



## Aberdeen Local Development Plan Review

### Main Issues Report Consultation Response

#### Question 1 – New Housing Sites

**Are there any other sites that would be suitable for housing?**

**Yes, bid reference: B0904 – Countesswells Wood**

#### Introduction

Our client wishes to promote bid reference B0904 – Countesswells Wood as a site that would be suitable for residential development, and contests the officers' conclusion that it is undesirable for allocation in the review of the ALDP.

#### Site assessment

The officers' assessment of bid reference B0904 confirms that the site is well sheltered by woodland to the north and west, while the site itself is south facing and relatively flat, with good drainage and no cultural heritage features that would constrain development here. It is also noted that there are no known contamination constraints and that utilities are understood to be available, as well as high speed broadband. On all these points, the site scored a maximum of 3, with this supporting the proposed allocation of the site for a residential development.

This notwithstanding, the assessment concludes that the site should remain as green belt on the basis that

*“Whilst the site is well sheltered, relatively flat and with a favourable aspect, its accessibility to facilities including shopping, health, recreation and education facilities is poor both in terms of proximity and connectivity, particularly in respect of sustainable means of transport such as walking, cycling and public transport links.”*

The assessment then goes on to state that:



*“The Proposed Strategic Development Plan asks the Local Development Plan to allocate a limited amount of housing land. These allocations should take place on brownfield sites and utilise the current “constrained” supply in the first instance. Reducing travel distances and making walking, cycling and public transport more attractive to people will be important considerations, particularly for any new greenfield development sites that are proposed. In addition allocations should be small scale in nature, and should not be extensions to any existing, strategic, development sites that have been subject to a masterplanning exercise (in this case Countesswells). Because of this, the allocation of this site is likely to be contrary to the Proposed Strategic Development Plan.”*

As set out below, our client strongly disagrees with that conclusion. In particular, the text quoted above expressly notes that the Proposed Strategic Development Plan (PSDP) supports small-scale allocations, with the reduction of travel distances particularly important where the allocation of new greenfield sites is proposed. In this regard, as expanded on further below, the allocation of this site is supported by the PSDP. At the same time, the site’s contained nature (with North Countesswells Road between this and the Countesswells development itself on one side, and woodland to the north and west), will allow it to retain its own identity while still providing connectivity between the two. As such, the proposed allocation should not be considered contrary to the PSDP.

With regards to the criteria against which the site has not scored the maximum of 3, it still scored relatively well (2) in terms of those set out below, with any concerns that were raised addressed as follows.

- **Landscape features** – as noted in the officers’ assessment, the site’s boundaries are defined by stone walls as well as mature trees in Countesswells Woods to the north and west, with these clearly demarcating and delineating the site. For the avoidance of doubt, these features would be retained as part of any development on the site, with any such development enhanced by them, and no negative impact on the features themselves. At the same time, these boundary features ensure that development on the site would not contribute to suburban sprawl beyond the site’s boundaries. As such, it is considered that the proposed allocation should be scored positively in this regard.
- **Relationship to existing settlement** – whilst the assessment notes that the site is adjacent to the Countesswells development site, it indicates that there would be some severance due to the road between the two areas. This however overlooks the fact that part of the existing Countesswells development is also to the west of North Countesswell Road, just north of the site to which bid reference B0904 relates on the other side of Countesswells Woods (with scope to provide pedestrian linkages



between the two through the woods). As such, it is not clear why this site should be considered to be any less well related to the rest of the Countesswells development than the land to the north is, and that this site should be scored positively in terms of its relationship to the existing settlement.

- **Land use mix** – the assessment indicates that the residential proposal would not contribute to better land use mix, but gives no reasons for coming to that conclusion. In this regard, it must be recognised that the PSDP expressly makes allowances for additional allocations be made for the period 2033 to 2040 in order to ensure the long-term maintenance of the housing land supply, and the allocation of this site for residential development would directly contribute to that. At the same time, residential development here would also support new shops and other facilities to be provided as part of the current development at Countesswells. Both these factors support the allocation of the site as proposed, particularly when compared with the fact that the site currently serves no useful or productive purpose, being too small to viably farm and, as set out in more detail below, having no particular natural heritage value.
- **Direct footpath/cycle connection to community and recreation facilities and resources** – whilst the assessment indicates that there are no pavement or cycle paths on the surrounding roads, the site’s location directly adjacent to phase one of the Countesswells development means that direct footpath/cycle connections could be provided through the site to new community and recreation facilities there. At the same time, there is scope for the provision of a footpath/cycle connection through Countesswells Wood to phase 2 of the Countesswells development to the north, and to provide an extension to the existing core path which connects Countesswells Wood and Hazlehead Park to tie in with the aspirational core path to the south of the site. It would therefore make a positive contribution to footpath/cycle connections in the area as a whole as a result.
- **Land use conflict** – in this regard, the assessment refers to major development under construction at Countesswells and forestry land adjacent to the site. However, for reasons given above, it is considered that these should be considered positive factors, as a result of which development would both be well contained and enhanced by the surrounding trees, while also being well connected to neighbouring development, services and facilities at Countesswells.

