

**SUSTAINABILITY APPRAISAL OF
THE ABERDEEN AND
ABERDEENSHIRE
STRUCTURE PLAN 2001-2016**

**REPORT TO ABERDEEN CITY AND
ABERDEENSHIRE COUNCILS**

SEPTEMBER 2000

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CONTENTS

EXECUTIVE SUMMARY.....	(i)
1. INTRODUCTION.....	1
2. METHODOLOGY.....	1
The Sustainability Criteria.....	1
Social, Economic and Environmental Trends.....	2
Scope the Plan Strategy against the Criteria.....	3
Scope the Plan Policies.....	4
Test the Plan Policies.....	4
3. THE PLAN STRATEGY	4
Plan Aims and Objectives	4
To what extent does the Plan Strategy address the Sustainability Criteria?.....	5
Indicators and Targets.....	5
4. HOW WELL DO THE PLAN POLICIES SUPPORT THE SUSTAINABILITY CRITERIA?	7
Maintenance of high and stable levels of economic growth and employment.....	7
Social progress which recognises the needs of everyone.....	10
Prudent use of natural resources.....	12
Effective protection of the environment.....	13
5. HOW SUSTAINABLE ARE INDIVIDUAL POLICIES?	25
APPENDIX 1: THE SUSTAINABLE DEVELOPMENT CRITERIA.....	27
APPENDIX 2: CONCLUSIONS FROM TESTING THE POLICIES.....	31
SUPPLEMENTARY REPORT (SEPARATE DOCUMENT)	
APPENDIX 3: SCOPING THE PLAN STRATEGY	
APPENDIX 4: SCOPING THE PLAN POLICIES	
APPENDIX 5: TESTING THE PLAN POLICIES	

EXECUTIVE SUMMARY

INTRODUCTION

CAG were commissioned by Aberdeen City and Aberdeenshire Councils to undertake a sustainability appraisal of the joint Aberdeen and Aberdeenshire draft Structure Plan 2001-2016. The key steps of the appraisal were the following.

1. Prepare sustainability criteria.
2. Identify key social, economic and environmental trends and pressures in the area.
3. Scope the Plan strategy against the sustainability criteria.
4. Scope the Plan policies against the sustainability criteria.
5. Test the Plan policies against the sustainability criteria.

THE SUSTAINABILITY CRITERIA

Sustainable development is about *meeting the needs of current generations without putting at risk the ability of future generations to meet their needs*. It entails taking account of our global responsibilities, and handing on sufficient decent quality social, economic and environmental resources to future generations. It is also about identifying and meeting the needs of local communities, especially those which are most deprived.

22 criteria were selected to encapsulate sustainable development as it relates to land use planning. The criteria were grouped under the four overarching themes of the UK Sustainable Development Strategy *A Better Quality of Life*, namely:

- maintenance of high and stable levels of economic growth and employment;
- social progress which recognises the needs of everyone;
- prudent use of natural resources;
- effective protection of the environment.

THE PLAN STRATEGY

This stage of the appraisal assessed the extent to which the Plan Strategy takes account of the sustainability criteria. The draft Structure Plan opens with a statement on the four 'main elements' of the strategy (paragraph 1.2) and five aims that the plan policies 'will seek to ensure' (paragraph 1.3). But many of the Plan objectives are submerged within the introductory text, and frequently it is unclear whether an issue is simply being discussed, or if a clear commitment is being made. It is also good practice to explain how the objectives are supported by the Plan policies. We recommend therefore the following.

R1: A set of Plan objectives are pulled out of the Strategy text and presented at the beginning or end of the introductory chapter.

R2: The links between Plan objectives and policies are explained.

The appraisal concluded that the majority of the sustainability criteria are discussed in the Plan Strategy, although it is not always clear to what extent the discussion is stating a concern or expressing a Plan objective. Several sustainability criteria are not considered at all in the

Strategy, even though many of these are covered by Plan policies. Although not every sustainability criterion needs to be mentioned in the Strategy, issues of major importance to local quality of life or global sustainable development should be highlighted. We recommend that:

R3: The statements in paragraphs 1.2 and 1.3 of the Strategy are expanded, or new objectives added. 16 new objectives are suggested.

The DETR guidance on *Planning for Sustainable Development* recommends that indicators should be identified to measure progress towards achieving Plan objectives, and that wherever feasible targets should be agreed. We recommend the following.

R4: Indicators are selected to monitor progress against the Plan objectives once they are agreed.

R5: In consultation with local stakeholders, plan targets are agreed against which progress may be monitored.

HOW WELL DO THE POLICIES SUPPORT THE SUSTAINABILITY CRITERIA?

The second stage of the appraisal considered how well the sustainability criteria are supported by the Structure Plan policies. Most of the criteria were broadly addressed, but the appraisal revealed many opportunities to strengthen the policies. These were considered under the four overarching themes of *A Better Quality of Life*.

Each section discusses how the sustainability criteria relate to local conditions, and arrives at key aims that the Plan should address. The appraisal then considers how well the Plan policies support these aims.

Maintenance of high and stable levels of economic growth and employment

The Employment Land policies provide for sufficient and suitable land to enable economic growth, but could do more to support local enterprise, encourage diversification away from declining sectors, and spread economic benefits to poorer (often remote) areas and disadvantaged groups. We therefore recommend the following.

R6: Strengthened and new employment policies to spread the benefits of economic success to disadvantaged areas; give added support to small scale indigenous enterprises; and promote economic diversification away from declining sectors.

Social Progress which Recognises the Needs of Everyone

The draft Structure Plan considers housing provision at some length and also discusses mitigation for loss of community facilities, provision of sport & recreation facilities, and protection of strategic access routes to the countryside. Other important aims, such as maintaining the integrity of local communities, improving access to essential facilities, enhancing community and road safety; and considering the diverse needs of the disabled, young, elderly, single people and ethnic minorities, are less well covered. We recommend the following.

R7: The addition and strengthening of housing and community policies to encourage Local Plans to (among other things): ensure that local people can remain within their communities; identify and overcome deficiencies in local community and education facilities; promote community and road safety; enhance walking and cycling facilities; and consider the diverse requirements of special needs groups.

Prudent Use of Natural Resources

This theme focuses on conserving energy and construction resources, and preserving undeveloped and high quality agricultural land. The draft Structure Plan encourages renewable energy facilities, advocates energy efficient siting and layout of developments, and promotes the use of sustainable construction materials. It also directs the majority of development into urban areas, favours the development of brownfield sites and protects prime agricultural land. Despite this, some untapped opportunities to conserve resources remain. We recommend the following.

R8: The strengthening or addition of new policies to preserve resources by: including energy conservation within design standards; encouraging the processing and use of recycled and secondary aggregates; and taking additional steps to minimise the use of greenfield sites for housing and employment developments.

Effective Protection of the Environment

Pollution and Climate Change Emissions

Transport is a major contributor to local pollution and climate change emissions. The Plan policies consider reducing the need to travel and promoting walking, cycling and the use of public transport, but all of these could be strengthened. Polluting developments are not considered at all. We recommend the following.

R9: The addition and strengthening of policies to reduce climate change and polluting emissions by: concentrating high trip generating developments in localities most suited to non car travel and requiring them to operate green transport plans; protecting and promoting cycling, walking and rail networks; setting maximum car parking standards; adding a policy on developments likely to give rise to odour, noise or light nuisance.

Nature Conservation, Coasts and Landscape

Protection of designated sites, coasts and flood plains are reasonably well covered by the Plan policies, although regional landscape designations are not considered. The wider objectives of protecting and enhancing countryside character and distinctiveness, landscape quality, and biodiversity are less well covered. We recommend:

R10: the addition and strengthening of natural area policies to: designate and protect areas of regional landscape importance; take account of advice in Landscape Character Assessments and the North East Scotland Biodiversity Action Plan.

The Built Environment

The draft Structure Plan promotes the vitality and viability of town centre economies, although this is rather lost in wider policies. The policy to protect historic and archaeological features and their settings does not specify levels of protection for features of different importance, nor does the Plan consider the quality of the built environment. We recommend the following.

R11: The addition and strengthening of built environment policies by adding policies to: promote high quality design and protect the character of the built environment; promote the vitality and viability of town centres; and clarify the levels of protection accorded to archaeological and historic sites.

Waste

Policy E8 promotes waste reduction, reuse and recovery, but does not follow this through to Appendix 2 which only refers to landfill. We recommend the following.

R12: Policy Environment 8 and Appendix 2 are strengthened to more actively promote a move up the waste hierarchy and support proposals in the Aberdeenshire Integrated Sustainable Waste Management Strategy; provide for recycling centres and separation of waste.

HOW SUSTAINABLE ARE INDIVIDUAL POLICIES?

This final stage of the appraisal tested the performance of individual policies against the sustainability criteria. Very few of the policies can be unequivocally described as supporting sustainable development. To some extent this is inevitable because:

- land is a limited resource, and it is rare that conflicts of interests can be completely overcome;
- the broad brush nature of structure planning is such that it is difficult to predict exactly how the policies will impact on the ground.

But much more could be done to improve the sustainability of the policies, by:

- i) more firmly guiding local plans towards sustainable options, for example, by specifying what the Local Plan's criteria for site selection should consider;
- ii) identifying sites for major employment, waste and minerals extraction operations using sustainability criteria for site selection;
- iii) strengthening policies to protect and enhance the quality of the built environment, cultural heritage, biodiversity and countryside character.

Appendix 2 summarises the detailed conclusions for each policy. Where relevant this recommends strengthening policies to give greater guidance to local plans. Much of this advice overlaps with the recommendations in section 4. In conclusion, we recommend the following.

R13: The Structure Plan policies are amended to incorporate the suggested changes in Appendix 2.

1. INTRODUCTION

- 1 CAG were commissioned by Aberdeen City and Aberdeenshire Councils to undertake a sustainability appraisal of the joint Aberdeen and Aberdeenshire draft Structure Plan 2001-2016. The next section of this report describes our methodology and the following sections summarise the conclusions and recommendations. A supplementary report presents the detailed records of the appraisal.

2. METHODOLOGY

- 1 The key steps of the appraisal were to:
 1. prepare sustainability criteria;
 2. identify key social, economic and environmental trends and pressures facing Aberdeen and Aberdeenshire;
 3. scope the Plan strategy against the sustainability criteria;
 4. scope the Plan policies against the sustainability criteria;
 5. Test the Plan policies against the sustainability criteria.

