

**Aberdeen Local Development Plan Review
Pre-Main Issues Report Questionnaire 2018**

Scottish Natural Heritage (SNH) response - May 2018

Vision

2.1 What do you think are the most important things that make Aberdeen a good place to live, visit and/or work?

The natural environment is a fundamental contributor to Aberdeen's quality of place and therefore quality of life. The rivers Dee and Don, Aberdeen's coast and sea are key assets that contribute significantly to the natural and cultural heritage of Aberdeen. In our response to the SDP MIR consultation we are recommending the Vision is revised to better reflect this. Please see our new [Corporate Plan](#) which focusses on 'Connecting People and Nature,' and sets out the contribution the natural environment can make to prosperity and wellbeing.

2.2 What do you think should be the Council's top priorities for the next Aberdeen Local Development Plan?

We seek a place-based plan which makes the most of Aberdeen's fantastic natural assets for people. Priorities for this plan should be:

- increasing Aberdeen's quality and connectivity of green infrastructure as a key part of quality of place;
- greening the city;
- implementing the green network

This should include creating walkable neighbourhoods and active travel, and linking with natural coastal assets.

Climate change mitigation and adaptation is also a top priority. Climate change will be an increasing pressure on the infrastructure and natural heritage in Aberdeen. We have provided more detailed advice on this in section 2.11 of this response.

We support the Council in working towards these aims and the ongoing work in terms of green space network mapping, open space audit, landscape research and the evolving Tree and Woodland Strategy. However, we think more action is needed to deliver and maintain a high quality natural environment which will attract investment and which people will want to live and work in.

2.3 Do you have any particular aspirations for your community or Aberdeen as a whole that you think should be taken forward through the ALDP? For example, what are your views on recycling of waste, affordable housing, access to green space or ways to reduce CO2 emissions?

We would be interested in hearing about community aspirations for open space /green networks and other natural heritage issues which arise from this question - please see 2.2.

What do you think should be our main planning priorities for...

2.4 ...the City Centre? (For example, what should the role of Union Street be? Does the City Centre have all the uses we want, or should there be more uses there - and if so where could they go?)

The proximity of Aberdeen's harbour and coastal environment to Union Street provides a unique and remarkable backdrop which could be further developed as a recreation asset. The green links from the city centre could be strengthened and include the rivers Dee and Don. The Dee in particular is an internationally important designation close to the heart of the city. We suggest further work to make the city centre an attractive, welcoming, green and walkable environment, and maximising the use and quality of the city centre green spaces and their connections to the coast.

Retrofitting green infrastructure elements in existing city centres as also helping to improve future resilience and quality of place. The [Town Centre Toolkit](#) and its themes of 'Attractive, Active, Accessible' link strongly to the design-led approach set out in SPP and NPF3. Toolkit principles such as "Improving greenspace", "Introducing green streets" and "Creating joined-up movement networks" should help the LDP expand on relevant higher tier policies.

2.5 ...providing infrastructure? (For example, how should new infrastructure be provided and how might it be paid for?)

We welcome the work that has taken place to date in relation to the green space network. We recommend a key focus of this new plan should be to improve the quality and quantity of greenspace in the city, and the identification of a local green network. In our response to the SDP MIR consultation we are recommending inclusion of a strategic green network and enabling LDPs development of local green networks. We suggest priorities for implementation should include spatial identification of specific green network routes that fulfil multiple functions such as active travel as well as habitat connectivity, connect to wider green networks or form a link in the SDP's strategic green network. The open space audit of Aberdeen being carried out this summer should help inform these priorities.

To help deliver this we recommend the LDP includes green infrastructure as eligible developer contributions. We refer to Angus LDP (policy DS5) and SDPs (e.g. TAYplan's Policy 8 on Green Networks and SESplan) which provide examples as to how this is being delivered elsewhere.

2.6 ...transport and accessibility? (For example, how can we make it easier to travel in and around Aberdeen? Should we look at pedestrianisation in the City Centre?)

We welcome the recent work on active travel, including Aberdeen City Council's adopted [Active Travel Action Plan 2017-21](#), published in January 2017 and containing current and proposed routes, and [Nestrans Active Travel Action Plan](#) which also contains specific routes.

However, we agree with the SDP's MIR that "much more is needed across the area to make active travel a more attractive option" (para 9.11). We note Nestrans's recognition that Aberdeen is not as well advanced in active travel provision as some other areas of Scotland and we recommend emphasis on implementation of the identified routes. There has been significant recent investment in Aberdeen's road infrastructure but the compact nature of Aberdeen and close proximity of settlements both within and adjacent to the city boundary provide significant opportunities for some green networks to operate as active travel routes. We would welcome discussion as to how the green network can add multiple benefits to these. Active travel is a key way of ensuring enjoyment of nature, recreation and walking and cycling can be combined.

