



51 Colthill Circle  
 Milltimber  
 Aberdeen  
 AB13 0EH

22 April 2009

Ms Sandra Carey  
 The Scottish Government  
 Directorate for the Built Environment  
 Area 2-H  
 Victoria Quay  
 Edinburgh  
 EH6 6QQ

Dear Ms Carey

### **Objections about the Finalised Aberdeen City & Shire Structure Plan**

I write on behalf of the Cults, Bieldside, Milltimber Community Council. Attached is a copy of the objections we raised as part of the consultation process in June 2008. We were extremely disappointed that the issues that we raised were largely ignored. Indeed the collective views of Community Councils were effectively dismissed with no real changes made to the finalised structure plan.

We would like to highlight the following points, which should be read in conjunction with our original objections:

#### **Economic Growth**

We all support the promotion of the economy of the North East of Scotland. Any efforts to diversify the economy particularly given the inevitable decline in employment in the oil and gas industry over the next 20 years should be greatly encouraged. However, the economic forecast is based on

- *A higher level of activity in the energy sector with increased investment west of Shetlands*
- *An expansion in onshore developments; an increase in the rate at which corporate / regional headquarters are relocated to the area*
- *Significant adjustments to the UK tax regime making the UK Continental Shelf (UKCS) a more attractive investment opportunity*
- *A surge in the renewables sector, with major projects and high employment levels in Aberdeen City and Shire.*
- *Higher than anticipated activity in non-energy sectors arising from spin-off opportunities created by increased investment in the UKCS.*

Peter Reiss, Chairman. 51 Colthill Circle, Milltimber AB13 0EH

☎ 01224 734592 ✉ peter@reiss7.wanadoo.co.uk

- *Expansion of Aberdeen Airport. Greater than expected economic benefits from the AWPR and other major infrastructure projects.*
- *Increasing demand for locally grown produce resulting in higher employment and increase in agricultural land use; relaxed quota and TAC restrictions on the local fishing fleet.*
- *Peterhead, Fraserburgh and Aberdeen becoming centres for fish processing and packing factories as a result of higher fish landings.*
- *Recent influx in overseas migrants, particularly from EU continues at its present pace*

While this may form a wish list for the City and Shire region there is no evidence that there will be resurgent levels of local employment in the offshore oil and gas industry, fishing and agriculture. Even with a more diversified economy it is difficult to identify anything on a significant enough scale to lead to substantially higher employment levels in the area. The new jargon of aspirational planning, with local politicians making pronouncements about the City and Shire being open for business, are not substitutes for realistic forecasting. We believe that it will be an outstanding achievement if the city region maintains its existing employment levels during the life of the structure plan. We believe a more robust and flexible structure plan should be built around this as the base case.

## Population Growth

We reject the underlying premise of a need to increase the combined population of Aberdeen City and Shire by 40,000, a 9% increase over the next 24 years. Indeed the aspiration to increase the population to 500,000 in the longer term may have a negative impact on the other objectives of the plan; particularly quality of the environment, standards of development in sustainable mixed communities and accessibility.

The Aberdeen City and Aberdeenshire Councils own “Probable Forecast” for the combined population of City and Shire by 2030 is 458,000. This is markedly different from the “High Forecast” of 481,400 on which the Finalised Structure Plan and an aspiration of 500,000 is based.

The “High Forecast” relies on significant inward migration. However, a recent influential report by a cross-party group of MPs and peers dismissed the argument that large-scale immigration into Scotland is needed to address a shrinking and ageing population.

All the above were projected before the full impact of the financial and economic crisis emerged. A declining working age population 16-65 is not unique to the City and Shire region. Population movements will be driven by the availability of work and relative pay levels. We don't believe that we need to build additional homes per year **in anticipation** of a level of economic activity that is very unlikely to materialise and an estimated, but unproven, inflexibility in the local supply of labour.

## Housing Allowance

The proposals for the numbers of houses to be built during the structure plan period, which stem in part from the anticipated growth in the economy and population, are the most controversial aspects of the plan. We believe that both the economic and population forecasts are founded on flawed assumptions.

Both forecasts are unrealistic and produce a housing forecast that is far too high, in that it states the **maximum possible numbers** needed, based on the **best (indeed Utopian)** view of the economy and an extrapolation of the **most optimistic population figures**.

The target of 72,000 households, evenly split between the City and Shire (and with 21,000 on Greenfield sites within the City) is ridiculously high, even at the extreme limit of inward migration. Predictions of the increase in the number of households to 2031 vary. The GROS Principal Projection estimates that for the period 2006-31 there will be 5,040 additional households in Aberdeen City and 32,820 in the Shire, giving a total of 37,860. The Aberdeen City and Shire “Probable Forecast” is broadly similar at 38,150. However, the two councils predict a much higher increase for Aberdeen City of 16,470 (versus 5,040), with a much lower increase for the Shire of 21,680 (versus 32,820).