These stages are explained below.

The Sustainability Criteria

- 2 Sustainable development is about *meeting the needs of current generations without putting at risk the ability of future generations to meet their needs*. It entails taking account of our global responsibilities, for example, by reducing greenhouse gas emissions, and handing on sufficient decent quality social, economic and environmental resources to future generations. These obligations frequently imply standard sustainability criteria that are relevant to all locations.
- 3 But sustainable development is also about identifying and meeting the needs of local communities, especially those which are most deprived. A firm conclusion of the 1992 Rio Earth Summit, summed up in the document *Agenda 21*, is that these local needs can only be identified and met with the involvement of local people. As a consequence, some of the sustainability criteria, or at least the interpretation of those criteria, should focus on issues and concerns identified locally and preferably through local consultations.
- 4 We have attempted in the criteria, and accompanying assessment of current conditions (see next section), to consider relevant local concerns, for example low quality housing in Aberdeen city centre, the predicted decline of employment in the oil industry, and the impact of commercial forestry on the landscape. This is based on a brief review of some of the available literature and information provided by the Appraisal Steering Group.
- 5 Appendix 1 presents the sustainable development criteria that formed the basis of the appraisal. There are 22 criteria, with examples of how these criteria might apply to the Structure Plan in the right hand column. The examples are not exhaustive. The list predominantly draws on the advice on sustainable development in chapter 4 of Planning

Policy Guidance Note 12 *Development Plans*. This is more recent than the Scottish guidance on structure plans, PAN37. PPG12 was published in January of this year, and therefore has been able to draw on the UK Sustainable Development Strategy *A Better Quality of Life*.¹

- 6 The criteria are grouped under the four overarching themes of *A Better Quality of Life*, namely:
- maintenance of high and stable levels of economic growth and employment;
 - social progress which recognises the needs of everyone;
 - prudent use of natural resources;
 - effective protection of the environment.
- 7 In fact many of the criteria could easily be placed under more than one theme. For example, improving access to facilities may be viewed as both a social and environmental objective. Despite this, the over-arching themes have been retained in order to preserve the structure of *A Better Quality of Life*.
- 8 A common sustainable development criterion is to encourage healthy lifestyles. We have not included this in the list because the ways in which land use planning can most influence health, for example, by encouraging more physical activity and participation in leisure activities, providing access to open spaces and the countryside, encouraging social interaction, and reducing pollution, have been covered elsewhere.

Social, Economic and Environmental Trends

- 9 PAN 37 notes that the ‘generation of a long term development strategy requires’ among other things:
3. awareness of how wider economic, social, environmental and technological change might affect the area;
 4. identifying the environmental constraints and perceptions of the environmental capacity of an area and individual settlement.

The 1993 guide to *Environmental Appraisal of Development Plans* also recommends that current environmental stock should be compared with environmental targets.

- 1 The extension to sustainability appraisal implies a similar need to understand local economic and social trends and how they compare with sustainability targets. Indeed PAN 37 notes that ‘policies and proposals should relate to the circumstances and pressures in the area’. As noted above, information was gathered from relevant documents and also provided by the Steering Group. This information was used to inform the both the appraisal and the recommendations. A summary of key local social, economic and environmental conditions is presented at the beginning of each sub-section of section 4.

¹ *A Better Quality of Life*, A Sustainable Development Strategy for the UK, DETR 1999.

Scope the Plan Strategy against the Criteria

- 2 This stage of the appraisal assessed the extent to which the Plan Strategy takes account of the sustainability criteria. The detailed conclusions for each criterion have been recorded on a form that is presented in the supplementary report. A summary of these conclusions and our recommendations for new Plan objectives are presented in the next section.

Scope the Plan Policies

- 3 This stage of the appraisal investigated whether the Plan policies are supporting all of the sustainability criteria. The detailed records of this stage are presented in the supplementary report. Section 4 presents our conclusions about how well the sustainability criteria are supported by the policies, and how policies might be strengthened or new policies added to better address the criteria.

Test the Plan Policies

- 4 For this final stage of the appraisal each policy was systematically assessed against the criteria, and the conclusions recorded on a separate form for each policy. These detailed records are presented in the supplementary report. Section 5 presents the general conclusions from this process. Appendix 2 presents the detailed conclusions and recommendations for each policy.

5. THE PLAN STRATEGY

- 1 This first stage of the appraisal assesses the extent to which the Plan Strategy addresses the key sustainability criteria. We would not necessarily expect all 23 criteria to be considered in the Strategy, but would expect all of the major sustainable development issues to be covered.

Plan Aims and Objectives

- 2 The DETR's guidance on the treatment of sustainable development within development plans² recommends that plans should be '(spatially) as specific as possible in setting local economic, social and environmental objectives'. The statement of clear objectives makes it much easier to:

- i) consult on and debate the objectives;
- ii) demonstrate how the Plan policies are supporting the objectives;
- iii) monitor progress towards the objectives.

- 3 The draft Structure Plan opens with a statement on the four 'main elements' of the strategy (paragraph 1.2) and five aims that the plan policies 'will seek to ensure' (paragraph 1.3). But many of the Plan objectives are submerged within the introductory text, and frequently it is unclear in the text whether an issue is simply being discussed, or a clear commitment is being made. We therefore recommend the following:

R1: A set of Plan objectives are pulled out of the Strategy text and presented at the beginning or end of the introductory chapter.

- 4 Some examples of more explicit Structure Plan objectives may be found in the Plans for Hertfordshire, Warwickshire and West Sussex. We apologise for the reliance on English examples, but we are much more familiar with English Plans.
- 5 It is also good practice to explain how the objectives are supported by the Plan policies. The recently published Report of the Panel on the South West Regional Planning Guidance recommends 'better links between the objectives and the thematic policies'.³

² *Planning for Sustainable Development: Towards Better Practice*, DETR October 1998.

³ *Regional Planning Guidance for the South West of England: Public Examination*. Panel Report March 2000.

The West Sussex Structure Plan, for example, links each of the Plan objectives to the General Policies which support it. Because each objective might be supported by several policies, and vice versa, it may be useful to present the link between Plan objectives and policies in tabular form. We recommend the following.

R2: The links between Plan objectives and policies are explained.

To What Extent does the Plan Strategy address the Sustainability Criteria?

- 6 As we have noted, many of the key sustainability criteria are discussed in the Plan Strategy, although it is not always clear to what extent the discussion is stating a concern or expressing a Plan objective. But, as Appendix 1 illustrates, several of the sustainability criteria are not considered at all in the Strategy, although often they are covered by Plan policies. We do not believe that every sustainability criterion needs to be mentioned in the Strategy, but clearly issues of major importance to local quality of life, or to global sustainable development, should be addressed. We therefore recommend the following.

R3: The statements in 1.2 and 1.3 are expanded, or new objectives added to:

- *target development to regenerate poorer communities and areas;*
- *encourage economic diversification away from the oil and fishing industries and in rural areas suffering a decline in agricultural income;*
- *provide affordable housing for households that can not afford market prices;*
- *reduce deficiencies in access to services and facilities for local communities;*
- *promote community safety;*
- *minimise the adverse impacts of traffic on quality of life, including reducing community severance and road traffic accidents;*
- *promote access to the countryside for residents and visitors;*
- *promote renewable energy;*
- *promote the use of public transport and encourage cycling and walking;*
- *protect and enhance the character and diversity of the countryside;*
- *protect and enhance habitats and support priority species in the North East Scotland Local Biodiversity Action Plan;*
- *protect undeveloped coasts from development and allow erosion;*
- *protect and enhance the character and vitality of town centres;*
- *protect and enhance the character of the built environment;*
- *protect historic buildings and historic and archaeological sites;*
- *promote waste minimisation and the reuse, recovery and recycling of waste.*

- 7 Although in many cases land use planning can not directly control the achievement of these objectives, it can certainly actively support them. The objectives need not be presented as separate objectives. In many cases several of the above may be combined into one objective. For example, promoting community facilities and community safety.

Indicators and Targets

8 One of the messages of sustainable development is that it is unlikely to be achieved without setting clear goals, monitoring progress towards these, and reviewing and revising strategies where there is inadequate progress. The need to monitor progress towards sustainable development was a key recommendation of *Agenda 21*, signed by 140 nations at the Rio Earth Summit in 1992. Since then the UK government and many local authorities have worked hard to monitor progress against sustainable development indicators.⁴

9 The DETR guidance on *Planning for Sustainable Development* recommends that indicators should be identified to measure progress towards achieving Plan objectives. PAN37 also notes that ‘the report of survey will need to establish baseline data and the indicators of change against which structure plan progress towards sustainable development can be charted’.⁵ More recent advice suggests that the Plan objectives and sustainable development objectives should be one and the same.⁶ Consequently the indicators should measure progress against plan objectives. The section on Monitoring and Review in the Structure Plan refers to the monitoring of indicators (paragraph 6.6). We recommend the following.

R4: Once the Plan objectives are agreed, indicators are selected to monitor progress towards these objectives.

10 We suggest that indicators are divided into ‘context indicators’ which may inform decisions about the future direction of structure plan policies, and ‘plan monitoring’ indicators which more directly measure the impact of the structure plan via local plans. Taking the first objective as an example:

Objective: Target development to regenerate poorer communities and areas.

Context indicator(s): Indicators of deprivation and unemployment by ward.

Plan monitoring indicator: % (square metres) of employment development approved in regeneration and other areas.

11 Monitoring indicators is of little value unless there is a clear sense of where you are trying to get to, or at least the desirable direction of change. The DETR guidance¹ therefore recommends that wherever feasible, targets should be agreed for Plan objectives. Target setting should take account of the views of local people about the future of their area. It might draw on consultations for sustainable development indicators, Local Agenda 21 and Community Plans, or consultations specifically for the Structure Plan. We recommend the following.

R5: In consultation with local stakeholders, plan targets are agreed, against which progress may be monitored.

⁴ See for example the UK sustainable development indicators *Quality of Life Counts*, DETR 1999.

⁵ *Structure Planning*, Planning Advice Note 37, Scottish Office 1996.

⁶ *Proposals for a Good Practice Guide on Sustainability Appraisal of Regional Planning Guidance*, DETR 1999.

