

Proposed Aberdeen Local Development Plan 2015 Representation Form

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Name	Mr <input checked="" type="radio"/> Mrs <input type="radio"/> Miss <input type="radio"/> Ms <input type="radio"/> Simon Pallant
Organisation	Scottish Government
On behalf of (if relevant)	
Address	Scottish Government, Planning and Architecture Division, Area 2H South, Victoria Quay, Edinburgh
Postcode	EH6 6QQ
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What document are you commenting on?	Proposed Plan	<input checked="" type="checkbox"/>	
	Proposed Supplementary Guidance	<input type="checkbox"/>	
	Proposed Action Programme	<input type="checkbox"/>	
	Strategic Environmental Assessment Environmental Report	<input type="checkbox"/>	
Policy/Site/Issue	Community Growing Space	Paragraph(s)	3.96 and 3.103

What would you like to say about the issue?

Scottish Planning Policy (SPP), paragraph 227, states that plans should encourage opportunities for a range of community growing spaces.

The Proposed Plan, whilst making reference to allotments, does not refer to community growing, which includes community gardens, community orchards, community market gardens and community farms.

The Scottish Government requests that additional wording is inserted into the Proposed Plan to encourage opportunities for a range of community growing spaces.

What change would you like to see made?

On page 52 - 'The Green Space Network', include wording in paragraph 3.96 to encourage opportunities for a range of community growing spaces. This could be achieved by amending paragraph 3.96, so that it reads as follows:

“3.96 By encouraging connectivity between habitats, the Green Space Network helps to improve the viability of species and the health of previously isolated habitats and ecosystems. An extensive network of open spaces, together with path networks, will also encourage active travel and healthier lifestyles. Protecting and enhancing the Green Space Network will also provide opportunities to enhance the landscape of Aberdeen, improve biodiversity and amenity, provide community growing spaces, reduce the impact of flooding and help us mitigate, adapt to the effects of climate change and support successful placemaking.”

On page 54 - Paragraph 3.103 - include wording on 'community growing space', so that it reads as follows:

“3.103. This Plan aims to ensure that new open space provided as part of new development is functional, useful and publicly desirable. For example it may take the form of naturalised areas, green corridors, play space, community growing space or allotments. Rather than provide minimum standards for open space based solely on quantity, requirements are also based on the quality and accessibility of open space.”

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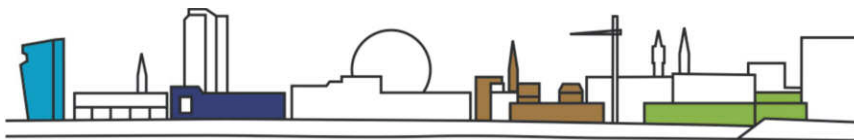
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Policy/Site/Issue	Low and Zero Carbon Buildings and Water Efficiency - Dates regarding the revision to building standards.	Paragraph(s)	1.137

What would you like to say about the issue?

The third sentence of paragraph 1.137 of the Proposed Plan is not clear on the revision to building standards that will be in force from October 2015. Paragraph 1.137 should be amended to reflect this.

What change would you like to see made?

The third sentence of Paragraph 1.137 should be amended to read as follows:

"While the 30% improvement applies from October 2010, in view of the economic downturn, Scottish Ministers requested that the Sullivan Panel reconvene to revisit some of their original recommendations. The output was the publication of a 2013 update to the Sullivan Report. In accordance with recommendations of the update, revised building standards will be introduced from October 2015."

If the above amendment is inserted then the forth sentence of Paragraph 1.137 is no longer necessary and should be deleted.

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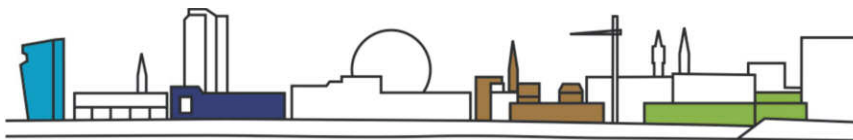
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Policy/Site/Issue	Low and Zero Carbon Buildings and Water Efficiency	Paragraph(s)	1.136

What would you like to say about the issue?

The final sentence of paragraph 1.136* on page 66 the Proposed Plan alludes to a policy position on Section 72 of the Climate Change (Scotland) Act that was contained in Scottish Planning Policy 2010. This is outdated and should be replaced with suggested text below.

* Note that this paragraph is incorrectly numbered as '3.136'. This should be 1.136.

What change would you like to see made?