Please also see our recommendations for green networks and active travel in our response to the SDP MIR consultation including:

- spatial identification in the LDP of existing and proposed green networks at local settlement scale,

- priorities for improvement identified as proposals, and
- implementation through developer contributions.

We suggest this should be a focus for discussion through community planning and as part of the alignment of community planning and the LDP. It would be helpful to discuss the online green network mapping tool and how this is used and applied (pg.67 of the LDP). We also support a more walkable city centre environment including pedestrianisation where feasible.

2.7 ...ensuring we have high quality buildings and places? (For example, how can we better protect our built heritage and ensure high quality and sympathetic architecture and landscape design?)

We recommend that site allocation is a proactive process, including 'where' and 'how' housing should be delivered in the Plan area, taking into account place characteristics, functions and connectivity. High quality, sustainable places are more likely to be delivered if design frameworks and development briefs are produced by the planning authority. We suggest a collaborative approach on this is necessary to understand how new housing relates to town centres, other neighbourhoods, greening the environment and how people move around between these areas.

2.8 ...meeting the needs of business and industry? (For example, what can be done to retain existing businesses and attract new employment opportunities to Aberdeen?)

The natural environment is one of Scotland's greatest assets, making a major contribution to economic growth and quality of life. Our research report '[Valuing our Environment: The Economic Impact of Scotland's Natural Environment](#)' calculated for the first time the significant economic impact of Scotland's natural environment as well as identifying wider benefits of the environment to businesses and the economy. We advocate using the natural environment to enhance quality of place and to create a more attractive place for business and industry to invest, work and live in. We have provided further detail in this response as to how this can be achieved.

2.9 ...meeting Aberdeen's housing and community needs? (For example, how can we meet the needs of people who cannot afford mainstream housing?)

We endorse working collaboratively on the details and issues of 'where' and 'how' housing should be delivered in the Plan area. This includes how new housing relates to town centres, communities and how people move around between these areas. In our experience, a collaborative approach to site consideration is helpful and can avoid the need for unnecessary consultation as highly constrained sites can be ruled out, allowing all plan-making partners to focus on sites which can contribute effectively to supply. This can help streamline both decision-making and assessment of the plan through SEA and HRA.

2.10 ...supporting retail centres across Aberdeen? (For example, should we be safeguarding existing centres, and what are your thoughts on new out-of-town retail parks?)

We support the current plan's approach for delivering sustainable communities and the hierarchy of centres.

2.11 ...protecting and enhancing the natural environment and preventing flooding? (For example, what areas or features should we be safeguarding?)

In addition to our other comments in this response, we would be pleased to discuss the following:

River Dee SAC: We are aware that Aberdeenshire Council are considering external guidance for developments which may affect the River Dee SAC – 2016. Because the SAC extends across both local authorities we recommend a joint approach to the guidance, such as that prepared for the [River Tay SAC advice to developers](#).

Abstraction of water from the River Dee should not conflict with the river's designation as an SAC. We would welcome further discussion with yourselves, the SDPA and SEPA in terms of climate change effects on the Dee as referred to in the approved SDP (pg. 31), and a commitment to water efficiency in all new development.

Habitat Regulations Appraisal (HRA) process: As the HRA of LDP1 gathered much of the relevant information for assessment, we expect that much of the designations information can be used again. An additional site to be considered is the Ythan Estuary, Sands of Forvie and Meikle Loch Special Protection Area: the proposed marine extension to this site extends down to Aberdeen, just north of the Dee. Please see SNH's [Sitelink](#) for further details.

Climate change: We support 'Aberdeen Adapts' work to help Aberdeen to become a city resilient to the impacts of current and future climate change, and its selection to receive support from the Scottish Government funded [Adaptation Scotland](#) programme. We understand the aim is to 'create a positive and ambitious strategic approach, setting the foundations for long term local partnership working on climate change.' We refer to the Government's Climate Change Plan: [The Third Report on Proposals and policies 2018-2032](#) (Feb 2018) and the information (pgs 33-35) about the planning system and supporting the need for low carbon lifestyles, placemaking, energy efficiency in buildings, sustainable forms of travel and active lifestyles. We would expect this to be embedded in the LDP and will be pleased to discuss further.

We suggest that further discussion between stakeholders is needed so the MIR can set the best framework for adaptation and mitigation. [Adaptation Scotland's Climate Ready Places](#) may be a useful way of communicating this issue to the wider audience who will have an interest in the MIR. Scotland's Climate Ready Cities provides Scottish showcase examples at [COP23 Annual United Nations Climate Change Conference](#):

Coastal change (pg. 77): We encourage the Council to lead by example on climate change issues and adopt best practice in relation to potential impacts of climate change, particularly sea level rise and the measures that may be required to adapt to such changes. Coastal erosion occurs along the Aberdeen beach front and extends north into Aberdeenshire. Please see our response to the SDP MIR where we have recommended an integrated approach to coastal planning to ensure that development plans and regional marine planning is complementary. We recommend the council consider preparing a Shoreline Management Plan to address the long term management of Aberdeen's coastline. This could follow the approach taken by Angus council and be done jointly with Aberdeenshire.

