Supermarket)

59826

Remove OP76 as an opportunity site for retail. Relocate this allocation to OP77.

B0907: Guttrie Hill West

59828

Include site as a brownfield allocation of 5 houses.

Summary of the responses by planning authority

Howes Road

General Objection

351831

The general objection for the Howes Road is noted.

Concentration of Sites

351831

Concern over the concentration of sites in the area is noted. While a site is identified within the Newhills development its exact location has not yet been identified nor the time frame for its delivery. The selection process for the site also examined this issue. In relation to services the Newhills and Greenferns developments, like all new developments, are required to contribute to any deficit in services cause by there development.

Proximity to school

358016, 51246

Concern over the proximity to the school is noted however the G/T community need access to these services making the site more sustainable for a deprived section of the community.

Roads and Traffic

358016, 37584

Concern over roads and traffic is noted. These issues would have to be examined as part of any planning application for the development of the site.

Proposed Greenferns Development

358016, 357467, 357467, 37584

Concern over the impact of the Greenferns Development Framework is noted. Like the introduction of the special needs school the introduction of the G/T may require an update to the existing Development Framework.

House Prices

37584

The impact on houses prices is noted. The site in question is surrounded by opportunity sites OP45, 35 & 39, and as such it is these sites which are likely to be impacted. New residents of these developments will be aware of the G/T site prior to purchasing.

Environmental Impact

351831, 358016

Concern over the impact of the development on the general environment of the area is noted. The purpose of identifying specific G/T sites is to provide facilities such as waste facilities to prevent many of the issues raised in submissions. Management of the sites will be crucial function and this is specifically required in current supplementary guidance.

Site Selection Process

57467, 37584

The validity of the selection process was questioned. A number of sites were presented to committee on the 21st of August 2013 and members instructed officers to proceed with the Howes Road site. The report which went to committee showed

that Howes Road scored higher than the other sites and was therefore most appropriate.

Lack of Consultation

57467

A lack of consultations with the communities involved was raised. While this concern is noted the selection process involved both members of the community and the G/T liaison officer.

Impact on amenity

58016

Any impacts on walking routes and LNCS will be mitigated through the planning application process.

Bye-law

57467

Support for the Bye-Law is noted, this is currently being progressed by the council with the Scottish Government.

Appropriateness of the site

58016, 57584

While concern is noted that the current site was not historically used by the G/T community, many of the sites that were historically used are inappropriate. As such sites were selected based on an agreed set of criteria.

Funding

57467

There will be no impact to homelessness provision in Aberdeen through the provision of a halting site.

Petition letter

350986, 51387, 51414, 50850, 51021, 50977

The concerns raised in the standard letter submitted by several members of the public is noted. The issues raised in these submission have been covered in the responses above.

Allocation of BO101: Persley Croft

56399

The site is subject to significant constraints regarding access. The site is considered to be undesirable for development due to its location directly on the A90 trunk road (The Parkway), which is a major transport route. The Parkway severs the site from nearby residential development, services and facilities at Danestone, and would be very difficult and hazardous to cross for pedestrians and cyclists. The Parkway is a robust Green Belt boundary in this area. Considering the plans for development of 7,000 homes and 5ha of employment land at OP12 Grandhome, it cannot be assumed that this road will become a significantly quieter local road post- AWPR

Phasing of Charleston (OP78)

59826

The overall vision and spatial strategy of the Local Development Plan is considered to be appropriate and was established following the Examination into the 2012 Local

Development Plan. Adequate employment land has been provided to meet the allowances set in the Strategic Development Plan. The Strategic Development Plan already seeks to supply a generous supply of employment land. We intend to keep this land as 'Future Growth' in the next Local Development Plan so that the employment phasing remains in compliance with the Strategic Development Plan.

Blackhills of Cairnrobin

59826

Part of the proposed site was originally included as OP79 in the 2012 LDP Proposed Plan. The Reporter concluded that, because the site lay within the buffer zone (whether 250m or 400m) of the extended OP71 Blackhills Quarry where blasting would take place, "its development for employment uses would be inappropriate and premature, pending the working out of the quarry". The extended OP71 boundary was adopted, and therefore the issues with land use conflict between the quarry and the proposed business use remain.

In addition, the overall vision and spatial strategy of the Local Development Plan is considered to be appropriate and was established following the Examination into the 2012 Local Development Plan. Adequate employment has been provided to meet the allowances set in the Strategic Development Plan. The Strategic Development Plan already seeks to supply a generous supply of employment land and there is no numerical justification to allocate further sites. Under these circumstances, it is considered that there are insufficient over-riding benefits arising from this site which would justify allocating it for development.

Land at Souter Head Road, Altens/Loirston (Supermarket)

59826

Souter Head Road is no longer identified as a retail opportunity on grounds that the site is undeliverable. There remains a need for a supermarket to the south. There is potential to accommodate suitable retail development, serving local needs, within the identified retail centre stated in the Loirston Development Framework instead of the Souter Head Road site. This will help to anchor a viable village centre for Loirston whilst still providing a convenient location to meet the needs of the wider area.

B0907: Guttrie Hill West

59828

The site is currently covered in its entirety by Ancient Woodland, and is designated as a Local Nature Conservation Site and it is also a habitat for protected species including bats and red squirrel. Its biodiversity value will be negatively impacted by development, despite the proposal to maintain some of the woodland. The site is also in a highly unsustainable location, being completely unrelated to existing settlement at Culter and an unacceptable distance from local facilities and employment opportunities.

The overall vision and spatial strategy of the Local Development Plan is considered to be appropriate and was established following the Examination into the 2012 Local Development Plan. Adequate housing has been provided to meet the allowances set in the Strategic Development Plan. The Strategic Development Plan already seeks to supply a generous supply of housing land and there is no numerical justification to allocate further housing sites. Under these circumstances, it is considered that there

are insufficient over-riding benefits arising from this site which would justify allocating it for development.

Planning authority action/recommendation for Proposed Plan

Howes Road

Further to instruction at the full council meeting on the 21st of August 2013 Howes Road site should be identified in the plan as a location for a Gypsy/Traveller site. This site is in addition to those already identified in the plan (As per Issue 14).

Souter Head Road/Loirston (Supermarket)

There is potential to accommodate suitable retail development, serving local needs, within the identified retail centre stated in the Loirston Development Framework instead of the Souter Head Road site. (As per Issue 25)

In respect of the other representations, no further changes are recommended.