



Aberdeen Local Development Plan Review

Pre- Main Issues Report Questionnaire 2018

Aberdeen City Council is currently in the early stages of reviewing the Aberdeen Local Development Plan 2017(ALDP). The 2018 Development Plan Scheme provides a timetable for the review of the ALDP and the opportunities to participate throughout the process.

It is available to view online at: www.aberdeencity.gov.uk/localdevelopmentplan

This questionnaire forms part of the pre-Main Issues Report consultation activities we are undertaking. It is designed to gather views on the main planning issues in Aberdeen to be considered by the next ALDP.

Using your Personal Information

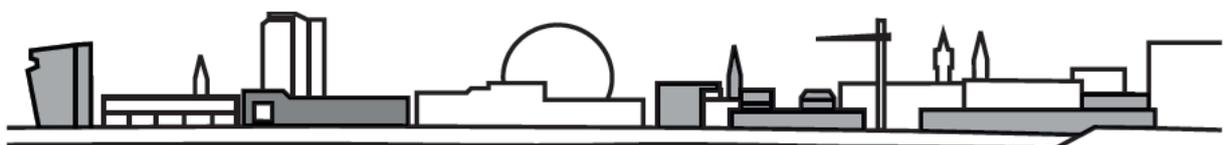
Information you supply to Aberdeen City Council (ACC) in this questionnaire will be used to prepare the Local Development Plan. ACC will not share the personal information provided in this questionnaire with other parties or organisations. ACC will not disclose any contact information about you to any organisation or person unless it is authorised or required to do so by law.

The Local Development Plan team may use your contact details to contact you about the comments you have made. Your name and organisation may be published alongside your comments but contact details will not be made public. If you chose not to provide a name or contact details, your comments will still be valid but we will not be able to contact you in the future.

For further information on how your information is used, how ACC maintain the security of your information, and your rights to access information ACC holds about you, please contact Andrew Brownrigg, Team Leader, Local Development Plan Team, Strategic Place Planning, Aberdeen City Council, Business Hub 4 Marischal College, Broad Street, Aberdeen AB10 1AB.

A separate form for submitting development sites for consideration can be found on our website at: www.aberdeencity.gov.uk/localdevelopmentplan

**Our consultation runs from the 19th March to the 8th of May 2018.
Please note the deadline has been extended to Monday 28th May 2018.**



1. YOUR DETAILS

1.1 Please let us know the capacity in which you are completing this questionnaire. Are you...

- A member of the public
- A community representative e.g Community Council

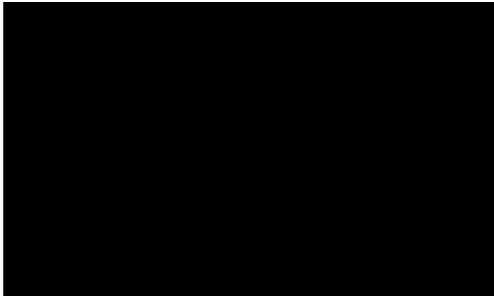
If yes, which area do you represent?

- A developer/ their agent
- A landowner/ their agent
- From a Key Agency
- Other

1.2 Please provide your name and contact details:

Name and Organisation:

Address:



Postcode:

Telephone:

Email:

1.3 If you are acting as an agent or completing this on behalf of an organisation, group or landowner, please provide their details:

Organisation/group/landowner:

Address:



Postcode:

Telephone:

Email:

2. ABERDEEN'S MAIN PLANNING ISSUES

Feel free to continue on separate sheets if necessary and attach to the questionnaire. You do not have to answer every question.

Vision

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

See attached paper apart.

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

See attached paper apart

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

See attached paper apart

Policy Topic Areas

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

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

See attached paper apart

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

See attached paper apart.

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

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

See attached paper apart

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

See attached paper apart

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

See attached paper apart.

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

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

See attached paper apart.

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

See attached paper apart.

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

See attached paper apart.

Thank you for taking the time to complete this questionnaire. Please return completed questionnaires to:

Local Development Plan Team

Strategic Place Planning
Aberdeen City Council
Business Hub 4
Ground Floor North
Marischal College
Broad Street
Aberdeen
AB10 1AB

Twitter: [@AberdeenLDP](https://twitter.com/AberdeenLDP)

You can also visit the Aberdeen Local Development Plan Facebook page.

