

Response ID ANON-B3JU-DS58-R

Submitted to **Local Development Plan Main Issues Report 2019 Consultation**
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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?:

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?:

Question 2 Housing Allowances Beyond 2032

Is there a need for us 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?:

See attached supporting statement, site proposed for refuelling station with business units at Guttrie Hill East.

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?:

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?:

MAIN ISSUE 5 Electric Vehicle Charging Infrastructure

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

This is a proposal that includes an electric charging station which can allow the AWPR to support changes in transport technologies, see supporting statement for further detail.

Not Answered

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?:

Question 21 Developer Obligations and Infrastructure Delivery

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

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?:

Not Answered

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?:

Additional Documents

Please include comments on other documents below:

Please include comments on other documents below::

Additional Files

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

Main Issues Report Response East v2.pdf was uploaded



Main Issues Report Response

Guttrie Hill East

IAAB16-0051

Mrs J. Ironside/ Midstocket Development Company Ltd

April 24, 2019

Table of Contents

1	Introduction	2
2	Site Description and Background	2
3	Refuelling Station	2
4	Policy	4
	4.1 NATIONAL POLICY	4
	4.2 ABERDEEN CITY AND SHIRE STRATEGIC DEVELOPMENT PLAN 2014	5
	4.3 REGIONAL TRANSPORT STRATEGY REFRESH 2013/2035	6
	4.4 LOCAL TRANSPORT STRATEGY 2016-2021	6
	4.5 MAIN ISSUES REPORT	6
	4.6 ABERDEEN CITY REGION HYDROGEN STRATEGY & ACTION PLAN 2015 – 2025	6
	4.7 SUMMARY	7
5	Access and Accessibility	7
6	Main Issues Site Assessment Response	9
	6.1 OUTLINE	9
	6.2 NATURAL CONSERVATION	10
	6.3 LANDSCAPE FIT	10
	6.4 RELATIONSHIP TO EXISTING SETTLEMENT	11
	6.5 ACCESSIBILITY	11
	6.6 PROXIMITY TO FACILITIES- SHOPPING/ HEALTH, RECREATION	11
	6.7 INFRASTRUCTURE & SERVICES	11
	6.8 DIRECT FOOTPATH/CYCLE CONNECTION TO COMMUNITY AND RECREATION FACILITIES AND RESOURCES	12
	6.9 PROXIMITY OF EMPLOYMENT OPPORTUNITIES	12
	6.10 LAND USE CONFLICT	12
	6.11 FOSSIL FUELS	12
7	Conclusion	13

1 INTRODUCTION

This report responds to the Aberdeen City Council Main Issues Report (MIR) and has been prepared on behalf of the landowner who previously submitted a development bid through the call for sites in preparation of the Local Development Plan (LDP).

The submission is in relation to land on the outskirts of Peterculter at Guttrie Hill East, the proposal is to develop the land for a refuelling station with provision for electric and hydrogen vehicles as well as small business units. The site was subsequently recommended as undesirable with constraints being identified in the MIR. This submission seeks to alter the Council's conclusion and ultimately have the site allocated in the upcoming LDP.

This report will briefly outline the proposal for the site once again providing site description, an outline of the proposal, highlight relevant policies and address concerns which have been highlighted regarding the proposal.

2 SITE DESCRIPTION AND BACKGROUND

The site in question is located on the northern outskirts of Peterculter, 900 metres from North Deeside Road. The line of the Aberdeen Western Peripheral Route (AWPR) runs immediately to the east of the site boundary and the southern boundary is lined by trees.

The area of the site is approximately 2.7ha, the proposed use is for a vehicle refuelling station and business start-up units. The refuelling station would provide a range of fuel alternatives such as electric charging points, hydrogen and conventional petrol and diesel. Whilst the station would to some extent take the form of a traditional fuel station, it is crucial to stress the priority of the development is electric and hydrogen. The proposal seeks to ensure sustainable methods of transport are primarily supported with fossil fuel options.

Alongside the refuelling station, the access and servicing would provide for approximately 8 start-up business units that could either be let or purchased. There is not an abundance of this type of development within the immediate vicinity of Peterculter and it is anticipated that employment land would be welcomed. The units would provide opportunities for local businesses and provide a range of employment opportunities including smaller industrial processes. At this point the uses are not defined, however, would be restricted to classes 4, 5 or 6.

