

From: Claire Coutts [REDACTED]
Sent: 08 May 2019 10:41
To: LDP
Cc: Donaldson, Angus A. M.
Subject: MIR Representations - Balgownie Playing Fields
Attachments: MIR Representation - B0223 Balgownie Entire Site (2).pdf; MIR Representation - B0221 Balgownie Area 2.pdf; MIR Representation - B0224 Balgownie Area 3.pdf; MIR Representation - B0225 Balgownie Area 4.pdf; MIR Representation - B0226 Balgownie Area 5.pdf; MIR Representation - B0227 Land to the North of Balgownie Playing Fields.pdf

Dear Sir/Madam

On behalf of my clients, the University of Aberdeen, please find attached representations to the Aberdeen City Main Issues Report in respect of the following:

B02/23 - Balgownie Playing Fields (entire site)
B02/21 - Balgownie Area 2
B02/24 - Balgownie Area 3
B02/25 - Balgownie Area 4
B02/26 - Balgownie Area 5

B02/27 - Land to the North of Balgownie Playing Fields.

I trust that this is appropriate and that we will receive confirmation of this in due course.

Kind regards
Claire

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Claire Coutts BLE (Hons) MRTPI
Associate (Planning & Research)
25 Albyn Place

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[REDACTED]

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Aberdeen Local Development Plan Review

Main Issues Report Response Form 2019

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The MIR has been published alongside a Monitoring Statement and Environmental Report. Copies are available to view at Marischal College, Broad Street, Aberdeen. These, and other supporting documents, are available at: - www.aberdeencity.gov.uk/aldp2022

Everyone now has the chance to comment on the report and associated documents. All comments received will be considered and used to inform the preparation of the Proposed Aberdeen City Local Development Plan. There will be a further opportunity to comment on the Proposed Plan when it is published in early 2020.

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- emailed to:- ldp@aberdeencity.gov.uk; or
- by post to:- Local Development Plan Team, Strategic Place Planning, Aberdeen City Council, Business Hub 4, Ground Floor North, Marischal College, Broad Street, Aberdeen, AB10 1AB.

Completed response forms should be with us no later than 13 May 2019.



YOUR DETAILS

Name	Claire Coutts
Organisation (if relevant)	Ryden LLP
On behalf of (if relevant)	The University of Aberdeen
Address	
Postcode	
Telephone	
E-mail	

Thank you for taking the time to complete this form. If you would like to be kept informed of our progress in producing the next Local Development Plan, please tick here

If yes, please provide an e-mail address

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YOUR COMMENTS

<p>Which document(s) are you commenting on?</p>	<ul style="list-style-type: none">• Main Issues Report• Strategic Environmental Assessment Environmental Report• Monitoring Statement	<input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
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Please indicate the document and the specific Issue, Question, Site, Policy, Map or Table you are commenting on. Please provide your comments below and explain your reason for supporting, opposing or commenting on this specific part of the document.

Please refer to attached Paper Apart

YOUR COMMENTS CONTINUED

PAPER APART

Representations to the Aberdeen City Local Development Plan 2019 Main Issues Report on behalf of the University of Aberdeen in relation to Site No. B02/23, Balgownie (entire site), Bridge of Don and in relation to the Settlement Strategy and Question 1.

Introduction

The University of Aberdeen has a major influence on the city. Founded in 1495, it is the oldest University in Scotland with a student population of around 15,000, studying 700 programmes across 85 subject areas, taught across 12 schools. The University community represents a significant proportion of the city's population and contributes approximately £500m per annum to the local economy. The students are invaluable to local businesses and the city overall in terms of the money they spend and the part timework they take up during their studies.

Like every major university, The University of Aberdeen must compete globally to attract the highest quality of students and staff from around the world. To do this successfully, it has invested heavily in the campus, including medical research, where University staff have demonstrated their skills as world leaders in their field. The Institute of Medical Sciences, completed in 2002, was designed to provide state-of-the-art facilities for medical researchers and their students. This was followed in 2007 by the Health Sciences Building. The Foresterhill campus is now one of Europe's major biomedical research centres. The Suttie Centre for Teaching and Learning in Healthcare, a £20m healthcare training facility, opened in 2009 and 2012 saw the opening of the £57 million Sir Duncan Rice Library in Old Aberdeen. The most recent development, the Science Teaching Hub, is currently under construction.

One of the key development priorities of the University relates to physical infrastructure. This includes the need to work independently and in partnership to provide a suitable physical infrastructure within which cultural engagement can flourish. This includes developing infrastructure to enhance the University's support for cultural and community activity, in particular through major capital projects such as the new library and sports facilities.

Over the years, the University has undertaken an ambitious capital investment programme to create appropriate physical infrastructure for staff and students. This has amounted to over £200 million over the last decade, generating considerable employment opportunities for local industries. This investment has been led by three flagship projects, one of which is the Aberdeen Sports Village which opened in August 2009. The capital investment programme for the next decade is equally ambitious with more than £200 million allocated to be spent over the next ten years.

Aberdeen Sports Village was a joint development between the University, Aberdeen City Council and SportScotland who themselves invested £7 million in this development due to their desire for a regional sports facility in the City. This world-class facility provides a host of sporting amenities previously unavailable in the area, resulting in top class sporting facilities for the whole of the City, not just the University. These include: a sports hall with space for 9 badminton courts, a third-generation indoor football pitch; a new athletics arena; an indoor athletics area; hockey pitches; squash courts; a gym; studio space; a fitness suite and performance clinic; and a café and crèche facilities. The facility also includes significantly improved disabled access. An aquatics centre with a 50m swimming pool opened in May 2014.

Settlement Strategy

On behalf of the University of Aberdeen, objection is made to the settlement strategy within the Aberdeen City Main Issues Report.

Paragraph 2.1 deals with housing allowances and states that the MIR puts forward new housing and employment allowances in line with the Proposed Strategic Development Plan 2018, which sets out a total allowance of 13,598 houses over three plan periods. This comprises 4168 in the period 2020-2032; 4500 in the period 2033-2035 and 4930 in the period 2036-2040. Any sites not identified as being 'effective' in the 2016 Housing Land Audit could be counted towards the 4168 allowances for 2020-2032. This includes 2449 constrained greenfield sites identified in the 2016 HLA; 120 greenfield sites in the current ALDP but not in the 2016 HLA; and 3048 brownfield sites. Aberdeen City Council have discounted the 2449 constrained greenfield sites as most are part of larger sites and may not be all be delivered in that period. That leaves 3528 units towards the 4168 allowances, leaving a shortfall of 640 units to be met through new allocations.

This is considered to be a low number of units, especially since local development plans are moving towards a 10 year timeframe in the ongoing review of the planning system. It is argued that the Council should take a more ambitious approach to growth and the housing supply target, housing land requirement and housing allowances.

Although the MIR provides a more positive approach to the delivery of new homes in later periods, through the identification of larger housing allowances in the periods 2033-2035 and 2036-2040, it is argued that the plan should be more aspirational in the first plan period, rather than increasing housing to later periods where delivery is less certain. This will support the recovery of the city following the recent downturn in the oil industry and boost economic growth.

The Council fail to acknowledge the significant value the delivery of new homes makes to the City Region and it is therefore argued that additional allocations should be identified in the Proposed Local Development Plan, particularly in the period 2020-2032. This will support the delivery of new homes, including affordable housing and should be in locations that people want to live, close to employment opportunities and infrastructure.

Q1. Do you agree with our preferred housing sites? Are there any other sites that would be suitable for housing?

On behalf of the University of Aberdeen, support is given to the identification of bid site B02/25 (Area 4) as desirable for a development of 15 houses. This site lies within the wider B02/23 bid site. However, a general objection is made to the strategy of identifying only brownfield or small scale greenfield sites. It is argued that this does not provide an adequate range of sites as required by SPP, to enable a variety of scale and choice of location to promote sustainable mixed communities.

Objection is also made to Aberdeen City Council's recommendation to identify bid site B02/23 at Balgownie as undesirable. This site is considered suitable for a mix of uses, including housing and improved sport and leisure facilities. This representation should be read in conjunction with the various Development Bids submitted for Balgownie at the pre-MIR stage (Area 2, 3, 5 and 5), which

demonstrate that the site is suitable for development via a range of development options and sizes of site.

It is appropriate to highlight at this stage that Area 2 was promoted for employment uses at the pre-MIR stage as an extension to the Aberdeen Innovation Park. However, discussions have been ongoing with Buccmoor LP who own and manage the Park, since the initial bid was submitted. It is argued that this land is now considered more suitable for residential development, given the difficulties in securing tenants for the existing employment uses on the adjacent site. This bid should therefore also be read in conjunction with the representations made to the Main Issues Report on behalf of Buccmoor LP in relation to Site No. B02/04 at Aberdeen Innovation Park.

Bid site B02/23 scores well in the assessment by Aberdeen City Council, however, some issues are raised to which we wish to respond.

Natural Conservation

It is noted by Aberdeen City Council that the site lies within the Green Space Network and Urban Green Space within the 2017 LDP. However, the Council fail to recognise that a large part of the site (Area 1) will be retained as open space to ensure that this designation will remain unaffected over a significant part of the site, extending to approximately 7.1ha.

