

# Response ID ANON-B3JU-DSVP-H

Submitted to **Local Development Plan Main Issues Report 2019 Consultation**  
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## About You

### What is your name?

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### What is your organisation?

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**On behalf of:**

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## How to Complete

### 1 Introduction

#### Section 1 provides a context for the Main Issues Report Do you have any comments in relation to this section?

**Do you have any comments in relation to this section?:**

No issues with this section. However, I'm left wondering how future LDPs/Local Place Plans will be guided given the lack of a Strategic Development Plan in future.

### 2 Settlement Strategy

#### Question 1 New Housing Sites

**Do you agree with our preferred housing sites? Are there any other sites that would be suitable for housing?:**

I agree with the preferred housing sites in my area, including Kingswells, Sheddocksley Maidencraig and Countesswells. I have some reservations about the desirability of site B03/20 on Old Skene Road (see later comments). The other sites proposed by developers have been rightly classified by Aberdeen City Council as "undesirable".

I agree that there is already a generous supply of housing land allocated to Aberdeen City. It is appropriate that site allocations from the existing (2017) LDP are being taken into account.

I support the statement that brownfield sites should be prioritised, and that any greenfield housing allocations should be small-scale.

#### Question 2 Housing Allowances Beyond 2032

**Is there a need for us to identify further Housing Allowances or sites for the period beyond 2032?:**

Given current economic uncertainties, there is no need at this stage to identify further housing allowances or sites for the period beyond 2032.

#### Question 3 Brownfield and other Opportunity Sites

**Are there any further brownfield or other opportunity sites which would be suitable for redevelopment?:**

#### **Question 4 New Healthcare Facilities**

**Do you have any comments on these sites? Are there any other sites in these areas that we should be considering?:**

### **3 Aberdeen City Centre and the Network of Centres**

#### **Question 5 City Centre Boundary**

**Do you agree the Local Development Plan should modify its City Centre boundary to match the City Centre boundary shown in the City Centre Masterplan?:**

This seems sensible.

#### **Question 6 City Centre Masterplan Intervention Areas**

**Do you agree that the City Centre Masterplan intervention areas should be identified as opportunity sites within the Local Development Plan?:**

#### **Question 7 City Centre Retail Core**

**Should the retail core be reduced to focus on a more compact area of Union Street and the existing shopping centres?:**

The City Centre, especially Union Street, needs to be re-vitalised and spruced up. The variety and quality of shops on Union Street has become very poor due to the high business rates. Partial pedestrianisation and lower business rates would help the deteriorating situation on Union Street.

Shopping centres in the City Centre should not be widely dispersed but kept within reasonable walking distance of each other. However, unless public transportation to outlying areas is much improved, sufficient car-parking will need to be included in the City Centre to enable shoppers to carry things home. Dispersing retail centres too much (e.g. to the beach area) only encourages car use.

#### **Question 8 Union Street Frontages**

**Should the Union Street Frontages percentages be reviewed? Do the current target percentages ensure there is a balance between a strong retail focus and allowing for other uses? What other uses should we allow on the retail core area of Union Street:**

#### **Question 9 Out of Town Retailing**

**Should we direct high footfall uses to existing centres including the City Centre? Should we consider new out of town retail parks? What would the impact of these be on Union Street and the City Centre, and Aberdeen's network of centres?:**

Out-of-town retail centres should be discouraged except where they are essential to ensure sustainable local communities. In such cases, they should be contained as far as possible within the communities themselves and not built on undeveloped Green Belt. Any new out-of-town retail which is considered essential must not add to traffic congestion on roads that are already very busy.

#### **Question 10 Commercial Leisure Uses**

**Should we continue to direct commercial leisure uses towards existing centres and the beach and leisure area?:**

Yes, don't disperse large-scale leisure developments to other areas (see response to Question 7). However, this should not preclude the development of small-scale leisure facilities in sustainable peripheral communities which require them.

#### **Question 11 City Centre Living**

**How can we encourage more people to live in the City Centre? Would a document outlining the principles which need to be applied in converting a building into residential use be helpful?:**

This should be encouraged but only if a healthier environment can be created in the City Centre. Air pollution from traffic will need to be substantially reduced. The conversion of buildings from commercial to residential use will have to include good sound insulation and appropriate security measures.

