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Aberdeen City Local Development Plan 2015

Proposed Plan

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Introduction

Scottish Enterprise has a national remit to identify and exploit opportunities for Scotland's economic growth by supporting Scottish companies to compete, helping to build globally competitive sectors, attracting new investment and creating a world-class business environment. SE supports the development of more globally competitive companies and Scotland's growth sectors that have the biggest opportunity in global growth markets.

SE also has a regional remit to stimulate the growth of the wider Aberdeen city and shire economy too. The remit is broadly two-fold. Firstly, through our various activities related to the drivers of growth: - Internationalisation; Innovation; Investment and support for Inclusive Growth, and secondly, through working collaboratively with the public and private sector to develop the business environment and attract new investment and development.

SE very much welcomes the opportunity to participate in the formal Aberdeen City LDP and considers that the Proposed Plan reflects well the current NPF3 and SPP status and requirements particularly with regard to the ambition of the plan in relation to 'place'.

SE's summary responses below predominantly have a focus on or have a bearing on the Scottish economy and in supporting sustainable growth, and relate to :

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|---------|---|
| Issue 1 | Commenting on the Proposed Plan - Section 1 Introduction and Section 2 : The Spatial Strategy
Omission of a Spatial Strategy Plan |
| Issue 2 | Commenting on the Proposed Plan - City Wide Proposals Map - Omission of Connections
beyond Aberdeen City Council Boundaries |
| Issue 3 | Commenting on The Proposed Plan paragraph 3.19, and Proposed Action Plan - City Centre |
| Issue 4 | Commenting on The Proposed Plan Section 3 : Aberdeen International Airport paragraph 3.65 -
6.68 and Policy B4 and associated OP land and Proposed Action Plan |
| Issue 5 | Commenting on The Proposed Plan Section 3 : Nigg Harbour Expansion paragraph 3.71 - 3.72,
Policy B5 and associated OP62 land and Proposed Action Plan |
| Issue 6 | Commenting on the Proposed Plan Section 3 The Network of Centres, paragraphs 3.18 - 3.29,
including policies NC1, NC4, NC5; the Proposed Plan Section 3 Supporting Business and
Industrial Development, paragraphs 3.55 - 3.64, including policies B1, B2, B3 and B4, and
associated OP sites and Supplementary Guidance 5, Topic Area 5 City Centre and Business -
Hierarchy Centres |



- Issue 7 Commenting on the Proposed Plan Section 3 Supporting Business and Employment Development pages 41 - 45, paragraphs 3.61 - 3.62 and Policy B2
- Issue 8 Commenting on the Proposed Plan Section 3 Supporting Business and Employment Development Policies B1 and B2, Supporting Business & Industrial Development, Aberdeen Energy Park, paragraphs 3.55 - 3.62
- Issue 9 Commenting on the Proposed Plan : Policies B1 and B2, Supporting Business & Industrial Development, Aberdeen Energy Park (and site OP3); paragraphs 3.55 - 3.62
- Issue 10 Commenting on the Proposed Plan Section 3 Supporting Business and Employment Development pages 41 - 45, paragraphs 3.63 - 3.64 and Policy B3
- Issue 11 Commenting on the Proposed Plan Section 1 Introduction, Section 2 The Spatial strategy and Supplementary Guidance Topic Area 2 Design : Energetica



Issue 1 Commenting on the Proposed Plan

- Section 1 Introduction
- Section 2 The Spatial Strategy -
- Omission of a Spatial Strategy Plan

What would you like to say?

SE notes that there is no spatial strategy plan within the PP and it requests that Aberdeen City Council gives consideration to the inclusion of such a plan within Section 1 Introduction or Section 2 The Spatial Strategy of the ACLDP. Reference is made to the Spatial Strategy Plan within the Aberdeenshire Council Local Development Plan Proposal Plan (page 9), which for the most part provides clear visual representation of the overall intentions for the plan area. Whilst SE recognises that the Strategic Development Plan provides the overall framework for development within the region, SE favours the approach of a strategic spatial introduction to the ACLDP as this sets the scene and context for the detailed policies, proposals and supplementary guidance (SG).