In relation to the Green Space Network, the aim of this designation is to protect, promote and enhance the wildlife, access, recreation, ecosystem services and landscape value of the area. The current value in these terms is relatively low, considering the site is used as playing fields by the University and is not available to the wider community. There are no wildlife designations on the site and there are significant opportunities to protect, promote and enhance wildlife on the site through the retention of existing trees and additional landscaping.

Access and recreation opportunities will be enhanced through the retention and improvement of the open space and recreational uses within Area 1, with links provided to this from the residential areas. As such, the current designations can be retained on a significant part of the site, with justification for the remainder of the land which is considered to be less sensitive and valuable to be developed. The development of the site, will enable the improvement of University facilities, both on site and elsewhere in Aberdeen, which is fundamental to the University's capital investment programme.

In terms of Urban Green Space, Policy NE3 of the 2017 LDP states that development will only be acceptable where *"there is no significant loss to the landscape character and amenity of the site and adjoining area; public access is either maintained or enhanced; the site is of no significant wildlife or heritage value; there is no loss of established or mature trees"*. During a previous LDP examination, both Aberdeen City Council and the Reporter concluded that the site has no landscape value. If parts of the site are identified in the LDP for residential development, public access would be enhanced considering that it is currently for University use only. As stated above, the site has no significant wildlife or heritage value and there would be no significant loss of trees as these are concentrated along the boundaries of the site and would be retained where possible.

Policy also requires that *“replacement green space of similar or better quality is located in or immediately adjacent to the same community, providing similar or improved health benefits to the replaced area and is accessible to that community”*. It is argued that the land is owned and used by the University of Aberdeen as sports pitches, but current use is low. The use of the pitches are under review in line with the University’s estate strategy and in the meantime, the pitches are appropriately maintained for University use and are not available for use by the general public. Therefore, they are not particularly high quality and do not currently provide facilities for the general local community. Their loss will not impact the capacity for wider community sport in Aberdeen.

Any funds realised by the University through the development of this site will be used towards other University infrastructure. This includes investing in modernising and upgrading the sports facilities at Balgownie. If the site is identified for development, this will enable the University to improve the pavilion, drainage and pitch surfaces, ensuring better quality green space is provided in line with Policy NE3. Although the amount of pitches would reduce on the site, a substantial area of 7.1 ha would remain. They would be significantly enhanced, providing better quality facilities which would be available to the whole community, rather than just University students as they currently do. This is a significant improvement on the current position.

In addition to this, the Aberdeen Sports Village at Linksfield, which was brought forward by the University in conjunction with the City Council and SportScotland, includes a full sized indoor sports pitch, 135m indoor running track, 9 court hall, 4 squash courts, performance gym, 2 exercise studios, sports science facilities, café and conference facilities. The indoor sports pitch was one of the first of its kind in Scotland, thereby highlighting the national importance of Aberdeen Sports Village. The Aquatics Centre provides a 50m, 10 lane training and competition pool, as well as a 25m pool and diving facilities, with spectator seating for 600. This centre provides an opportunity for Aberdeen to host national and international aquatics competition, being a base for local performance swimming. These facilities are also open to the general public as well as University staff and students, unlike the Balgownie playing fields.

The Sports Village therefore provides a modern facility which significantly improves both the range and quality of sports facilities in the City, with a wider variety of sporting opportunities available. It is in a convenient location, approximately 3.5 kilometres from the bid site, with good access by public transport available. It is also located to the north of the City, therefore users of the current pitches will not have significant distances to travel to access the new facilities. It enhances public access to high quality sporting facilities as it is available to the whole of the city rather than just University students.

Future development plans for the Aberdeen Sports Village include further expansion to accommodate growing demand and all future investment in sport and leisure facilities by the University, the City Council and SportScotland in the north of the city will be focused on this facility. The Balgownie pitches are therefore surplus to requirements and their long term use is under review by the University. They should not be relied upon to meet long term demand and should be identified for appropriate alternative uses in the Aberdeen City Local Development Plan.

It is argued that the provision the Sports Village and the provision of improved facilities on the site which would be available for public use, more than meets the requirements of the Policy NE3 in relation to Urban Green Space and provides everything and more that the Balgownie pitches currently provide.

Landscape Features

The Council's assessment states that the site is zoned as Urban Green Space. This is addressed fully above and the aims of policy related to such areas would not be significantly impacted considering a large part of the site would remain undeveloped.

The Council also advise that the site is classed as Prime Landscape in the Aberdeen Landscape Character Assessment and potentially there will be some tree loss for access. This assessment is dated 1996 and it is not clear from this report that the site is classed as Prime Landscape and objection is therefore made to this assessment. Much of the landscape will have evolved in the 23 years since it was prepared and the development of parts of this site will have no significant impact on the landscape. It should also be emphasised that a large, central part of the site would be remain as playing fields which would soften any landscape impact from the proposed development.

Existing trees and areas of landscaping would also be retained where possible and a tree survey and habitat survey would be carried out in due course to determine any impact. The size of the site ensures that new planting can be undertaken to replace any that have been lost and encourage biodiversity, wildlife habitat and species throughout the site.

Landscape Fit

Aberdeen City Council acknowledge that the proposals would provide improved sport and leisure facilities which could be used by the local community. However, they go onto state that the playing fields are very prominent and can be viewed from large areas of the city to the south. This is refuted. The Landscape Character Assessment raised by Aberdeen City Council states that, in relation to the "Braes of Don" area that *"in the main, this area cannot be seen from many other viewpoints"*.

In any case, only parts of the site are identified for housing and development is focused on the least sensitive parts of the site. Area 1, extending to over 7ha, would be retained for sports and leisure uses, therefore, a large area of open space would still be retained in a central, reducing the impact of development.

Land Use Mix/Balance

Aberdeen City Council score the site highly in relation to the range of uses proposed on the site. Originally, this included residential, sport/leisure and business uses, thus creating a balance. It has been highlighted previously that Area 2 which was initially proposed for business use as an extension to the adjacent Aberdeen Innovation Park. However, due to the amount of business land available at that location, it is not considered appropriate to provide additional business opportunities through this bid.

Therefore, Area 2 is now proposed for a residential development, in association with Buccmoor LP who own the Park. Although the range of uses on the Balgownie site would subsequently be reduced, there is still an adequate range of uses in the area between the residential and improved sporting facilities proposed and the existing business use on the adjacent Innovation Park. This position has been accepted by Aberdeen City Council in the assessments of the other bids for Balgownie Playing Fields.

Other Constraints

The main issue in relation to this site is the zoning of the site as Urban Green Space and this is addressed in full above.

The Council continue to emphasise that the site is well used for recreation purposes and no clear excess of provision has been demonstrated. This is refuted. The development bid submitted at the pre-MIR stage highlighted that current use of the site for only for University students and recreational use is low. As a result, the use of the pitches are under review in line with the University's estate strategy. In the meantime, the pitches are appropriately maintained for University use, but are not available for use by the general public. The Sports Village provides an abundance of new and better quality facilities, thus further reducing demand for the Balgownie pitches. If the pitches were in high demand and well used, the University of Aberdeen would not be seeking their redevelopment.

Conclusion

To conclude, it is argued that the housing allowances identified for Aberdeen City should be increased, with additional sites identified for housing in the Proposed Local Development Plan. Although it is welcomed that Area 4 has been identified for a small scale residential development, it is argued that there is scope for further development on the site, either all of the areas proposed for development, or some additional parts.

Additional development at Balgownie would enable the retention and improvement of the recreational facilities on the site and allow their use by the whole community. Linkages would be provided to and from the site, ensuring good accessibility, to the benefit of the wider Bridge of Don area. The retention of a central area of open space would also ensure that a significant part of the site is retained as Urban Green Space and Green Space Network. Existing trees would be retained where possible, reducing any impact of development and ensuring houses are built within a mature landscape feature.

It is therefore respectfully requested that the Urban Green Space and Green Space Network is removed from all but Area 1 of the site and bid site B02/23 identified as an Opportunity Site for residential development within the Proposed Aberdeen Local Development Plan.



Aberdeen Local Development Plan Review

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YOUR DETAILS

Name	Claire Coutts
Organisation (if relevant)	Ryden LLP
On behalf of (if relevant)	The University of Aberdeen
Address	
Postcode	
Telephone	
E-mail	

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Paragraph 2.1 deals with housing allowances and states that the MIR puts forward new housing and employment allowances in line with the Proposed Strategic Development Plan 2018, which sets out a total allowance of 13,598 houses over three plan periods. This comprises 4168 in the period 2020-2032; 4500 in the period 2033-2035 and 4930 in the period 2036-2040. Any sites not identified as being 'effective' in the 2016 Housing Land Audit could be counted towards the 4168 allowances for 2020-2032. This includes 2449 constrained greenfield sites identified in the 2016 HLA; 120 greenfield sites in the current ALDP but not in the 2016 HLA; and 3048 brownfield sites. Aberdeen City Council have discounted the 2449 constrained greenfield sites as most are part of larger sites and may not be all be delivered in that period. That leaves 3528 units towards the 4168 allowances, leaving a shortfall of 640 units to be met through new allocations.