### **MAIN ISSUE 1 Living in the City Centre**

**Should we include a policy in the Local Development Plan supporting residential development in the City Centre, including the conversion of upper and basement floors of premises to provide residential accommodation?:**

Yes, but only if the conditions in Question 11 can be met. Potential fire risks from shops above or below residential accommodation is another consideration. So also is waste disposal on the street. Below-pavement recycling bins that are used in some French cities might be worth considering.

Option 2 - Preferred Option

#### **Question 12 Residential Development in the City Centre**

**Are there any other locations within the City Centre where residential accommodation could be provided?:**

### **MAIN ISSUE 2 A 24-Hour City**

**Should 24-hour activities in Aberdeen be supported and encouraged to grow, especially in the City Centre? Could this be achieved through policy?:**

Clearly there is some potential for conflict between the 24-hour city idea and encouraging more people to live in the City Centre. Younger people may find City Centre living an attractive option but it is less likely to appeal to those with families, or to older people.

How will amenity for residents be assured, especially during night time ? Stricter regulations and policies, e.g. on licensing, may be needed in some areas to encourage a broader range of potential residents. (See also response to Question 11)

Option 2 - Preferred Option

### **Question 13 Encouraging the Creative Arts**

**What can we do to support and encourage the creative sector to ensure a range of distinctive experiences so that Aberdeen City Centre is like no other place?:**

### **Question 14 Proposals for Creative Arts**

**Are there other buildings or areas within Aberdeen that could accommodate the existing, and support an emerging creative sector for desk-based and studio-based artists?:**

### **Question 15 Percent for Art**

**To ensure Aberdeen City Centre retains its distinctiveness, should developments with construction costs of £1 million or over be required to allocate at least 1% of construction costs for the inclusion of art projects in a publicly accessible/ visible place or places within the development?:**

Yes, definitely, though 1% is a very modest contribution.

New buildings themselves need to be more imaginative and interesting in design. There are too many "glass boxes" that are purely functional rather than "artistic". Councillors need to visit places like Barcelona or Berlin to see what truly "artistic" cities look like.

## **MAIN ISSUE 3 Support for Visitor Attractions**

**To support our existing visitor attractions should Aberdeen have a policy about protecting and growing visitor attractions?:**

Aberdeen needs to do more to promote itself as a "cultural" city. The City Centre especially has a good number of cultural and historical attractions including the art gallery and museums. I think these could be better advertised and "joined up" into trips involving walking tours or bus tours. Throughout the City, there is a visual beauty in all the granite buildings themselves. Union Street itself is fairly unique but needs improvements to make it more appealing to visitors.

It is a pity that the main harbour area is so closed-off to visitors as many would probably find it interesting.

Road signage could be improved to divert passing tourists off the AWPR and into the city. The new harbour at Nigg will need to be immediately welcoming to cruise passengers with quick transport available into the city.

Option 2 - Preferred Option

## **4 Quality Places**

### **MAIN ISSUE 4 Minimum Internal Space Standards for New Residential Development**

**How can we ensure that new residential development delivers an adequate amount of internal floor space for future occupants?:**

Floor space in some new homes is unacceptably small. A good example is the categorisation of some bedrooms as "double" when they are barely large enough to accommodate a double bed. Firmer minimum standards are required. They should not be voluntary.

Option 2 - Preferred Option

### **Question 16 External Space Standards**

**Do you think that the amenity spaces currently delivered are of a sufficient quality? Should we strive for a better quality/ quantity of private/ semi-private residential amenity space across the city and refuse planning permission to proposals which do not meet our high standards? What standards would you like to see set for new dwellings, flats, and conversions in respect of quality and quantity of external amenity space?:**

The closeness of quality green spaces, even small areas, has been shown in research to improve people's health and wellbeing. Masterplans for new developments should include at least 40% green spaces to include play areas, parks, wildlife areas, etc. The plans for Chapelton of Elsick and Countesswells are good examples of this.

Some green spaces in and around the city are "over-managed" and provide little interest in terms of biodiversity. Where possible, they should include some "wild" areas.

### **Question 17 Natural Environment**

**Do you agree that the proposed list of policies for Natural Environment gives a clearer and more coherent structure than at present?:**

Promoting opportunities to create "new" natural environments is very important. For example, a field of plain grass might have very limited biodiversity value but, with imagination, be converted to incorporate woodland planting, water features, wild area, etc within a development zone.