If Aberdeen City Council is minded to include such a plan in the ACLDP, SE requests that it also considers the benefit of indicating areas which have a regional significance for development, and an overlap between the City and Shire boundaries - for example Energetica and other growth areas and settlements which are bisected by the Councils' boundary lines.

What changes would you like to see?

The inclusion of a Spatial Strategy plan within the Introduction or Spatial Strategy sections of the ACLDP.

Issue 2 Commenting on the Proposed Plan

- City Wide Proposals Map -
- Omission of Connections beyond Aberdeen City Council Boundaries

What would you like to say?

Whilst SE recognises that planning policy may change within Aberdeenshire Council's area, over which Aberdeen City Council has limited control, the entire region's economy and lifestyle is dependent on interactivity between both Council areas.

Notwithstanding the Strategic Development Plan, SE requests that in order to provide a clear context to the development proposals, consideration is given to expressing within the ACLDP the interdependency with the Aberdeenshire area, by indicating the locations of important strategic growth zones, policy zones and employment areas. For example, SE notes also that the PP allocates an additional area of land at Westhill (OP34, under 1 F1) as an 'extension' to Aberdeenshire PP's OP3 allocation. Where possible, SE considers that such areas should also be shown on the proposals maps (and a corresponding position for Aberdeenshire LDP). Similar actions should also be taken with other allocations which 'overlap'.

Reference should also be made to SF's response Issue 1 relating to the need for a Spatial Strategy plan.

What changes would you like to see?

Wider context to the City Wide Proposals Map including identification of Energetica and other growth areas, and the entirety of allocations, where sites are bisected by the Councils' boundary lines (for example ACLDP PP allocation OP34 and ALDP PP OP3 at Westhill).



Issue 3 Commenting on:

- The Proposed Plan paragraph 3.19, and
- Proposed Action Plan

What would you like to say?

SE very much welcomes the introduction of clear policies that support the development of town centres and considers that the regeneration of Aberdeen City Centre through the proposed new Masterplan and Delivery Plan is one of the most significant policies for the medium to longer term growth of the local economy, and efforts to reach a consensus about future development and connectivity in the City Centre through the Masterplanning process is greatly appreciated. However, SE requests that consideration be given in the PP to place greater emphasis on the fact that funding mechanisms are to be identified and the Delivery Plan is to be implemented as a matter of urgency/priority, along with the funding and delivery of better public transport to and around the City Centre.

What changes would you like to see?

SE requests that Aberdeen City Council gives consideration to amending the PP and the Action Plan, to place greater emphasis on identifying and securing funding mechanisms and delivery of essential infrastructure to secure the implementation of the City Centre Masterplans (in addition to the International Airport Growth Zone and Nigg Harbour Masterplans, see Issues 4 and 5 below).

Issue 4 Commenting on:

- The Proposed Plan Section 3 : Aberdeen International Airport paragraph 3.65 - 6.68 and Policy B4 and associated OP land and
- Proposed Action Plan

What would you like to say?

SE considers that the International Airport and the Airport Employment Growth Zone is crucial to the continued growth of the Region and is wholly supportive of measures within the PP and associated documents to protect land for employment uses within this area and to seek delivery of the necessary infrastructure to facilitate economic development. SE considers, however, that the scale of the economic importance of this area as a whole coupled with the success of Aberdeen International Airport is not fully conveyed within the PP.

In order to achieve the full potential of this area, including the delivery of the necessary infrastructure through various funding mechanisms, the ACLDP and its associated documents need to provide a more proactive positive framework, in the written text, policies and action plan, to highlight the importance of the employment land allocations adjacent to the Airport, which will create a significant commercial and international transport hub to serve the economy and the international oil & gas sector in particular. Priority should be given, within the Action Plan, to the Masterplans (provision and / or implementation as appropriate) and to delivery mechanisms to secure implementation for land within this growth zone.