This is considered to be a low number of units, especially since local development plans are moving towards a 10 year timeframe in the ongoing review of the planning system. It is argued that the Council should take a more ambitious approach to growth and the housing supply target, housing land requirement and housing allowances.

Although the MIR provides a more positive approach to the delivery of new homes in later periods, through the identification of larger housing allowances in the periods 2033-2035 and 2036-2040, it is argued that the plan should be more aspirational in the first plan period, rather than increasing housing to later periods where delivery is less certain. This will support the recovery of the city following the recent downturn in the oil industry and boost economic growth.

The Council fail to acknowledge the significant value the delivery of new homes makes to the City Region and it is therefore argued that additional allocations should be identified in the Proposed Local Development Plan, particularly in the period 2020-2032. This will support the delivery of new homes, including affordable housing and should be in locations that people want to live, close to employment opportunities and infrastructure.

Q1. Do you agree with our preferred housing sites? Are there any other sites that would be suitable for housing?

On behalf of the University of Aberdeen, a general objection is made to the strategy of identifying only brownfield or small scale greenfield sites. It is argued that this does not provide an adequate range of

sites as required by SPP, to enable a variety of scale and choice of location to promote sustainable mixed communities.

Objection is also made to Aberdeen City Council's recommendation to identify bid site B02/21 at Balgownie (Area 2) as undesirable. This site was originally promoted at the pre-MIR stage as a site suitable for employment uses as an extension of the adjacent Aberdeen Innovation Park. However, the Council's assessment states that there is no need to identify any further employment land in the area. As such, it is considered that the site should be considered for residential development, in association with residential development proposals on the adjacent Park.

This representation should therefore be read in the context of submissions made by Buccmoor LP in relation to Site No. B02/04 at Aberdeen Innovation Park, specifically in respect of Campus 1. Their initial bid and subsequent representation argues that, given the difficulties in securing tenants for the existing employment uses on the site, that Campus 1 should be re-zoned to permit residential use on land immediately adjacent to Balgownie Playing Fields. An indicative masterplan for this land, as well as Balgownie Area 2, has been prepared to support this representation (Appendix 1).

Developed in conjunction with the Buccmoor land to the east, the site could provide for a range of house types and tenures with a higher than normal percentage, or indeed all, made over to affordable housing subject to a suitable partner being found. This would contribute greatly to satisfying an unmet need in this part of the City in proximity to an existing business location and within walking distance of public transport services. The indicative masterplan shows that access could be provided from Campus One via an existing roundabout, however, it is considered that a secondary access could be provided to the site from Balgownie Drive to the south. This would be investigated in due course. Longer-term access could be taken from Balgownie Playing Fields to the north should they be developed for housing as advocated through the separate Development Bids and representations submitted by University of Aberdeen under ref: B02/23, B02/24, B02/25 and B02/26.

The conjoined site is considered capable of accommodating around 120 units with approximately 80 occupying the Balgownie (Area 2) site. The indicative Masterplan, attached at Appendix 1 highlights the capacity of the site to accommodate development. The Council's assessment of the other Balgownie sites within the MIR indicates that education capacity is available within the Bridge of Don area to accommodate additional residential development. Indeed, there are no infrastructure constraints to the development of the site for residential use.

The Balgownie Area 2 site scores well in the assessment by Aberdeen City Council, however, some issues are raised to which we wish to respond.

Natural Conservation

It is noted by Aberdeen City Council that the site lies within the Green Space Network and Urban Green Space within the 2017 LDP. Although development is proposed on this part of the site, the Council fail to recognise that a large part of the wider site to the north will be retained as open space to ensure that this designation will remain unaffected over the adjacent land.

In relation to the Green Space Network, the aim of this designation is to protect, promote and enhance the wildlife, access, recreation, ecosystem services and landscape value of the area. The current value in these terms is relatively low, considering the site is used as playing fields by the University and is not available to the wider community. There are no wildlife designations on the site and there are significant opportunities to protect, promote and enhance wildlife on the site through the retention of existing trees as well as additional landscaping opportunities.

Access and recreation will be enhanced through the retention and improvement of the open space and recreational uses to the north of the site, with links provided from bid site B02/21 to this area. As such, the current designations can be retained on the adjacent land, allowing this bid site, which is considered to be less valuable and sensitive, to be developed. This will enable the improvement of University facilities to the north and elsewhere, which is fundamental to the University's capital investment programme.

In terms of Urban Green Space, Policy NE3 of the 2017 LDP states that development will only be acceptable where *"there is no significant loss to the landscape character and amenity of the site and adjoining area; public access is either maintained or enhanced; the site is of no significant wildlife or heritage value; there is no loss of established or mature trees"*. During a previous LDP examination, both Aberdeen City Council and the Reporter concluded that the site has no landscape value. It is argued that if the site is identified in the Local Development Plan for development, public access would be enhanced considering that it is currently for University use only. As stated above, the site has no significant wildlife or heritage value and there would be no significant loss of trees as these are concentrated along the boundaries of the site and would be retained where possible.

Policy also requires that *"replacement green space of similar or better quality is located in or immediately adjacent to the same community, providing similar or improved health benefits to the replaced area and is accessible to that community"*. It is argued that the land is owned and used by the University of Aberdeen as sports pitches, but current use is low. The use of the pitches are under review in line with the University's estate strategy and in the meantime, the pitches are appropriately maintained for University use and are not available for use by the general public. Therefore, they do not currently provide facilities for the general local community and their loss will not impact the capacity for wider community sport in Aberdeen.

Any funds realised by the University through the development of this site will be used towards other University infrastructure. This includes investing in modernising and upgrading the sports facilities at Balgownie within Area 1 to the north. If this site is identified for development, this will enable the University to improve the pavilion, drainage and pitch surfaces. Although the amount of pitches would reduce on the site, a substantial area of 7.1 ha would remain to the north of Area 2. They would be significantly enhanced, providing better quality facilities which would be available to the whole community, rather than just University students as they currently do. This is a significant improvement on the current position.

In addition to this, Aberdeen Sports Village at Linkfield, which was brought forward by the University in conjunction with the City Council and SportScotland, includes a full sized indoor sports pitch, 135m indoor running track, 9 court hall, 4 squash courts, performance gym, 2 exercise studios, sports science facilities, café and conference facilities. The indoor sports pitch was one of the first of its kind in Scotland, thereby highlighting the national importance of Aberdeen Sports Village. The Aquatics Centre provides a 50m, 10 lane training and competition pool, as well as a 25m pool and diving facilities, with spectator seating for 600. This centre provides an opportunity for Aberdeen to host national and international aquatics competition, being a base for local performance swimming. These facilities are open to the general public as well as University staff and students, unlike the Balgownie playing fields.

The Sports Village therefore provides a modern facility which significantly improves both the range and quality of sports facilities in the City, with a wider variety of sporting opportunities available. It is in a convenient location, approximately 3.5 kilometres from the bid site, with good access by public transport available. It is also located to the north of the City, therefore users of the current pitches will not have significant distances to travel to access the new facilities. It enhances public access to high quality sporting facilities because it is available to the whole of the city rather than just University students.

Future development plans for the Aberdeen Sports Village include further expansion to accommodate growing demand and all future investment in sport and leisure facilities by the University, the City Council and SportScotland in the north of the city will be focused on this facility. The Balgownie pitches are therefore surplus to requirements and their long term use is under review by the University. They should not be relied upon to meet long term demand and should be identified for appropriate alternative uses in the Aberdeen City Local Development Plan.

It is argued that the provision the Sports Village and the provision of improved facilities on the site which would be available for public use, more than meets the requirements of the Policy NE3 in relation to Urban Green Space and provides everything and more that the Balgownie pitches currently provide.

Landscape Features

The Council's assessment states that the site is zoned as Urban Green Space. This is addressed fully above and the aims of policy related to such areas would not be significantly impacted considering a large part of land to the north would remain undeveloped.

The Council also advise that the site is classed as Prime Landscape in the Aberdeen Landscape Character Assessment and potentially there will be some tree loss for access. This assessment is dated 1996 and it is not clear from this report that the site is classed as Prime Landscape and objection is therefore made to this assessment. Much of the landscape will have evolved in the 23 years since it was prepared and the development of parts of this site will have no significant impact on the landscape. It should also be emphasised that a large area of open space would be retained to the north of the site, to soften any landscape impact from the proposed development. The Council accept in the 'Landscape Fit' section that development would be "*unobtrusive in the landscape*".

Existing trees and areas of landscaping would be retained where possible, if worthy of retention and a tree survey and habitat survey would be carried out in due course to determine any impact. The size of the site ensures that new planting can be undertaken to replace any that have been lost and encourage biodiversity, wildlife habitat and species throughout the site.

Landscape Fit

Aberdeen City Council state that the development would provide an extension to the already existing Science and Technology Park and would therefore be unobtrusive in the existing landscape. This was based on the original employment uses proposed. The residential use now promoted would similarly be unobtrusive in the landscape. It is bound by existing development to the east and south, with landscaping on most sides. There is capacity to retain large areas of open space on the site and this is reflected in the indicative layout prepared for the site (Appendix 1), showing a large, central area of open space. This ensures that housing is created in an appropriate landscape setting.