The proposal includes improvements to the core paths which link the proposals at Guttrie Hill and provision of a pedestrian link over the AWPR to improve links between Peterculter and Milltimber. There will also be a car park provided for those wishing to access the scenic walks around Guttrie Hill and beyond.

3 REFUELLING STATION

The AWPR is now open and there are currently limited fuel stations located along the new route for vehicles. Whilst it is acknowledged that vehicles can come in to towns like Peterculter or deviate to Kingswells, it is proposed that these options are not suitable for the drivers, the existing fuel stations and the villages within which they sit. The alternative and more sustainable option is to provide a dedicated refuelling site which is sensibly located and would limit the potentially profound impact on areas like Peterculter. The current petrol stations were not planned to cope with the demand associated with the AWPR and the roads to them lack sufficient capacity. Encouraging use of these existing local stations would have a profound impact on the towns and negatively impact their sense of place. Peterculter, in

particular, would suffer from additional traffic into a location where there is a desire to see fewer vehicular trips and afford higher priority to pedestrians.

It is considered that this application provides the Council with an opportunity to allocate development which will contribute to a more sustainable future. Numbers of electric and hydrogen fuelled vehicles remain low, however, this will not be the case for long as Scottish Ministers have committed to phasing out new petrol and diesel vehicles by 2032. It is estimated that that number of electric vehicle registrations have increased tenfold between 2014 and 2018 with 5,000 electric cars now being registered every month. Recent estimates show that there are now 210,000 electric vehicles on the road and the growing momentum behind their use will only increase demand for charge points along key traffic routes.

Charge Place Scotland keep a register of all the publicly available charge points in Scotland. They present these on a map which highlights a large gap on the AWPR highlighting a clear need for this infrastructure to be delivered. Currently the only charge points available on the AWPR are three points at Kingswells Park and Ride, the need for electric charge points will soon far exceed this provision and more charge points need to be planned on the route to ensure the increase in demand is met.

It is clear that the creation of the AWPR, which is 28 miles in length, will create a demand for refuelling stations along the route. In practical terms, these will need to be positioned at major junctions. The site proposed at Guttrie Hill East lies at the mid-point of the bypass and is grade separated providing access from the north and the south. It is therefore ideally positioned to accommodate a vehicle refuelling station. This location will also ensure that existing settlements are not adversely impacted by traffic visiting the petrol stations and unlike the other locations, the station at Guttrie Hill will be designed to cope with the demand and far better suited to cope with a busy road.

One of the primary objectives of the AWPR is to reduce traffic on Aberdeen City Centre, the result of this should not be to increase traffic on the city's conurbations. Similarly, a further objective of the project is to improve air quality in Aberdeen City Centre by reducing the traffic, by allowing traffic that needs to use a petrol station to go into villages around Aberdeen will simply transfer the emissions rather than remove them.

During the submission for allocation in the previous LDP, the Reporter stated, "*Filling stations supplying petrol and diesel are available near the AWPR in Peterculter and to the west of Kingswells.*" The first of these is a BP site in Peterculter which would require drivers to come off the bypass and travel 1.6km down the A93. At Kingswells there are two potential sites, the first is a small Esso garage which lies approximately 200m from the AWPR. This station is in close proximity, however, is not equipped to deal with a high volume of traffic. This station would also face significant challenge due to vehicles entering and exiting the station, the junction is not designed to allow traffic to re-join the AWPR. The alternative site the Reporter may be referring to is a Tesco station which is 1.8km from the AWPR, this is accessed alongside a busy junction to an industrial estate and Tesco which will cause conflict with these uses.

The bypass will allow traffic which previously had to travel through Aberdeen using the A92 to avoid this and go around the city rather than through it. Prior to the opening of the AWPR, all traffic wishing to travel north of the city had to travel through the city. In order to ascertain the previous petrol station availability on the old route a desktop study was conducted. The aim was to establish stations which were suitably located on the route through Aberdeen, these were deemed primary sites. Further sites were then identified within 1.5km of the route, given the Reporters conclusion in the previous LDP this was determined an acceptable distance to deviate from a main route for fuel.

The stations currently available are presented in Tables 1 and 2 below with summary to follow.

