

Response ID ANON-B3JU-DSQR-E

Submitted to **Local Development Plan Main Issues Report 2019 Consultation**
Submitted on **2019-05-11 14:17:16**

About You

What is your name?

Name:

Gael Sangster

What is your organisation?

Organisation:

N/A

On behalf of:

How can we contact you?

Email:

[REDACTED]

Telephone:

Address:

[REDACTED]

Additional Documents

Please include comments on other documents below:

Please include comments on other documents below::

Please see attached PDF re Development Bids Assessment - B1308 Royal Devenick Park Phase 1.

Additional Files

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

G Sangster City MIR response.pdf was uploaded

Comments from Ms Gael Sangster

Development Bids Assessment

My comments specifically concern **B1308 – Royal Devenick Park Phase 1**.

I very much welcome the Council's recommendation to classify the above development bid as 'undesirable', and this recommendation's consistency with the Aberdeen City and Shire's Strategic Plan, 2018.

It appears also consistent with section of the City MIR **4.4 Natural Environment**:

"Our natural environment, and the ecosystems within it, provide a range of benefits for communities and the local economy. It provides us with the natural resources we depend on; for example, for food, energy and water. It also benefits our health and wellbeing and our overall quality of life. We therefore need to maintain a healthy natural environment so that we – and future generations – can continue to enjoy it and benefit from it."

I welcome the above statement - the existing natural environment must be protected at all costs, to ensure quality of life now and in the future.

"The 'natural environment' expands across many areas and is not just limited to 'green' spaces and 'greenfield' land. It is how these spaces are connected, how accessible they are, and the plants, wildlife, and heritage they provide – as well as 'blue' infrastructure like water bodies, rivers and the coast."

The proposed siting of B1308 – Royal Devenick Park Phase 1 sits within the green belt. The Den of Leggart - a Local Nature Conservation Site and a designated a Prime Landscape (DWP) Area - lies inside the proposed site. The recommendation of 'undesirable' is justified on these issues alone.

Furthermore, the proposed site would adversely affect the landscape vistas of Banchory Devenick, Tollohill Wood, the Dee Valley and Aberdeen west, particularly from Kincorth and the A92, significantly impacting on the green belt and landscape setting of Aberdeen.

Road upgrades would be necessary for site entry - presumably from Deeside Braes (constrained by the Den of Leggart), the A92 and from the Causey Mounth itself - an ancient drovers' road constructed in the 12th century, which is a designated 'Heritage Path' - see <http://www.heritagepaths.co.uk/pathdetails.php?path=24>

"Green areas can promote sustainable development, help to mitigate the impacts of climate change such as flooding and air pollution and provide green networks by linking various habitats benefiting bio-diversity."

The Den of Leggart comprises semi-natural and ancient woodland, and provides a habitat for a number of protected species. Designated species identified in the NESBReC 'Notable species search' (survey undertaken in July 2018) identifies the following:

The Burn of Leggart would likely be contaminated through construction activities for Royal Devenick Park Phase 1. The Burn flows into the River Dee - an internationally designated SAC.

"The planning system therefore has an integral role to play in protecting and enhancing our natural environment. We also need to consider opportunities for 'new' natural environments."

I welcome the above statement - keeping consistency with strategy enables planning with integrity, giving the public trust in the Council's processes.

"There are no significant changes proposed in relation to Natural Environment policies. The position for the next LDP is to continue the promotion and conservation of the city's natural environment. The current LDP contains a number of natural environment policies (Policy NE1 through to NE9). The principle of these policies will be retained..."

It is good to know that the City Council will commit to maintaining current policies on the natural environment, especially in relation to bids for new housing developments. *Royal Devenick Park Phase 1* City is just a small part of the overall proposed developments (ref. KN 069 - 072, Land at Tollohill Wood). If the City Phase is eventually approved it would constitute 'the thin end of the wedge', paving the way for further unwanted developments, that would be contrary to the City's natural environment policies.

Well done for recommending B1308 – *Royal Devenick Park Phase 1* as 'undesirable'.

Strategic Environmental Assessment of Bid Site

This is a thorough assessment of the key environmental factors likely to be affected by the proposed development **B1308 – *Royal Devenick Park Phase 1***. The overall and cumulative 'adverse' and 'significantly adverse' effects (even post-mitigation) cannot be ignored. The SEA table states objective reasons for the bid to be deemed 'undesirable'.

B1308 – Royal Devenick Park Phase 1

- Residential (major; 235 units)

Constraints:

Green Belt

Recommendation:

Undesirable

Justification:

The proposal is for a residential development of 235 units and is part of a much larger new settlement proposal, most of which lies in Aberdeenshire. The site is located in an area of Green Belt and Green Space Network which acts as a gateway into Aberdeen. This allows an impressive view of Aberdeen on the approach from the A90, providing a distinct sense of place. Its development would therefore have a significant impact on the green belt and landscape setting of Aberdeen. The site is not well-related to any settlement; it is poorly located to public transport and community facilities, and therefore would be car dependent.

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 – this is part of a much larger proposal. Because of this, the allocation of this site is likely to be contrary to the Proposed Strategic Development Plan.

Natural Conservation

2

Site is currently zoned as Green Belt/ GS in LDP 2017. Den of Leggart LNCS lies inside site area which is also formed of Semi-Natural and Ancient Woodland.

Protected Species may be an issue.

Landscape Features

2

Woodland and burn intersecting site area. Footpath connection to existing residential development to the north (Deeside Brae)

Landscape Fit

1

Den of Leggart is Prime Landscape (DWP) Area. Site is located within Leggart Landscape Character Area. The site is located in an area of Green Belt and Green Space Network which acts as a gateway into Aberdeen. This allows an impressive view of Aberdeen on the approach from the A90, providing a distinct sense of place. Its development would therefore have a significant impact on the green belt and landscape setting of Aberdeen.

Relationship to existing settlement

1

Site lies on south side of the River Dee; Kincorth is a large settlement area of the city, located across the A90 Stonehaven Rd. Deeside Brae located close by.

Land Use Mix / Balance / Service Thresholds

1

Land use limited; only residential north of site.

Accessibility

1

Footpath connection from Deeside Brae. Road access by unnamed road off S Deeside Rd on west side of site (Aberdeenshire administrative area). No pavement or cycle space.

Land Use Conflict

2

Site currently zoned as Green Belt/ GSN, LNCS and Ancient Woodland located within site.