The final sentence of paragraph 1.136* should be removed and replaced with:

"Scottish Planning Policy supports the planning system in reducing emissions and energy use in new buildings, promoting development that is resource efficient , and maximises the efficiency of the use of resources through natural or technological means."

* Note that this paragraph is incorrectly numbered as '3.136'. This should be changed to 1.136.

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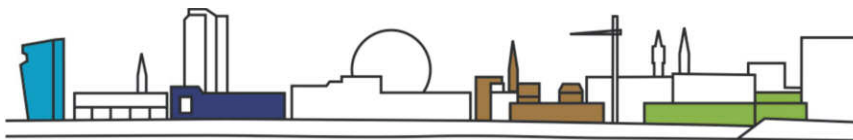
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Policy/Site/Issue	National Marine Plan - Lack of reference in the Proposed Plan	Paragraph(s)	1.10-1.14, and 3.116-3.117

What would you like to say about the issue?

The National Marine Plan was adopted and published on 27 March 2015. The Plan applies from Mean High Water Springs and covers both Scottish inshore waters (out to 12 nautical miles) and offshore waters (12 to 200 nautical miles). The Plan has statutory effect for any public authority taking decisions which can affect the marine environment.

National Marine Plan - <http://www.gov.scot/Topics/marine/seamanagement/national/nmp>

Relevant marine legislation (Marine (Scotland) Act 2010 and UK Marine and Coastal Access Act 2009) requires that:

- public authorities taking authorisation or enforcement decisions that affect or might affect the marine area must do so in accordance with the National Marine Plan and any subsequent regional marine plan once adopted, unless relevant considerations indicate otherwise. This includes decisions on terrestrial planning applications and enforcement action which affect the UK marine area.
- public authorities when making decisions which are capable of affecting the marine area which are not authorisation or enforcement decisions, must have regard to National and regional marine plans. This applies to the preparation and adoption of terrestrial development plans.

The Local Development Plan identifies a coastal zone and contains policy relevant to this area. The National Marine Plan could have some relevance in this area. While the general level of the Development Plan policy does not require detailed mention to be made of National Marine Plan, Aberdeen City Council should consider the relevance of National Marine Plan Policies in Plan development or for their relevance in decision making.

What change would you like to see made?

The Proposed Plan should be amended to refer to the National Marine Plan as being a relevant part of the Scottish Government planning and/or decision making framework.

- The introductory text in paragraphs 1.10 to 1.14 in the section headed 'Working towards the Vision' provide the opportunity to make such a reference.

- Paragraph 3.116 and the text within the section entitled 'Coastal Planning' should also be amended to reflect that the National Marine Plan has been published.

- The National Marine Plan has statutory effect for any public authority taking decisions which can affect the marine environment. The statement in Paragraph 3.116 regarding the role of Supplementary Guidance 'in guiding how the provisions and requirements of the National and Regional Marine Plans when they are adopted' should be revised in light of the publication of the National Marine Plan to avoid the suggestion that the National Marine Plan has no current application.

- It should also be clarified in Paragraph 3.117 that the National Marine Plan applies from Mean High Water Springs; this would avoid any implication that the principles of integrated zone management (as a non statutory mechanism) are the only management direction which apply in the intertidal area.

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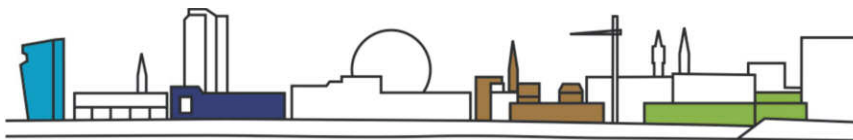
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Policy/Site/Issue	Policies: - NC2 (criteria 2e) - NC3 (criteria 4) - NC6 (criteria 6)	Paragraph(s)	

What would you like to say about the issue?

Scottish Planning Policy (SPP) (paragraph 67) provides that plans should include policies to prevent over-provision and clustering of some non-retail uses (such as betting offices and high interest money lending premises), where there are concerns about the number and clusters of such uses and a town centre strategy indicates that further provision of particular activities would undermine the character and amenity of centres or the well-being of communities.

Proposed Plan policies:

NC2 –City Centre Retail Core and Union Street (criteria 2 e)

NC3 – West End Shops and Cafes (criteria 4)

NC6 –Town, District, Neighbourhood and Commercial Centres (criteria 6)

all include criteria that changes of use may be acceptable where

- “the new use does not create clustering of a particular use in the immediate vicinity”.

We would highlight that clusters are not in themselves always a negative, and may indeed give an area its distinctiveness. The key point in SPP is about where clustering of particular uses would undermine the character and amenity of centres or the well-being of communities.