In visual terms, from the south, the flats on Balgownie Drive are the highest point and these are visible from the surrounding area. They also screen the bid site and it is therefore not visible from this point. Further to this, Aberdeen City Council, in their previous assessment of the site confirmed that the development would not intrude into the immediate landscape. Any development would be well screened or seen in the context of adjacent development, including existing residential properties to the south and proposed residential use of the adjacent Campus 1. Any further development within bid site B0221 would integrate well in the landscape.

Land Use Mix/Balance

Aberdeen City Council state that although only one type of use is proposed on the bid site, the 5 areas together constitute a mix of residential, sport/leisure and business use, thus creating a balance. Although Area 2 is now proposed for a residential development in association with Buccmoor LP, the Council's assessment would still be valid, given the employment uses that are located on the remainder of the Innovation Park.

Other Constraints

The main issue in relation to this site is the zoning of the site as Urban Green Space and the Council's contention that the site is in recreational use. The Urban Green Space issue is addressed in full above.

The Council acknowledge that this part of the playing field is not as high quality as the others and appears to be used less and it is argued that this justifies its removal from its current designation. The use of the playing fields are low and under review in line with the University's estate strategy. In the meantime, the pitches are appropriately maintained for University use, but are not available for use by the general public. Further to this, the Sports Village provides an abundance of new and better quality facilities, thus further reducing demand for the Balgownie pitches. If the pitches were in high demand and well used, the University of Aberdeen would not be seeking their redevelopment.

The Council also acknowledge that the site can be accessed via Balgownie Drive. It is therefore argued, that Area 2 is well located for residential development given the proximity of existing residential development adjacent.

Conclusion

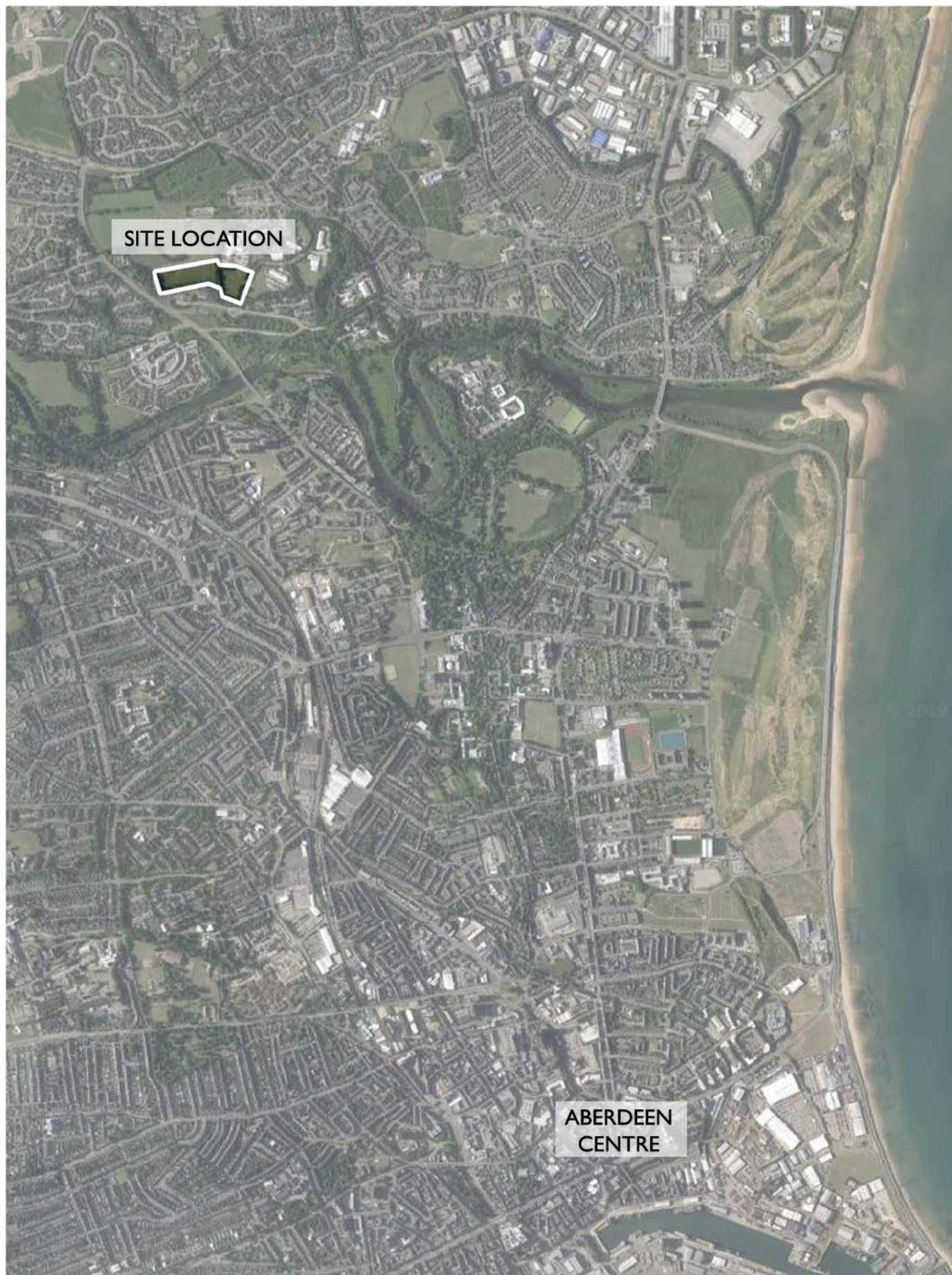
To conclude, it is argued that the housing allowances identified for Aberdeen City should be increased, with additional sites identified for housing in the Proposed Local Development Plan.

Aberdeen City Council conclude that there is no identified need for further employment land in the area, therefore, it is argued that the site should be identified for residential uses. This would fit well in the landscape, adjacent to existing residential development to the south and should be promoted in conjunction with adjoining land at Campus 1 which is owned by Buccmoor LP.

The development of Area 2 would enable the retention and improvement of the recreational facilities within Area 1 to the north and allow their use by the whole community. Linkages would be provided from the site, ensuring good accessibility, to the benefit of the wider Bridge of Don area. The retention of a central area of open space to the north would also ensure that a significant part of the site is retained as Urban Green Space and Green Space Network. Existing trees would be retained where possible, reducing any impact of development.

It is therefore respectfully requested that the Urban Green Space and Green Space Network is removed from Balgownie Area 2 and bid site B02/21 identified as an Opportunity Site for residential development in the Proposed Aberdeen Local Development Plan.