Additionally, SE considers that Policy B4 and the supporting text does not provide sufficient clarity in relation to safeguarded zones and requests that Aberdeen City Council continues discussion with NATS to seek to remedy this. SE requests that NATS if possible should be encouraged to provide a safeguarding zone map for inclusion within the ACLDP.

What changes would you like to see?

SE requests that consideration be given to :

- revisions to the Action Plan to give priority to the implementation of the Masterplans within this growth zone (in addition to the City Centre and Nigg Harbour masterplans, see Issues 3 and 5 within this statement), ensuring the delivery of the necessary infrastructure with innovative funding mechanisms
- expanding the wording within Policy B4, or to provide an additional Policy for the Airport Employment Growth Zone, to make cross reference to other policies within the plan (for example OP18,19, 23 and 24),
- amending the wording of policy B4 and the supporting text in paragraph 3.68 to provide greater clarity in relation to requirements for safeguarded zones

Issue 5 Commenting on:

- The Proposed Plan Section 3 : Nigg Harbour Expansion paragraph 3.71 - 3.72, Policy B5 and associated OP62 land and
- Proposed Action Plan

What would you like to say?

SE strongly welcomes the policies and proposals which support the development of Aberdeen Harbour and also its expansion into Nigg Bay in line with NPF3 and Policy OP62 and allocations that support key access and capacity improvements for new supporting infrastructure. SE feels, however, that the PP does not give sufficient priority to the potential for this area to contribute to the economic development of the region.

In order to achieve the full potential of this area, SE considers that measures should be introduced into the ACLDP and associated documents to seek delivery of the necessary infrastructure to facilitate the Harbour expansion. Additionally, nearby 'new employment land allocations' require consideration to allow for wider area benefits from the expansion proposals. SE request that consideration be given including revised wording and / or new policy for the proposed harbour expansion and to indicate how the wider area beyond Nigg Bay could benefit from masterplanning activity in addition to Nigg Bay, including for example the new employment land allocations in and around East Tullos, West Tullos, Altens and Peterseat

What changes would you like to see?

SE requests that Aberdeen City Council gives consideration to amending the PP and the Action Plan:

- revisions to the Action Plan to give priority to the implementation of the Masterplan for the Nigg expansion and development of associated employment land (in addition to the City Centre and Airport masterplans, see Issues 3 and 4 above), ensuring the delivery of the necessary infrastructure with innovative funding mechanisms
- expanding the wording within Policy B5, or to provide an additional Policy for the proposed Harbour expansion at Nigg, to ensure positive presumption in favour of development of the expanded harbour and associated employment land
- to expand paragraphs 3.71 and 3.72 to make cross reference to other appropriate policies within the plan (for example employment land allocations in and around East Tullos, West Tullos, Altens and Peterseat).

Issue 6 Commenting on:

- the Proposed Plan Section 3 The Network of Centres, paragraphs 3.18 - 3.29, including policies NC1, NC4, NC5
- the Proposed Plan Section 3 Supporting Business and Industrial Development, paragraphs 3.55 - 3.64, including policies B1, B2, B3 and B4, and associated OP sites (where business/employment is the predominant use)
- Supplementary Guidance 5, Topic Area 5 City Centre and Business - Hierarchy Centres

What would you like to say?

SE very much welcomes the introduction of clear policies that support the development of town centres, and supports the PP's intention of encouraging the inclusion of all uses which are appropriate to town centres, e.g. retail, commercial and leisure uses. SE considers that there should be some explicit reference to opportunities for Hotel and Office development in the City Centre, which should be reflected in the wording of Policy NC1, given the beneficial impacts that they have on the economy.

SE supports attempts to ensure that town centres are the location to be considered first for many forms of development to which a lot of people may visit but for the avoidance of doubt this should not be to the detriment of employment uses referred to in Policy B1 – B4 areas and employment allocations in OP's policies and proposals to ensure a clear supportive policy background for economic development.