The Scottish Government recommends that the above referenced policies be amended to explicitly include the wording that refers to the potential negative effects clustering of particular uses can bring, so that this can be fully taken account of in decision making.

What change would you like to see made?

Amend policies:

NC2 – City Centre Retail Core and Union Street (criteria 2e)

NC3 – West End Shops and Cafes (criteria 4)

NC6 –Town, District, Neighbourhood and Commercial Centres (criteria 6)

to read:

“the new use does not create overprovision and/ or clustering of a particular use in the immediate vicinity which would undermine the character and amenity of the centre or the well-being of communities; and”

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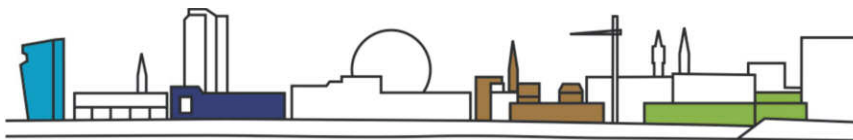
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Policy/Site/Issue	Policy NE3 'Urban Green Space'	Paragraph(s)	

What would you like to say about the issue?

Policy NE3 'Urban Green Space' refers to playing fields and sports pitches, but it does not make specific reference to Outdoor Sports Facilities. As a result Policy NE3 does not cover the full range of uses encompassed by the term Outdoor Sports Facilities in the SPP and the Regulations below – to give those other spaces and facilities the policy protection expected in national planning policy.

Scottish Planning Policy (SPP) contains specific reference to safeguarding Outdoor Sports Facilities. SPP sets out that these should be safeguarded from development subject to some exceptions which are then detailed in SPP (paragraph 226).

Outdoor Sports Facilities are defined in the SPP Glossary as:

“Uses where sportscotland is a statutory consultee under the Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013, which establishes 'outdoor sports facilities' as land used as: (a) an outdoor playing field extending to not less than 0.2ha used for any sport played on a pitch; (b) an outdoor athletics track; (c) a golf course; (d) an outdoor tennis court, other than those within a private dwelling, hotel or other tourist accommodation; and (e) an outdoor bowling green.”

What change would you like to see made?

Part 7 of Policy NE3 ' Urban Green Space' should be amended to insert the term "Outdoor Sports Facilities", to read as follows:

"7 Proposals to develop Outdoor Sports Facilities, including playing fields and sports pitches, should also be consistent with the terms of SPP".

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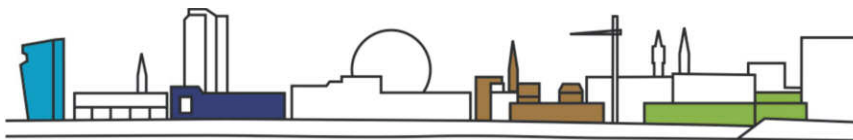
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Policy/Site/Issue	Policy NE8 - Natural Heritage	Paragraph(s)	

What would you like to say about the issue?

In reference to the protection of Natura sites the second paragraph of Policy NE8 'Natural Heritage' should add that development that would have an adverse impact will only be permitted where compensatory measures are provided to ensure that the overall coherence of the Natura network is protected. This amendment is required to ensure the Policy is in accordance with paragraph 208 of Scottish Planning Policy (SPP).

With regards to Natura sites, Paragraph 208 of SPP sets out that:

A derogation is available for authorities to approve plans or projects which could adversely affect the integrity of a Natura site if:

- there are no alternative solutions;
- there are imperative reasons of overriding public interest, including those of a social or economic nature; and
- compensatory measures are provided to ensure that the overall coherence of the Natura network is protected.

Policy NE8 should therefore be amended to reflect this.

What change would you like to see made?

The final sentence of the 2nd paragraph of Policy NE8 'Natural Heritage' should be amended to read as follows:

Development that would have an adverse effect will only be permitted where there are no alternative solutions and there are imperative reasons of overriding public interest, including those of a social or economic nature, and compensatory measures are provided to ensure that the overall coherence of the Natura network is protected.

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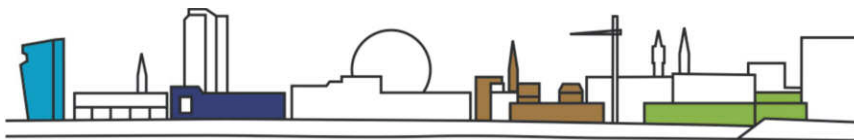
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	Proposed Action Programme	<input type="checkbox"/>	
	Strategic Environmental Assessment Environmental Report	<input type="checkbox"/>	
Policy/Site/Issue	Policy R7 - Low and Zero Carbon Buildings and Water Efficiency	Paragraph(s)	First Paragraph of Policy R7.