- 12 As with the indicators, there may be overall targets for the area, and more specific targets for structure and local plans. Returning to the example above:

Objective: Target development to regenerate poorer communities and areas.

Overall target: Reduce inequalities in deprivation and unemployment.

Plan target: 20% of employment developments to be located in regeneration areas.

6. HOW WELL DO THE PLAN POLICIES SUPPORT THE SUSTAINABILITY CRITERIA?

- 1 The second stage of the appraisal considers how well the sustainability criteria are supported by the Structure Plan policies. As Appendix 3 demonstrates, most of the criteria were broadly addressed by the policies, but there are many opportunities to strengthen the policies. Below we discuss our recommendations for strengthened or new policies under the four overarching themes of *A Better Quality of Life*.
- 2 In some cases our recommendations are discussed in the draft Structure Plan's supporting text, but they have not been systematically followed through into the policies. We have concentrated on the latter because it is the policies that carry the authority.
- 3 We also include some examples of policies from English structure plans. These are merely provided as illustrations of approaches taken elsewhere. We do not necessarily advocate the wording used. Although these examples are only two years old, important PPG advice on development plans (PPG12), housing (PPG3) and transport (PPG13) has already moved on. The examples quoted below have not had the opportunity to take advantage of the revised guidance.

Maintenance of high and stable levels of economic growth and employment

- 4 A well functioning economy that meets our needs is important for quality of life and therefore for sustainable development. Sustainable development also advocates the fair sharing of benefits derived from the earth's resources, ie. economic rewards. This section therefore also focuses on how the Structure Plan policies advance the cause of disadvantaged individuals and areas.
- 5 The structure plan area, and particularly Aberdeen city, has enjoyed economic success, mainly as a result of the oil industry. But economic forecasts are less optimistic and some individuals and locations (selected wards in Aberdeen, North Aberdeenshire and some rural areas) have not enjoyed the same prosperity. Both agriculture and fishing are in decline. A recent consultation programme in Aberdeen City⁷ revealed a wish for greater equity across the city and measures to assist those who do not benefit from the city's relative prosperity. In rural Aberdeenshire people without access to a car or regular public transport have difficulty finding employment.

⁷ *You Said It: A Report on Imagine Aberdeen*, Aberdeen City Council July 2000.

- 6 Key aims for this theme should be to:
- i) provide sufficient and suitable land to enable economic growth;
 - ii) support small and medium-sized local enterprises;
 - iii) encourage diversification away from declining sectors, notably oil and gas, agriculture and fishing;
 - iv) spread the benefits of economic success to poorer (often remote) areas and disadvantaged groups.
- 7 The Employment Land policies address point (i) above, but could do more to promote (ii) to (iv). We therefore recommend the following.

R6: Strengthened and new employment policies.

- ***Remove 'land' from the title of employment policies to signify that the objective is to do more than find suitable sites.***
- ***Add a policy to require local plans to support conversions and extensions for small and medium-sized indigenous enterprises.***
- ***Encourage local plans to both protect existing employment sites in, and to allocate new employment land to (or easily accessible to), regeneration areas and / or areas of high unemployment, and to promote public transport links between disadvantaged areas and employment areas.***
- ***Encourage local plans to promote local employment and training agreements for long-term unemployed, women returners, disabled and workers needing to retrain.***
- ***Allow the relaxing of Employment Land 3 criteria in rural areas of high unemployment. For example, require local plans to allow some development on greenfield sites, and developments / change of uses that are not close to existing populations as long as the new use is unlikely to generate significant trip levels.***
- ***Clarify how economic need may be demonstrated in Employment Land 3.***
- ***Require local plans to take account of plans for economic diversification by Scottish Enterprise Grampian and other economic development agencies.***

Policy G4 (Extract)

- (a) Local Planning Authorities will foster the growth of the local economy in a sustainable way. They will promote business development...which will help the county benefit from information technology, regenerate areas of deprivation, or more generally advance the economic and social well-being of the county....
- (b) The provision within each district will recognise....
 - (6) the need to regenerate the local economy within the Coastal Districts.

West Sussex Structure Plan Review, 1998

Policy I.6 (Extract)

Ongoing expansion needs of existing businesses should be specifically catered for in local plans.

Warwickshire Structure Plan, Deposit Draft, 1998

Policy 14 Development for Employment Needs (Extract)

In considering development proposals regard should be had to the following...

- vi) the needs of local people and businesses as identified in any comprehensive settlement appraisals
- vii) the desirability of encouraging small scale employment development to achieve an appropriate mix of uses in urban areas.

Hertfordshire Structure Plan Review, Adopted 1998

Policy G8 The Countryside and the Rural Economy (Extract)

- (a) The Planning Authorities will seek to sustain the countryside as a place of varied and productive economic and social activity, whilst safeguarding and managing countryside resources. They will normally permit small scale development and seek the provision of services where these will assist in the evolution of rural communities providing that the environment is not harmed.
- (b) Small scale business development in the countryside, either as an independent proposal or a part of a programme for diversification of farming or forestry will be considered.....

West Sussex Structure Plan Review, 1998

Social progress which recognises the needs of everyone

- 1 Sustainable development implies maintaining sustainable communities with access to essential facilities in a safe environment, and sharing the benefits of development equitably. Another important element of sustainable development is that local communities should be closely involved in identifying their community needs.
- 2 Although a decline in population is forecast for the Structure Plan area, household numbers are expected to grow, especially single and elderly households. Some housing, especially in Aberdeen city centre, is of poor standard. House prices are high by national standards, and 45% of households can not afford market-priced housing.
- 3 32% of households do not have access to a car, rising from 23% in Aberdeenshire to 57% in Aberdeen city centre. The Aberdeen City consultation revealed a desire for more accessible learning opportunities, sports and arts facilities, retraining for redundant workers and better provision of youth and community centres across the city. The Aberdeenshire Rural Facilities Monitor has recorded a steady decline in rural facilities over the last two decades. Scottish Enterprise Grampian (SEG) are currently identifying areas in the North East where access to lifelong learning is a problem.
- 4 Concern about community safety attracted a high response in the Aberdeen consultation, and the Aberdeen Community Safety Plan⁸ advocates schemes to design safety into new developments and car parks. Community safety is less of a concern in Aberdeenshire, but road safety and the impact of traffic on community severance are major issues. Although the number of serious traffic accidents has fallen, they still exceed government targets. Access to the countryside is restricted by the absence of legally established rights of way.
- 5 An Ethnic Minority Forum, Disability Advisory Group and several Youth Fora operate in Aberdeen. We did not receive any information on the particular concerns of these groups.
- 6 Key aims for this theme should be to:
 - i) involve local people in decisions about developments in their communities;
 - ii) meet the housing needs of current and future households, especially single and elderly households and disabled people;
 - iii) ensure that suitable housing provision is available to allow local people to remain within their communities;

⁸ *Towards a Safer Aberdeen*, Aberdeen Community Safety Partnership Strategy and Action Plan 2000.

- iv) provide sufficient affordable housing;
- v) protect existing community facilities (retail, education, leisure, recreation), and provide facilities which are accessible for those without a car in localities which are deficient;
- vi) protect public open space and provide open space in localities which are deficient;
- vii) promote safe and accessible routes to local facilities, especially for pedestrians and cyclists, and avoid community severance;
- viii) increase safety from crime (especially in Aberdeen);
- ix) minimise the adverse impacts of traffic, including community severance and road traffic accidents;
- x) improve access to the countryside;
- xi) promote equity and equality of opportunity.

7 The draft Structure Plan considers housing provision at some length and also discusses mitigation for loss of community facilities, provision of sport and recreation facilities, and protection of strategic access routes to the countryside. Other aspects of this theme are less well covered. A particular concern is that local people, especially young and elderly households, may find it difficult to obtain suitable housing in settlements which are not allocated housing by the Local Plan. We recommend the following.

R7: The addition and strengthening of housing and community policies to:

- ***ensure that suitable housing provision is available in settlements to allow local people to remain within their communities;***
- ***require local plans to set standards for access to community facilities (standards will vary depending on the nature and size of settlement), identify deficiencies in local facilities, identify appropriate sites for new facilities or how provision might be made within other developments, and encourage appropriate provision. (Policy Sport and Recreation 1 does do this for sport & recreation facilities.);***
- ***include access to education, training and life long learning among standards for access to community facilities referred to above. (Direct local plans towards the SEG study.);***
- ***create a new policy on open space which currently only receives a brief mention in Sport and Recreation 1. Require local plans to set standards for access to open space in urban areas, identify areas with a deficiency in provision, and encourage appropriate provision;***
- ***require local plans to involve local communities in identifying local needs for facilities and services;***
- ***adapt Housing 7 to require that new developments must not add to severance of communities, including by traffic generation, and if necessary will contribute to measures to reduce severance;***

- *include under the section on ‘Living in the North East’ a policy to encourage local plans to set design standards that include: the promotion of community safety; road layouts and designs to reduce traffic speed and maximise road safety; and the identification and protection of rights of way through developments;*
- *expand Transport 3 to require developments likely to generate significant trips to include transport plans (see below) which consider measures to maximise road safety and minimise community severance;*
- *add a policy that requires local plans to not only safeguard access, but promotes the provision of public access routes (cycling or walking) to open space, countryside, or other sites of interest, through developments. Require identification, protection and development of the core paths network;*
- *add policies which require local plans to include policies for ease of movement for all, particularly for disabled people, young children and their carers; identify the need for and encourage developers to provide housing for elderly, single people, disabled and other special needs groups;*

Policy RA.3 (Extract)

Housing and industrial development in rural areas should:

c) meet local needs as identified by the community in an appraisal or assessment set in the context of the local plan process:

d) for settlements outside the hierarchy of settlements (ie. those without basic facilities) growth levels should be determined by the community in an appraisal or assessment.

Warwickshire Structure Plan Deposit Draft 1998

Policy 3 Comprehensive Settlement Appraisals (Extract)

Comprehensive settlement appraisals, affording positive opportunities for public involvement...will be encouraged for all towns listed in Policy 6, and where appropriate other settlements, to assist the process of reviewing or amending local plans.

Hertfordshire Structure Plan Review, Adopted 1998

(CSAs focus on land use and related transportation implications of community needs, including the provision of community facilities.)