Appendix 1
Indicative Masterplan

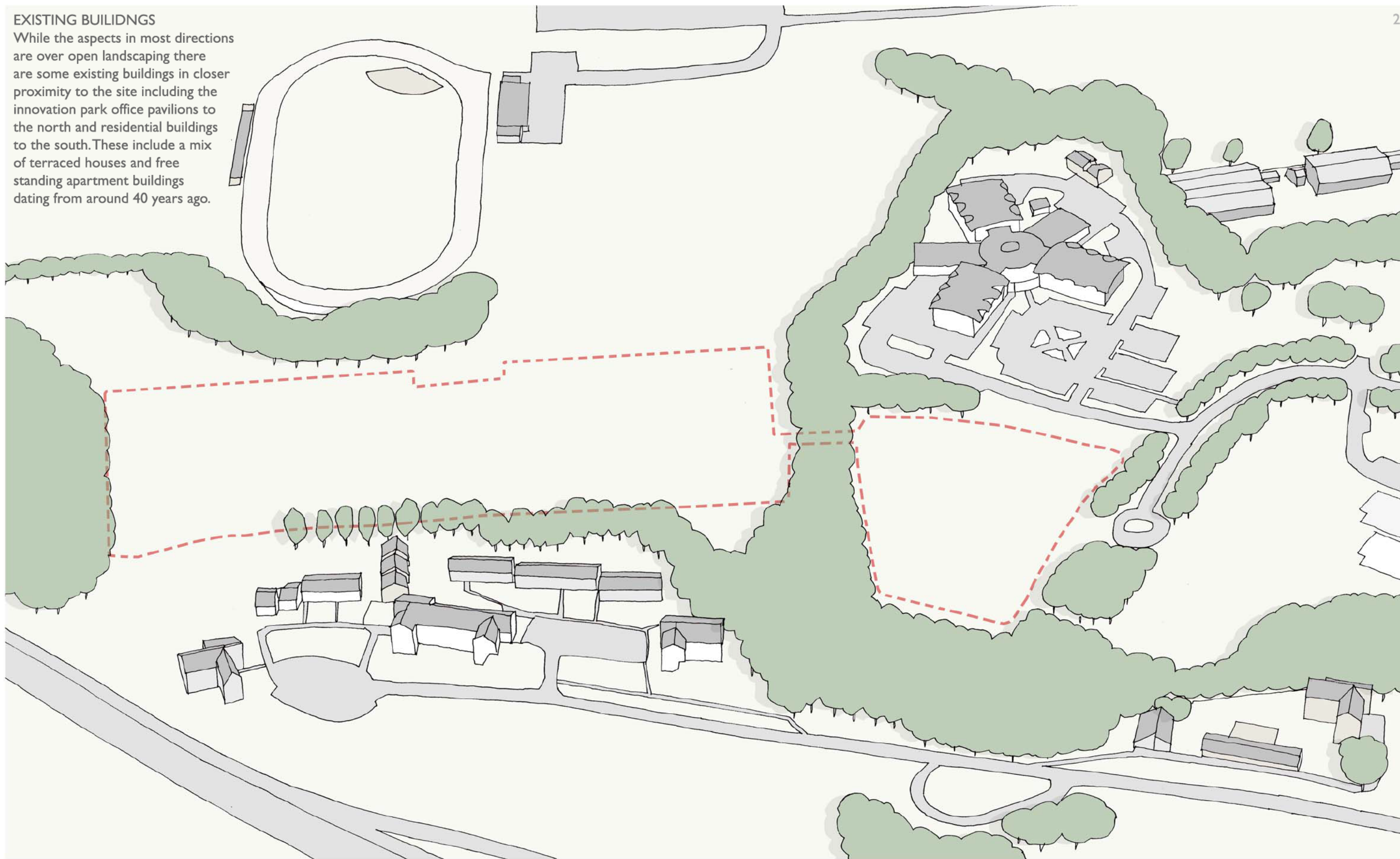


LOCATION

The site sits in a very green setting to the north of central Aberdeen close to the A92 which links with Bridge of Don.

EXISTING BUILDINGS

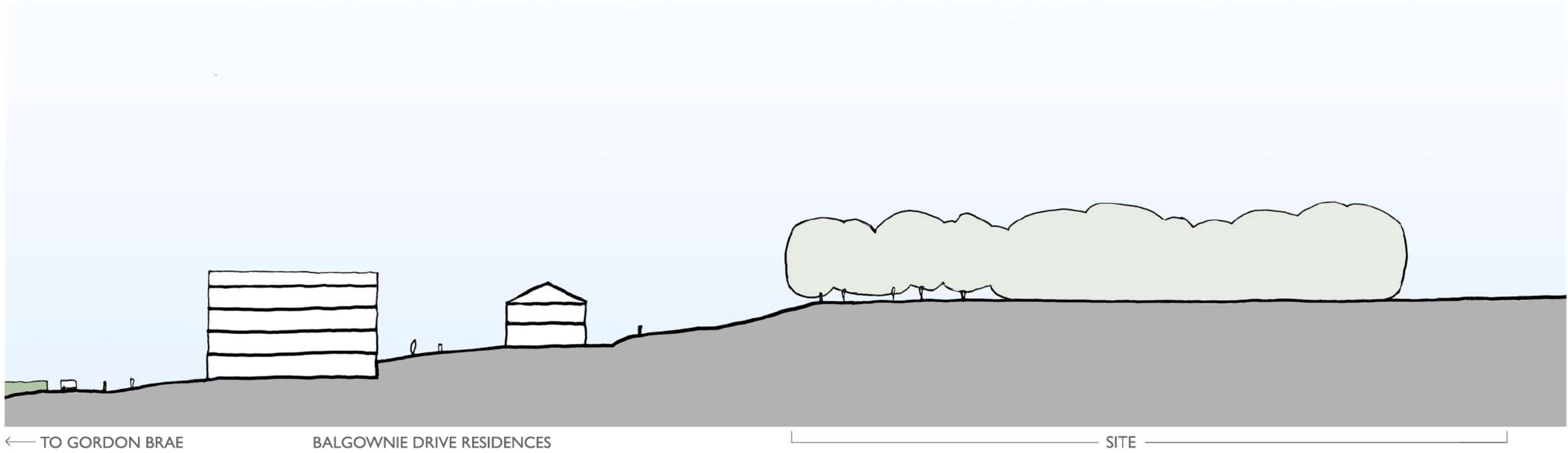
While the aspects in most directions are over open landscaping there are some existing buildings in closer proximity to the site including the innovation park office pavilions to the north and residential buildings to the south. These include a mix of terraced houses and free standing apartment buildings dating from around 40 years ago.



SITE SURROUNDINGS

The existing buildings close to the site are generally low and vary between two and four storeys. The taller residential buildings lie to the south but as they are relatively compact on plan and, as the topography falls away in that direction, they would not be significantly impacted in visual terms. The Innovation Park buildings lying to the north are commercial use, and so have higher floor to floor heights than the existing residential buildings, but they are only two storey structures with relatively low, curved roof forms so do not present tall built forms. The proposed design is based on new family housing, with potentially a mix of tenures, using two and three storey scale of buildings so there will be minimal visual impact when looking towards the city centre or looking back across the site from afar. The far views looking from the south have the strong tree line in the foreground and would not be greatly affected by the low scale of buildings proposed.

VISUAL IMPACT



LEVELS/TOPOGRAPHY

The open setting offers excellent amenity to the site for potential residential use especially looking south where the existing topography falls away creating opportunities for far reaching views back across the city centre. The smaller eastern part of the site falls to the south, opening up excellent view opportunities, while the western part is generally flat east to west and very gently sloping north to south.



SITE ANALYSIS

ACCESS

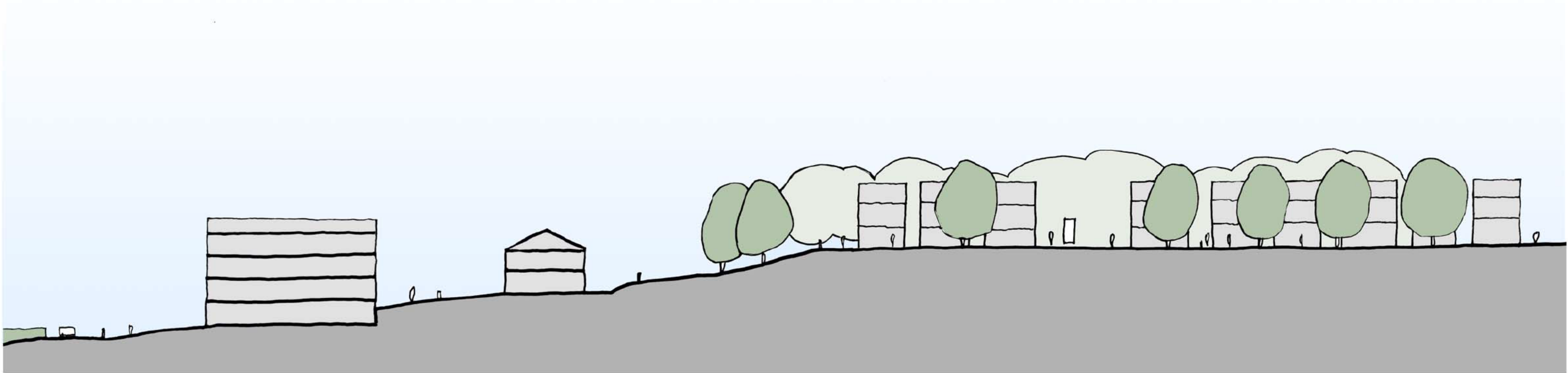
There is only one vehicular access point which can be formed using a new connection to the existing roundabout lying to the east of the site. This is a relatively new roundabout and, subject to detailed checking, should be able to give full car, service vehicle and emergency vehicle access. There will also be additional pedestrian and cycle access points. The maximum number of new houses is likely to be less than 200 and therefore the single access point should be acceptable for emergency access.



STREETS/MOVEMENT/HOUSE DESIGNS

HOUSE DESIGNS

The final typology and mix of house types will need to be developed in more detail, in line with a detailed brief in due course, however the outline pattern of streets indicated will enable a variety of house types to be developed to meet market and general demand. The provision of family housing over the site will therefore be able to be realised once subsequent design detail is progressed. This further design stage will also factor in Aberdeen housing standards for instance garden sizes, front-to-front and back-to back house spacing, parking arrangements and general amenity provision across the site.