Wildlife corridors are important should be included in all masterplans. To be effective, they need to be continuous for as far a distance as possible and not obstructed by buildings.

Wet areas can be very important to wildlife. Drainage systems built into developments should, as far as possible, be designed to include any pre-existing boggy areas. At Prime Four, for example, a boggy area was transformed very effectively into a small lake. Some SUDS systems only incorporate dry grassy "craters" with zero wildlife value. Developers should be encouraged to be more imaginative with SUDS and include wet areas and pools for wildlife. There is no shortage of national guidance available on how to do this.

Environmental assessments done as a pre-requisite to developments are conducted by experts at specific times of the year. Although they are valuable they are limited in scope because they only provide a "snapshot" of the local biodiversity. Wildlife present at other times of the year is often missed and not included in the surveys. Environmental surveys need to be supplemented by local knowledge provided through consultation. Local advice should be taken seriously.

Urban green spaces should not be over-managed (see Q16). Expansive areas of cut grass can provide space for recreation but have very little biodiversity value.

When trees have to be felled, they should be replaced by at least one new one to help tackle air pollution and climate change.

### **Question 18 Food Growing**

**How can the Local Development Plan support the delivery of food growing projects in the City? Do you think food growing should be included in the next Plan by way of a new policy, or through existing policy and guidance?:**

This is a good idea to help give people exercise and an interest in their environment. It is good for people's health and well-being. However, it should go hand-in-hand with improving air quality in the city to ensure that the food grown is free from contamination.

"Vertical farms" that use hydroponics and solar/artificial light for food growing should also be considered in the City as they are economic of space and close to consumers.

The environmental challenges ahead in the next 10-15 years are pressing and the City needs to be imaginative !

## **5 Transport and Infrastructure**

### **Question 19 City Centre Parking**

**Should we reduce car parking in the City Centre to support the City Centre Masterplan? If so, how?:**

This is currently very difficult to do because bus services in/out of the city are often poor and too slow to be a viable alternative to the car. Introducing express bus services with few stops from the peripheral park-and-ride sites could help.

Reducing parking spaces will only encourage people to use out-of-town shopping centres.

Ultimately, as we move more to electric and alternative fuel vehicles, air quality in the city centre should improve. In time, City Centre parking should become less of an issue.

### **MAIN ISSUE 5 Electric Vehicle Charging Infrastructure**

**How best can we encourage the provision of infrastructure to support changes in transport technologies? :**

THIS IS CRUCIAL. At present there are not nearly enough electric charging points for vehicles in and around the city. The situation is not being treated with enough urgency. Many more rapid charging points are needed for the transformational change that will be needed over the next 10 years. All new developments should have the necessary infrastructure inbuilt from the start with easy connect-up facilities to encourage residents to "go electric". Many more charging points will be needed in public parking areas and at park-and-ride sites so that vehicles can be charged up while people are at work, shopping, etc. This could reduce the need for on-street charging points in residential areas.

The introduction of hydrogen-powered buses in the city is a good thing. It would be better, however, if the hydrogen was produced from sustainable sources and not fossil fuels. The City should also keep up with emerging developments in hydrogen-powered cars and be able to respond with the necessary infrastructure.

Option 2 - Preferred Option

### **Question 20 Digital Infrastructure**

**Should high speed broadband be mandatory in all new residential developments with 5 or more units? Do you wish to suggest any other proposed changes to the Digital Infrastructure and Telecommunications Infrastructure policies?:**

Yes, this should be the requirement for all developments of 5 or more units. However, there is also a need to ensure that homes on the rural fringes of the City have easy access to high-speed broadband, especially those which run small businesses.

Copper-from-the-cabinet broadband needs to be replaced by full-fibre to all properties in the City area as soon as possible. Priority should be given to residents who rely on fast broadband for work purposes.

5G technology should be introduced as quickly as possible to help keep the City competitive with others.

### **Question 21 Developer Obligations and Infrastructure Delivery**

**Do we need to change our approach to securing developer obligations for future development proposals?:**

The key principle should be the need to build sustainable communities and not just houses.

Developers' contributions have often been paltry when set against the profits they are making. Developers should not be able to wriggle out of contributions on the grounds that they are too expensive.

Developer contributions should be focused on the immediate area affected and not hived off to support general needs within the Council budget.