Policy 11 (Extract)

Support will be given in local plans to proposals which would secure housing and other accommodation designed to be suitable for people with physical disabilities and other special needs. The provision of such accommodation should be considered in both market and affordable housing proposals.

Hertfordshire Structure Plan Review, Adopted 1998

Prudent use of natural resources

- 1 An important element of sustainable development is the preservation of resources in sufficient quantity and quality that future generations are able to meet their needs. Probably the essential resources which land use planning has the most potential to conserve are: energy and water; undeveloped land; prime agricultural land; and

construction materials, particularly aggregates. The government intends to introduce an aggregates tax, and therefore a reduction in the use of virgin aggregates will also bring business benefits.

- 2 Aberdeen City has a target of a 30% reduction in home energy consumption over 10 years. A 3.3% reduction in domestic energy consumption has been achieved over the two years March 1997 to 1999. There is very little renewable energy generation in the Structure Plan area. There is little concern about the capacity of the water supply or about the environmental impacts of over abstraction in Aberdeen or Aberdeenshire.
- 3 Key aims for this theme should be to:
 - i) conserve energy and promote renewable energy;
 - ii) safeguard undeveloped land;
 - iii) preserve the best and most versatile agricultural land;
 - iv) preserve construction resources by encouraging reuse and recycling.
- 4 The draft Structure Plan encourages renewable energy and energy efficiency through the siting and layout of developments; promotes the use of sustainable construction materials; directs the majority of development into urban areas; favours the development of brownfield sites; and protects prime agricultural land. It does not include policies on the thermal efficiency of buildings, combined heat and power, or the promotion of recycled or secondary aggregates.
- 5 The employment land and housing policies will be the major contributors to a further loss of greenfield sites, and more could be done to minimise this loss. All of our recommendations for housing policies are drawn from PPG3.⁹
- 6 We recommend the following.

R8: The strengthening or addition of new policies to preserve resources:

Energy, Water and Construction Resources

- ***Require local plans to include advice on energy conservation within design standards and development briefs.***
- ***Require local plans to encourage the development of facilities to handle and process secondary and recycled aggregates.***
- ***Require local plans to include in design standards and development briefs advice on the reuse of building materials on site and a target percentage of recycled and secondary aggregates.***

Land Resources

- ***Strengthen the recommendation to plan, manage and monitor housing allocations, and emphasise that the allocations in Housing 4 and Housing 5 should depend on conclusions from monitoring housing allocations up to 2006.***
- ***Encourage local plans to undertake regular urban housing capacity studies before relying on greenfield allocations.***
- ***Require local plans to allow for windfall sites and conversions when estimating the need for new allocations.***

⁹ Planning Policy Guidance Note 3: Housing, DETR 2000.

- *Require local plans to set minimum average housing densities, maximum car parking standards, and promote reductions in housing vacancy rates.*
- *Require local plans to follow a sequential approach in allocating employment and housing land – sites within the existing urban fabric should always be considered first. (But existing employment land should not be displaced in areas of high unemployment, or where unemployment would be created as a consequence of displacing employment land.)*
- *Require local plans to make maximum efforts to overcome constraints on existing employment land before allocating greenfield sites.*

Policy H3 (Extract)

Local Plans should minimise the amount of greenfield land needed for new housing development by maximising:-

- (a) the existing building stock through measures to reduce vacant dwelling numbers, enable the subdivision of large houses into flats and bedsits, and secure conversion of vacant premises to dwellings

Warwickshire Structure Plan Deposit Draft 1998

Policy 1.4 (Extract)

A site should be reserved for the possible development of a large industrial site...This site should be brought forward for development, but only released when:

- (a) there is clear and demonstrable evidence that identified and available sites have been thoroughly considered and rejected by a prospective investor
- (b) all realistic brownfield alternatives have been considered before greenfield land release is contemplated.

Warwickshire Structure Plan Deposit Draft 1998

Policy H3

Land should be released in phases in local plans where this can be justified:

- (a) by infrastructure considerations or;
- (b) in environmentally constrained areas, where there is evidence that severe development pressures would lead to the early exhaustion of total planned housing provision.

Phasing will need to be sufficiently flexible to take account of changes in land supply including the emergence of unidentified sites.

Gloucestershire Structure Plan Adopted 1999

Policy EN.2

The County Council will support the introduction of combined heat and power, and community heating schemes where there is potential for their efficient use subject to other environmental considerations.

Gloucestershire Structure Plan Adopted 1999

Policy M.2

In order to reduce the demand on finite resources, proposals that promote the greater use of secondary, waste and recycled materials as an alternative to primary aggregates will be encouraged where environmentally acceptable.

Gloucestershire Structure Plan Adopted 1999

Effective Protection of the Environment

1. Pollution and Climate Change Emissions

- 1 Traffic is a major contributor to local air pollution and climate change emissions. Air pollution is not a significant problem in the Plan area, although to achieve all of the Air Quality Targets by 2005, work will need to be done to ensure that Nitrogen Dioxide, PM10s and Sulphur Dioxide do not exceed limits. Despite the relatively good air quality, reducing the number and length of trips remains a priority in order to curb climate change emissions. There is a predicted 38% increase in Aberdeen trips by 2016.
- 2 A reduction in (car-based) trips must be achieved while maintaining people's access to facilities, either by improving the provision of local facilities (see above), or by improving public transport, walking and cycling provision. Policies to improve alternatives to the car are set out in the Aberdeen and Aberdeenshire Local Transport Strategies. Aberdeen has targets to (by 2011) increase the number of commuters travelling by bus by 30%, the number of commuters walking by 20%, and to increase cycling to approximately 8% of commuters. Development plans have an important supportive role in achieving these targets.
- 3 Both Aberdeen and Aberdeenshire have prepared Local Transport Strategies (LTS)¹⁰. The strategies predominantly deal with non land use planning issues, but include important proposals that should be integrated with the structure and local plans. In particular the Aberdeen LTS recommends reducing car parking standards for new developments and setting maximum levels of permitted parking; putting in place a strategic cycle network through the city; and protecting corridors and sites with long-term potential for rail or LRT including new stations. The Aberdeenshire LTS advocates the development of urban cycle routes and secure cycle parking; safer routes to school; the designation of public transport interchange points; and the production of green travel plans by employers and schools.
- 4 Pollution control regulators (SEPA and local authorities) have the primary responsibility for ensuring that new developments meet pollution standards, but development plans have a responsibility for the appropriate siting of potentially polluting developments, especially those developments that are likely to cause neighbour nuisance from odour, noise and light. There are frequent complaints about noise and odour throughout Aberdeenshire. Fish markets and processing are a particular source of problem odours. Complaints about light nuisance are relatively few though increasing. Floodlighting by private sports clubs are the most common source of complaints. Contaminated land is not a major problem in the Plan area.
- 5 Key aims for this sub-theme should be to:
 - i) reduce the need to travel by locating housing, employment, retail and other facilities in close proximity; and locating new housing in settlements with at least a minimum level of services;
 - ii) increase the use of public transport by improving public transport and restricting car parking provision;
 - iii) improve provision for walking and cycling;

¹⁰ *A Transportation Strategy for Aberdeen*, Aberdeen City Council 1999.
Local Transport Strategy – Consultative Draft, Aberdeenshire Council August 2000.

- iv) prohibit developments which are likely to significantly contribute to pollution levels, and to site polluting developments away from communities or natural areas which could be adversely affected.
- 6 Reducing the need to travel is addressed in policy Transport 1 of the draft Structure Plan. It also gives priority to proposals that will increase the proportion of journeys by public transport, walking and cycling. This policy could be strengthened and better linked to the housing, retailing and employment land policies which are the ones most likely to undermine efforts to reduce the need to travel.
- 7 In keeping with the aim of allocating housing to areas with good access to facilities and public transport links, the draft Plan encourages the development of new housing within urban areas and other settlements. But there is a significant allowance for unnamed 'other settlements' outside the Aberdeen Housing Market Area. Similarly Employment Land 2 allocates the majority of new employment land to larger settlements, although any other settlement may accommodate up to 5ha of marketable land. There is a possibility that a major new business park, industrial site and specialist technology parks will be located some distance from major settlements, although Employment Land 2 requires that 'all allocations should...contribute towards reducing the need to travel and dependence on the car'.
- 8 The siting of polluting developments is not discussed in the draft Plan.
- 9 The policies to promote access to facilities and to conserve scarce land which were discussed above will contribute to a reduction in the need to travel. In addition we recommend the following.

R9: The addition and strengthening of policies to reduce climate change and polluting emissions.

- ***In urban areas develop public transport accessibility (PTA) zones and direct large trip generating developments to the most accessible zones.***
- ***Require local plans to develop and apply criteria for the selection of 'other settlements' which are suitable for housing and employment developments. The criteria to include the availability of facilities, employment opportunities and frequency of public transport links. Rank settlements into a settlement hierarchy, and allocate housing and employment to those settlements at the top of the hierarchy.***
- ***Require all large trip generating developments, including educational establishments, and especially developments in low PTA zones or outside major settlements, to prepare green transport plans. Transport plans to inform planning conditions and developer contributions.***
- ***Require local plans to promote and protect strategic cycling and walking networks, especially into and around urban areas, and to take account of Local Transport Strategies' proposals for an Aberdeen strategic cycle network and other urban cycle networks.***
- ***Require local plans to set maximum car parking standards for developments in line with advice in Local Transport Strategies, and to set standards for cycle parking.***

- ***Strengthen Transport 1 to require local plans to protect potential new routes for rail and other public transport networks identified in Local Transport Strategies***
- ***Require local plans to designate (in consultation with Local Transport Planners) local public transport interchanges, and to protect and enhance these.***
- ***Add a policy on developments likely to give rise to odour, noise or light nuisance.***

Policy RA.3 (Extract)

Housing and industrial development land in rural areas should:

- a) be planned in or adjacent to towns and villages;
- b) be related to a hierarchy of settlements as determined by local plans on a scale proportionate to job opportunities, and the availability of public transport and basic social facilities, ie. at least a school, shop and bus service.

Warwickshire Structure Plan Deposit Draft 1998

Policy 23 Networks and Facilities for Non Motorised Transport and Buses (Extract)

Pedestrian, cycle, bus and where appropriate equestrian networks will be identified and implemented as part of integrated transport plans. Along these routes measures will be taken to give greater priority and safety to pedestrians, cyclists, bus users and horse riders. Regard will be had in this policy to the National Cycling Strategy.