COMPLETED QUESTIONNAIRES SHOULD BE WITH US BY NO LATER THAN 28 MAY 2018.

If you wish to be added to the LDP E-Mailing list to be kept informed of our progress in producing the next Local Development Plan, please tick here.

If yes, please provide an email address

ABERDEEN LOCAL DEVELOPMENT PLAN REVIEW PRE-MAIN ISSUES REPORT QUESTIONNAIRE

PAPER APART: RESPONSE BY CALA HOMES (NORTH) LTD

Introduction

My client, CALA Homes (North) Ltd are a premium housebuilder, with roots firmly established in the North East and are currently active and delivering new homes on a number of development sites across the City. My client therefore welcomes the opportunity to respond to Aberdeen City Council's Pre-Main Issues Report Consultation. The following paper provides a detailed response to a number of questions posed by Aberdeen City Council within the associated Pre-Main Issues Report Questionnaire, as well as additional views on matters not covered.

Q. 2.1 – Vision

My client is generally content with the vision contained within the extant Local Development Plan (LDP) and feels it is worthy of retention, albeit with a number of minor tweaks as proposed within the recent publication of the Aberdeen City and Shire Strategic Development Plan (SDP) Main Issues Report 2018. These changes promote industry diversification and resilience, in recognition of the challenges the North East has experienced through the recent Oil and Gas restructuring. These amendments would ensure that the LDP vision ties in with the Regional Economic Strategy. In light of our ever changing environment, my client would seek assurances and further details on how the Council's vision will be achieved in practice?

One further suggestion would be to amend the second bullet point within the existing vision to read "*the unique qualities of our **built and natural** environment*", in recognition of the significant contribution that the housebuilding industry makes in shaping the places we live, work and do business, as well as the high quality natural environment we benefit from across throughout the City.

Q. 2.2 – ACC Priorities

A top priority for the Council within the next LDP should be housing delivery, across both Brownfield and Greenfield sites. My client maintains serious concerns over a lack of progress on a number of sites allocated within the existing LDP which are distorting the Established Effective Land Supply. The Council need to show commitment to housing delivery and this should be achieved through the allocation of further sites to provide a variety of opportunities of size, mix and location across the City with the next LDP to give the best possible chance of increased delivery, which is a key target of ACC.

Whilst Affordable Housing delivery must continue to be a main priority of the new LDP, there is too heavy a burden on the development industry to deliver affordable housing in parallel with mainstream housing units as part of existing residential allocations. This method will not achieve the levels currently required to address demand across the city, therefore the Council need to review existing delivery

mechanisms to ensure there is sufficient flexibility on the type of affordable housing delivery available. It is often not viable for all sites to provide 25% on site affordable units, therefore the Council need to take a more pro-active approach to Local Authority-led, 100% affordable housing sites and make best use of secured funding from Scottish Government and commuted payments from the housebuilding industry to reach current targets. Further commentary on Affordable Housing is provided in 2.9 below.

Regeneration must also be a key focus of the next LDP, with significant emphasis placed on the delivery of the aims and objectives of the City Centre Masterplan and its identified projects. The City needs to maintain resilience as we emerge from a period of economic instability brought about by the downturn in the Oil and Gas Industry. Over the last number of years, significant levels of employment sites have come forward, with the creation of a number of key business parks on the periphery of the City as well as significant floorspace created within the City Centre. As such, there has been a gradual shift companies decanting from older stock into brand new business and industrial premises. We have been left with a large supply of vacant premises and whether this relates to older stock within some of the more historic employment sites within the city. The new LDP needs to recognise this and promote the effective regeneration of these sites, providing flexibility in the consideration of high quality employment proposals that do not neatly fit within traditional use classes 4, 5 and 6, as per existing policy restrictions. As highlighted below, housing sites coming forward in the city centre should not be liable to any affordable housing contributions.

Q. 2.3 - Community Aspirations

CALA Homes (North) Ltd request that additional land is allocated through the next Local development Plan to allow for the sustained growth of the city and to allow my client to deliver community aspirations for high quality housing, offering a range and choice of new homes across a number of sites within the city. Existing communities will also benefit from the creation of new homes, which bring appropriate infrastructure upgrades, and help sustain schools and services. My client believes there should be a greater emphasis placed on housebuilding in general. It is a significant contributor to the economy, yet too often, applications are met with significant delays due to over prescriptive policy requirements and lengthy S75 negotiations to try and agree ever increasing developer obligations requirements.