SE appreciates that the PP is breaking new ground in that it is seeking to implement the requirements of the Scottish Planning Policy (SPP) and SE recognises the challenges this presents. SE, however, requests that consideration is given to the specific wording of the policy to ensure that it will achieve the desired aim of town centre development without unnecessary constraint. Whilst SE appreciates the attempts to seek to redirect the intentions of investors towards town centres, SE is concerned that the requirements of policy NC1, and the supporting Supplementary Guidance, is insufficiently clear in relation to its requirements for sequential assessment, other than for retail development, and there is no other similar policy elsewhere upon which reliance can be placed. SE acknowledges that the 'sequential assessment' is a clearly understood and defined mechanism for assessing retail development but considers that office, business, commercial, hotel and leisure development are not similar in characteristic, form or requirement and the sequential assessment, normally applied to retail development, is not directly transferrable.

If this approach is deemed necessary, SE requests that consideration be given to rewording the policy, the supporting text and the Supplementary Guidance to provide more information to support this policy to ensure that the assessment is robust and to clearly define how the policy and guidance will work in practice. For example, further guidance is required on the type and size of office, business, commercial and leisure uses which are expected to locate in town centres, car parking and accessibility requirements, the type of 'tests' which will be required, and how other sites can or cannot be differentiated as being 'appropriate'.

SE also considers that there should be no constraint in principle to development to 'which a lot of people will visit' (i.e. office and other business development) on existing and allocated B1, B2, B3 and B4 sites and associated OP sites. On this basis there should be no need to address the sequential assessment under NC1 and SG 5 if such a requirement is retained in the ACLDP. Such clarification should be included in Policy NC1 for clarity and certainty as it may otherwise be difficult to implement the business and employment allocations to the detriment of economic development and employment growth. As these employment allocations have been justified, in accordance with the Strategic Development Plan, it is considered unnecessary, and indeed counterproductive to the various employment land allocations, to introduce an additional level of assessment.

What changes would you like to see?

SE requests that Aberdeen City Council gives consideration to the following amendments (existing PP wording in italics, proposed amendment in bold italics) to the proposed policies and text in the PP, and the text of SG5.

Policy NC1 City Centre Development

*Regional Centre Development within the city centre must contribute towards the delivery of the vision for the city centre as a major regional centre as expressed in the City Centre Masterplan and Delivery Programme. As such the city centre is the preferred location for retail, **office, hotel, other** commercial, leisure and other significant footfall generating development serving a city-wide or regional market.*

*Proposals for new retail, **office, hotel, other** commercial, leisure and other significant footfall generating development shall be located in accordance with the sequential approach referred to in this section of the Plan and in Supplementary Guidance detailed below, **other than business and employment development to be located under policies B1, B2 and B3 or B4, and associated OP land.***

Paragraph 3.25

*The city's network of centres has been classified into a hierarchy and the role of each centre in the hierarchy has been set out in Supplementary Guidance Hierarchy of Centres. A sequential approach to assessing all significant footfall generating proposals (such as retail, leisure, business etc.) will be taken in accordance with this hierarchy **other than for business use proposed on existing or allocated land under policies B1, B2, B3 or B4, and associated OP land.***

Policy NC4 Sequential Approach and Impact

NOTE: This policy applies to proposals for new development and to proposals to extend existing development.

*All significant footfall generating development appropriate to town centres, **other than those proposed on B1, B2, B3 or B4 and associated OP land**, should be located in accordance with the hierarchy and sequential approach as set out below and detailed in Supplementary Guidance*

Hierarchy of Centres:

Tier 1 : Regional Centre

Tier 2 : Town Centres

Tier 3 : District Centres

Tier 4 : Neighbourhood Centres

Tier 5 : Commercial Centres

In these circumstances, proposals serving a catchment area that is city-wide or larger shall be located in the city centre. Retail proposals shall preferably be located in the City Centre Retail Core. Proposals serving a catchment area of a size similar to that of a town centre or district centre shall be located in a town centre or a district centre. They may also be located in the city centre. Proposals serving a catchment area of size similar to that of a neighbourhood centre shall be located in a neighbourhood centre. They may also be located in any centre that is in the first, second or third tiers of the hierarchy.