Table 1: Primary Petrol Stations	
Station	Location
Esso	Bridge of Don
Esso	Haudagain Roundabout
Shell	North Anderson Drive
Shell	Bridge of Dee

Table 2: Secondary Petrol Stations		
Petrol Station	Location	Proximity to Route
Sainsbury's Garthdee	Garthdee Road	400m
Asda Garthdee	Garthdee Road	240m
Co-Op	Springfield Road	1.16km
Esso	Great Northern Road	120m
Tesco	Bridge of Don	300m
Asda	Bridge of Don	1km

The A92 (previously the A90) in Aberdeen has four primary stations with direct access to the trunk road, these are then complemented with a further six secondary sites within 1.5km of the trunk road. The AWPR has no primary sites and two secondary sites. Vehicles travelling on the AWPR will have a distance of 60km without a single primary site and will only have petrol stations at Peterculter and Kingswells placing pressure on these locations that are not designed for this purpose.

The AWPR needs a suitable refuelling station to cope with not only demand but also the vehicles which will need petrol, many of which will be HGVs. The site at Guttrie Hill East provides a remedy to this issue and should be reconsidered for inclusion in the LDP.

4 POLICY

4.1 National Policy

The need to consider this type of infrastructure is necessary within the development plan as indicated by Scottish Planning Policy (SPP) which states, "*Development plans should support the provision of infrastructure necessary to support positive changes in transport technologies, such as charging points for electric vehicles*" (SPP, para 275). Development which provides sustainable transport infrastructure is explicitly supported by national policy. SPP further advises that "*Development Plans and Development Management decisions should take account of the implications of development proposals on traffic, patterns of travel and road safety*" (SPP, para 271).

SPP also refers to the need to consider "*how proposed development will contribute to fulfilling the objectives of Switched on Scotland – A Roadmap to Widespread Adoption of Plug-in Vehicles. Electric vehicle charge points should always be considered as part of any new development and provided where appropriate*" (SPP, para 289).

Transport Scotland published 'Switched on Scotland: A Roadmap to Widespread Adoption of Plug in Vehicles' in 2013, this stresses the Scottish Government's commitment to the almost complete

decarbonisation of road transport by 2050. The first action set out in the policy states, *"Transport Scotland to continue to engage with colleagues across government and the wider public sector to promote inclusion of plug-in vehicles in relevant policies and strategies"* (Transport Scotland, p66). The national stance set out by Transport Scotland is clear, authorities should include plug-in vehicle policies in their local plans to implement this.

To achieve this goal, a multi-faceted approach will be required involving cross-cutting initiatives from a range of stakeholders. The Switched on Scotland document contains a range of actions to promote the use of renewably powered vehicles. Action 25 of the document states, *"Transport Scotland to deploy rapid charge points at intervals of at least 50 miles on Scotland's primary road network to enable extended all-electric journeys"* (Transport Scotland, p35). There are no electric charge points immediately along the AWPR at present with none currently planned for the future.

The Government's Strategic Transport Projects Review¹ states that *"promoting innovation and encouraging implementation of new transport technologies (such as alternative fuels) can help to meet the challenges associated with a greener Scotland and contribute to Scotland's economic growth"* (Transport Scotland, para 4.21). This is further recognition of the importance of planning for a greener future by implementing electric and hydrogen refuel points to reduce emissions. The well-publicised targets for emission reduction in Scotland requires broad adaptation, particularly from transport which is estimated to account for a high proportion of all emissions.

The National Transport Strategy² identifies that *"Innovation is implicit in most technology and service sectors. One emerging area is the hydrogen and fuel cell sector. The Scottish Government is a key funder of the Aberdeen Hydrogen Bus Project, which has seen the establishment of Europe's largest fleet of hydrogen-fuelled buses, supported by a state-of-the-art green hydrogen production and refuelling facility"* (Transport Scotland, p23). This support by the government for hydrogen fuelled vehicles shows clear policy support at national level for this sustainable mode of transport.

4.2 Aberdeen City and Shire Strategic Development Plan 2014

The Aberdeen City and Shire Strategic Development Plan (SDP) 2014 addresses sustainable development and climate change, paragraph 4.8 states that *"significant changes will also be needed to reduce the effects of transport on climate change. As well as increasing energy efficiency, we need to encourage the use of alternative fuels and take opportunities, such as providing electric vehicle charging points to encourage people to use them"* (SDP, p28). Regionally the requirement for a move to alternative fuels has clearly been recognised in the SDP, there is further recognition that in order to increase electric car use, the necessary infrastructure must be in place such as charging points.