Policy topic Areas

Q. 2.4 - City Centre

My client believes that there should be a continued focus on regeneration within the City Centre, with a particular focus on Union Street which has suffered a gradual decline as part of a shift in retail/shopping habits, with established shopping malls at Union Square and the Bon Accord Centre, pulling retail expenditure away from the City Centre's main thoroughfare. Delivering the aims and objectives of the City Centre Masterplan and the new LDP should provide flexibility to attract a range of uses to the city centre to bolster its existing retail offering.

The Aberdeen City Centre Masterplan has an objective to create a “living city for everyone” and aims to add some 3,000 new residents to the city over the next 25 years. In order to unlock city centre sites and bring forward new housing proposals to meet these ambitious demands, a degree of flexibility must be provided. The next LDP should therefore contain specific policy to with a presumption in favour of new residential development within the City Centre. My client believes that existing LDP Policies are not geared towards achieving this vision and too often, overcritical application of policies and guidance can see schemes thwarted.

Additionally brownfield city centre sites will often have higher development costs, whilst experiencing more constraints and extraordinary development costs, than standard greenfield sites. Therefore a substantial relaxation in current affordable housing requirements for proposed residential development within the confines of the City Centre would serve as a strong incentive for delivery of new housing and ultimately attract people back in to the City Centre to live, work and contribute to its overall vitality.

Furthermore, whilst not specifically defined as the City Centre, the West End Office Area forms a substantial specialist employment area on the western fringes of the City Centre, with related LDP Policy B3 highlighting it as a “prestigious, high quality office location on the edge of the city centre”, with a focus on promotion of the area for continued Class 4 Office development. In recognition of the recent shift in the marketplace which has witnessed a number of high profile and established businesses moving from the typical large granite villas which dominate area, in favour of newly built Grade A office accommodation, there should be a review of the current policy. Whilst it does give some provision for alternative uses, such as residential, it simply states that these will be assessed “on their own merits”. There are a substantial number of unlet office buildings on the market within the West End Office area, therefore LDP Policy needs to be more flexible and open to alternative employment and residential development, in order to stimulate investment and promote vibrant and sustainable new uses for these vacant buildings.

Q. 2.5 - Infrastructure Provision

The provision of infrastructure is crucial to the long term and successful growth of the City, therefore the LDP must set out appropriate provision to ensure that long term, strategic transport projects and cumulative interventions are identified and their delivery is appropriately planned for through associated policy provision.

In previous years there has been an overreliance on the development industry to fund these projects. The previous STF was effectively a development tax and served to add a further financial burden on the housebuilding industry, often leading to exorbitant costs being placed on sites in addition to developer obligations and affordable housing requirements, which often placed viability constraints on sites. The STF has since been quashed by the Supreme Court, who deemed it to be unlawful. We therefore remain in a state of flux, with identified projects yet to be delivered, stymieing further development in those areas and an apparent lack of detail through existing policy provision on how investment in those projects will be made.

There has been suggestion through the recent Planning Bill of the introduction of a new Infrastructure Levy. CALA remain unconvinced and have yet to see sufficient detail on how the Levy would operate in practice. Concerns remain over poor administration and the imposition of significant charging (in addition to proposals for increased planning fees and S75 obligations) which will lead to a stifling of development rather than positive increased delivery. The development industry should not be responsible for the resolution of existing infrastructure deficiencies, nor should any collection of payments through proposed policy provision or the introduction of a Levy be restricted solely to the housebuilding industry as commercial and industrial development can create significant infrastructure demand. Furthermore, any affordable housing units proposed as part of a development should be exempt from any payments towards infrastructure.

Q 2.7 - High Quality Buildings and Places

As highlighted above, the housebuilding industry makes a significant contribution to our built environment, helping to create successful places and sustainable new communities for people to live, work and relax within their surroundings. To ensure that the Council's vision of creating new development that contributes to the sustainability of the city, my client has a number of suggestions based on their experience of existing placemaking and design policies contained within the extant LDP.

Policy D1 and its associated myriad of Supplementary Guidance are much too prescriptive and restrictive and can often leave both the development industry and local communities confused over policy approach. These restrictions are often misaligned with the overarching planning policies contained in the primary LDP. My client would welcome a revised approach within the next LDP which removed the requirement for additional Supplementary Guidance. Its removal will provide greater clarity in decision making for all parties. My client would however emphasise that its removal should not revert to overly complex and prescriptive LDP policy which would only serve to be counterproductive. Further concerns over specific topics on existing Supplementary Guidance are detailed below.

