

[REDACTED]

From: Pippa [REDACTED]
Sent: 07 May 2019 16:28
To: LDP
Subject: ALDP MIR Consultation Response
Attachments: MIR response.pdf

Hi

Please find attached a response to the current MIR consultation on behalf of residents of Craigton Road and the Craigbank area.

I would be grateful if you could confirm safe receipt.

Thanks, and kind regards

Pippa

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Aberdeen Local Development Plan Review

Main Issues Report Consultation Response

Response on behalf of residents of Craighton Road, Craigbank and Corbie

Our clients, named in Appendix 1, all live in the Craighton Road/Craigbank area and support the planning officers' assessment of the following sites as being undesirable for inclusion in the new Aberdeen Local Development Plan:

- Friarsfield North (bid reference B09/10); and
- Countesswells Expansion Areas 2 and 7 (both part of bid reference B09/21).

Bid reference B09/10 was submitted on behalf of CALA Homes (North) Limited and seeks the allocation of land to the south of Craighton Road for housing. Collectively referred to as Friarsfield North and described as having capacity to deliver 280 units, the site comprises three areas; Craigbank, Corbie and Newton. This response primarily relates to that part of the site identified as Craigbank and Corbie, although many of the issues raised apply equally to the Newton area.

Bid reference 0921 was submitted by Stewart Milne Group and seeks the allocation of seven different areas, of which numbers 2 and 7 are located directly to the North of Craighton Road. Area 2 is described as having capacity to deliver around 175 units, while area 7 is described as having capacity to deliver around 80 units (255 in total).

Our clients believe that the proposed development in these locations would be contrary to regional and national policy, particularly in terms of the impact that development here would have both on the coalescence of Cults and Countesswells, and on the local landscape. They are also of the view that development here would be unsustainable in terms of encouraging reliance on the private car, with health, safety and environmental impacts all arising as a result. These issues are discussed in more detail below. To avoid undue repetition when doing this, the sites are addressed under policy issues which are common to them all, rather than on a site by site basis.



Policy context

Aberdeen City and Shire Proposed Strategic Development Plan

The Strategic Development Plan is a statutory document used to inform Local Development Plans. Since the call for sites for the Main Issues Report, the Proposed Aberdeen City and Shire Strategic Development Plan (PSDP) has been published (in August 2018) and the new Aberdeen Local Development Plan requires to be consistent with that. The allocation of land as proposed at Friarsfield North and areas 2 and 7 of the Countesswells expansion would not comply with the content of the PSDP for the reasons set out below.

The PSDP notes that there is sufficient housing land available to meet the housing land requirement and proposes only limited additional land to safeguard against the risk of existing strategic allocations not being delivered. At the same time, the PSDP is clear that allocations should be small-scale and should not be extensions to any existing strategic development sites that have been subject to a masterplanning exercise. While it is for Local Development Plans to determine whether a proposal is “*small-scale*”, the bid form issued as part of the call for sites indicated that the Council’s focus would be on sites with capacity for no more than 100 units. It is hard to see how the allocation of sites for 280, 180 and 75 units (those 75 units being an integral part of a much larger allocation) as proposed in this instance could ever be said to align with the Council’s focus in this regard, or be characterised as small-scale sites as required to be supported in terms of the PSDP. In addition, as extensions of existing allocations (site OP41 at Friarsfield, and site OP38 Countesswells) for which approved Development Frameworks/Masterplans are supplementary guidance to the ALDP, the proposed allocations also run directly contrary to the PSDP’s strategy in this regard.

The PSDP also makes it clear that new allocations should consider opportunities to address brownfield land and attempt to utilise the current “*constrained*” supply in the first instance. The allocations proposed at Friarsfield and areas 2 and 7 of the Countesswells expansion do neither of these things.

Finally, where greenfield sites are to be considered, the PSDP emphasises that reducing travel distances and making walking, cycling and public transport more attractive to people will be particularly important considerations. In this regard, it should be noted that the proposed allocations are not well located in terms of access to community facilities and employment opportunities, both key criteria in determining the acceptability of future development sites. As identified in the officers’ assessment of the bids, there are no facilities within 800m of any of the sites (with much of the proposed new housing being more than a kilometre away), nor are there any significant employment opportunities within 1.6km. Given that there are also very limited public transport connections, with poor pedestrian access (including road safety issues) and the closest bus stop being over 600m away from any of the sites (over 800m from



Craigbank and Corbie, 1.6km from area 7, and 2km from area 2), the sites will be highly car dependent and do not accord with the requirements of the PSDP in this regard.

Scottish Planning Policy (SPP)

As a statement of Scottish Government policy and priorities, the content of SPP is a material consideration that carries significant weight and there is an expectation that development plans will comply with its terms; as stated in SPP, where development plans do this, their progress through the planning system should be smoother. As demonstrated below, the allocation of these sites for development would not achieve such compliance.

The proposed sites currently form part of the Aberdeen Green Belt, the purpose of which is set out in SPP as being to:

- direct development to the most appropriate locations and support regeneration;
- protect and enhance the character, landscape setting and identity of settlements; and
- protect and provide access to open space.

In this regard, the land at Friarsfield North is positioned between existing development at Cults and proposed development at Countesswells, and plays an important role in maintaining the distinct identity of the two. Conversely, and as highlighted in the officers' assessment of the site, development here would erode the distinct identities of the two areas

The same is true of the proposed allocation of areas 2 and 7 of the Countesswells expansion, which would also erode the separate identities of Cults, Countesswells and Aberdeen.

Allocation of land for development in these locations would therefore undermine the purpose of the green belt in terms of protecting the identity of settlements.