In August 2018 the proposed SDP was published for the Aberdeen City Region, it states, *"Improving bus and train services and maximising the opportunities for charging and refueling network for electric and hydrogen vehicles will make sure that people will be encouraged to use more environmentally friendly forms of transport and secure the City Region as a world leader in transport and energy technologies"* (SDP, para 7.3). This point would indicate a recognition of the need to expand on the regions current provision for these sustainable vehicles, Guttrie Hill is an opportunity for the region to realise this ambition.

¹ <https://www.transport.gov.scot/media/26366/j11260a.pdf>

² <https://www.transport.gov.scot/media/10310/transport-scotland-national-transport-strategy-january-2016-final-online.pdf>

4.3 Regional Transport Strategy Refresh 2013/2035

The Regional Transport Strategy contains a range of strategic objectives, one of these seeks to reduce the effects of transport on climate, noise and air quality in line with national targets. This broad objective is translated into more detail by a range of proposals for action, this includes 'Proposal CR1 - Carbon Reduction, Noise and Air Quality.' This proposal gives strong encouragement to the use of alternative fuels with hydrogen fuel cells, electric vehicles and biodiesel growing in importance, with a view to the north-east being recognised as a leading player in the development of new energy sources. The document states that the strategy shall, "*continue to support initiatives to promote and establish Aberdeen City and Shire as an alternative energy capital, including the trial of hydrogen vehicles*" (NESTRANS, p52).

4.4 Local Transport Strategy 2016-2021

Further relevant guidance is contained in Aberdeen City Council's Local Transport Strategy. This includes the objective of facilitating the uptake of ultra-low and low emission vehicles as a contribution towards improving air quality in the city. It notes that whilst the network of charging points for electric vehicles is not yet widespread, Aberdeen City has been making strides in this regard, it is thought that Guttrie Hill East can help continue this momentum.

The AWPR is highlighted for the numerous benefits it will bring Aberdeen, as part of the implementation of the route a number of improvements are planned for the Peterculter area such as improved bus lanes, walking and cycling routes. These improvements will further encourage use of sustainable modes of transport, however, may fail to deliver if the acceptance of traffic entering Peterculter for fuel is allowed to proceed.

4.5 Main Issues Report

Main Issue 5 of the Aberdeen City MIR proposes a preferred option whereby developers would be required to provide vehicle charging infrastructure for all developments which provide parking. One of the implications noted of this that it would "gives confidence to public that there is sufficient infrastructure and in turn encourages modal shift to electrical vehicles." The Council are clearly aspiring to provide enhanced infrastructure to encourage moves to electric vehicles, however, the Main Issue does not account for the areas where there is not parking. These areas such as the AWPR will be equally as crucial to encourage the intermodal shift to electric vehicles. Failing to plan for electric and hydrogen fuelling options on the bypass will hinder the Scottish Governments target to decarbonise the road transport by 2050.

4.6 Aberdeen City Region Hydrogen Strategy & Action Plan 2015 – 2025³

Aberdeen City Council developed a hydrogen strategy named H2 Aberdeen as it sought to make the city an early leader in the deployment of hydrogen fuelled vehicles. The vision of this document is for the Aberdeen City region to be a world class energy hub leading a low carbon economy and at the forefront of hydrogen technology in Europe. To achieve this, the document highlights that it will be necessary to develop hydrogen refuelling infrastructure.

³ <http://www.aberdeeninvestlivevisit.co.uk/home/H2-Aberdeen-hydrogen-economy.aspx>

The strategy outlines 7 key objectives, number 3 addresses hydrogen refuelling infrastructure and states, "an accessible, convenient and safe refuelling infrastructure network is deployed across the City and beyond" (H2 Aberdeen, p3). The proposal at Guttrie Hill will assist in the delivery of this objective and provide a suitable hydrogen refuelling point in an appropriate and convenient location. This development would only enhance the hydrogen provision in Aberdeen currently and increase the potential realisation of the strategy.