What would you like to say about the issue?

Paragraph 3.139 and Policy R7 put the role of Low and Zero-Carbon Generating Technology (LZCGT) as meeting the requirements of building standards. However the first sentence of Policy R7 then goes on to suggest that the LZCGT should be used to go beyond the building standards in force at the time of the application. That is contradictory and should be amended.

The suggested amendment below is designed to make the paragraph consistent in the use of LZCGT for meeting building standards.

What change would you like to see made?

The first sentence of Policy R7 should be amended to read as follows:

"All new buildings, in meeting building regulations energy requirements, must install low and zero-carbon generating technology (LZCGT) to ensure they provide for at least 20% of the carbon dioxide savings required by the Scottish Building Regulations at the time of the application".

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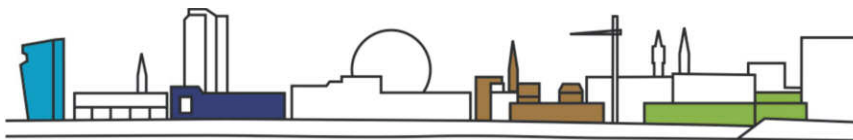
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Policy/Site/Issue	Policy R7 - proportion of greenhouse gas emissions.	Paragraph(s)	

What would you like to say about the issue?

Advice contained within annual reporting on the operation of Section 72 of the Climate Change (Scotland) Act 2009 (<http://www.gov.scot/Topics/Built-Environment/planning/Policy/Principal-Policies/Sustainability/Section72Report>) is that local development plan policy should indicate at least one increase in the proportion of emissions to be saved through the use of LZCGT.

Whilst Policy R7 identifies that an increase will occur, it does not state what that increase will be. Section 3 F of the Town and Country Planning (Scotland) Act 1997 is for the local development plan to include '...policies requiring all developments in the local development plan area to be designed so as to ensure that all new buildings avoid a specified and rising proportion of the projected greenhouse gas emissions from their use...'.

In order to remain specified in its 'risen' form, the proportion of the increase should be specified in Policy R7 of the Proposed Plan.

What change would you like to see made?

The final sentence of the first paragraph of Policy R7 should be amended to read as follows:

"This percentage requirement will be increased as specified in the table below". Insert Table 1 from Aberdeen Local Development Plan draft Supplementary Guidance 'Topic Area 9 – Resources, Energy and Resources.'

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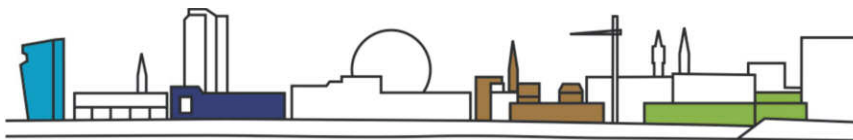
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Policy/Site/Issue	Policy R8 - use of word 'negatively'.	Paragraph(s)	Policy R8, parts 2 & 3.

What would you like to say about the issue?

Policy R8 sets out the criteria where renewable and low carbon energy developments will be supported in principle.

Criteria 2 - states "Do not negatively impact on air quality".

Criteria 3 - states "Do not negatively impact on tourism"

We are of the view that the the use of the word "negatively" is not appropriate and an alternative should be used instead. A renewable or low carbon energy development may have some negative impacts on particular areas or receptors, but in the round might still be considered to be acceptable. We suggest that the criteria is changed.

What change would you like to see made?

We recommend that the wording in Policy R8, parts 2 and 3 is changed from:

Criteria 2 - "Do not negatively impact on air quality".

Criteria 3 - "Do not negatively impact on tourism".

to

Criteria 2 - "Do not result in a significant adverse impact on air quality".

Criteria 3 - "Do not result in a significant adverse impact on tourism".

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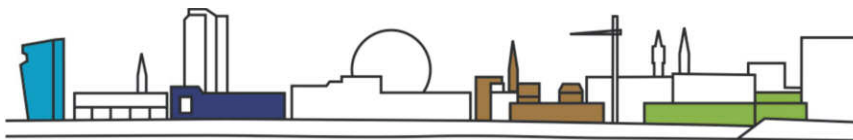
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Policy/Site/Issue	Temporary Greening - Lack of reference in the Proposed Plan	Paragraph(s)	

What would you like to say about the issue?

