

## Proposed Aberdeen Local Development Plan 2015 Representation Form

Please use this form to make comments on the Proposed Aberdeen Local Development Plan, ensuring that your comments relate to a specific issue, site or policy in either the Proposed Plan, Proposed Supplementary Guidance, Proposed Action Programme or Strategic Environmental Assessment Environmental Report. Please include the relevant paragraph(s) and use a separate form for each issue you wish to raise.

**The consultation period runs between Friday 20<sup>th</sup> March and Monday 1<sup>st</sup> June 2015. Please ensure all representations are with us by 5pm on Monday 1<sup>st</sup> June.**

Name	Mr <input checked="" type="radio"/> Mrs <input type="radio"/> Miss <input type="radio"/> Ms <input type="radio"/> Michael Lorimer
Organisation	Ryden LLP
On behalf of (if relevant)	Robert Gordon University
Address	25 Albyn Place, Aberdeen
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Please tick if you would like to receive all future correspondence by e-mail

What document are you commenting on?	Proposed Plan	<input checked="" type="checkbox"/>
	Proposed Supplementary Guidance	<input checked="" type="checkbox"/>
	Proposed Action Programme	<input type="checkbox"/>
	Strategic Environmental Assessment Environmental Report	<input type="checkbox"/>
Policy/Site/Issue	Appendix 4 - Masterplans	Paragraph(s)

**What would you like to say about the issue?**

See Attached Paper Apart

**What change would you like to see made?**

See Attached Paper Apart

Please return the completed form by:

- post to the Local Development Plan Team, Aberdeen City Council, Business Hub 4, Ground Floor North, Marischal College, Broad Street, Aberdeen AB10 1AB; or
- email to [ldp@aberdeencity.gov.uk](mailto:ldp@aberdeencity.gov.uk)

The representation form can be filled in, saved, e-mailed and/or printed. You must “save as” to ensure the completed form is saved with the changes you have made. If you need more space, please fill out another representation form or send a word document attachment via e-mail with your completed representation form. **Please ensure all representations are with us by 5pm on Monday 1<sup>st</sup> June.**

Thank you. For more information, please visit [www.aberdeencity.gov.uk/aldp2016](http://www.aberdeencity.gov.uk/aldp2016) or to contact the Local Development Plan Team call 01224 523470.

#### **Data Protection Statement**

The comments you make on the Proposed Plan will be used to inform the Local Development Plan process and the Examination into the Local Development Plan by the Scottish Ministers' Reporter. You must provide your name and address for your representation to be considered valid, and this information will be made publicly available. Other personal contact details such as telephone and e-mail will not be made public, although we will share these with the Reporter, who may use them to contact you about the comments you have made. For more information about how Aberdeen City Council maintains the security of your information, and your rights to access information we hold about you, please contact Andrew Brownrigg (Local Development Plan Team Leader) on 01224 523317.

## **PAPER APART**

### **Representation to the Proposed Aberdeen Local Development Plan 2016 on behalf of Robert Gordon University (RGU).**

#### **Aberdeen Local Development Plan 2012 Supplementary Guidance – Robert Gordon University: Garthdee Masterplan (2009).**

##### Introduction

Representation is made to the content of the Proposed Aberdeen Local Development Plan 2016 (PLDP), specifically to the failure of “Appendix 4- Masterplans” to identify the existing Robert Gordon University: Garthdee Garthdee Masterplan (GMP) 2009 to be taken forward as Supplementary Guidance and utilised as a material planning consideration for the lifespan of the new LDP. The PLDP’s approach reflects proposals contained within a letter from Aberdeen City Council (ACC) Local Development Plan Team sent to RGU dated 14 April 2015, as attached as Appendix 1. The content of the letter highlights ACC’s review of existing Supplementary Guidance to the extant Local Development Plan (2012) and their intension to remove the RGU Garthdee Development Framework (2009).

The ACC letter (Appendix 1) suggests that guidance should be removed on sites that “*have been developed or are near completion or where the document has been superseded*”, and this is provided as justification for removal of the GMP. RGU would stress that such an assumption is entirely inaccurate, as the existing GMP is still a relevant working document. Whilst a number of developments identified within the GMP have come forward and are consented, there remains a number of development opportunities, as set out within the GMP and discussed in greater depth below, which have yet to be commenced. Accordingly, the GMP is still live and crucial to the evaluation of future applications as they come forward. To remove the GMP as Supplementary Guidance would be premature in the context of the ongoing development of the Garthdee Campus and undermine the very spirit of the entire masterplanning process.

##### Modification Requested

RGU wish to object strongly to the proposed removal the existing GMP as Supplementary Guidance and would herby request that it is respectfully carried forward with the adoption of the Aberdeen Local Development Plan 2016 to be retained as relevant Supplementary Guidance and remain a material consideration in the assessment and determination of planning applications at the RGU Campus. Appendix 4 – Masterplans of the PLDP should be amended accordingly to specifically include the GMP within the list of Masterplan Supplementary Guidance.