Additionally Pages 26 and 27 of the extant LDP set out the "Six Qualities of Successful Placemaking", which echo those contained within Scottish Planning Policy. However the prescriptive bullet points which follow thereafter may not be appropriate to every development site which comes forward. For example, expectation that a development is "distinctive", yet then goes on to suggest that established patterns of development are reinforced appears contradictory. Replication of established development patterns, styles, and materials will not ensure a new development is distinctive in its own right.

Policy H3 – density should also be reviewed. Whilst a net minimum density of 30 dwellings per hectare may be appropriate for some residential sites, it may not be suitable for all. The current wording is too restrictive and my client would therefore suggest a more flexible approach. A more appropriate wording at point 1 should therefore highlight that all sites over 1ha should "aim to" deliver 30 dwellings per hectare, but that sites will be assessed on a site by site basis, in consideration of established densities and patterns of development, as well as associated landscape features and impacts.

Similar flexibility should be provided within Policy H4 - Housing Mix. My client feels that the current requirement for the preparation of a masterplan for 50 units and above is too low a threshold and leads to unnecessary delays and complexities and also requires sufficient staff resources, which would be better placed negotiating high quality layout and design principles through positive pre-application engagement. It would therefore be more suitable to increase the current threshold to sites proposed for 100 units and above. This would help bring forward smaller sites quicker, rather than imposing lengthy master planning requirements and associated process. Additionally, cognisance needs to be made of the variety of products on offer by different housebuilders. The requirement to provide smaller 1 and 2 bed units should not be a blanket policy across all sites. In that respect, my client provides a large range of house types and sizes. Their 4 and 5 bedroom units range from 1,200 sq ft to 2,800 sq ft and currently offer 14 different housetypes, ensuring a range and choice for customers, as well as creating a variety and mix in the aesthetic characteristics of their sites, yet can often encounter difficulties with this policy. My client undertakes extensive market research and the scale and mix offer on their sites should ultimately be led by market demand, not restrictive policies which result in requirements to deliver housetypes which have little demand for that particular area.

Finally in relation to Policy D4 – Historic Environment, whilst my client acknowledges the significant benefits which arise from Aberdeen’s unique built and cultural heritage, the Policy approach is very much focused on “protect and preserve” rather than the wider aims and aspirations of conservation-led regeneration, which allows for sensitive intervention. Whilst my client agrees that every effort should be made to retain and reuse listed buildings and buildings within conservation areas, there needs to be greater flexibility and provision within the wording to recognise that this may not always be possible in every instance.

Q. 2.9 - Meeting Affordable Housing Needs

The wording of Policy H5 should be amended to more properly reflect the requirements of Scottish Planning Policy (SPP). As worded it seeks to impose a minimum requirement across the City. Also, it does not provide flexibility for a reduction in exceptional circumstances.

The provision of affordable housing currently relies too heavily on the delivery of mainstream housing, with the onus placed on landowners to make land available for development. If an unacceptable burden is placed on land values there is likely to be a reluctance on the part of landowners to release land for development. Whilst the supporting text to Policy recognises this to an extent, concern must be expressed regarding the lack of flexibility in approach to delivery, as set out in the text and the associated Supplementary Guidance.

Off-site provision should be viewed as acceptable as onsite provision. In many instances, it is simply not viable to provide affordable housing on-site. This is particularly evident on smaller sites close to the city centre. For example, the factoring costs for shared amenities and open space provision are often not capable of being met by RSLs or the occupiers of affordable housing. CALA have experienced this on a number of their sites, where RSLs have failed to commit to the site as a consequence of the council tax payable and factoring costs. Therefore the existing “hierarchy” of preferred delivery mechanisms

contained within Supplementary Guidance should be removed, instead opting for additional flexibility and support for delivery across all mechanisms, whether on-site, off-site or commuted payments, depending on the circumstance. The key is the delivery of affordable housing in areas of need. Off-site provision and Commuted sums can therefore play an important role in the delivery of affordable housing, acting as a catalyst for delivery on specific sites. Accordingly, there should be a wider acceptance of the benefit of all forms of affordable housing delivery mechanisms, not the current overreliance on developers to meet 25% delivery on-site.