Development proposals should include appropriate facilities to provide safe access for pedestrians, cyclists and passenger transport users. Passenger transport accessibility profiles will be required to assist evaluation of proposals with significant travel requirements. Developers and occupiers will also be encouraged to develop their own transport plans...

Hertfordshire Structure Plan Review, Adopted 1998

Policy 25 Car Parking

All non-residential development with significant parking implications should be in locations with the potential for good access to other means of travel than the private car...The main emphasis shall be on maximum standards, on minimum provision to meet operational and customer requirements, and on catering for the travel needs of employees either by public transport or, to the extent that car usage is necessary, by provision shared with other users...Employee car parking demands should...not be met on site but be substituted with alternative provision for non motorised or passenger transport or publicly managed parking. The developer can achieve this by commencing the cost of meeting potential parking demands on site into financial contributions to fund these alternative measures.

Hertfordshire Structure Plan Review, Adopted 1998

Policy P.1

Provision will only be made for development where it does not have an unacceptable effect in terms of:

- (a) the environment and local community in terms air, noise or light pollution;
- (b) the quality of surface or ground water; or
- (c) contamination of the land or soil.

Gloucestershire Structure Plan

1. Nature Conservation, Landscape Character, Coasts and Flood Defence

- 1 The diversity and character of our countryside and the quality of outstanding landscapes make an important contribution to the quality of our lives. Maintaining the extent and variety of species (biodiversity) is crucial for the security of current and future generations. In recent decades both have been steadily declining in the UK and elsewhere.
- 2 At the 1992 Rio Earth Summit the UK signed up to a commitment to prepare a national biodiversity action plan (BAP) to reverse the decline in species loss. The proposals in the national plan have been translated into local BAPs. These plans shift the emphasis away from solely relying on designated areas for protection, and recognise that the protection of biodiversity requires a concerted approach across all areas.
- 3 In Aberdeenshire there is a general concern that development pressures are leading to the loss of important habitats and species. Fragmentation and isolation of habitats is also a concern. The North East Scotland Biodiversity Action Plan identifies priority species and habitats for the Structure Plan area. 33 Habitat Action Plans have been or will be prepared for the protection and promotion of priority species. Some individual Species Action Plans may also be developed. In addition two action plans have been prepared for specified urban areas, and generic plans for urban locations, such as wildlife corridors, church yards and vacant land, are in development.
- 4 North East Scotland has some nationally important landscape areas, but there is concern about the declining quality of less spectacular rural areas. Key concerns are: the loss of distinctiveness as a result of new developments that do not preserve local styles; poor quality design; new developments which are out of scale and poorly located in the landscape; erosion of traditional landscape patterns and features; the pressure for increased commercial conifer plantations; and the impact of tourism developments such as caravan sites. SNH has commissioned three landscape character assessments covering the Structure Plan area. These provide detailed landscape guidance for small areas, with the exception of Banff and Buchan where detailed advice is still to be developed.
- 5 The aim for coasts is to retain their naturalness and to allow for erosion. Rising sea levels as a result of climate change are likely to increase the rate of erosion.
- 6 Key aims for this sub-theme should be to:
 - i) protect designated habitat and landscape areas from inappropriate development and to promote their management for conservation;
 - ii) ensure that rural developments protect and enhance the character and distinctiveness of the countryside and landscape character;
 - iii) ensure that biodiversity is protected and enhanced;
 - iv) protect undeveloped coasts from inappropriate development and prepare for coastal retreat;
 - v) avoid inappropriate development in floodplains.

- 7 These aims are predominantly covered by the draft Structure Plan's environment policies, although policies for housing, employment land and other developments will inevitably impinge on them. Protection of designated nature conservation sites, coasts and floodplains are reasonably well covered, although designated and regionally important landscapes are not considered. The wider objectives of protecting and enhancing countryside character and distinctiveness, landscape quality, and biodiversity are less well covered. The recent PAN 60 on *Planning for Natural Heritage* provides useful advice. We recommend the following.

R10: The addition and strengthening of natural area policies.

- **Require local plans to define regionally important landscape areas and specify the level of protection to be afforded to designated and regionally important landscapes.**
- **Add a new policy (or strengthen Environment 2) to require local plans to protect and enhance the landscape character and diversity of the countryside, and to take account of (in design standards, development briefs and during development control) the area advice available in Landscape Character Assessments. The policy should require local plans to identify the character of areas and the developments which would be appropriate or inappropriate. It should promote the active enhancement of landscape character and diversity through planning conditions, agreements and developer contributions.**
- **Add a new policy (or strengthen Environment 2) to protect and enhance biodiversity and require local plans to take account of relevant Habitat, Species and Urban Biodiversity Action Plans in design standards, development briefs and during development control. The policy should encourage the active enhancement of biodiversity through planning conditions, agreements and developer contributions. Efforts should be made to protect and enhance wildlife corridors and to avoid habitat fragmentation.**
- **Take account of Landscape Character Assessment advice on forestry and woodland in policy Environment 6.**
- **Strengthen policy Employment Land 4 on tourism developments by referring to the generic guidelines on tourism development in the South and Central Aberdeenshire Landscape Character Assessments.**
- **Explain how the advice in Landscape Character Assessments, and Habitat, Species and Urban Biodiversity Action Plans should be considered in the selection of sites for mineral extraction, renewable energy and waste management facilities, and amend Appendix 2 accordingly.**
- **Incorporate Landscape Character Assessments and Habitat Action Plans / Species Action Plans considerations in the restoration and aftercare of mineral workings and landfill – policies Environment 7 and Environment 8.**

8 Landscape Character Assessments and local Biodiversity Action Plans are only just being developed throughout the UK. Consequently it is difficult to find examples of structure plan policies which specifically mention these. Instead we have included more general examples of policies to protect and enhance character and diversity.

Policy 44 Landscape Regions (Extract)

Landscape regions will be defined as a framework for further action and advice to conserve the distinctive landscape and habitat features of particular tracts of the county. More detailed policies to conserve these features will be incorporated in local plans...Development proposals and other activities should take account of the particular characteristics of the landscape regions in which they are located, once these regions and their particular characteristics have been defined in local plans.

Hertfordshire Structure Plan

Policy NHE.2 (Extract)

Development will be required to protect and, wherever possible, enhance the biodiversity, including wildlife and habitats, of the County.

Local Plans should identify:

- (a) sites of nature conservation importance including unfragmented and linear features such as small woods, traditional field boundaries, ponds and disused railways which act as wildlife corridors or stepping stones; and
- (b) appropriate targets for the enhancement of biodiversity.

Gloucestershire Structure Plan

Policy S6

In providing for development the following aspects of the environment which contribute to local character and distinctiveness should be safeguarded and wherever possible enhanced:

- .1 the quality of the landscape
- .2 the setting of settlements and buildings within the landscape
- .3 the quality of the built and historic environment
- .4 the sites and landscapes of archaeological and historic value
- .5 the distinctive wildlife and habitats
- .6 the special qualities of rivers, canals and other water courses and features

Gloucestershire Structure Plan

1. The Built Environment

- 1 The appearance and character of the built environment, including the preservation of open spaces, is an important contributor to people's quality of life. The recent consultation in Aberdeen revealed considerable regret that new developments have contributed to a loss in the city's distinctiveness, especially the loss of granite buildings. There are also concerns that the spread of housing at the periphery of urban areas has brought a loss of character and suburban feel to rural areas. The preservation of historic and archaeological resources is also essential to maintaining local distinctiveness. The maintenance of the quality and character of the built environment overlaps with the aim of maintaining the character and diversity of countryside character discussed above.
- 2 Another important goal of sustainable development is to promote the vitality and viability of urban centres. This will contribute to the quality of people's experience. It should also reduce the number and length of trips and encourage the increased use of public transport.
- 3 Key aims for this sub-theme should be to:
 - i) protect and enhance the character of the built environment;
 - ii) preserve historic and archaeological features and their settings;
 - iii) enhance the vitality and viability of urban centres.
- 4 The draft Structure Plan promotes the vitality and viability of town centre economies, although this is rather lost in policies Retailing 1 and Transport 1. The Plan includes a policy to protect historic and archaeological features and their settings, but does not specify different levels of protection for features of different levels of importance. It does not consider the quality and distinctiveness of design.
- 5 We recommend the following.

R11: The addition and strengthening of built environment policies.

- ***Add a new policy to require local plans to promote high quality and distinctive design and to protect the character of the built environment.***
- ***Add a new policy on town centres which expands on policies Retailing 1 and Transport 1(c).***
- ***Clarify the level of protection to be accorded to archaeological and historic sites.***

Policy TC.1

The vitality, viability and character of existing town, district and local centres should be sustained and enhanced.

A hierarchy of centres for Gloucestershire will comprise:

- (a) Cheltenham and Gloucester sub-regional town and city centres;
- (b) Stroud, Tewkesbury, Cirencester and Dursley town centres;
- (c) District centres in Gloucester and Cheltenham;
- (d) Other centres in principal settlements;
- (e) Local centres.

Provision should be made in centres for shopping, employment, leisure and other uses which generate many trips, provided that the development is of a scale consistent with the function and character of the centre, its catchment and role in the hierarchy, and it would sustain and enhance the vitality and viability of the centre.

Mixed use development, including housing, will be encouraged. The regeneration of appropriate centres will be promoted by special strategies and proposals in local plans, to include where necessary land assembly.

Gloucestershire Structure Plan

Policy S7

In providing for development the quality of the County's environment should be maintained and enhanced by the following:

- a) high standards of design
- b) urban regeneration, conservation and townscape enhancement
- c) traffic management
- d) the retention and provision of open space

Gloucestershire Structure Plan

Policy ER.6 (Extract)

Local plans should include policies to protect open space which contributes to the character and attractiveness of urban areas.

Warwickshire Structure Plan

1. Waste

- 1 The aims of a sustainable waste management strategy are well established and reinforced by the new National Waste Strategy for Scotland. There is a steady rise in the quantity of waste arising from all sectors. Waste is environmentally damaging and costly for business and local authorities, increasingly so with the landfill tax. The EU landfill directive sets targets to reduce biodegradable municipal waste sent to landfill to 75% of

1995 levels by 2010 and 50% by 2013. Aberdeenshire Council is currently preparing an Integrated Sustainable Waste Management Strategy (AISWMS). This focuses on reduction, then reuse and recycling. It is committed to increasing the provision of mini recycling centres and reducing the disparity in provision across the county.