This suggests an attempt on the part of the councils to engineer a reverse to the current population drift from City to Shire and in the process generate income via developer gain from building on prime Greenfield sites in the City.

We believe that the Finalised Structure Plan should instead use the “Probable Forecast” in projecting increases in the number of households, i.e. 38,150 for the combined City and Shire.

All these forecasts were made prior to full impact of the financial and economic crisis becoming apparent in the last quarter of 2008. The view of the councils is that these are short-term issues. However, the front-loading of the housing forecast has not changed, with 12,000 houses projected for Greenfield sites within the Aberdeen City boundary by 2016. No thought seems to have been given to the lessons learned from the crisis, i.e. about overly optimistic growth projections and a lack of effective regulation. The market for mortgages has changed for the foreseeable future and prospective house purchasers will need to raise substantial deposits in order to enter into the property market.

## **Quality of the Environment**

The structure plan needs to find the right balance between promoting economic prosperity and the proper regulation of development to protect the quality of the environment. The structure plan shows a marked absence of effective regulatory control.

The structure plan is full of grand statements of good intent such as:

*‘to help create sustainable mixed communities, and the associated infrastructure, which meet the highest standards of urban and rural design and cater for the needs of the whole population’*

There is no substance to how this objective is going to be achieved. Issues about coalescence between communities, the maintenance of tranquil areas to walk, selection of the type of housing to be built (flats and the size of houses; 2/3/4 bedrooms), standards of design and robust strategies to provide affordable housing are not properly addressed.

Underpinning the above is the review of the whole green belt policy. There are no indications about the principles behind the green belt review. There appears to be no role for Community Councils in this review. It implies that sufficient Green Belt and Green Spaces land will be made available to build the 21,000 houses to meet the perceived housing requirement on Greenfield sites in the Aberdeen city boundary by 2030. This will certainly have an impact on the quality of life for the people of Aberdeen. We see it as a contradiction of the quality of the environment objective to make sure new development maintains and improves the region’s important “built, natural and cultural assets”.

In essence, overly optimistic housing forecasts are likely to lead to unfettered development with developers able to ‘cherry pick’ Greenfield sites across the city in order to maximise their profits. The scale of the proposed developments and the desire to increase income for Aberdeen City Council, despite the boundaries between the city and shire being very arbitrary, is likely to lead to

lack of regulatory control. We believe that these issues need to be directly addressed as part of the structure plan with a focus on regulatory control.

## Accessibility

The spatial strategy in the Finalised Structure Plan is predicated on the provision of a modern transport system for the region, highlighted in the Regional Transport Strategy. The result of the Strategic Transport Projects Review announced in December 2008 should be integrated with the Finalised Structure Plan. However, this does not appear to have been recognised. No account has been taken in the Finalised Structure Plan of the demise of the cross rail project. Even the minor improvements in the rail links between Aberdeen and Inverness and Aberdeen and Edinburgh have no timescales or costs assigned to them. Once again it is another wish list with little substance on how it will be delivered.

There is no evidence that what has been proposed will significantly change the behaviour of people towards using public transport as opposed to cars. It is not surprising that our proposal, to include a transport carbon emission target in the Finalised Structure Plan, was rejected.

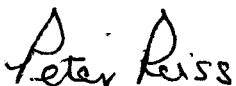
We believe that the spatial strategy needs to be revisited in light of the Strategic Transport Projects Review. In our view, development should be focussed around existing towns within the city region to create self sustaining communities that provide employment, high quality living and a reduced need to travel long distances to work.

Many existing towns are already within the spatial growth areas. The emphasis should be on development of these locations with necessary supporting infrastructure, rather than development along a corridor with inadequate transport links. This would also be an opportunity to re-examine prospects for regeneration along the northeast coast including Fraserburgh and south of Stonehaven.

## Summary

1. We are very disappointed that our views and those of other Community Councils were rejected in the consultation phase of the Finalised Structure Plan, without any proper explanation.
2. We believe that the Finalised Structure Plan is based on an overly optimistic economic forecast and unrealistic population and household projections.
3. We are most concerned about the lack of regulatory control. This will lead to excessive house building on Greenfield sites and irreparable damage to the quality of the environment.
4. It is our firm belief that there is a lack of proper integration between the Finalised Structure Plan and the Regional Transport Strategy and outcome of the Strategic Transport Projects Review.
5. We believe that the Finalised Structure Plan is deeply flawed. We therefore have no alternative but to recommend that an Examination in Public (EiP) be held, to provide a forum for the councils views to be robustly challenged.

Yours sincerely



Peter Reiss

Chairman

Cults, Bieldside, Milltimber Community Council