The LDP should be more pro-active in terms of identifying and allocating specific sites for affordable housing. Planning Advice Note 2/2010 promotes four additional or alternative means of delivering affordable housing, which could be considered by Planning Authorities. These include:

1. Allocating new sites in Local Development Plans specifically for affordable housing.
2. Identifying plots for self-build dwellings.
3. Using Compulsory Purchase powers to support the delivery of a new supply and regeneration.
4. Making appropriate surplus Local Authority land or buildings available for affordable housing.

Given the mechanisms available to Aberdeen City Council as set out above, this should be reflected through the Local Development Plan. Specific sites should be identified for the provision of affordable housing along with the preferred method by which they will be delivered. The alternatives also clearly support the principle of off-site provision, which should be better reflected in the LDP and associated Supplementary Guidance.

In considering off-site provision and the scale of commuted sums, the Supplementary Guidance makes reference to sub-market areas. This is unacceptable. Aberdeen City, along with its immediate hinterland lying within Aberdeenshire, comprise a single housing market area and it is not appropriate to divide this into sub-market areas. This policy approach is unwarranted and serves to stifle the delivery of affordable housing, rather than encourage it and my client would seek to have it removed from the next plan. Such an approach contravenes SPP and the Strategic Development Plan. If sub-market areas are to be adopted then the Strategic Development Plan should be identifying the housing requirement for those sub-market areas. There is a very real danger that the approach advocated could distort the housing market. Similarly, inconsistencies in the delivery of affordable housing and the calculation of commuted sums in those parts of the Aberdeen Housing Market Area lying within the City and Shire could also distort the market and favour development in certain areas over others. There should be a consistent joined-up approach applied throughout the Aberdeen Housing Market Area comprising both the City and part of the Shire.

A review of the commuted sums figures and the low cost home ownership benchmark should be undertaken in consultation with the development industry and the appropriate forum for that is through the Development Plan process. At present the commuted sum figures listed within the Supplementary Guidance are often in excess of the private plot values. It must be emphasised that any figure used should be for the duration of the Plan and not be subject to further increases, without a full and informed consultation with the housebuilding industry. My client also feels that the existing benchmark figures need to be reviewed to reflect a continuing surge in build costs, otherwise affordable housing delivery will continue to fail in reaching current targets.

Q. 2.11 Protecting and Enhancing the Natural Environment

Policy NE5 – Trees and Woodlands and its associated supplementary guidance needs to be substantially reviewed as it is not fit for purpose, placing overly restrictive policy and guidance which serves to stymie development across the city, rather than promoting a more flexible approach to tree management. The reading of the policy asserts that no development will take place if there is an impact on trees. Such an approach applied within the built up confines of a city, with established trees is entirely unworkable. There will undoubtedly be a requirement for tree management on both brownfield and greenfield sites, however it should be guided by appropriate mitigation strategies.

My client has had severe difficulties engaging with this policy and in particular the details within the Supplementary Guidance. A main area of concern is in relation to 8.4.2 “*Proximity of Structures and Infrastructure to Trees*”, which relates to their zone of influence. Strict application of this guidance would have serious implications for the wider delivery aspirations in relation to existing sites and allocations contained within the LDP. My client recently experienced an instance whereby replacement of an existing building with a proposed new building was resisted due to the existing building being located within the zone of influence, despite the existing building already being within the zone. Development proposals offer the opportunity to work with existing trees to promote sustainable tree management and supplementary landscaping and planting arrangements to ensure any potential loss is appropriately mitigated. My client would therefore reiterate that this policy needs to be reviewed and it would be beneficial to have input and advice from a third party arboriculturalist. Unless some degree of flexibility is provided, there is a danger it could lead to more rogue measures being adopted by individuals, such as felling unprotected trees on sites prior to lodging planning applications. This is a situation that needs to be avoided, therefore a serious review of this policy and guidance needs to happen.

My client would also request a review of existing LDP Policy NE4 – open Space Provision in New development, which stipulated that 2.8 hectares per 1,000 people of meaningful and useful open space must be provided in new residential development. Such a requirement advocates a “one size fits all” approach to all sites. This contradicts other parts of the Policy which, recognising the findings of Aberdeen’s Open Space Audit 2010, proposes a more flexible approach to identifying the exact level and mix of open space and being responsive to the level of existing provision, and its quality and accessibility, on a site by site basis.