4.7 Summary

In summary, national and local policy provide strong support for the development of facilities for electric plug-in vehicles and alternative fuel sources. Furthermore, Transport Scotland has been encouraged to create a network of rapid charge points along primary routes throughout the country which can be delivered through this project. The number of vehicles which require these provisions is only going to increase as technology improves, costs of traditional fuels increase and mind-sets change. Policy at all levels is beginning to recognise the role that recharging facilities can provide in encouraging the use of electric and hydrogen vehicles and subsequently reducing emissions. The LDP is due to be adopted in 2022, by this stage use of electric and hydrogen fuelled cars will only have intensified, failure effectively plan sufficient infrastructure now could leave road users unwilling to intermodal moves to more sustainable modes of transport such as electric vehicles.

5 ACCESS AND ACCESSIBILITY

There is straightforward access to the junction onto the AWPR to the east of the site providing convenient access for passing traffic without the need for an extensive detour to Peterculter which would affect traffic on the radial routes in the area. With the AWPR open, the residents of Peterculter will benefit from less large vehicles utilising the A93 to travel through the village, failure to provide an appropriate fuelling station will render this enjoyment short lived as they will have to again enter Peterculter for fuel.

The plan below in Figure 2 provides an indication as to how the site would be accessed and developed.

With the AWPR directly to the east, Aberdeen City Council are seeking to link a core path from Peterculter to Milltimber. In conjunction with the proposal for Guttrie Hill West, it is proposed to create a core path connection where improved access can be established. Figure 3 identifies the proposed site layout, this includes a car park providing access to the woodland and walks from this point, these enhancements to the area will result in substantial public gain who will be able to more easily enjoy the area.



Figure 1: Image of Potential Design



Figure 2: Potential Wider Core Path Connections



Figure 3: Indicative Site Plan

6 MAIN ISSUES SITE ASSESSMENT RESPONSE

6.1 Outline

The development bid at Guttrie Hill East was reviewed as part of the call for sites in Aberdeen, the MIR classified the site as undesirable. Aberdeen City Council conducted their reviews against certain criteria which ultimately provide a score for each site out of 63. The scoring is purely indicative and whilst there is no pass mark for sites to proceed, it provides helpful feedback for allowing mitigation to be considered and will be applied to structure this response.

The scoring is conducted on a scale of 1-3 with 3 being desirable and 1 undesirable, utilising the scores issued for Guttrie Hill East the mitigation required has been prioritised accordingly. The site scored 7 scores of 1 for the following reasons-

- Natural Conservation
- Landscape Fit
- Relationship to Existing Settlement
- Accessibility
- Proximity to Facilities- Shopping/ Health, Recreation
- Physical Infrastructure Capacity
- Service Infrastructure Capacity

These have been considered as the highest priority in this response and will individually be addressed with relevant mitigation provided in order to rectify the lower scores.

Scores of 2 were then issued for 6 further criteria, these were-

- Exposure
- Slope
- Landscape Features
- Direct Footpath/Cycle Connection to Community and Recreation Facilities and Resources
- Proximity of Employment Opportunities
- Land Use Conflict

These points will also be individually addressed other than where a combination of the criteria can be addressed collectively, a short section concerning fuel types at the refueling station has also been provided. Where one of the criteria has not been addressed it is considered that the feedback from the Council is just and no mitigation can be provided to alter the position.

6.2 Natural Conservation

The report suggests that there could be an impact on red squirrel in the area, prior to the original submission of the site, an ecological walkover survey was conducted which suggested there was little evidence of red squirrels using the site, the limited evidence indicated squirrels used the site to commute through the area only.

The MIR notes that trees which previously stood on the site have been felled but also note that the site is Ancient Woodland. The proposal put forward would enhance the area by planting native trees, such as upland birch woodland which previously stood in the area to ensure a natural feel to the site. Prior to planting, collaboration would be sought with key stakeholders who could provide invaluable input such as Woodland Trust or the Forestry Commission.

The RTPi provide advice on Ancient Woodland, they state that any development on this land should improve biodiversity, the area at Guttrie Hill East currently offers little biodiversity and this is acknowledged by the Council who state, "*the site is of diminished biodiversity following the felling of all trees.*" This lack of biodiversity could be significantly enriched by the proposed development through appropriate tree planting which would enhance woodland value in the area.