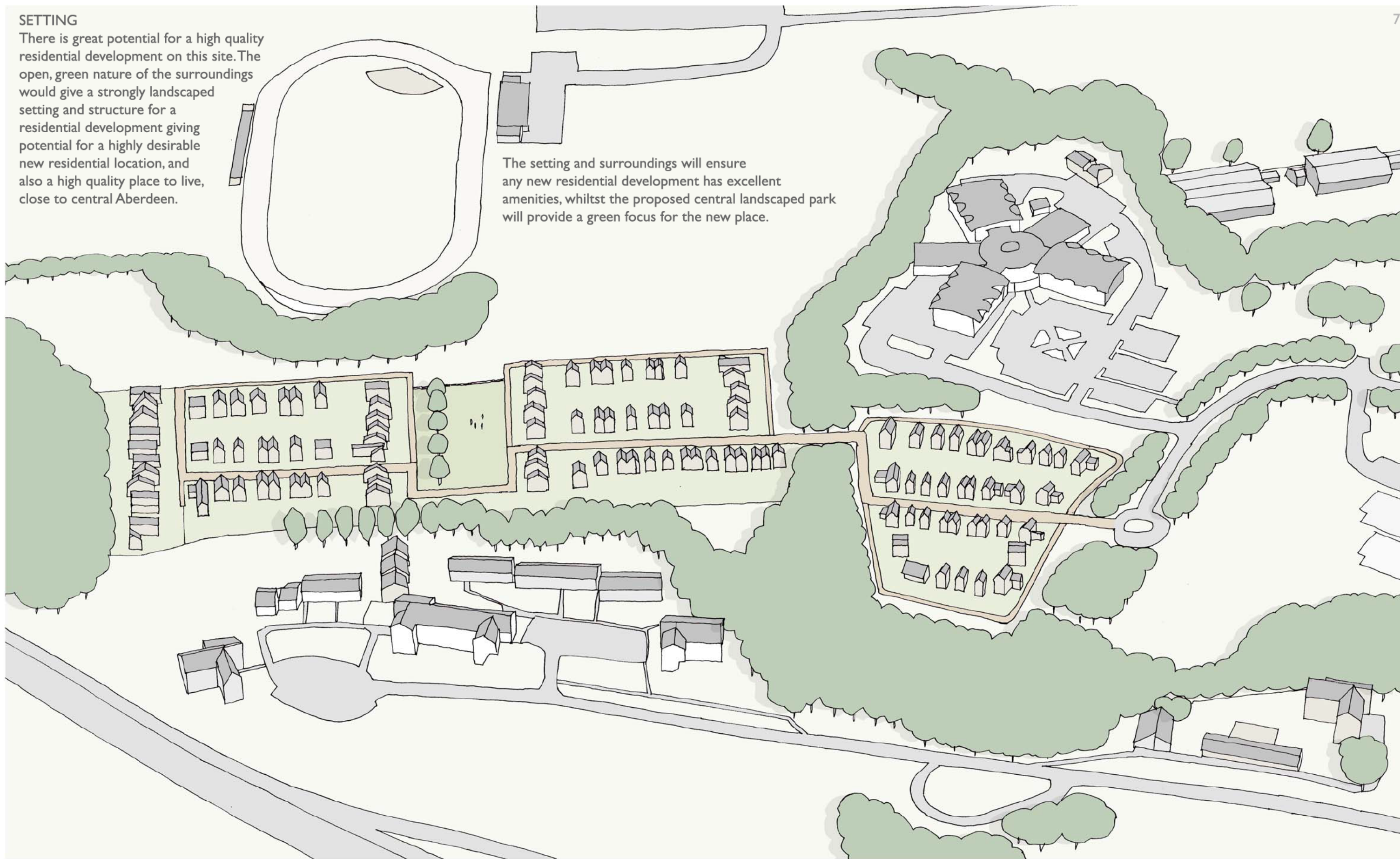
LANDSCAPE

The green, heavily landscaped, setting and sloping topography offer huge opportunities to develop a well-designed residential development structured by the landscaped setting. This will give the development the potential to have a strong landscaped character by using the basic principles of well-designed spaces buildings and streets.

SETTING

There is great potential for a high quality residential development on this site. The open, green nature of the surroundings would give a strongly landscaped setting and structure for a residential development giving potential for a highly desirable new residential location, and also a high quality place to live, close to central Aberdeen.

The setting and surroundings will ensure any new residential development has excellent amenities, whilst the proposed central landscaped park will provide a green focus for the new place.



KEY DESIGN PRINCIPLES

A central design principle with new housing in strongly landscaped settings such as this is the external presentation of the development and the relationship between private and public spaces. The indicative street design illustrated is based on having shared surface streets around the perimeter of the site for access. These shared surfaces have a primary function of enabling safe pedestrian, cycle and car access to the houses along with service and emergency vehicles. Another key advantage with this arrangement is it enables the perimeter houses to face outwards and therefore present frontages to the surrounding landscaping, rather than private back garden spaces. This will enable a high quality place to be created with all houses facing the surroundings enabling the rear, private, gardens to be enclosed thereby creating a clear delineation between private and public space.



Aberdeen Local Development Plan Review

Main Issues Report Response Form 2019

Aberdeen City Council has published a Main Issues Report (MIR) which is part of the process of preparing a new Local Development Plan. It is designed to gather views on specific proposals and sets out options for dealing with the key planning matters facing Aberdeen over the next 20 years such as the location of new housing and employment development, the future of retailing and the City Centre, housing needs and tackling climate change. It also includes a number of potential new policies which would be used in the determination of planning applications.

The MIR has been published alongside a Monitoring Statement and Environmental Report. Copies are available to view at Marischal College, Broad Street, Aberdeen. These, and other supporting documents, are available at: - www.aberdeencity.gov.uk/alp2022

Everyone now has the chance to comment on the report and associated documents. All comments received will be considered and used to inform the preparation of the Proposed Aberdeen City Local Development Plan. There will be a further opportunity to comment on the Proposed Plan when it is published in early 2020.

The consultation runs from 4 March 2019 to 13 May 2019.

Responses to the published documents can be:

- made online at:- <http://consultation.aberdeencity.gov.uk/planning/mir2019>;
- emailed to:- ldp@aberdeencity.gov.uk; or
- by post to:- Local Development Plan Team, Strategic Place Planning, Aberdeen City Council, Business Hub 4, Ground Floor North, Marischal College, Broad Street, Aberdeen, AB10 1AB.

Completed response forms should be with us no later than 13 May 2019.



YOUR DETAILS

Name	Claire Coutts
Organisation (if relevant)	Ryden LLP
On behalf of (if relevant)	The University of Aberdeen
Address	
Postcode	
Telephone	
E-mail	

Thank you for taking the time to complete this response form. If you wish to be added to the LDP e-mailing list to be kept informed of our progress in producing the next Local Development Plan, please tick here



If yes, please provide an e-mail address

PRIVACY STATEMENT

As part of the review of the Local Development Plan, Aberdeen City Council (ACC) will offer you several opportunities to submit your views and comments. These opportunities will range from the current consultation stage, the Main Issues Report, where we will ask you to comment on specific proposals and alternatives to the Proposed Plan stage where the set view of ACC has been established.

ACC are legally required to consult at this stage and at Proposed Plan stage. This is set out in the Town and Country Planning (Scotland) Act 1997 (as amended) and supporting regulations. The Environmental Assessment (Scotland) Act 2005 also requires us to consult on a Strategic Environmental Assessment Environmental Report.

By submitting a response to the consultation, you understand that ACC can use the information provided in this form, including personal data, as part of the review of the Aberdeen City Local Development Plan. ACC will not share or disclose any personal data about you to any organization or person unless it is authorized or required to do so by law.

The data controller for this information is ACC. We understand our legal basis for processing this information as Article 6(1)(c) of the General Data Protection Regulation as this is an activity we are legally required to carry out under the Town and Country Planning (Scotland) Act 1997 (as amended) and supporting regulations and The Environmental Assessment (Scotland) Act 2005. The data on the form will be used to inform the preparation of the Proposed Aberdeen City Local Development Plan 2022. At the end of the consultation, where contact details have been provided, the Local Development Plan team will provide you with a respondent number. You may also be contacted about the comments you have made and, as obliged by the Town and Country Planning (Scotland) Act 1997 (as amended) and supporting regulations, the Local Development Plan team will contact you to inform you of the publication of the proposed Aberdeen Local Development Plan in early 2020. If you chose not to provide your contact details, your comments will still be valid but we will not be able to contact you in the future.

Responses will be collated, redacted, summarised and stored electronically or in locked cabinets in Marischal College. All redacted responses will be published, alongside the respondents name (if provided), on the Aberdeen City Local Development Plan website. Contact details will not be made public, but your name and respondent number will be published.

Aberdeen City Council will only keep your personal data for as long as is needed. Data will be kept until the emerging Local Development Plan is itself replaced – this is likely to be around 5 years following its adoption in 2022 – so 2027. Following this, data will be disposed of in a secure manner.

YOUR DATA, YOUR RIGHTS

You've got legal rights about the way ACC handles and uses your data, which include the right to ask for a copy of it, and to ask us to stop doing something with your data. Please contact the Council's Data Protection Officer by e-mailing DataProtectionOfficer@aberdeencity.gov.uk or writing to Data Protection Officer, Aberdeen City Council, Governance, Level 1 South, Marischal College, Broad Street, Aberdeen, AB10 1AB. More information is available at: - <https://www.aberdeencity.gov.uk/your-data>

YOUR COMMENTS

<p>Which document(s) are you commenting on?</p>	<ul style="list-style-type: none">• Main Issues Report• Strategic Environmental Assessment Environmental Report• Monitoring Statement	<input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
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Please indicate the document and the specific Issue, Question, Site, Policy, Map or Table you are commenting on. Please provide your comments below and explain your reason for supporting, opposing or commenting on this specific part of the document.

Please refer to attached Paper Apart

YOUR COMMENTS CONTINUED

PAPER APART

Representations to the Aberdeen City Local Development Plan 2019 Main Issues Report on behalf of the University of Aberdeen in relation to Site No. B02/24, Balgownie (Area 3), Bridge of Don and in relation to the Settlement Strategy, Question 1.