Q. 2.12 Resource Management / Sustainability

CALA recognise the importance of addressing climate change, however, the requirements set out in Policy R7 – Low and Zero Carbon Buildings and Water Efficiency are too onerous, are not directly reflected within SPP and should, therefore, be more appropriately addressed through stringent Building Regulations rather than through the policies of the Local Development Plan, which should instead be directing the appropriate management of the use of land. The requirements for carbon reduction and the calculation of those reductions are a complex requirement and meeting these requirements at pre-planning stage is not necessary. The Policy is in effect stipulating similar measures as implemented through building warrant regulations which is in effective creating a duplication of work for my client.

The requirement to install low and zero carbon generating technologies in new residential developments does not flow directly from SPP. Instead, SPP encourages Local Development Plans to take a more holistic view through, for example, heat mapping to identify the potential for co-location of developments with a high heat demand with sources of heat supply. It advises that heat demand sites for particular consideration include high density developments, communities off the gas grid, fuel poor areas and anchor developments, such as hospitals, schools, leisure centres and heat intensive industry. The onus is, therefore, on the planning authority through their Local Development Plans to be more proactive in terms of identifying opportunities for co-location of development

CALA maintains that a “**fabric first**” approach should be adopted ahead of the requirement to install low and zero carbon generating technologies. Such technologies are often unproven and add significantly to the cost of development. This can further exacerbate viability issues for sites which already experience substantial development costs. Furthermore, the development industry is at the forefront of delivering sustainable and energy efficient new homes. More needs to implement schemes to improve older housing stock, which are much less energy efficient.

Similarly, water efficiency measures are more appropriately controlled through Building Regulations rather than through the Local Development Plan, which essentially controls the use of land.

Q. 2.13 – Additional Comments

Planning Obligations

My client maintains concern over the existing provisions contained within LDP Policy I1 – Infrastructure Delivery and Planning Obligations. Aberdeen City Council are increasingly utilising planning obligations as a roof tax on the development industry. Objection is also taken to the ever growing list of services and infrastructure which developers are expected to contribute to, which ultimately impacts on the viability of development projects and often results in long and protracted negotiations and significant and unnecessary delays through the preparation of associated S75 Agreements.

The wording of the existing Policy and Supplementary Guidance makes no reference to Scottish Government Circular 3/2012: Planning Applications & Good Neighbour Agreements nor the associated tests set out in that Circular, **all of** which must be met before Planning Obligations can be sought. As presently worded, Policy I1, its supporting text and the Supplementary Guidance on Planning Obligations do not properly reflect Circular 3/2012. The Circular highlights that Planning Obligations have a **limited**, but useful role to play in the development management process. This would imply that Planning Obligations should be the exception, rather than the rule. Unfortunately, my Client's experience is that Planning Obligations are sought on practically every development, covering a wide range of infrastructure requirements towards community facilities, education or healthcare, etc, even where there is a pre-existing capacity, particularly in relation to education and healthcare. CALA maintain that where there is existing capacity, there should be no obligations sought, as that would conflict with the tests of the Circular.

Greater transparency is required in relation to the methodologies used for calculating the cost of providing community infrastructure. At present the Policy and Guidance does not include sufficient provision to account for individual site and local circumstances. Additionally, if the cost of that infrastructure is ultimately less than the Planning Obligations made then there should be greater scope for the return of any unspent funds within an appropriate timescale.

CALA would also oppose any plans to seek an upfront payment of developer contributions, prior to any units being delivered on site. This is completely unacceptable. Any infrastructure requirements are created by houses being occupied, therefore payments must remain subject to completions and subsequent sales. There is no justification for any deviation away from this practice.

Energetica

Whilst my client recognises there has been a substantial investment which has been committed to creating a "world-class sustainable development corridor", however has reservations over the extent of development that has actually been delivered on the ground over the course of the last 10 years since its first inception. Rather than implantation of specific Supplementary Guidance which places over restrictive criteria for development within this region. These burdens are likely to deter development with developers focussing on established business and industrial parks elsewhere. For Energetica to be successful the focus should be on reducing bureaucracy and making it easier to secure planning permission and a more proactive approach could be achieved through the use of a Simplified Development Zone, which would tie in with the aspirations as set out through the recent Planning (Scotland) Bill.