- 2 Key aims of this sub-theme should be to:
- i) promote a shift in waste management towards reuse, recycling and recovery;
 - ii) minimise the social and environmental impacts of waste management.
- 3 Policy Environment 8 discusses waste reduction, reuse and recovery, but does not follow this through to its guidance to local plans or Appendix 2 which only refers to landfill. The policy could be strengthened and advice included on design to promote recycling. We recommend the following.

R12: Policy Environment 8 on waste is strengthened to:

- ***more actively promote a move up the waste hierarchy and amend Appendix 2 accordingly;***
- ***require local plans the support the proposals in the AIWMS and any equivalent strategy for Aberdeen;***
- ***require local plans to include advice on siting of recycling centres and provision for recycling in design standards and development briefs.***

Policy WM.4

Provision will be made for facilities associated with the recovery of materials through recycling and composting. The following locational criteria will apply:

- (a) facilities should contribute towards an integrated waste management system;
- (b) facilities should be in close proximity to major concentrations of waste arisings; and
- (c) industrial, redundant and “brownfield” sites or existing waste management sites should be used in preference to virgin land where appropriate.

Gloucestershire Structure Plan

Policy 55 Waste Management (Extract)

Those facilities further up the hierarchy of waste management will receive more favourable consideration...

Disposal of waste will only be permitted where it can be demonstrated that:

- i) it will not give rise to unacceptable adverse environmental effects, in particular air, water or land pollution...
- ii) it is necessary and appropriate to restore sites worked, or being worked, for mineral extraction
- iii) it would result in significant land drainage, landscape enhancement or other environmental benefit.

Hertfordshire Structure Plan

1. HOW SUSTAINABLE ARE INDIVIDUAL POLICIES?

- 1 This final stage of the appraisal tested the performance of individual policies against the sustainability criteria. The detailed records of this stage are presented in a supplementary document. This section draws out the main conclusions and recommendations.
- 2 We assessed each policy against every criterion. Policies that effectively operate together, such as the two Green Belt policies, were tested together. Policies were scored for their impact on each criterion as follows:
 - ✓ positive;
 - ✗ negative;
 - I depends on how implemented by Local Plans;
 - ? unknown;
 - N/A not applicable.
- 3 The testing aimed to answer the question - *given anticipated future development and the impact of this policy - will Aberdeen and Aberdeenshire move towards or away from sustainable development compared with now?* This is a hard test. A policy may well be intended to reduce the unsustainable aspects of developments, but because the developments will inevitably have adverse impact on some of the criteria, the policy is still awarded some negative scores. The Sport and Recreation 2 policy on skiing illustrates this point. By concentrating new skiing development at existing centres, the policy should reduce their adverse environmental impacts, but any new ski developments may be expected to have adverse impacts on trip generation, landscape character and habitats.
- 4 Both 'I' and '?' imply an uncertainty about the impact of the policy on the criterion. The difference between the two is that 'I' indicates that this depends on how the policy is implemented by Local Plans. In other words there is potential to have a more positive impact on the criterion through the local planning process. '?' indicates a general uncertainty about the likely impact, either because of an absence of sufficient background information, or simply because the response to the policy is difficult to predict.
- 5 The records for each policy conclude with notes on the key points arising from the testing plus suggestions for change. The latter refer both to suggestions for change to the policy being tested, as well as other policies that may influence how this policy impacts on the criteria. For example, a policy on building design would influence how employment, housing and retailing policies impact on the quality of the built environment.

How Sustainable are the Policies?

- 6 As the detailed records show (see supplementary report), very few of the policies can be unequivocally described as supporting sustainable development. To some extent this is inevitable because:
 - land is a limited resource, and it is rare that conflicts of interests can be completely overcome;
 - the broad brush nature of structure planning is such that it is difficult to predict exactly how the policies will impact on the ground (hence the high number of 'I' scores).

- 7 But much more could be done to improve the sustainability of the policies by:
- i) more firmly guiding local plans towards sustainable options, for example, by specifying what should be considered in the local plan's criteria for site selection, or what should be covered in design guidance;
 - ii) identifying general localities for major employment, waste and mineral extraction operations and including more detailed criteria for site selection within the policies;
 - iii) strengthening policies to protect and enhance the quality of the built environment, cultural heritage, biodiversity and landscape character.
- 8 Appendix 2 summarises the detailed conclusions for each policy. Where relevant, this recommends strengthening of policies to give greater guidance to local plans. Much of this advice overlaps with the recommendations in section 4.
- 9 A number of criteria, notably those for the quality of the built environment, cultural heritage, biodiversity and countryside character, were repeatedly scored as 'I' for most of the policies. Most developments (and therefore most Structure Plan policies) will inevitably impact on these criteria, and as discussed in section 4, policies for all of these criteria would benefit from strengthening. Consequently we have not included recommendations for these criteria under every policy. Instead our recommendations are included under the Environment policies and in section 4.
- 10 In conclusion, we recommend the following.
- R13: The Structure Plan policies are amended to incorporate the suggested changes in Appendix 2 of this report.***

APPENDIX 1: THE SUSTAINABLE DEVELOPMENT CRITERIA

SUB-THEME	CRITERIA	For example, does the Structure Plan:
Maintenance of high and stable levels of economic growth and employment		
<i>Local Economy</i>	Strengthen the local economy	<ul style="list-style-type: none"> ▪ Provide for the needs of local firms ▪ Encourage growth sectors ▪ Encourage enterprise and support SMEs ▪ Encourage the purchase of local goods and services ▪ Support local employment
	Regenerate disadvantaged areas	<ul style="list-style-type: none"> ▪ Target disadvantaged areas for economic and social regeneration
	Benefit the most economically disadvantaged	<ul style="list-style-type: none"> ▪ Promote the employment of the long-term unemployed ▪ Promote access to employment in areas of high unemployment ▪ Promote retraining and reskilling
	Promote diversification away from declining sectors	<ul style="list-style-type: none"> ▪ Assist diversification away from the oil industry ▪ Promote rural economic diversification ▪ Encourage sustainable tourism
Social Progress which recognises the needs of Everyone		
<i>Sustainable communities and Access to Facilities</i>	Meet housing need especially of low income households	<ul style="list-style-type: none"> ▪ Bring all dwellings up to a tolerable standard ▪ Improve poor quality housing estates ▪ Meet the needs of new households ▪ Provide affordable dwellings for low income households
	Promote community viability and cohesion and access to essential facilities	<ul style="list-style-type: none"> ▪ Encourage provision in under-served localities of: ▪ General stores, post offices, banks, health centres, community centres, accessible open spaces, education, sports and leisure facilities ▪ Access to public transport ▪ and other needs expressed by local communities ▪ Protect existing community facilities ▪ Provide dwellings to allow local residents to remain within their communities, especially for young and elderly ▪ Involve local people in identifying community needs ▪ Restrict the scale and rate of development such that it can be integrated satisfactorily into existing communities ▪ Avoid severance of communities
	Promote access to training and skills for all	<ul style="list-style-type: none"> ▪ Provide access to pre-school, primary, secondary, further and higher education for all ▪ Promote life time learning, especially among disadvantaged groups

SUB-THEME	CRITERIA	For example, does the Structure Plan:
	Promote a sense of safety	<ul style="list-style-type: none"> ▪ Design buildings and open spaces to reduce feelings of insecurity and encourage informal surveillance ▪ Avoid the routing of walking and cycling routes through isolated spots ▪ Reduce the risk of road accidents through slowing speeds and road design
	Promote access to the countryside	<ul style="list-style-type: none"> ▪ Promote access to the countryside for urban populations, especially those without a car ▪ Improve access to the land for residents and visitors, particularly by walking, cycling and horse riding ▪ Encourage the maintenance of public rights of way
<i>Equity</i>	Promote equity and equality of opportunities	<ul style="list-style-type: none"> ▪ Identify and provide for the needs of ▪ Disabled ▪ Ethnic minorities ▪ Elderly ▪ Carers of children and adults
Prudent Use of Natural Resources		
<i>Natural resources</i>	Conserve energy and water	<ul style="list-style-type: none"> ▪ Encourage developments with high thermal efficiency ratings ▪ Promote renewable energy and combined heat and power (CHP) ▪ Minimise water consumption and abstraction, and maintain river and groundwater levels
	Reduce land take and protect soil	<ul style="list-style-type: none"> ▪ Promote the use of brown field sites and / or re-use of vacant buildings in preference to green field sites? ▪ Follow a sequential approach to land development ▪ Adopt high-density building where appropriate ▪ Safeguard the best and most versatile agricultural land
	Conserve scarce construction resources	<ul style="list-style-type: none"> ▪ Encourage reduction in demand for primary aggregates ▪ Encourage the use of sustainable materials and the reuse of materials

SUB-THEME	CRITERIA	For example, does the Structure Plan:
Effective Protection of the Environment		
<i>Pollution and Climate Change Emissions</i>	Reduce the number and length of trips	<ul style="list-style-type: none"> ▪ Reduce the need to travel <ul style="list-style-type: none"> - locate employment and housing in close proximity - locate retail, community and leisure facilities close together to encourage 'combined' visits - locate retail, community and leisure facilities close to residential areas ▪ Improve and increase the use of public transport <ul style="list-style-type: none"> - locate new development in areas which can be best served by public transport - consider requirements of public transport in the layout and design of new development - restrict parking provision in areas which can be well served by public transport - consider developer contributions to public transport initiatives ▪ Promote green travel plans ▪ Encourage provision for walking and cycling, including safe routes to schools, shops and employment centres
	Minimise pollution	<ul style="list-style-type: none"> ▪ Minimise and reduce emissions of pollutants to the atmosphere from buildings and vehicles ▪ Prevent unacceptable levels of noise, odour, light and dust pollution ▪ Locate sensitive development away from existing sources of light, noise and odour pollution ▪ Resist development which may cause unacceptable ground contamination ▪ Encourage reclamation of contaminated land ▪ Prevent pollution of watercourses and groundwater
<i>Natural Conservation, Landscape Character, Coasts and Flood Defence</i>	Sustain the character and diversity of the countryside & coast, preserve landscape quality	<ul style="list-style-type: none"> ▪ Protect the character of the countryside? e.g. <ul style="list-style-type: none"> - areas of landscape value / distinctiveness including designated sites - wild areas - ensure that development is in keeping with local character and landscape assessments ▪ Protect tranquil areas