New developments, if not properly planned, can be very disruptive and costly to the travelling public, sometimes resulting in long detours for road traffic. (The very lengthy road closure at Countesswells last year is a prime example). The onus should be on developers to minimise disruption and compensate drivers, e.g. by paying for road improvements.

## **6 Resource and Business Policy**

### **MAIN ISSUE 6 Low and Zero Carbon Generating Technologies and Water Efficiency**

**Should the requirement of existing Policy R7 be changed?:**

Aberdeen should be doing much more to help meet/exceed international obligations on carbon reduction. This is especially the case since the production of oil and gas, which is important to Aberdeen, is simply 'exporting' emissions elsewhere.

The main focus of developers has been on insulating new buildings to a suitable standard. This is very important but not enough. There needs to be a much greater emphasis on incorporating solar technologies and heat pumps rather than heating with fossil fuels.

Commercial buildings (e.g. at Prime Four) are often lit and wasting energy unnecessarily during night time. The Council should be working with employers to try to discourage this practice.

Option 3 - Alternative Option

### **Question 22 Low and Zero Carbon Generating Technologies and Water Efficiency**

**What methodology should the Council use in calculating compliance with Policy R7, specifically how should the target of reducing carbon dioxide levels be calculated?:**

How does Aberdeen take account of the oil and gas industry when calculating the City's contribution to emissions ?

The City needs to take account of the impact of the AWPR on total emissions. Emissions may have been reduced in the City Centre but will have been increased in the outskirts.

### **Question 23 Solar Farm Developments**

**Do you agree that Solar Farms should be supported within the Council's policy on Renewable and Low Carbon Energy developments, and should specific guidance be included within Policy R8?:**

There is certainly a place for solar farms, provided they are not sited in areas of landscape value. Brownfield sites are preferable. However, sheep, chickens, etc. can be grazed within solar farms and they can also double as sites for food production.

"Vertical" farms that use solar energy for food growing should also be considered in the City as they are economic of space.

The environmental challenges ahead in the next 10-15 years are pressing and the City needs to be imaginative !

### **MAIN ISSUE 7 Heat Networks**

**Should we include a policy in the Local Development Plan supporting the development of Heat Networks within the City?:**

Heat networks are a good idea but current practice is not compatible with steps to reduce emissions. New technologies such as heat pumps need to be considered as an alternative source of the heat.

The new Energy from Waste plant should not be burning materials that can be recycled or used for another purpose (e.g. road surfacing). Emissions need to be minimised.

Option 3 - Alternative Option

### **Question 24 Supporting Business and Industrial Development**

**Should we carry forward our current policy approach to safeguarding existing business and industrial areas from other development pressures into the next Local Development Plan?:**

Yes. Employment sites should be protected.

### **MAIN ISSUE 8 West End Office Area**

**Should the policy support a mix of uses in the West End Office Area? If so, what types?:**

Option 2 - Preferred Option

## 7 Affordable Housing

### Question 25 Affordable Housing

**Do you agree with the Local Development Plan's current affordable housing approach being carried forward? What other measures could the Council consider in order to assist with the delivery of affordable housing units via the Plan? Should the threshold of not applying affordable housing requirements to developments smaller than 5 units remain in place?:**

I agree that the requirement for affordable housing should not apply to developments smaller than 5 units. For larger developments, the target of "generally no more than 25%" is weak. Does that mean 1% would be acceptable ? Being able to wriggle out of a 25% commitment on the basis of profit is not acceptable and is debarring people with less money from living in certain parts of the City. This "wiggle room" just encourages inequality and prevents social mobility.

### Question 26 Private Rented Accommodation and Build to Rent

**Are there ways that the Local Development Plan can facilitate Build to Rent development, through policy?:**

## 8 Sustainable Mixed Communities

### MAIN ISSUE 9 Inclusive Housing Mix (Housing for the Elderly and Accessible Housing)

**How can the Local Development Plan ensure a greater mix of housing types is achieved in new developments?:**

Developers are not building nearly enough homes suitable for the growing elderly population (eg. small bungalows with small, manageable gardens, or flats with lifts). Current housing mix policy is not firm enough to address this need. A percentage requirement is needed for all new developments (cf. affordable homes) based on an analysis of local need and demand.