Proposals for ... continue as per PP

Policy NC5 Out of Centre Proposals

*All significant footfall generating development appropriate to designated centres **other than development on B1, B2, B3 or B4 and OP land**, when proposed on a site that is out-of-centre, will be refused planning permission if it does not satisfy all of the following requirements:*

... continue as per PP

Topic Area 5 - City Centre and Business - Business

5.1.2 Hierarchy of Centres

*Within the hierarchy, the City Centre is identified as being the preferred location for retail, commercial, leisure and other significant footfall generating developments servicing a city wide or regional market, **other than business uses locating on allocated B1, B2, B3, B4 and OP land**. The ... continue as per remaining SG*

Issue 7 Commenting on the Proposed Plan Section 3 Supporting Business and Employment Development pages 41 - 45, paragraphs 3.61 - 3.62 and Policy B2
What would you like to say?

SL supports the PP's intention to provide generous land for employment and economic growth and to retain and promote land for research and development / knowledge -driven industries. It notes that Policy B2 restricts the use of the specialist employment uses mainly to Class 4 (other than at the Aberdeen Energy Park where it allows Class 4 and Class 5 and ancillary Class 6, and which is referred to as 2 separate issues nos 8 and 9 below).

SE considers that the ACLDP should be sufficiently flexible to accommodate other uses on all B2 land, where such uses are ancillary to the prime Class 4 use. In this respect, SE feels that as currently worded Policy B2 may impose a constraint on development proposals and, therefore, suggests minor modification to the policy to allow more flexible provision of uses, where ancillary to and / or consistent with the amenity and environment of that employment site.

What changes would you like to see?

Amendment to policy B2 to reflect current planning status of specialist employment areas, and to facilitate essential ancillary development within such sites. Policy B2 is replicated below in italics, with SF's suggested wording in bold / strike-through:

Policy B2 Specialist Employment Areas

*In areas that are identified as Specialist Employment Areas on the Proposals Map, only Class 4 (Business) uses shall be permitted in order to maintain a high quality environment **unless it is demonstrated that ancillary Class 5 and / or Class 6 uses are required to facilitate the Class 4 development** . In all **circumstances**, ~~a~~ activities associated with research, design and development, knowledge-driven industries and related education and training will be encouraged in these areas **and the ancillary Class 5 and Class 6 uses will only be considered** ~~—The exception is proposals at the Aberdeen Energy Park where a mix of Class 4 (Business) and Class 5 (General Industrial) uses will be considered if it can be shown that the respective uses can co-exist without eroding the amenity of the park.~~*

Issue 8 Commenting on the Proposed Plan Section 3 Supporting Business and Employment Development Policies B1 and B2, Supporting Business & Industrial Development, Aberdeen Energy Park, paragraphs 3.55 - 3.62

What would you like to say?

This issue is specific to Aberdeen Energy Park and is in addition to the more strategic comments SE has made in Issues 4 and 5 relating to business and employment land generally. It is understood that similar representations are also being submitted to the PP on behalf of Buccmoor LP relating to this specific site.

The Aberdeen Energy and Innovation Parks are home to a range of companies, from start up businesses to global head-quarters. The Parks were established by Scottish Enterprise and have grown over the last two decades, with investment in high quality infrastructure and new development across both sites, creating not only mature parkland campuses but also facilitating the growth of many successful companies. It was a measure of this success which resulted in the decision to extend Aberdeen Energy Park.

As the Council are aware planning permission in principle for the extension to Aberdeen Energy Park, to allow for the development of both Class 4, 5 and 6 uses, was approved by the Council's Planning Development Management Committee on 6 November 2014 (application reference P131483).

The application was granted subject to a number of conditions, including in relation to the development of ancillary Class 6 uses.