Scottish Planning Policy (SPP) states at paragraph 229, that “Local development plans should encourage the temporary use of unused or underused land as green infrastructure while making clear that this will not prevent any future development potential which has been identified from being realised.” The Proposed Plan does not include text on temporary greening, to comply with this requirement of SPP. The Scottish Government requests additional wording be inserted into the plan to encourage temporary greening.

What change would you like to see made?

An additional paragraph should be inserted into the Proposed Plan, on the following lines:

“Temporary greening can be an appropriate way to create safe and attractive places prior to the development of sites. The Council will support the use of temporary greening of land awaiting development, where appropriate. Consideration will be given to whether greening of a site could bring about a positive impact to the local environment and overall amenity of the area, without prejudicing the effectiveness and viability of the site, if it is allocated for development in the longer term.”

The appropriate location for this additional text could be either:

- on page 52, in the section on the Green Space Network
 - o after paragraph 3.95 which refers to enhancing green infrastructure networks ; or
 - o after paragraph 3.98, which refers to opportunities for improvement and enhancement; or
- on page 54, in the section on Urban Green Space
 - o after the current paragraph 3.100, which refers to promoting and enhancing open space]

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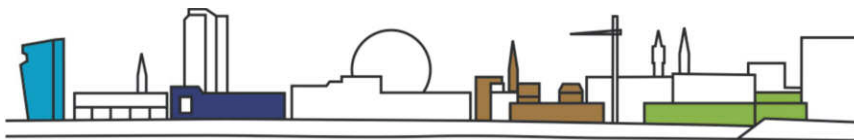
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Policy/Site/Issue	Town Centre Strategies: Proposed Plan pages 26 and 30 Proposed Action Programme - pg 62	Paragraph(s)	

What would you like to say about the issue?

Scottish Planning Policy (SPP) (paragraph 65) expects town centre strategies to be developed following the preparation of town centre health checks to deliver improvements to the town centre.

The Proposed Action Programme says at Action 3.4 that the Council will produce documentation on Town Centre Health Checks in 2016. However, neither the Proposed Plan (including the Supplementary Guidance on Network of Centres) nor the Action Programme make reference to town centre strategies.

The Scottish Government would like to see commitment in the Proposed Plan and Action Programme that the Council will, in line with SPP, progress the development of town centre strategies.

SPP goes on to state (in paragraph 66) that the spatial elements of town centre strategies should be included in the development plan or supplementary guidance. Given that it appears the town centre strategies have not yet been prepared, in time to go into the plan itself, we would suggest the inclusion of a 'connection' in the development plan, to allow the spatial elements of the town centre strategies to be developed into supplementary guidance as and when they are prepared. This will allow the spatial elements of the eventual town centre strategies to gain the formal status of being part of the development plan as envisaged in SPP.

What change would you like to see made?

- Amend the Proposed Plan (LDP) to provide a suitable statement to set out that, following the preparation of town centre health checks, town centre strategies will be prepared to deliver improvements to the town centres, and that Supplementary Guidance will be brought forward to cover the spatial elements of town centre strategies.
- This statement should provide a suitable connection between the LDP and the supplementary guidance, as required by Regulation 27 of The Town and Country Planning (Development Planning) (Scotland) Regulations 2008 and described in Circular 6/2013 - Development Planning.
- It would be appropriate to include this statement within the text on The Network of Centres (pages 26-28 of the LDP) and / or within the section on Supplementary Guidance on page 30 of the LDP.
- Amend the Action Programme, to insert a new action on page 62, under the heading '3. City Centre', to read:
 - "3.x "Develop town centre strategies and Supplementary Guidance."

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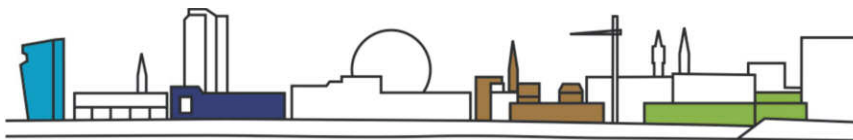
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	Strategic Environmental Assessment Environmental Report		<input type="checkbox"/>
Policy/Site/Issue	Renewable and Low Carbon Developments - Use of the term 'Areas of Search'.	Paragraph(s)	3.142

What would you like to say about the issue?

The term "areas of search" in Paragraph 3.142 of the Proposed Plan is no longer used in the context of developing spatial frameworks for wind farms, as defined in SPP 2014. It should be removed and replaced with "Group 3: Areas with potential for wind farm development".

This change is recommended as it is appropriate to maintain consistency of language between National policy (SPP) and Local Development Plans to avoid confusion.

What change would you like to see made?

In paragraph 3.142 the term "areas of search" should be replaced with:

"Group 3: Areas with potential for wind farm development".

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