Option 3 - Alternative Option

### MAIN ISSUE 10 Residential Care Facilities

**How should the Local Development Plan cater for proposals relating to Residential Care Facilities?:**

Not Answered

### MAIN ISSUE 11 Student Accommodation

**How can the Local Development Plan cater to proposals relating to student accommodation?:**

Not Answered

### MAIN ISSUE 12 Houses in Multiple Occupation

**How can the Local Development Plan support sustainable mixed communities, with regards to HMOs?:**

Not Answered

**Percentage limit of HMOs in each area:**

**Please explain why you chose your answer:**

**Geographical boundary of each area:**

**Please explain why you chose your answer:**

**Threshold for when planning permission is required for a HMO:**

**Please explain why you chose your answer:**

### Question 27 Community Planning

**Is there anything else that the Local Development Plan can do to support the objectives of the LOIP or the aims of Community Planning?:**

### Question 28 Changing Places Toilets

**Should large new developments that require public access provide Changing Places toilets? What types of venues should provide them?:**

## Appendix 1 Proposed Draft New Policies

### Policy D2 Amenity

**Do you have any comments on the policy?:**

**Policy D5 Advertisements and Signage**

Do you have any comments on the policy?:

**Policy D8 Shopfronts**

Do you have any comments on the policy?:

**Policy D9 Windows and Doors**

Do you have any comments on the policy?:

**Policy H4 Housing Mix and Housing for Particular Needs**

Do you have any comments on the policy?:

**Policy H8 Residential Care Facilities**

Do you have any comments on the policy?:

**Policy H9 Student Accommodation Developments**

Do you have any comments on the policy?:

**Policy H10 Houses in Multiple Occupation**

Do you have any comments on the policy?:

**Policy NC9 City Centre Living**

Do you have any comments on the policy?:

**Policy NC10 24-hour City**

Do you have any comments on the policy?:

**Policy NC11 Visitor Attractions and Facilities**

Do you have any comments on the policy?:

**Policy NC12 Public Art Contribution**

Do you have any comments on the policy?:

**Additional Documents**

**Please include comments on other documents below:**

**Please include comments on other documents below::**

DEVELOPMENT BIDS ASSESSMENTS

GENERAL FACTORS RELATED TO THE KINGSWELLS AREA

1.

Most of the bid sites in the Kingswells area have been submitted by developers in previous LDPs and were classed as unsuitable by both Aberdeen City Council and the Scottish Government Reporter. The Reporter stated in the previous LDP round that:

"It is generally not helpful to the certainty that the development planning system is intended to provide to revisit the principle of development on sites that have been considered through earlier equivalent processes unless circumstances have clearly and significantly changed."

As circumstances have not "clearly and significantly changed" in Aberdeen in a way that would require major new developments, it is clear that some developers are simply ignoring this request.

2.

I fully agree with the following statement in the MIR.

"The proposed Strategic Development Plan expects us to prioritise brownfield sites. Any greenfield housing allocations should be small, have limited impacts on the environment and infrastructure and should not be extensions to existing sites identified in the Aberdeen LDP 2017."

Clearly, some developers have also ignored this request.

3.

Kingswells doesn't need further expansion to make it sustainable - it is already perfectly sustainable as a community.

4.

Previous developments have been controlled to ensure minimal impact on the landscape setting and separate identity of Kingswells. Most of the community lies in a hollow and the highest areas of housing are well concealed by mature woodland. The current development at Countesswells exemplifies good practice in planning as it will have minimal impact on the surrounding landscape.

5.

The opening of the AWPR has brought advantages but has increased traffic volumes on the A944 which was already a very busy road. The perimeter road (C89) around Kingswells is a little less busy since the opening of the AWPR. However, traffic volumes on both the A944 and the C89 are only bound to increase as developments take place at Countesswells, Kingsford and the Newhills Expansion. More car-dependent developments in Kingswells will only add to the local traffic situation.

6.

Previous development plans have aimed to protect the individuality of communities and prevent their coalescence into one large conurbation. The green belt between Kingswells and the rest of the City is already going to be reduced by the masterplanned developments at Maidencraig, Greenferns and the Newhills Expansion. This makes it even more important to protect what green belt remains.

7.

The capacity of Kingswells Primary School to cope with additional housing has been a long-standing issue for the local community. The school should not be forced into dealing with excessive class sizes and constraints on accommodation that harm the quality of the children's education.