Buccmoor LP, a joint venture, now control Aberdeen Energy Park. References to the park at paragraph 3.62, whereby it is stated that "The parks are an essential component of Scottish Enterprise's Economic Development Strategy" are now not accurate, do not reflect the current situation and, accordingly, SE requests that this sentence is removed. In addition and to reflect the branding at the park and the nature of the market interest for the extension, references should be updated throughout the Proposed Plan to the site being known as Aberdeen Energy Park.

Issue 9 Commenting on the Proposed Plan : Policies B1 and B2, Supporting Business and Industrial Development, Aberdeen Energy Park (and site OP3); paragraphs 3.55 - 3.62
What would you like to say?

This issue is specific to Aberdeen Energy Park and is in addition to the more strategic comments SE has made in Issues 4, 5 and 6 relating to business and employment land generally. It is understood that similar representations are also being submitted to the PP on behalf of Buccmoor LP relating to this specific site.

The Aberdeen Energy and Innovation Parks are home to a range of companies, from start up businesses to global head-quarters. The Parks were established by Scottish Enterprise and have grown over the last two decades, with investment in high quality infrastructure and new development across both sites, creating not only mature parkland campuses but also facilitating the growth of many successful companies. It was a measure of this success which resulted in the decision to extend Aberdeen Energy Park.

As the Council are aware planning permission in principle for the extension to Aberdeen Energy Park, to allow for the development of both Class 4, 5 and 6 uses, was approved by the Council's Planning Development Management Committee on 6 November 2014 (application reference P131483).

The application was granted subject to a number of conditions, including in relation to the development of ancillary Class 6 uses.

In light of the granting of the planning permission in principle and reflecting the Council's approach elsewhere across the City, it is considered that the forthcoming Proposed Plan should replace the Specialist Employment Area designation across Aberdeen Energy Park (including site OP 3 which benefits from the consent) within the wider Business and Industry designation (B1).

There continues to be significant market interest in occupying space across the energy park. The quantum and cluster of development in this part of the city is particularly attractive to developers. This interest is for high amenity requirements and as previously discussed with the Council in the context of the planning application that market interest is in Class 5 and 6 uses. This market interest must be reflected in allocations so as not to undermine the plan.

It is of particular note that Aberdeen Innovation Park, in close proximity to the Energy Park, retains its specialist employment allocation and high quality and high amenity opportunities continue to exist for further development and investment here to accommodate purely research and development interest. Given this supply of land for purely research and development uses it is considered that any change in allocation of the Energy Park will not undermine any such investment opportunities.

The Strategic Development Plan's objectives in relation to encouraging economic growth are of particular relevance to Aberdeen Energy Park.

The LDP continues to note that 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 Plan allocates sites for more than 7,000 homes in this area and 32 ha of employment land (in addition to more than 75 ha of land already zoned within the 2008 Aberdeen City Local Plan).

Appendix 2 of the LDP refers to a number of Opportunity Sites, including site reference OP3 – land at Finlay Farm, Murcar. The site is some 16.4 ha, and it is noted as a Specialist Employment Area and an opportunity to extend the Aberdeen Science and Energy Park.

Policy LR1 - Land Release Policy

The energy park extension has been zoned under this policy for 16.4ha of specialist employment land and as an opportunity to extend the Aberdeen Science and Energy Park. The site was similarly identified in the 2008 Local Development Plan and is considered to be suitable for commencement immediately.

The LDP refers to Specialist Employment Areas as a means of maintaining and promoting a strong and diverse economy. The LDP refers to two specialist technology parks [Aberdeen Energy and Innovation Parks], within the Bridge of Don area, as forming an essential component of Scottish Enterprise's Economic Development Strategy.

Policy B12 – Specialist Employment Area

The policy notes that:-

"in areas that are identified as Specialist Employment Areas on the Proposals Map, only Class 4 Business uses shall be permitted. The exception being, proposals at the Aberdeen Science and Energy Park for a mix of Class 4 Business and Class 5 General Industrial which will be considered on their merits.

Activities associated with research, design and development of new or existing technologies, products, processes or services of a high technology nature, together with related educational/training facilities are encouraged in these areas.