The site currently offers little value to the natural environment and with mitigation it would offer significantly more if this development were to proceed. On balance the benefits of development are considered to outweigh the Ancient Woodland designation.

6.3 Landscape Fit

The MIR notes that this is an area which seeks to separate Milltimber and Peterculter, this may have been relevant prior to the introduction of the AWPR, however, this has now significantly changed. The bypass now provides clear and pronounced separation between the two settlements preventing any opportunity of coalescence.

The MIR also points out that the site is isolated, whilst this is not contested it is suggested that this could actually be a benefit of the site. The potential impact on the town should traffic have to enter Peterculter for fuel has been highlighted previously, the impact would be profound and detract from any

improvements planned for the town. Residents in Peterculter should benefit from a reduction in traffic with the opening of the bypass, without a suitable refueling site for the traffic it will not enjoy this for long as vehicles will still come into the settlement to use the existing petrol station. Guttrie Hill East, in its isolation, ensures minimal impact on the village and provides numerous benefits to ensure the bypass serves its purpose.

6.4 Relationship to Existing Settlement

The MIR highlighted the sites isolation and detachment from the settlements as a negative, however, it is suggested this is actually a positive given the nature of the proposal. Detachment from the settlement by 1.6km is advantageous, the traffic that will predominantly use the fuel station will not be local traffic. Rather, it will be vehicles from the bypass who stop to refuel or have a break from driving, many of which will be HGVs, who without a suitable provision for fuel will be forced to travel into Peterculter.

The AWPR seeks to deliver a number of objectives, such as reducing emissions in Aberdeen City Centre, reduce congestion and improve the amenity of the City Centre. These challenges would be relocated to Peterculter if traffic is allowed to come off and go into the village to refuel. Guttrie Hill East is isolated enough to prevent this transference of issues and as such should not be viewed so adversely on a point which is actually a strength of the site.

6.5 Accessibility

The supposed lack of accessibility to the site is highlighted by the Council due to distances to the nearest bus stop and to the town centre. The distance to the nearest bus stop is acknowledged, however, the vast majority of people visiting the site will travel by car given the nature of the proposal. For many developments this would be a negative and alternative access methods would be sought such as walking and cycling, however, this is not the case for this proposal. It is unlikely that people will visit a refueling site by bus, by bike or even walk there, therefore, this should not be considered so negatively.

The town centre is 1.6km away and it has been highlighted previously that this is in fact a positive for the site due to its ability to prevent an influx of traffic on Peterculter to use its petrol service. This point would simply be echoed on this criteria.

6.6 Proximity to Facilities- Shopping/ Health, Recreation

Whilst it is acknowledged that the site is a short distance away from facilities such as nearby school and medical practice, it is considered that the proximity to these is less of a priority due to the nature of the development and the benefit of keeping unwelcomed traffic away from these amenities should be welcomed.

The proximity to facilities should not have such a detrimental impact on the application as the need of these facilities to a development of a refueling station is questionable. The report highlights the proximity of Peterculter Sports Centre, the relevance of a sports centre's proximity to a refueling station is not thought to be a relevant assessment of the site and therefore the Council should reconsider their previous approach to this criteria.

6.7 Infrastructure & Services

It is acknowledged that the site does not have services and infrastructures at present, this would naturally be planned in ensuring crucial infrastructure is incorporated. Collaboration with key agencies would ensure this is in place prior to any development. The MIR assessed the site against this and awarded the

lowest score, a development of this nature will require new or upgraded connections, as the site is close to the existing built up area and with a public road to the east it is not considered to be a constraint to development.

6.8 Direct Footpath/Cycle Connection to Community and Recreation Facilities and Resources

The original submission in the call for sites indicated that as part of any development an improvement to the core path would be undertaken. This submission would again echo this plan, Figure 2 outlines the planned improvement to the core path which would subsequently connect the site with the centre of Peterculter through core path 76. This enhancement is proposed in recognition that the area is enjoyed by walkers, the site does not wish to detract from this and considers the improvements as a way to encourage more people to walk in the surrounding area as well as providing a link with neighbouring Milltimber.

Further recognition of the visitors to the area is adapted into the plans to provide car parking for those wishing to leave their car to enjoy walking in the area. These enhancements would improve recreation facilities in the area for locals as well as those from further afield resulting in public gain from the development.