#### SPECIFIC BID SITES

##### B03/02 GILLAHILL

\* I agree with Aberdeen City Council that this site is undesirable.

\* Gillahill has been a very contentious site for the last 30 years. It is valued by many local people as a "green lung" of countryside between Kingswells and the rest of the City. In a previous LDP consultation there were over 500 individual objections to its development from people in Kingswells. It has been rejected by Scottish Government Reporters in previous LDPs.

\* The site comprises land that is actively farmed.

\* The number of homes planned (650) far exceeds the expectations set out in the Strategic Development Plan.

\* Development at Gillahill would cause further erosion of the greenbelt between Kingswells and the rest of the City. Strategic Development Plans have advised against the coalescence of communities.

\* The countryside at Gillahill affords excellent views of Aberdeen, the sea, and up into Buchan especially from Core Path 29 which is very popular with walkers. A housing development on the site would deny these views to the general public and restrict the views to a minority of properties within the development.

\* Interesting historical features including the Resurrectionists' burial site and Gillahill Farm with its historic chimney stack would be obscured from view by the surrounding houses.

\* The site is not energy-efficient. It is high up and exposed to northerly winds. The northern half of the site slopes to the north/north-east.

\* The development would be very visible on the landscape when viewed from the north. The tree belt on its northern edge is too low to conceal most of the site.

\* The development would be largely car-dependent. The nearest bus service is slow and inconvenient for commuters travelling into the City. Based on the developer's own plans for streets and pathways, the walking distance to the nearest shops and services in Kingswells would be about 980m from the centre of the development but 1270m to 1400m from the eastern and south-eastern parts of the development. Cycling distances would be similar.

##### B03/03 SUNNYFIELD

\* I agree with Aberdeen City Council that this site is undesirable.

\* Although the development site is relatively small and south-facing it encroaches onto the higher land of Newpark Hill which would make it very visible from the A944 and detract from the landscape setting of Kingswells. Houses will breach the skyline when viewed from the A944.

\* Road access would be from the Old Lang Stracht which is a 2-way bus lane. Traffic entering/exiting the site, when combined with traffic from the current development at Huxterstone, will impede buses using the Lang Stracht and further increase bus journey times. This will only discourage people from using the buses.

##### B3/05 GATESIDE FARM

\* I agree with the Aberdeen City Council that this site is undesirable.

\* The site is just an extension of Maidencraig which has already been masterplanned.

\* The site will contribute to the potential coalescence of Kingswells and Maidencraig along the A944.



\* The site spans the Den Burn valley and will curtail its function as a wildlife corridor.

\* Access arrangements are not clear.

#### B03/06 HUXTERSTONE

\* I agree with Aberdeen City Council that this site is undesirable.

\* The site is yet further encroachment into the greenbelt separating Kingswells from Maidencraig.

\* The site is south-facing but this does not justify the very detrimental impact it will have on the landscape setting of Kingswells. The rolling green valley of the Den Burn is a very attractive topographical feature when viewed from the A944. It is a continuation of the Ice Age glacial outwash channel to be seen in the Den of Maidencraig Nature Reserve and is a valuable landscape feature of the City as a whole.

\* The site will be largely car-dependent. The walking/cycling distance to Kingswells shops and services and Kingswells Primary School is about 1400m from the centre of the development site using the shortest route.

\* Road access would be from the Old Lang Stracht which is a 2-way a bus lane. Traffic entering/exiting the site, when combined with traffic from the current development at Huxterstone, will impede buses using the Lang Stracht and further increase bus journey times. This will only discourage people from using the buses.

\* When the existing development at Huxterstone was approved in the 2017 SDP it was promised that the westernmost of the two fields concerned (currently used by the developer for a temporary site access road) would be returned to its original state. Clearly, this was never the developer's intention.

\* The road layout shown in the plans is particularly troubling as it implies that the developer intends to build even further along the Den Burn valley in future.

#### B03/09 DERBETH

\* I agree with Aberdeen City Council that this site is undesirable.

\* The number of homes planned (700) far exceeds the expectations set out in the Strategic Development Plan.

\* The eastwards-sloping site is a key part of the landscape setting of Kingswells and is highly visible from vantage points in Kingswells and other vantage points further away to the north and east. It "fronts" the very distinctive feature of Brimmond Hill which is a country park, an important landmark, and the highest hill within Aberdeen City.