Ancillary facilities aimed primarily at meeting the needs of businesses and employees within the business and industrial area may be permitted where they enhance the attraction and sustainability of the specialist employment area for business investment.

The Aberdeen Exhibition and Conference Centre is reserved for exhibition centre purposes and uses compatible with the exhibition centre and the park & ride facility."

The now consented scheme includes for Classes 4, 5 and 6, with the predominant use being Class 4 Business. The consented uses reflect the market demand, and consequently should be reflected in the emerging policy position.

Aberdeen City and Shire Strategic Development Plan

The March 2014 Strategic Development Plan (SDP) post dates the preparation of the 2012 Local Development Plan. Clearly the emerging LDP requires to reflect the SDP.

Of particular note in relation to Aberdeen Energy Park is the SDP's objectives in relation to economic growth. These are stated at Section 4 as being:-

"to provide opportunities which encourage economic development and create new employment in a range of areas that are both appropriate for and attractive to the needs of different industries, while at the same time improving the essential strategic infrastructure necessary to allow the economy to grow over the long term."

In seeking to achieve this objective of economic growth the plan notes that the oil and gas industry will continue to be very important into the future. Of particular relevance to Aberdeen Energy Park in this regard, it continues that "its changing focus over the next few decades (into supplying the export market and decommissioning) will mean that the area will need to sell itself more strongly to make sure growth happens."

The opportunity for sites such as Aberdeen Energy Park, which are the focus of inward investment, require to have sufficient flexibility to accommodate the nature of the demand.

Aberdeen Energy Park will continue to be a high amenity site, indeed the recent planning permission seems to develop a significant landscape setting which reflects the nature of the site and surrounding and neighbouring land uses.

What changes would you like to see?

In light of the granting of the planning permission in principle noted above references in the Proposed Plan should be updated to reflect entirely the nature of the Class 4, 5 and 6 consent.

In light of the planning permission in principle Aberdeen Energy Park, including OP 3, should be reallocated as Business and Industry (B1), including to reflect the Core's designation on adjacent land to the north (OP2).

This change would reflect exactly the Council's latest position on similar designations at Dyce Drive.

In these respects the Main Issues Report acknowledges that the "B2 Specialist Employment land now has planning permission for Class 5 and 6 uses as well as Class 4." It continues that "we [the Council] therefore propose to rezone the B12 land at Dyce Drive to B1 [now B]."

As previously noted Scottish Enterprise is keen that the nature of the planning permission in principle, in this and in other respects, are now reflected in the emerging Local Development Plan. Such a move will in no way preclude research and development companies locating at Aberdeen Energy Park but would allow for maximum flexibility in incorporating interest. The change, it is considered, is entirely consistent with the thrust of the development plan.

Issue 10 - Commenting on the Proposed Plan Section 3 Supporting Business and Employment Development pages 41 - 45, paragraphs 3.63 - 3.64 and Policy B3
What would you like to say?

SE supports the intentions for the West End Office Area, and particularly welcomes paragraph 3.63 which states:

West End Office Area

3.63 The West End Office Area is a prestigious, high quality office location on the edge of the city centre, readily accessible by public transport, which also provides off-street car-parking and space for expansion. The area contains a mix of other uses, including schools, hotels, flats and a hospital. The Council will encourage and promote the continued development of this area as a focus for office development.

SE wishes to ensure that the implementation of the policy is positive to office development and requests that Aberdeen City gives consideration to the precise wording of the policy to ensure it is favourably framed to encourage office development and to avoid constraint to development.

What changes would you like to see?