The main points about which the Council expressed any significant concerns are then those set out below, each of which is addressed in turn.



- **Natural conservation** – the assessment raises a number of nature conservation concerns, in response to which it should be noted that:
  - River Dee Catchment Area – while it is recognised that the site is within the catchment area, there are no water courses in or adjacent to the site that would feed into the River Dee, and so no reason why this would impede development on the site.
  - Ancient Woodland – while the ancient woodland to the north and west of the site is noted, this is outwith the boundary of the site and would not in any way be affected by development here. Conversely, development of the site would create opportunities for improved and extended pathways through the ancient woodland, allowing more people to appreciate and enjoy this. The same applies to any priority habitat.
  - Red Squirrels and Red Kite – again, while there may be red squirrels and red kite in the habitats outwith the boundary, there are no trees within the site itself, and so there is no scope for either species to be found here. As such, there is no risk of any development on the site having any impact on these.
  - Green space network – on the basis of the information above (in particular the absence of any trees, other natural habitats or protected species on the site), this currently contributes little to the green space network. Conversely, sensitive development of the site would allow for the incorporation of features to improve biodiversity here, including through new amenity planting.
- **Landscape fit** – in this regard, the assessment states that part of site is in the Lower Deeside Character Area, while the other part is in the West Aberdeen Character Area, but gives no reasons as to why this would impede development here. In any event, SNH’s digital map-based national Landscape Character Assessment identifies the site as being located within the Wooded Estates Character Area, the key characteristics of which are described as including views being short range and strongly contained by woodland, as are residential buildings in the area. The development of this site, with residential buildings contained within the surrounding woodland, would be wholly in keeping with the landscape character of this area.

The assessment then goes on to state that the site would be disjointed from the main Countesswells opportunity site, and separated by a road. Again though, this overlooks the fact that part of the existing Countesswells development is also to the west of



North Countesswells Road, just north of the site to which bid reference B0904 relates on the other side of Countesswells Woods.

In light of the above, and given that the site would both be well screened by existing trees and consistent with the existing pattern of development (within which development at Countesswells extends to both sides of North Countesswells Road), the site should be assessed positively in terms of landscape fit.

- **Accessibility** – the assessment here states that there are no pavements and no cycle lanes. While recognising that development at Countesswells will bring changes in terms of public transport provision, the assessment does not then afford any weight to this. As also set out above, the site’s location directly adjacent to phase one of the Countesswells development means that direct footpath/cycle connections to this could be provided through the site, including access to bus stops within the development. As such, the site should be assessed positively in terms of accessibility.
- **Proximity to facilities (shopping/health/recreation) and employment opportunities** – again in the context of both of these criteria, the assessment does not seem to have given any weight to current development at Countesswells, and the facilities and employment opportunities which will be available here. Specifically, as set out in the Countesswells Development Framework, this is expected to provide a mix of office space, retail and leisure uses, as well as civic and community uses such as a GP surgery, dentists and pharmacy, all within easy walking or cycling distance of the site. With development there currently underway, there is no justification for not taking this into account when considering the suitability of the proposed site and, when it is taken into account, the site requires to be assessed positively in terms of its proximity to both facilities and employment opportunities.
- **School capacity** – finally, the assessment also does not seem to have given any weight to current development at Countesswells when looking at school capacity, referring only to existing capacity at Cults Primary and Cults Academy rather than taking the new Countesswells schools into account. Again, when the new schools are taken into account, it is hard to see how any capacity concerns can arise.

## Conclusion

For the reasons set out above, as well as those given in our client’s initial response to the call for sites, it is submitted that the officers’ reasons for concluding that the site is undesirable are not justified and that the site should be allocated for residential development as set out in the bid.