It should be noted that RGU has formally responded to the letter issued to them by ACC, stressing that it would wish to see the DF retained as Supplementary Guidance to the new LDP. A copy of this response dated 28<sup>th</sup> April 2015 is also contained within the attached Appendix 1 and a follow up reminder dated 28<sup>th</sup> May 2015 was also sent as is attached as Appendix 2. At the time of writing, no

further correspondence from ACC has been received, therefore a formal representation to the publishing of the Proposed Local Development Plan is considered to be necessary.

### Planning Policy Context

Within a national context, Scottish Planning Policy (SPP) 2014 and National Planning Framework 3 emphasise the linkages between Sustainable Development and Placemaking. Successful Masterplanning plays a pivotal role in helping to achieve these aims, establishing a vision for new development and an effective programme for the delivery of high-quality buildings, infrastructure and spaces in the right locations. These aims also filter through at regional and local levels through the Spatial Strategy contained within the extant Aberdeen City and Shire Strategic Development Plan (SDP) 2014 and the Aberdeen City Local Development Plan 2012. The planned expansion identified within the Development Plan highlights that Masterplans will be “essential” to guide development going forward. In addition to figure 1 contained within the LDP which identifies new Greenfield Masterplan Zones, Appendix 5 also details existing Masterplans taken forward as Supplementary Guidance, including the RGU Campus Garthdee (2009).

Scottish Planning Circular 6/2013 - “Development Planning”, discusses the implementation of Supplementary Guidance in accordance The Town and Country Planning (Development Planning) (Scotland) Regulations 2008. Paragraph 145 of the Circular stipulates that, “*Supplementary Guidance adopted in connection with a plan falls when that plan is replaced. But if it remains up-to-date, authorities may readopt it in connection with the replacement plan after consultation, provided a proper connection with the new plan remains*”. The GDF is still entirely “up-to-date” as the development programme at the campus is still ongoing, therefore in recognition of this, ACC should carry the GMP forward as Supplementary Guidance thus retaining a strong connection between the campus and the next LDP.

In addition, the existing RGU Campus is identified within the PLDP Proposals Maps as land designated under CF1- Existing Community Sites and Facilities. Proposed Policy CF1 stipulates that, “*Large sites in sensitive locations will be subject to a Planning Brief or Masterplan*”. The RGU Garthdee site already has an appropriate and live Masterplan in place, therefore any proposals to remove it would be in direct contradiction to the proposed policy mentioned above.

### Background to the RGU Masterplan and Intentions Going Forward

RGU undertook and invested a substantial degree of time and effort into the production of the GMP in order to provide both Aberdeen City and Shire Local Authorities a concise strategy for future development of the campus, with the vision of creating a world class teaching and learning environment along the banks of the River Dee. The GMP was approved as Supplementary Guidance by ACC Planning Committee on 18 June 2009 and remains as such under the current LDP.

The GMP sets out the context, identity, connectivity and community engagement undertaken, as well as the associated phasing of development and construction works which have been broken down into two distinct phases, with the first programmed for 2010 – 2013 and the second taking development beyond 2013. Section 5.3 and supporting Figure 14 of the GDF illustrates the various Masterplan components associated with the long term vision for the campus and this also includes works beyond the scope of Phase 1 & 2 works. RGU have successfully completed and/or gained permission for works associated with a number of these Masterplan components, however the majority of these are located within the eastern section of the campus. RGU have not yet undertaken any construction/redevelopment works associated with the western area of the campus, as set out explicitly below in accordance with the relevant Masterplan components referenced within the GDF:

- *Component 4 - Former site of Gray's School of Art for possible student village*
- *Component 8 – Conversion of Scott Sutherland School, Central & Student Services buildings into new University Administration Hub*
- *Component 11 – Enhancement of greenspace and pedestrian linkages*
- *Component 12 – Demolition and future redevelopment of Kaim Cottage.*

It is therefore evidently clear from the above that the development programme for the campus is still ongoing and RGU are not as advanced in the process of implementation as originally envisaged through the phasing contained within the GMP. In order to provide RGU with continued confidence in the planning system and a degree of certainty going forward as development continues to progress on site, the GMP should be retained as Supplementary Guidance to the next LDP.

#### Recommendation

On the basis of the foregoing, we respectfully request that the existing Robert Gordon University: Garthdee Masterplan (2009) is carried forward as Supplementary Guidance to the new LDP and thus remain a material consideration in the determination of future planning applications on the campus site. Appendix 4 – Masterplans of the PLDP should be modified accordingly in order to reflect this.