Amendment to policy B3 to reflect current planning status of specialist employment areas, and to facilitate essential ancillary development within such sites. Policy B3 is replicated below in italics, with SF's suggested wording in bold / strike-through:

Policy B3 West End Office Area

In the West End Office Area (as shown on the Proposals Map) proposals for change of use to:

*A - office use or the expansion of existing office use will ~~only~~ be **approved** ~~acceptable~~ provided;*

a) the size, scale and design of development proposals respect the special historic and architectural character of the area and;

b) the design meets ~~all of the~~ relevant criteria set out in the Historic Environment TAN, with regards to relationship to the existing building, context and modifications to existing extensions (see also the Design.

c) ~~New development proposals that do not protect~~ there is no significant adverse impact on existing residential amenity ~~will be refused.~~

B - Proposals for change of use to residential use, or any new residential development, will be ~~considered on their merits~~ approved provided it is demonstrated that the proposed residential use will not harm any existing or future potential for office development within this area.



Where there is scope to provide access to properties from rear lanes, this will only be acceptable if satisfactory access arrangements are in place, or can be provided by the developer. Please refer to the Transport and Accessibility Supplementary Guidance for more information.

The re-development of front gardens to provide car parks and driveways, and the subsequent erosion of associated landscaping, will not be permitted. The Council will support the principle of reinstating and restoring front gardens and cast iron railings

Issue 11- Commenting on :

- the Proposed Plan Section 1 Introduction Section 2 The Spatial strategy and
- Supplementary Guidance Topic Area 2 Design : Energetica

What would you like to say?

SE welcomes the enhanced status of Energetica through the publication of specific Supplementary Guidance to guide development within its boundaries. It is pleased to note that the entire Energetica corridor is shown in the SG.

SE suggests that as Energetica extends into Aberdeen City and Aberdeenshire Councils' areas, all plans showing Energetica should show that part within the neighbouring authority area too (for example, on a Spatial Plan and on the City Wide Proposals Plan, both as referred to in SE's Issues 1 and 2 above representations).

In relation to the 'Compliance Statement', whilst SE recognises and supports the overall aspirations of Energetica, SE feels that there is a risk that the requirements for the Compliance Statement may be perceived as an additional stringent test. Compliance Statements are not required for development outside the corridor area, and may be interpreted as a requirement to provide more detailed and costly levels of information without clarity in place. The SG will carry significant weight in the determination of development proposals and it will therefore be necessary to demonstrate material circumstances to grant proposals if contrary to the tests of the SG, even when such development would normally be deemed acceptable. The SG would therefore be improved if the benefits of preparing a 'Compliance Statement' and clarity on the required contents were outlined.

SE notes that Aberdeenshire Council's recently issued LDP PP, for which consultation has recently closed has a consistent SG for Energetica, and accordingly SE made the same representations and comments, as above. SE welcomes the consistent approach between Aberdeen City and Aberdeenshire Councils and, for the avoidance of doubt, suggests that any changes to the policy are agreed with key stakeholders and both Councils so a final consistent policy is agreed and adopted.

What changes would you like to see?

SE requests that Aberdeen City Council gives further consideration to the tests in the Supplementary Guidance (SG) for the Energetica corridor (paragraph 2.7.2) to ensure that it is satisfied that it is supportive of development proposals and does not introduce unnecessary assessment:

A - Delete the (following) second paragraph from Energetica SG 2.7.1

The guidelines set out in this document shall apply, on a city-wide basis to listed buildings and those within conservation areas, unless otherwise stated. The document is applicable to residential, commercial, industrial and institutional buildings.

B - Revise and / or prepare all plans to show Energetica connections in Aberdeen City area (e.g. City Wide Proposals Map) and into Aberdeenshire Council Area

C - In collaboration with key stakeholders, including SE, and Aberdeenshire Council, consider:

- addressing within the SG the risk that the SG may be perceived as creating more stringent tests for Energetica compared with other locations, within and outwith the region.
- emphasising that the purpose of the SG is to create a comparatively better quality living and working environment so people are attracted to live and work there, and that planning applications will be considered in this context.
- giving greater clarity relating to the types or sizes of development against which the SG criteria should be tested.

D – It is encouraging to note that the Energetica SG is consistent with the Aberdeenshire Council PP. The revisions requested should apply to the Aberdeenshire Energetica policy / SG also. SE has made similar representations to Aberdeenshire PP to this effect.