In addition, as set out in the officers' assessment, any development at Friarsfield North would be highly visible from the south, with a significant landscape impact as a result. This would also dramatically alter the landscape character of Craigton Road, which has traditionally been separated from development at Cults by open fields

Likewise, development of Areas 2 and 7 of the Countesswells expansion would erode the wooded farmland between Cults and Countesswells, this being an important feature of the wooded estates landscape character type of the area, with a negative impact on the local landscape character as a result. Area 2 in particular would be highly visible from Countesswells Road and Hazlehead Golf Course.



The allocation of these sites would therefore have a significant adverse impact on the landscape and would also undermine the stated purpose of the green belt in this regard. It would also negatively impact on the existing semi-rural character of the area and the transition that the green belt here provides between the more urban area to the south and the rural areas to the north.

Other considerations

As well as the proposed allocations being contrary to regional and national policy, they raise a number of other concerns which means that they are not appropriate for inclusion in the new Local Development Plan. These are discussed below.

Education capacity

Both Friarsfield North and the majority of Countesswells Expansion Areas 2 and 7 would be zoned to Cults Primary School and Cults Academy, both of which are currently over capacity. Information submitted with the bid for Friarsfield North indicates that rolls at these schools were forecast to decline and that proposed housing could be phased to match that decline. However, this projection is not borne out by the most recent school roll forecasts (2017), which show both Cults Primary School and Cults Academy to be over capacity, and to continue to be over capacity as far forward as the school roll forecasts look (2025). Likewise, Airyhall Primary School and Hazlehead Academy, to which the northmost parts of Countesswells Expansion Areas 2 and 7 are allocated, are forecast to be over capacity by 2024 and 2021 respectively. In the absence of any clear indication as to how these capacity issues might be addressed, there is no justification for supporting further development at either Friarsfield North or areas 2 and 7 of the Countesswells expansion.

Nature conservation

As highlighted in the officers' assessment of the sites, all of the proposed allocations would fall within the River Dee Special Area of Conservation Catchment Zone. As such any development here would require to ensure that it has no impact on any of the features for which the site has been designated and undermine the integrity of the SAC. In addition, our clients are aware of a number of wildlife species in the area, including bats, badgers, roe deer, woodpeckers, barn owls, fieldfares, redwings and firecrests, with the number of species having increased here as a result of the loss of habitat in the area of the current Friarsfield development. It is therefore surprising that the officers' assessment gives Craigbank and Corbie a score of 3 in terms of the nature conservation criteria, particularly since it also states that a bat survey may be required for this area.



In terms of the proposed Countesswells expansion allocation, there are additional nature conservation considerations relating to the green space network designation covering parts of the sites and the existence of priority habitats. There is also ancient woodland to the south west of area 2, while the Den Wood Local Nature Conservation Site (which is also ancient woodland) sits to the north of area 7 across Countesswells Road, and a tree preservation order abuts the southern boundary. The allocation and subsequent development of these sites would undermine the purpose of the tree preservation order (with regards to which, our clients have advised that the name Cults is derived from the Gaelic for trees, highlighting the importance of retaining the trees in this area).

Previous bids

In looking to overcome the regional and national policy principles (set out above) against development here, the masterplan document submitted with the Friarsfield North bid seeks to draw support for the proposed allocation of the site from the 2004 Finalised Local Development Plan, in terms of which the land now identified as Craigbank was identified for residential development, while the land now identified as Corbie was partially identified for residential development and partially as part of a future new communities designation. It must however be recognised that what was proposed as a direction for growth 15 years ago is no basis for deciding what would be an appropriate direction for growth now, given the significant changes that have taken place since then. This is particularly so in terms of proposed development at Countesswells which dramatically changes the pattern of development to the west of Aberdeen, and makes it all the more important to maintain green space between that development and Cults as outlined above.

For the Countesswells expansion areas, these were also considered in the preparation of the current Aberdeen Local Development Plan, during the Examination of which the Reporter concluded that areas 2 and 7 in particular would be a major intrusion into the green belt separating Cults, the new development at Countesswells and the existing built-up area of Aberdeen lying to the east, and that development here would have an unacceptable impact on the landscape and green belt function. There has been no change in circumstances that would alter that conclusion.

Ownership

Whilst recognising that ownership issues are not generally a material planning consideration, our clients wish to highlight that not all of the land put forward for allocation by Stewart Milne Group is within their ownership (or under option to them), including the access points. In addition, a number of our clients have servitude rights over the CALA site which would require to be retained. Ownership and access/servitude rights mean that these sites may not actually



be deliverable, and any development would be compromised should the site be considered appropriate for allocation.

Conclusion

For the reasons given above, it is submitted that Friarsfield North (bid reference B09/10) and Counteswells Expansion Areas 2 and 7 (both part of bid reference 09/21) are not suitable locations for residential development and, in accordance with the officers' assessment, these should be maintained as green belt in the new Local Development Plan.



Appendix One: List of clients

Properties accessed off Craigton Road

Mr & Mrs Corray, [REDACTED]

Mr & Mrs Wallace, [REDACTED]

Ms C Primrose, [REDACTED]

Mr C Mitchell, [REDACTED]

Mr G Mills, [REDACTED]

Mr M Wilson, [REDACTED]

Mr & Mrs Harbottle, [REDACTED]

Mr & Mrs Hinkley, [REDACTED]

Craigbank Properties accessed off/via Kirk Brae

Mr & Mrs Logan, [REDACTED]

Mr & Mrs Ogg, [REDACTED]

Mr & Mrs Riley, [REDACTED]

Ms L Bell, [REDACTED]