Introduction

The University of Aberdeen has a major influence on the city. Founded in 1495, it is the oldest University in Scotland with a student population of around 15,000, studying 700 programmes across 85 subject areas, taught across 12 schools. The University community represents a significant proportion of the city's population and contributes approximately £500m per annum to the local economy. The students are invaluable to local businesses and the city overall in terms of the money they spend and the part timework they take up during their studies.

Like every major university, The University of Aberdeen must compete globally to attract the highest quality of students and staff from around the world. To do this successfully, it has invested heavily in the campus, including medical research, where University staff have demonstrated their skills as world leaders in their field. The Institute of Medical Sciences, completed in 2002, was designed to provide state-of-the-art facilities for medical researchers and their students. This was followed in 2007 by the Health Sciences Building. The Foresterhill campus is now one of Europe's major biomedical research centres. The Suttie Centre for Teaching and Learning in Healthcare, a £20m healthcare training facility, opened in 2009 and 2012 saw the opening of the £57 million Sir Duncan Rice Library in Old Aberdeen. The most recent development, the Science Teaching Hub, is currently under construction.

One of the key development priorities of the University relates to physical infrastructure. This includes the need to work independently and in partnership to provide a suitable physical infrastructure within which cultural engagement can flourish. This includes developing infrastructure to enhance the University's support for cultural and community activity, in particular through major capital projects such as the new library and sports facilities.

Over the years, the University has undertaken an ambitious capital investment programme to create appropriate physical infrastructure for staff and students. This has amounted to over £200 million over the last decade, generating considerable employment opportunities for local industries. This investment has been led by three flagship projects, one of which is the Aberdeen Sports Village which opened in August 2009. The capital investment programme for the next decade is equally ambitious with more than £200 million allocated to be spent over the next ten years.

Aberdeen Sports Village was a joint development between the University, Aberdeen City Council and SportScotland who themselves invested £7 million in this development due to their desire for a regional sports facility in the City. This world-class facility provides a host of sporting amenities previously unavailable in the area, resulting in top class sporting facilities for the whole of the City, not just the University. These include: a sports hall with space for 9 badminton courts, a third-generation indoor

football pitch; a new athletics arena; an indoor athletics area; hockey pitches; squash courts; a gym; studio space; a fitness suite and performance clinic; and a café and crèche facilities. The facility also includes significantly improved disabled access. An aquatics centre with a 50m swimming pool opened in May 2014.

Settlement Strategy

On behalf of the University of Aberdeen, objection is made to the settlement strategy within the Aberdeen City Main Issues Report.

Paragraph 2.1 deals with housing allowances and states that the MIR puts forward new housing and employment allowances in line with the Proposed Strategic Development Plan 2018, which sets out a total allowance of 13,598 houses over three plan periods. This comprises 4168 in the period 2020-2032; 4500 in the period 2033-2035 and 4930 in the period 2036-2040. Any sites not identified as being 'effective' in the 2016 Housing Land Audit could be counted towards the 4168 allowances for 2020-2032. This includes 2449 constrained greenfield sites identified in the 2016 HLA; 120 greenfield sites in the current ALDP but not in the 2016 HLA; and 3048 brownfield sites. Aberdeen City Council have discounted the 2449 constrained greenfield sites as most are part of larger sites and may not be all be delivered in that period. That leaves 3528 units towards the 4168 allowances, leaving a shortfall of 640 units to be met through new allocations.

This is considered to be a low number of units, especially since local development plans are moving towards a 10 year timeframe in the ongoing review of the planning system. It is argued that the Council should take a more ambitious approach to growth and the housing supply target, housing land requirement and housing allowances.

Although the MIR provides a more positive approach to the delivery of new homes in later periods, through the identification of larger housing allowances in the periods 2033-2035 and 2036-2040, it is argued that the plan should be more aspirational in the first plan period, rather than increasing housing to later periods where delivery is less certain. This will support the recovery of the city following the recent downturn in the oil industry and boost economic growth.

The Council fail to acknowledge the significant value the delivery of new homes makes to the City Region and it is therefore argued that additional allocations should be identified in the Proposed Local Development Plan, particularly in the period 2020-2032. This will support the delivery of new homes, including affordable housing and should be in locations that people want to live, close to employment opportunities and infrastructure.

Q1. Do you agree with our preferred housing sites? Are there any other sites that would be suitable for housing?

On behalf of the University of Aberdeen, objection is made to the general strategy of identifying only brownfield or small scale greenfield sites. It is argued that this does not provide an adequate range of

sites as required by SPP, to enable a variety of scale and choice of location to promote sustainable mixed communities.

Objection is also made to Aberdeen City Council's recommendation to identify bid site B02/24 at Balgownie (Area 3) as undesirable. This site is considered suitable for a residential development of 117 houses along with associated infrastructure and open space. This representation should be read in conjunction with the development bid submitted at the pre-MIR stage, along with the development bid submitted for the entire site (Ref: B02/23). These demonstrate that the site is suitable for development and should be identified in the Proposed Aberdeen City Local Development Plan as an Opportunity Site for residential development.

The Balgownie Area 3 site scores well in the assessment by Aberdeen City Council, however, some issues are raised to which we wish to respond.

Natural Conservation

It is noted by Aberdeen City Council that the site lies within the Green Space Network and Urban Green Space within the 2017 LDP. Although development is proposed on this part of the site, the Council fail to recognise that a large part of the wider site will be retained as open space to ensure that this designation can remain over the adjacent land, extending to approximately 7.1ha.

In relation to the Green Space Network, the aim of this designation is to protect, promote and enhance the wildlife, access, recreation, ecosystem services and landscape value of the area. The current value in these terms is relatively low, considering the site is used as playing fields by the University and is not available to the wider community. There are no wildlife designations on the site and there are significant opportunities to protect, promote and enhance the wildlife on the site through the retention of existing trees and implementation of additional landscaping.

Access and recreation opportunities will be enhanced through the retention and improvement of the open space and recreational uses on the land to the east, with links provided from bid site B02/24 to this area. As such, the current designations can be retained on the adjacent land, allowing this bid site, which is considered to be less valuable and sensitive, to be developed. This will enable the improvement of University facilities to the north and elsewhere, which is fundamental to the University's capital investment programme.

In terms of Urban Green Space, Policy NE3 of the 2017 LDP states that development will only be acceptable where *"there is no significant loss to the landscape character and amenity of the site and adjoining area; public access is either maintained or enhanced; the site is of no significant wildlife or heritage value; there is no loss of established or mature trees"*. During a previous LDP examination, both Aberdeen City Council and the Reporter concluded that the site has no landscape value. It is argued that if the site is identified in the Local Development Plan for development, public access would be enhanced considering that it is currently for University use only. The site has no significant wildlife or heritage value and the areas of trees can be designed into any layout of the site. As such, there would be no significant loss of trees which would be retained where possible.

Policy also requires that *“replacement green space of similar or better quality is located in or immediately adjacent to the same community, providing similar or improved health benefits to the replaced area and is accessible to that community”*. It is argued that the land is owned and used by the University of Aberdeen as sports pitches, but current use is low. The use of the pitches are under review in line with the University’s estate strategy and in the meantime, the pitches are appropriately maintained for University use and are not available for use by the general public. Therefore, they do not currently provide facilities for the general local community and their loss will not impact the capacity for wider community sport in Aberdeen.

Any funds realised by the University through the development of this site will be used towards other University infrastructure. This includes investing in modernising and upgrading the sports facilities at Balgownie within Area 1. If this site is identified for development, this will enable the University to improve the pavilion, drainage and pitch surfaces. Although the amount of pitches would reduce on the site, a substantial area of 7.1 ha would remain to the east of Area 3. They would be significantly enhanced, providing better quality facilities which would be available to the wider community. This is a significant improvement on the current position.

In addition to this, Aberdeen Sports Village at Linkfield, which was brought forward by the University in conjunction with the City Council and SportScotland, includes a full sized indoor sports pitch, 135m indoor running track, 9 court hall, 4 squash courts, performance gym, 2 exercise studios, sports science facilities, café and conference facilities. The indoor sports pitch was one of the first of its kind in Scotland, thereby highlighting the national importance of Aberdeen Sports Village. The Aquatics Centre provides a 50m, 10 lane training and competition pool, as well as a 25m pool and diving facilities, with spectator seating for 600. This centre provides an opportunity for Aberdeen to host national and international aquatics competition, being a base for local performance swimming. These facilities are open to the general public as well as University staff and students, unlike the Balgownie playing fields.

The Sports Village therefore provides a modern facility which significantly improves both the range and quality of sports facilities in the City, with a wider variety of sporting opportunities available. It is in a convenient location, approximately 3.5 kilometres from the bid site, with good access by public transport available. It is also located to the north of the City, therefore users of the current pitches will not have significant distances to travel to access the new facilities. It enhances public access to high quality sporting facilities because it is available to the whole of the city rather than just University students.

Future development plans for the Aberdeen Sports Village include further expansion to accommodate growing demand and all future investment in sport and leisure facilities by the University, the City Council and SportScotland in the north of the city will be focused on this facility. The Balgownie pitches are therefore surplus to requirements and their long term use is under review by the University. They should not be relied upon to meet long term demand and should be identified for appropriate alternative uses in the Aberdeen City Local Development Plan.