\* Much of the site is currently classed as Green Space Network. The land is actively farmed.

\* The C89 perimeter road around Kingswells was described by the Reporter in the previous LDP round as forming a "strong green belt boundary". Accepting the AWPR as the new green belt boundary at this stage in Aberdeen's development would set a precedent for other building up to the AWPR which the Councils promised would not become a development corridor.

\* 700 new homes will simply reinstate traffic pressure on the C89 which has been relieved somewhat by the opening of the AWPR. In future the Newhills Expansion will add further pressure on this road.

\* The site has no obvious connection with the rest of Kingswells as it is separated from it by the C89 perimeter road. For safety, new junctions with the C89 would have to be controlled by traffic lights.

\* The development would be largely car-dependent. Walking/cycling distances to Kingswells shops and services would range from around 800m for the southern half of the site to 800-1600m for the northern half. Traffic on the C89 is likely to discourage pedestrian or cycling journeys from the development into Kingswells. The bus service in Kingswells is already very limited. There is no guarantee that a new bus service would be provided for a separate part of Kingswells.

\* In terms of people's health and wellbeing, it is not good practice to build homes so close to a major trunk road (AWPR) with the attendant problems of traffic noise and wind-blown air pollution. Tree screening alongside the AWPR will take years to mature and become effective.

#### B03/10 PRIME WEST

\* I agree with Aberdeen City Council that this site is undesirable.

\* Kingswells Community Council has already objected to the development of this site for retail. I agree with the objections they submitted. The main problems are to do with increased traffic on the A944, pedestrian safety and competition with City Centre retail.

#### B03/11 PRIME FOUR NORTH

\* I agree with Aberdeen City Council that this site is undesirable.

\* Because the site is low-lying so it would have less impact on the landscape than Derbeth (B03/09). However, the agricultural setting of the historic consumption dyke is important. The dyke would be largely obscured from view when travelling southwards on the C89.

\* The C89 perimeter road around Kingswells was described by the Reporter in the previous LDP round as forming a "strong green belt boundary" on the western edge of Kingswells. Like Derbeth (B03/09) this development would breach that boundary.

\* On its western edge the development runs up against the West Hatton Local Nature Conservation Site. This will affect the integrity of the nature site and a wide separation buffer would be required.

\* The development has no real connection with the rest of Kingswells due to its isolation on the other side of the C89. The walking/cycling distance to Kingswells shops and services is not excessive but a safe pedestrian crossing point would be required on the C89.

\* The pedestrian link to Kingswells Centre shown on the plans will entail a loss of trees on the east side of the C89.

\* An additional junction controlled by traffic lights would be required on the C89 at the access to the development. This would give a total of 4 sets of traffic lights over a distance of 1400m between here and the Kingswells Roundabout.

#### B03/12 EAST KINGSFORD

\* I agree with Aberdeen City Council that this site is undesirable.

\* It further erodes the green belt between Kingswells and Westhill and only contributes to the conversion of the A944 and the AWPR into development corridors.

\* The development will be largely car-dependent. It will add to the growing traffic congestion at the Kingswells South roundabout on the AWPR.

\* Due to its location, the pedestrians most likely to use the shop(s) are football supporters. This will just encourage supporters to use the dangerously narrow walkway along the busy A944.

#### B03/14 MAIDENCRAIG NORTH WEST (1)

\* I agree with Aberdeen City Council that this site is undesirable.

\* It is just an "add-on" to the Maidencraig development which has already been masterplanned.

\* It will contribute significantly to further erosion of the green belt and coalescence of Kingswells with the rest of the City. Popular Core Paths run along the site's northern and western boundaries. The value of these paths for outdoor recreation will be diminished.

\* It will impinge on the landscape setting of Newpark Hill which is a prominent feature when travelling westwards from Sheddocksley along the Lang Stracht.

\* The north-east section of the development area includes part of the 'community woodland' that was planted some time ago in the green belt between Sheddocksley and Kingswells. This woodland is not shown on the developer's plans. This area is currently Green Space Network. It is not clear how this woodland will be protected.

\* Traffic on the A944/Lang Stracht will be substantially increased. Bus transport that benefits from the 2-way bus lane along the Old Lang Stracht will be impeded, further increasing bus journey times. This will only discourage people from using the buses.

#### B03/15 MAIDENCRAIG NORTH WEST (2)

\* I agree with Aberdeen City Council that this site is undesirable.