Our Ref.  
Your Ref.  
Contact Donna Laing  
Email [DLaing@aberdeencity.gov.uk](mailto:DLaing@aberdeencity.gov.uk)  
Direct Dial 01224 523512  
Direct Fax 01224 636181

Required 28/4.  
- wish to know  
STATUS AS  
AT PRESENT -



**ABERDEEN**  
CITY COUNCIL

14 April 2015

The Robert Gordon University  
Estates Director  
Garthdee Campus  
Aberdeen  
AB10 7QB

Planning and Sustainable  
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**Communities, Housing and  
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[www.aberdeencity.gov.uk](http://www.aberdeencity.gov.uk)

Dear Sir/Madam:

**Aberdeen City Council Supplementary Guidance:  
Robert Gordon University Campus Garthdee (2009)**

We are writing to you regarding the above named document which is currently adopted as Supplementary Guidance/Local Planning Advice to the Aberdeen Local Development 2012. We are reviewing the existing Aberdeen Local Development Plan and associated documents and, as part of this review, intend to remove guidance on the development of those sites which have been developed or are near completion or where the document has been superseded.

As such, we do not consider it necessary to take forward the above mentioned document as Supplementary Guidance/Local Planning Advice to new Aberdeen Local Development Plan. The document would therefore no longer be a material planning consideration when determining planning applications on this site.

Should you have any queries on the above, or wish to discuss this further, then please do not hesitate to contact me via the details above.

Yours sincerely,

[Redacted signature]

**Donna Laing**  
Planner (Local Development Plan)

ISSUES  
-> GRAYS LISTING IS  
REMOVED  
-> PLANNING STATUS  
FOR DEVELOPMENT  
OF  
KAY  
SCOTT'S  
GRAYS  
SITES

PETE LEONARD  
DIRECTOR



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 **COPY**

FILE



**ROBERT GORDON  
UNIVERSITY ABERDEEN**

FAO: Donna Laing  
Planner (Local Development Plan)  
Planning and Sustainable Development  
Communities, Housing, and Infrastructure  
Aberdeen City Council  
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**ESTATES AND PROPERTY SERVICES**

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Aberdeen  
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United Kingdom  
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Fax: 01224 263456  
www.rgu.ac.uk

BS/LG/Lett15/0003

28 April 2015

Dear Ms Laing

**Aberdeen City Council Supplementary Guidance  
Robert Gordon University Campus Garthdee (2009)**

I refer to your letter of 14 April 2015 regarding the above and your proposal to remove same as Supplementary Guidance/Local Planning Advice within the proposed new Aberdeen Local Development Plan.

In the letter you state that you "intend to remove guidance on the development of those sites which have been developed or are near completion or where the document has been superseded"

Whilst we (RGU) have completed and/or gained planning permission to complete the building project to the east of the site we have not undertaken any works as yet on the potential development/redevelopment sites to the west of the campus (Component 4, 8, 11, and 12).

These are also potential major development opportunities and will require substantial discussion/consultation with Aberdeen City Council and, as such, I would suggest that there should be no change in the status of the existing document, thus retaining its status as Supplementary Guidance/Local Planning Advice to the new Aberdeen Local Development Plan.

I would therefore appreciate the opportunity to discuss the issue further at your earliest convenience prior to your final decision on the matter.

Yours sincerely



Bill Somerville  
Director of Estates & Property Services



INVESTOR IN PEOPLE

Director  
Estates and Property Services  
**Bill Somerville**

FAO: Donna Laing  
Planner (Local Development Plan)  
Planning and Sustainable Development  
Communities, Housing, and Infrastructure  
Aberdeen City Council  
Business Hub 4, Marischal College  
Broad Street  
Aberdeen  
AB10 1AB

BS/LG/Lett15/0006

28 May 2015

Dear Ms Laing

**Aberdeen City Council Supplementary Guidance  
Robert Gordon University Campus Garthdee (2009)**

I refer to your letter of 14 April 2015 (and my reply of 28<sup>th</sup> April – copy attached) regarding the above and your proposal to remove same as Supplementary Guidance/Local Planning Advice within the proposed new Aberdeen Local Development Plan.

In the letter you stated that you “intend to remove guidance on the development of those sites which have been developed or are near completion or where the document has been superseded”.

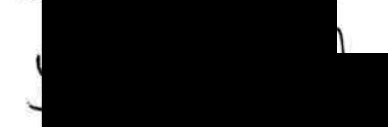
In return I noted that whilst we (RGU) have completed and/or gained planning permission to complete the building project to the east of the site we have not undertaken any works as yet on the potential development/redevelopment sites to the west of the campus (Component 4, 8, 11, and 12).

These are also potential major development opportunities and will require substantial discussion/consultation with Aberdeen City Council and, as such, I would suggest that there should be no change in the status of the existing document, thus retaining its status as Supplementary Guidance/local Planning Advice to the new Aberdeen Local Development Plan.

As yet I have had no confirmation of your receipt of the communication, any reply as to the opportunity to discuss the matter further prior to closure of submissions, or your intent to consider the matter further.

As the date for submissions/representation is fast approaching I would appreciate some form of contact as to whether consideration has been given to the matter and/or my submission will be considered within the overall review. Alternatively if you require further information or wish to discuss the matter further I am available to either attend your office or to discuss the matter by phone at a time to suit your schedule.

Yours sincerely



Bill Somerville

**ESTATES AND PROPERTY SERVICES**

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