SUB-THEME	CRITERIA	For example, does the Structure Plan:
	Conserve and enhance wildlife habitats and species	<ul style="list-style-type: none"> ▪ Preserve or enhance biodiversity e.g. <ul style="list-style-type: none"> - encourage improvement of habitat value of <i>all</i> land - replace habitats which are lost to development - encourage sustainable farming practice ▪ Protect existing natural areas and wildlife habitats e.g. <ul style="list-style-type: none"> - national and local designated sites - sites of importance to priority species identified in the North East Scotland Biodiversity Action Plan - native woodland, unimproved grassland, ponds, waterways and wildlife corridors - avoid severance of habitats
	Protect coasts and flood defence	<ul style="list-style-type: none"> ▪ Maintain natural coasts and manage controlled retreat ▪ Avoid unsuitable development in flood plains
<i>Built Environment</i>	Sustain the character and vitality of urban centres	<ul style="list-style-type: none"> ▪ Resist out of centre developments ▪ Preserve and enhance the character of urban townscapes ▪ Protect and enhance public open spaces ▪ Promote mixed development ▪ Give priority to pedestrians in town centres ▪ Support locally owned and independent retailing
	Improve the quality of the built environment and harmony with surroundings	<ul style="list-style-type: none"> ▪ Ensure that development is in keeping with its surroundings ▪ Encourage high quality design ▪ Involve local people in building design
	Preserve historic and archaeological resources	<ul style="list-style-type: none"> ▪ Protect historic buildings and historic and archaeological sites from damage from development including visual intrusion ▪ Enable investigation of historic and archaeological sites
<i>Waste</i>	Minimise waste arising and maximise reuse, recovery and recycling	<ul style="list-style-type: none"> ▪ Minimise waste creation <ul style="list-style-type: none"> - Encourage developments to reuse materials and soils ▪ Encourage reuse, recovery and recycling e.g. <ul style="list-style-type: none"> - promote facilities for materials recycling and composting - enable sorting and recovery of materials in domestic and commercial properties - provide public recycling banks ▪ Minimise social and environmental impacts during transport, handling , storage and disposal of waste

APPENDIX 2: CONCLUSIONS FROM TESTING THE POLICIES

POLICY Employment Land 1 – *Employment Land* & Employment Land 2 – *Employment Land Distribution*

Key points from testing exercise	Suggestions for changes
<p>Not clear how these policies will impact on regeneration and other disadvantaged areas or on trip generation. This is because criteria for allocating to small settlements or for business, industrial and technology parks are not specified.</p> <p>Will probably be land take outside of Aberdeen, especially in smaller settlements and outside of settlements in Aberdeenshire, by business, industrial and technology parks.</p>	<p>Encourage LPs to guide allocation towards regeneration and disadvantaged areas.</p> <p>Specify that LPs should develop criteria for small and major employment land allocations, and that criteria should prioritise regeneration and disadvantaged areas and trip reduction. (See settlement hierarchy advice in section 4 of report.)</p> <p>Require LPs to make more effort to overcome constraints on existing employment land before allocating more land, eg. searching for funding to overcome constraints. Follow sequential approach so that existing allocations are always considered before new allocations.</p>

POLICY Employment Land 3 – *Providing for Employment Opportunities outside Urban Areas*

Key points from testing exercise	Suggestions for changes
<p>May bring benefit to disadvantaged areas, but it is not clear what 'economic need' implies.</p> <p>Might have an adverse impact on the viability of urban centres by allowing development out of centres.</p> <p>Could lead to trip generation.</p>	<p>Specify that economic need implies: (i) areas of declining income or industries (farming and fishing) or high unemployment (say x% above Scottish average); (ii) important economic uses that can only operate outside of urban areas.</p> <p>Specify that certain types of development will not be allowed, ie. those named in R1.</p> <p>Specify that developments must be close to public transport corridor. Developments likely to generate more than x trips a day are not permitted outside of settlements if they are for uses which are suitable for locations within settlements. Any large trip generators (above y trips per day) must prepare a green transport plan.</p>

POLICY Employment Land 4 - Tourism

Key points from testing exercise	Suggestions for changes
<p>Very difficult to judge impact of this policy because it will depend on how LPs interpret 'in an environmentally sensitive and sustainable way' to apply only to landscape character and habitats, or also other environmental impacts.</p>	<p>Strengthen policy to make clear what considerations should apply for 'sustainable tourism'. For example:</p> <ul style="list-style-type: none"> ▪ Target towards disadvantaged communities, eg. fishing. ▪ Tourism related developments should be within settlements, except for farm conversions in areas of agricultural decline and visitor attractions based on existing resources in the countryside ▪ Brownfield developments preferred. ▪ Large trip generators must be close to public transport corridors and have green transport plan, to be enforced through planning conditions and agreement. <p>Example from Gloucestershire SP - Policy TSM.1:</p> <p>Proposals for all tourism developments will be judged against principles of sustainable tourism. Particular attention will be given to:</p> <ol style="list-style-type: none"> (a) conserving the urban and rural environments; (b) providing facilities of appropriate scale, standards and design; (c) managing tourism pressures in popular areas or at sites of special attraction; (d) promoting access by public transport, cycling and walking; and (e) encouraging the re-use of existing buildings so as to maintain or enhance the character and appearance of the surroundings.

POLICY Housing 1 – Development within the Existing Urban Fabric

Key points from testing exercise	Suggestions for changes
<p>Broadly sustainable policy. Negatives and uncertain impacts can be dealt with by strengthening other policies.</p>	

POLICY Housing 2 – A Five Year Effective Housing Land Supply

Key points from testing exercise	Suggestions for changes
<p>The impact of this policy will be via Housing policies 3, 4 and 5. Therefore this policy has not been separately tested against the criteria.</p> <p>The main negative impact of housing forecasts will be landtake, with consequent implications for biodiversity and trip generation.</p> <p>The housing allocations appear to directly equate housing requirements with forecast household growth. No attempt is made to reduce forecasts by promoting a reduction in vacancy rates.</p>	<p>Consider opportunity for vacancy rate reductions to reduce forecast demand for new housing units.</p>

POLICY Housing 3 – New Housing in the Aberdeen Housing Market Area 2001 to 2006

Key points from testing exercise	Suggestions for changes
<p>Development in settlements without housing allocations is precluded and therefore local people (especially new households and elderly) may not be able to remain within their community.</p> <p>Will lead to landtake, especially outside of Aberdeen where less brownfield sites are available. This will have consequential impacts for habitats and possibly countryside character.</p> <p>Can not judge impact of policy on trip generation because this will depend on the basis that LPs use to allocate housing.</p> <p>Impact on equal opportunities unclear.</p>	<p>Adapt policy to ensure that local people can remain within their communities. See section 4 of main report.</p> <p>LPs should be required to maximise opportunities for conversions, windfalls rather than new allocations, meet average minimum density standards, maximum average car parking standards etc. See section 4 of main report.</p> <p>LPs should be required to determine settlement hierarchy for rural settlements to minimise transport impacts. This policy should specify what considerations should be included in the criteria. See section 4 of main report.</p> <p>Can be dealt with by strengthening H8.</p>

POLICY Housing 4 – *Housing Strategy in Aberdeen Housing Market Area 2006 to 2011*

Key points from testing exercise	Suggestions for changes
As Housing 3.	As Housing 3.

POLICY Housing 5 – *Housing Strategy in Aberdeen Housing Market Area 2011 to 2016*

Key points from testing exercise	Suggestions for changes
As Housing 3 & 4.	As Housing 3 & 4.

POLICY Housing 6 – *House Building in the Countryside*

Key points from testing exercise	Suggestions for changes
<p>Could deter rural diversification, eg. conversion of farm buildings for holiday lets.</p> <p>Could potentially lead to significant housing developments linked to countryside enterprises, with consequences for land take, habitats and trips generation.</p>	<p>Strengthen policy by opening with a statement that housing will only be allowed in the countryside under exceptional circumstances, namely to enable farm diversification, and to meet essential housing needs for the efficient operation of enterprises that can only operate in the countryside. (In other words housing only allowed for economic needs if it is essential for (some of) the workforce to be accommodated on site.)</p> <p>Place an upper limit on the number of dwellings per enterprise that may be permitted under this policy.</p>

POLICY Housing 7 – Developer Contributions

Key points from testing exercise	Suggestions for changes
<p>Only applies to housing. Other developments may add to pressure on local community infrastructures or bring loss to local community.</p> <p>Nothing included on compensation for loss of benefits of the site / existing building to local people, including loss of open space as a result of the development.</p> <p>Does not prioritise not car transport provision.</p> <p>Does not consider loss of habitat.</p>	<p>Apply to all types of developments.</p> <p>Developer to fund independent consultation with local people on the value of the site / existing building to local people (quality of life capital) and to compensate for any loss, eg. provision of alternative wild space, footpath, football ground.</p> <p>Clarify under first bullet point that this includes contributions to public transport infrastructure and services, and access by cycling and walking. Also, that if contributions are made to public transport, cycling and walking facilities, that contributions to car infrastructure will be reduced accordingly.</p> <p>Include replacement of any damaged habitat.</p>

POLICY Housing 8 – Affordable and Special Needs Housing

Key points from testing exercise	Suggestions for changes
<p>Overall positive impact on sustainability, but reference to special needs is weak.</p>	<p>Specify which special needs groups must be considered, eg. elderly, disabled, single households. Require LPs to identify (through surveys) extent of demand for these facilities in different localities and to secure appropriate levels of provision.</p>