6.9 Proximity of Employment Opportunities

The MIR notes the limited employment opportunities within the proximity of the site. The proposal includes small business start-up units on the site, these have the ability to create jobs in an area where opportunities are often considered to be limited. The proposal creates employment opportunities which is a positive for the surrounding area and therefore should be reconsidered.

6.10 Land Use Conflict

The Council consider the proposed development of a fuel station in a rural setting does not fit, but acknowledge that the development would complement the bypass. The presence of the AWPR has had significant impact on its surrounding area, one of these is Guttrie Hill East. Whilst this site would have historically been surrounded by rural or agricultural land to the north and west, this has changed with the AWPR.

The development can be designed to fit within the existing landscape and appear as a part of the AWPR infrastructure. Additional planting will screen the development from views to the south and minimise any potential land use conflict.

6.11 Fossil Fuels

The proposal is for a fueling station, this appears to have been assessed as a traditional fossil fuel petrol/diesel station with limited focus on the electric and hydrogen service offered. Naturally, a provision for fossil fuels is required, however, with attitudes changing, the use of electric and hydrogen vehicles is rapidly rising, therefore, refueling stations are required to adapt.

The hydrogen fueling point appears to have been missed in the assessment, therefore, it would be beneficial to again highlight that this is core to the development and not simply added in to illustrate a sustainable approach. From the indicative layout it can be seen that hydrogen station is afforded more space than the fossil fuel equivalent. Similar to the electric charging points, the use of hydrogen is highly

likely to increase, therefore, planning for this provision will ensure that future demand is met and also encourage intermodal shifts to more sustainable transport.

The assessment is critical of the site in this respect stating that it was, *"first and foremost a fossil fuel station with electric vehicle charging points appearing to be a bolt on."* This is untrue and should be reconsidered, the development has the potential to significantly contribute to Aberdeen's ambition to be at the forefront of sustainable transport.

7 CONCLUSION

This report has been prepared in response to the Aberdeen City Council MIR with specific reference to the submission at Guttrie Hill East. The MIR highlighted constraints on the site assessment, however, it is considered that some of these are unjust whilst others can be suitably mitigated to allow the benefits of the proposal to be realised.

The development at Guttrie Hill East provides an opportunity for a crucial and sustainable development which will further encourage people to move to sustainable modes of transport. Scotland is seeking to significantly reduce emissions made by cars in the coming years, Aberdeen in particular want to be at the forefront of this and play a leading role for Scotland.

The construction of the AWPR represents a milestone in the provision of strategic infrastructure for the City of Aberdeen. The quality of the bypass and the benefits in removing traffic from existing routes will be greatly enhanced by the provision of associated services including refuelling stations. The proposal to create a refuelling station with provision for electric and hydrogen bases vehicles, meets national and local objectives for the proportion of alternative fuel sources and this development will assist in achieving these objectives to reduce the carbon footprint related to transport. In particular, this proposal would work towards meeting the Council's own hydrogen promotion strategy and gives the site strong backing for inclusion in the next LDP.

The location of the proposed refuelling site at the Milltimber junction is an appropriate location at the mid-point of the bypass which benefits from access from both the north and south. This location will also significantly minimise local disruption that may be caused by additional vehicle trips into Peterculter to access the petrol station facility and, in particular, minimise HGV movements in this area. The residents of Peterculter, like other towns, will now benefit from less traffic travelling through their settlement, these benefits could be eradicated should a sufficient refuelling option fail to be provided.

Alongside the development of the refuelling station it is proposed to provide land for start-up business units. This provides an opportunity that would not have any detrimental effect on residential amenity and offers much needed employment opportunities in the local area. Residents of Peterculter consistently highlight a lack of employment opportunity in the area, with many having to commute to the City Centre for work, whilst small in scale, this employment land opportunity would likely be welcomed by the local community.

The area is currently used as a walking route and the core paths in the area would be significantly enhanced to provide greater accessibility to the area and in combination with the proposals for Guttrie Hill West, will form a part of the aspirational core path between Peterculter and Milltimber.

This submission has adapted to the feedback from the MIR and suitably addressed many of the concerns raised. Through mitigation the benefits of the site can be realised and allow economic gain. It is trusted

that the site will be given renewed consideration and ultimately hoped that the site is allocated in the forthcoming LDP.