The [National Coastal Change Assessment](#) (NCCA) informs policy makers of past and anticipated future coastal change and promotes greater appreciation of the 'assets' which are vulnerable and resilient to coastal erosion. The relevant coastal cell report is: <http://www.dynamiccoast.com/files/reports/NCCA%20-%20Cell%202%20-%20Fife%20Ness%20to%20Cairnbulg%20Point.pdf>

Planning across the land-sea interface: Planning for climate change at the coast is one key issue, but we encourage the LDPs to take a broader approach to the integration of

marine and terrestrial planning systems. Many decisions about the land affect the marine area and its use, just as many decisions about the sea affect people, businesses and the environment on land.

The National Marine Plan was adopted by Scottish Ministers in 2015 and includes many policies relevant to terrestrial planners and decision-makers. In due course it is expected that a regional tier of statutory marine plans will come forward, which will allow more detailed integration; however it is not known when regional marine plans will come forward for the marine area adjacent to Aberdeen City.

In the interim the East Grampian Coastal Partnership (EGCP) aims to progress work to support an integrated approach to coastal management. It would be helpful to discuss with EGCP (and Marine Scotland) how the key development planning considerations can be integrated following the 'Marine Planning on the East Grampian coast' workshop in March 2017 (<http://www.egcp.org.uk/publications.html>) and the preparation for regional marine planning.

Water resources: We encourage ecological solutions to SUDS (for example natural wetland creation) in the Plan's policy framework

Trees and woodland: The development of Aberdeen's Tree and Woodland Strategy is welcomed. One of the emerging themes is the importance of street trees and we recommend the plan policy framework includes protection of the existing resource and a commitment to new street tree and woodland planting as part of the 'granite city forest'. We also recommend specific mention in the policy framework of the value of ancient semi-natural woodland as an irreplaceable resource (SPP para 216) and the need to accord with Scottish Government's [Control of Woodland Removal Policy](#).

Biodiversity: We would welcome an update on the work for Local Nature Conservation Sites and also discussion as to how to improve the success of implementing biodiversity mitigation and enhancement measures through development.

Landscape: We are pleased to support the Council in relation to Aberdeen City's 'Aberdeen Landscape Study' in progress, and understand it will cover:

- a review and update of the original Landscape Character Assessment;
- a new Coastal Character Assessment;
- a Sensitivity Study (looking at housing, business, and industrial developments); and
- a "peri-urban" study (covering the urban edge).

We would be pleased to discuss how this can be used most effectively in the development plan process and ensure development is appropriate within the relevant landscape character. The sensitivity study considers the likely landscape effects of particular types of development and should be able to inform development management decisions.

2.12 ...ensuring that resources and waste are managed sustainably? (For example, can we make more innovative use of waste as a resource? Should we encourage renewable energy use? How could we do these things?)

We encourage the LDP to identify actions to help deliver the Scottish Government's energy strategy, published in December 2017. For example:

- Opportunities to decarbonise heat through the provision of heat networks; better energy standards in new buildings

- Opportunities to decarbonise transport by supporting active travel and public transport
- Supporting the deployment of electric vehicles through an expanding network of EV charge points
- Identifying further opportunities to deploy renewable energy technologies

We also encourage actions to help deliver 'Making Things Last - A Circular Economy Strategy for Scotland' for example:

- Opportunities to utilise waste materials from oil and gas decommissioning
- Opportunities from repowering of onshore wind energy sites

2.13 If you have any views on topics not covered above, please write them below.

The Aberdeen City Region Deal

We see the role of the natural environment as a key underpinning asset in this City Region Deal. We consider that the LDP should embed a place based approach and steer how city deal development proposals should be delivered. We would encourage the Council to set out details of the landscape and natural heritage assets which should be protected and to identify project-specific design principles and outcomes required, including in relation to green infrastructure and active travel infrastructure.

We would be happy to work with you to ensure that landscape, natural heritage and active travel are fully considered in developing sustainable proposals. We would welcome discussion to understand intentions to reflect City Deal opportunities within the LDP. Potential initiatives we would be interested in discussing with you include Scottish Government's [Green Infrastructure Strategic Intervention \(GISI\)](#) fund which SNH leads on, and Locality Plans/Place Plans.

An iterative and streamlined approach to the LDP, Strategic Environmental Assessment (SEA) and Habitats Regulations Appraisal (HRA) processes

Local Development Plan site assessment and SEA: We strongly support an integrated SEA and LDP site assessment process which should be less resource-intensive, save duplication, and help to ensure better integration between the LDP, SEA and HRA.

Our [Local Development Plan: Site Assessment and SEA Checklist](#) can also help integrate the two processes further. The three SEA consultation authorities have provided a checklist aimed at streamlining the Local Development Plan site assessment and SEA processes. We recommend you adapt this to best fit your area's needs.