\* The same objections apply as for B03/14.

#### B03/20 LAND AT OLD SKENE ROAD ADJACENT TO A944

\* It is difficult to decide if this site is desirable.

\* In terms of public health, is it good practice to locate new homes so close to the A944 with its attendant problems of road noise and air pollution? (The A944 has become busier since the opening of the AWPR and traffic is likely to increase even more with developments at Countesswells and Kingsford).

\* Housing would overlook the Den Burn valley which needs protected from further development. If the new homes did not exceed 2 storeys and had tree screening on the east side they could be acceptable.

\* The site is currently green belt that helps to prevent Kingswells coalescing with the rest of the City. A real concern is that development on this site could be used by other developers to justify extending development for the same distance eastwards on the north side of the Den Burn valley. This would be highly undesirable.

\* The site will be car-dependent as it is distant from shops and services in Kingswells and from Kingswells Primary School.

#### B03/21 HUXTERSTONE

\* I agree with Aberdeen City Council that this site is undesirable.

- \* It would occupy a very prominent position on the side of Newpark Hill and be damaging to the landscape character of Kingswells. Housing will breach the skyline when viewed from the A944.
- \* The site is a another incursion into the green belt that helps to protect the individual character of Kingswells and prevent coalescence with the rest of the City.
- \* Access to the development would be from the Old Lang Stracht. This road is primarily a 2-way bus lane which now also serves as an entry/exit point for the existing development at Huxterstone. Traffic entering/exiting B03/21 will further impede buses using the Lang Stracht and increase bus journey times. This will only discourage people from using the buses.

#### B09/26 HUXTERSTONE

- \* I agree with Aberdeen City Council that this site is undesirable.
- \* The site is north-facing and quite steep so it is not energy-efficient.
- \* The prominent grassy slopes up to Kingshill Wood are a landscape feature of the area when viewed from the A944 and vantage points to the north.
- \* This development will contribute further to building a development corridor along the A944, blurring the individual characters of Westhill and Kingswells and encouraging their future coalescence.
- \* Access would be off the A944 and traffic volumes entering/leaving the site are likely to be high. The A944 is a very busy road, with congestion common at peak times. Traffic on the road has increased since the opening of the AWPR and is likely to increase even further with the developments at Countesswells and Kingsford.
- \* It is not clear why this site has been chosen for a healthcare facility and commercial uses when ample employment land is still available within the Prime Four site opposite. Indeed, there was a previous application for a healthcare facility on the Prime Four site some time ago.

#### B10/03 LAND AT PHASE 1 NE COUNTESSWELLS

- \* I agree with Aberdeen City Council that this site is undesirable.
- \* It is essentially just an "add-on" to the large masterplanned site at Countesswells which still has plenty of land available for development. The nearby masterplanned site at Maidencraig also has plenty of land still available.
- \* All of the site is currently Green Space Network. Developing the site will entail removing a considerable area of woodland with potential harm to wildlife.
- \* The development will add even more traffic to the A944 and Skene Road.

#### B10/04 JESSIEFIELD AND SMITHFIELD

- \* I agree with Aberdeen City Council that this site is undesirable.
- \* It is close to the large masterplanned sites at Countesswells and Maidencraig which still have plenty of land available for development.
- \* The site is north-facing.
- \* The site is insensitively close to the crematorium and covers land zoned in the current LDP for cemetery expansion.
- \* Part of the site is currently classed as Green Space Network. If this site is developed along with Maidencraig then the two sites will enclose part of the Den of Maidencraig Nature Reserve, reducing the ambience of the site and its landscape value.

#### B10/05 BELLFIELD FARM

- \* I agree with Aberdeen City Council that this site is undesirable.
- \* It is essentially just an extension of the masterplanned site at Countesswells on which there is still plenty of land available for building.
- \* The number of homes planned is excessive and will add considerably to existing and future traffic pressures on the A944 (See earlier comments).
- \* The site is elevated and quite exposed to northerly winds. Any development would be much more prominent on the landscape than Countesswells which lies in a shallow depression/plateau well screened by mature woodland.
- \* The development will remove most of the remaining green belt between Countesswells and Kingswells, blurring their individual identities and making coalescence much more likely.

#### Additional Files

**If you have further information you would like to provide you may upload it here.:**

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