POLICY Retailing 1 – Retail Development

Key points from testing exercise	Suggestions for changes
<p>Title is retail development, but policy also refers to other key town centre uses.</p> <p>No attempt to guide developments as part of regeneration programmes.</p> <p>No protection against damage to historic character or loss of amenity from additional traffic.</p> <p>Out of town centres: the requirement to `demonstrate' points b) and c) does not set any standards against which developments should be allowed or refused. This opens the possibility for out of town developments which reduce vitality of town centres and add to trips.</p>	<p>Convert into town centre policy. (See section 4 of main report.)</p> <p>Favour developments which are part of regeneration programmes.</p> <p>Include requirement that town centre developments must protect historic character and avoid adding to local traffic congestion.</p> <p>Clarify that if out of town developments are expected to have adverse impact on town centres that they will be refused.</p> <p>Place car parking restrictions on out of town developments (of any size), require provision of public transport to the development and green travel plan.</p>

POLICY Sport and Recreation 1 – Sport and Recreation Facilities

Key points from testing exercise	Suggestions for changes
<p>Open space provision is easily overlooked in this policy which mainly focuses on sports & recreation facilities.</p> <p>Sports and recreation facilities can be major trip generators. Although policy requires that new developments should `not increase reliance on the car', this gives little guidance to LPs on what action they should take.</p> <p>Catering for all members of the community is particularly important for S&R facilities.</p>	<p>Create separate publicly accessible open space policy. As with sport and recreation facilities, use existing study or undertake own study to identify areas of under provision and aim to rectify.</p> <p>Set transport criteria for major facilities, eg. must be in high passenger transport accessibility zone, or include high level of public transport provision. Require green travel plans for all facilities above a certain size, and link these to planning conditions and agreements.</p> <p>Planning conditions to require provision for disabled, carers of young people and adults, and for ethnic minorities.</p>

POLICY Sport and Recreation 2 – Skiing Facilities

Key points from testing exercise	Suggestions for changes
<p>Could have an adverse impact on attempts to diversify away from declining economic sectors.</p> <p>New skiing developments will add to trip generation.</p>	<p>Compensate by strong presumption in favour of alternative more sustainable forms of tourism. (Policy EL4.)</p> <p>New developments to provide public transport links and prepare green transport plans.</p>

POLICY Environment 1 – Designated Nature Conservation Areas

Key points from testing exercise	Suggestions for changes
<p>Might have adverse impact on out of settlement employment developments for industry, business and technology parks. Difficult to tell as preferred locations for these are not considered.</p> <p>No consideration of management of designated sites.</p> <p>Although text is entitled 'ensuring access to a good environment', the policy makes no mention of improving public access to designated sites.</p>	<p>Any development on designated sites must contribute to the management of these sites for conservation.</p> <p>Any development on designated sites must contribute to improving public access where this is appropriate, ie. currently poor access, and site not in need of strict protection.</p>

POLICY Environment 2 – Designated Areas and Other Considerations

Key points from testing exercise	Suggestions for changes
<p>Title refers to designated and other areas, but policy is less concerned with designated sites than E1.</p> <p>No reference to designated or regionally important landscapes.</p> <p>As phrased the policy could severely restrict opportunities for rural and fishing diversification.</p> <p>Takes a blanket approach to protection of countryside character, biodiversity and historic resources.</p>	<p>Change title to 'protection of environmental resources and promoting access to the countryside.' Alternatively, transfer access policies to Sport & Recreation.</p> <p>Create new policy or expand E1 to include designated landscape areas and require LPs to define regionally important landscapes.</p> <p>Be more specific that developments must not have adverse impacts proposals in LCAs, HAPs and SAPs, or on locally important wildlife sites and open spaces. Clarify what aspects of the built heritage, archaeology and historic landscapes are sufficiently important to refuse development.</p> <p>Needs to tie in more closely with recommendations of LCAs, HAPs, SAPs and any advice on protection of historic and archaeological resources. See section 4 of main report.</p>

POLICY Environment 3 – Coastal Planning

Key points from testing exercise	Suggestions for changes
<p>Could have adverse impact on diversification away from fishing and promotion of tourism. Although tourism may also benefit from undeveloped coasts.</p>	<p>Compensate by strong presumption in favour of alternative more sustainable forms of tourism. (Policy EL4.)</p>

POLICY Environment 4 – Green Belt and Environment 5 – Development in the Green Belt

Key points from testing exercise	Suggestions for changes
<p>Green Belt could displace employment developments into more valuable habitat and landscape areas, but difficult to say because Structure Plan does not specify where major out of settlement employment developments are likely to be allocated.</p> <p>Could prohibit provision of essential facilities and housing for local people for communities within the Green Belt.</p> <p>Not clear what local plans must do to `protect landscape setting`</p> <p>Accommodating the development required by Structure Plan will result in landtake.</p> <p>Greenbelt likely to add to length of trips, given high rate of commuting into Aberdeen.</p>	<p>In exceptional circumstances development allowed for communities which can demonstrate that they are severely under resourced.</p> <p>Expand on `protection of landscape setting.` For example, should a minimum width of Green Belt or important vistas be maintained?</p> <p>See recommendations under housing and employment land policies.</p> <p>Compensate by requirement for making sure that new housing developments the other side of the Green Belt are in settlements with good public transport links. See comments on H3 above.</p>

POLICY Environment 6 – Indicative Forestry Strategy

Key points from testing exercise	Suggestions for changes
<p>Likely to restrict commercial forestry and rural diversification opportunities. This is as a result of IFS rather than planning policy.</p> <p>Forestry planting may have adverse impacts on landscape and habitats.</p>	<p>Compensate by strong presumption in favour of alternative more sustainable forms of tourism and other methods of rural diversification.</p> <p>LPs should take account of advice in LCAs, HAPs and BAPs as well as IFS.</p>

POLICY Environment 7 - Minerals

Key points from testing exercise	Suggestions for changes
<p>Minerals extraction will require landtake and consume vital resources.</p> <p>Minerals extraction will damage landscapes and possibly habitats, even if it is directed away from the most valuable sites.</p>	<p>Minimise demand for virgin aggregates by promoting use of recycled aggregates, and facilities recycle aggregates, in this or other policies.</p> <p>LPs to take account of advice in LCAs, HAPs and SAPs as well as the four tier approach in appendix 2. All permissions to include obligations for planting and layout to reduce visual impact, and to restore sites at the end of their life for habitat and landscape value.</p>

POLICY Environment 8 – Waste Management Facilities

Key points from testing exercise	Suggestions for changes
<p>It is not clear how the tiered exploration should be applied.</p> <p>Appendix 2 only refers to landfill, whereas policy refers to all waste management facilities.</p> <p>Renewable energy is not promoted.</p> <p>First bullet point is very weak on promotion of reduction, re-use and recovery of waste.</p> <p>Delivery of waste to management facilities is large generator of trips.</p> <p>Odour and noise nuisance are common with waste management.</p> <p>Landfill sites can be used to promote habitats and open spaces.</p>	<p>Explain as in E7.</p> <p>Include tiers for materials reclamation, composting, and incineration.</p> <p>Any permission for incinerators and landfill must require renewable energy generation. Have strong presumption in favour of other renewable energy options such as anaerobic digestion.</p> <p>Require LPs to actively promote materials recycling facilities. See section 4 of main report. Refer to councils' Waste Strategies.</p> <p>Require LPs to consider proximity to waste source and trip minimisation as one criterion for location of facilities.</p> <p>Facilities must be sited sufficiently far from residential areas to avoid odour and noise nuisance. Distance necessary may vary with type of facility.</p> <p>All permissions to include obligations to restore sites at the end of their life for habitat and other local benefit.</p>

POLICY Environment 9 – Renewable Energy Facilities

Key points from testing exercise	Suggestions for changes
<p>Tiers in appendix 2 only applies to windfarms. Other forms of renewable energy generation may have significant impacts on the quality of the urban environment, countryside character and landscape, and habitats.</p> <p>Appendix 2 does not refer to regionally important landscapes.</p>	<p>Prepare tiers or give advice on what should be considered in locational criteria for other forms of renewable energy. Consider criteria for both urban and rural locations. Refer to LCAs, HAPs and SAPs as well as designated sites.</p> <p>Include regionally important landscapes in appendix 2.</p>

POLICY Environment 10 – Saving Energy

Key points from testing exercise	Suggestions for changes
<p>Policy name is about saving energy, but sustainable materials and `Development within Nature` are likely to cover other environmental issues.</p> <p>Uncertain about impact on a variety of environmental issues, because it is not clear if these are covered in the advice `Development within Nature`.</p> <p>`Development within Nature` apparently only applies to housing.</p> <p>Design standards, SPG and development briefs are as important as LP policies.</p>	<p>Rename policy `Environmental Design`.</p> <p>Check if `Development within Nature` considers thermal efficiency of buildings, noise, CO₂ fixing, habitat enhancement, design quality. If not recommend other advice, or include direct reference to these in the policy.</p> <p>Similar advice should be identified for other types of development.</p> <p>Require development of design standards and development briefs to incorporate environmental design.</p>

POLICY Transport 1 – *Connecting Communities within the North East*

Key points from testing exercise	Suggestions for changes
<p>This is a mixture of two different policies. One about helping to reduce the need to travel, the other about safeguarding land for all transport proposals, whether or not they reduce the need to travel.</p> <p>Trip reduction policy is positive for sustainability, but is weak on what could be done to reduce the need to travel.</p> <p>Impossible to say for last paragraph as we do not know the details of other transport proposals, and what strategic options have been considered. This is presumably primarily the responsibility of Local Transport Strategies.</p>	<p>Divide into two policies.</p> <p>Strengthen requirements and advice on reducing the need to travel as in section 4 of main report.</p> <p>Require sustainability appraisal of Local Transport Strategies.</p>

POLICY Transport 2 – *Connecting Communities to Places Further Afield*

Key points from testing exercise	Suggestions for changes
<p>This policy does not give any guidance to local plans.</p>	<p>Change the policy to say that local plans should support Local Transport Strategies.</p>

POLICY Transport 3 – *Sharing Responsibility for Transport and its Impact*

Key points from testing exercise	Suggestions for changes
<p>Meaning of 'mitigated in a sustainable way' is unclear.</p> <p>Meeting everybody's transport needs implies meeting the needs of car drivers, which will add to trip generation.</p>	<p>Be more specific about what this implies, eg. in situations where developments would put pressure on road capacity, no additions to road capacity. Instead development must find alternative ways to transport goods, employees, visitors.</p> <p>Prioritise provision for non car users. Needs of car users only to be considered if public transport, cycling and walking provision is insufficient to manage transport needs.</p> <p>Specify situations where green transport plans will be required, eg. size of development by type of facility.</p>