It is argued that the provision of the Sports Village and the provision of improved facilities on the site which would be available for public use, more than meets the requirements of the Policy NE3 in relation to Urban Green Space and provides everything and more than the Balgownie pitches currently provide.

Landscape Features

The Council's assessment states that the site is zoned as Urban Green Space. This is addressed fully above and the aims of policy related to such areas would not be significantly impacted considering a large part of the site would remain undeveloped.

The Council also advise that the site is classed as Prime Landscape in the Aberdeen Landscape Character Assessment and that the playing fields are a prominent green space feature which can be seen widely from the south. This assessment is dated 1996 and it is not clear from this report that the site is classed as Prime Landscape and objection is therefore made to this assessment. In relation to the "Braes of Don" area it states that "**in the main, this area cannot be seen from many other viewpoints**". In any case, much of the landscape will have evolved in the 23 years since it was prepared and the development of parts of this site will have no significant impact on the landscape. It should also be emphasised that a large area of open space would be retained to the north of the site, to soften any landscape impact.

Land Use Conflict

Aberdeen City Council state that as the site sits within the Danestone residential area, it is not likely that there will be any conflict with any adjoining land uses. It is therefore questioned why the site only scores a 2 for this issue, when there is no conflict arising?

Other Constraints

The main issue in relation to this site is the zoning of the site as Urban Green Space and the Council's contention that the site is a high quality recreational facility, is well used and no clear excess of provision has been demonstrated.

The Urban Green Space issue is addressed in full above.

In terms of the use and quality of the recreational facility, the Council's assessment contradicts the landowner's position. The development bid submitted at the pre-MIR stage highlighted that current use of the site for recreational use is low and as a result, the use of the pitches are under review in line with the University's estate strategy. In the meantime, the pitches are appropriately maintained for University use, but are not available for use by the general public. This would suggest that they are not particularly well used, or high quality, compared with the new and better quality facilities at the Sports Village, which further reduces demand for the Balgownie pitches. If the pitches were in high demand and well used, the University of Aberdeen would not be seeking their redevelopment to invest in improving the remaining facilities within Area 1.

Conclusion

To conclude, it is argued that the housing allowances identified for Aberdeen City should be increased, with additional sites identified for housing in the Proposed Local Development Plan.

The identification of Area 3 for residential development would enable the retention and improvement of the recreational facilities within Area 1 to the east and allow their use by the whole community. Linkages would be provided to and from the site, ensuring good accessibility, to the benefit of the wider Bridge of Don area. The retention of a central area of open space would also ensure that a significant part of the site is retained as Urban Green Space and Green Space Network. Existing trees would be retained where possible, reducing any impact of development.

It is therefore respectfully requested that the Urban Green Space and Green Space Network is removed from Balgownie Area 3 and bid site B02/24 is identified as an Opportunity Site for residential development in the Proposed Aberdeen Local Development Plan.



Aberdeen Local Development Plan Review

Main Issues Report Response Form 2019

Aberdeen City Council has published a Main Issues Report (MIR) which is part of the process of preparing a new Local Development Plan. It is designed to gather views on specific proposals and sets out options for dealing with the key planning matters facing Aberdeen over the next 20 years such as the location of new housing and employment development, the future of retailing and the City Centre, housing needs and tackling climate change. It also includes a number of potential new policies which would be used in the determination of planning applications.

The MIR has been published alongside a Monitoring Statement and Environmental Report. Copies are available to view at Marischal College, Broad Street, Aberdeen. These, and other supporting documents, are available at: - www.aberdeencity.gov.uk/alDP2022

Everyone now has the chance to comment on the report and associated documents. All comments received will be considered and used to inform the preparation of the Proposed Aberdeen City Local Development Plan. There will be a further opportunity to comment on the Proposed Plan when it is published in early 2020.

The consultation runs from 4 March 2019 to 13 May 2019.

Responses to the published documents can be:

- made online at:- <http://consultation.aberdeencity.gov.uk/planning/mir2019>;
- emailed to:- ldp@aberdeencity.gov.uk; or
- by post to:- Local Development Plan Team, Strategic Place Planning, Aberdeen City Council, Business Hub 4, Ground Floor North, Marischal College, Broad Street, Aberdeen, AB10 1AB.

Completed response forms should be with us no later than 13 May 2019.



YOUR DETAILS

Name	Claire Coutts
Organisation (if relevant)	Ryden LLP
On behalf of (if relevant)	The University of Aberdeen
Address	
Postcode	
Telephone	
E-mail	

Thank you for taking the time to complete this response form. If you wish to be added to the LDP e-mailing list to be kept informed of our progress in producing the next Local Development Plan, please tick here



If yes, please provide an e-mail address

PRIVACY STATEMENT

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YOUR DATA, YOUR RIGHTS

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YOUR COMMENTS

<p>Which document(s) are you commenting on?</p>	<ul style="list-style-type: none">• Main Issues Report• Strategic Environmental Assessment Environmental Report• Monitoring Statement	<input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
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Please indicate the document and the specific Issue, Question, Site, Policy, Map or Table you are commenting on. Please provide your comments below and explain your reason for supporting, opposing or commenting on this specific part of the document.

Please refer to attached Paper Apart

YOUR COMMENTS CONTINUED

PAPER APART

Representations to the Aberdeen City Local Development Plan 2019 Main Issues Report on behalf of the University of Aberdeen in relation to Site No. B02/25, Balgownie (Area 4), Bridge of Don and in relation to Question 1.

Introduction

The University of Aberdeen has a major influence on the city. Founded in 1495, it is the oldest University in Scotland with a student population of around 15,000, studying 700 programmes across 85 subject areas, taught across 12 schools. The University community represents a significant proportion of the city's population and contributes approximately £500m per annum to the local economy. The students are invaluable to local businesses and the city overall in terms of the money they spend and the part timework they take up during their studies.

Like every major university, The University of Aberdeen must compete globally to attract the highest quality of students and staff from around the world. To do this successfully, it has invested heavily in the campus, including medical research, where University staff have demonstrated their skills as world leaders in their field. The Institute of Medical Sciences, completed in 2002, was designed to provide state-of-the-art facilities for medical researchers and their students. This was followed in 2007 by the Health Sciences Building. The Foresterhill campus is now one of Europe's major biomedical research centres. The Suttie Centre for Teaching and Learning in Healthcare, a £20m healthcare training facility, opened in 2009 and 2012 saw the opening of the £57 million Sir Duncan Rice Library in Old Aberdeen. The most recent development, the Science Teaching Hub, is currently under construction.

One of the key development priorities of the University relates to physical infrastructure. This includes the need to work independently and in partnership to provide a suitable physical infrastructure within which cultural engagement can flourish. This includes developing infrastructure to enhance the University's support for cultural and community activity, in particular through major capital projects such as the new library and sports facilities.

Over the years, the University has undertaken an ambitious capital investment programme to create appropriate physical infrastructure for staff and students. This has amounted to over £200 million over the last decade, generating considerable employment opportunities for local industries. This investment has been led by three flagship projects, one of which is the Aberdeen Sports Village which opened in August 2009. The capital investment programme for the next decade is equally ambitious with more than £200 million allocated to be spent over the next ten years.

Aberdeen Sports Village was a joint development between the University, Aberdeen City Council and SportScotland who themselves invested £7 million in this development due to their desire for a regional sports facility in the City. This world-class facility provides a host of sporting amenities previously unavailable in the area, resulting in top class sporting facilities for the whole of the City, not just the University. These include: a sports hall with space for 9 badminton courts, a third-generation indoor

football pitch; a new athletics arena; an indoor athletics area; hockey pitches; squash courts; a gym; studio space; a fitness suite and performance clinic; and a café and crèche facilities. The facility also includes significantly improved disabled access. An aquatics centre with a 50m swimming pool opened in May 2014.

Q1. Do you agree with our preferred housing sites? Are there any other sites that would be suitable for housing?

On behalf of the University of Aberdeen, support is given to Aberdeen City Council's recommendation to identify bid site B0225 at Balgownie (Area 4) as desirable for a residential development of 15 houses.

This representation should be read in conjunction with the development bid submitted at the pre-MIR stage, along with the development bid submitted for the entire site (Ref: B0223) which demonstrate that the site is suitable for development. As such, it should continue to be identified in the Proposed Aberdeen City Local Development Plan as an Opportunity Site for residential development.

The Balgownie Area 4 site scores well in the assessment by Aberdeen City Council, however, some issues are raised to which we wish to respond.

Natural Conservation

It is noted by Aberdeen City Council that the site lies within the Green Space Network and Urban Green Space within the 2017 LDP, however, they also accept that the area is hardly used and its sporting potential is limited. This is welcomed and reflects the position taken through the promotion of the entire site (B02/23); that the use of the Balgownie Playing Fields for recreational use is low and as a result, the use of the pitches are under review by the University, especially now that the Sports Village has been developed with better quality facilities.

The Council state that one tree on the site has a TPO and would need to be retained. This would be given full consideration in the layout prepared for the site as part of any formal application process.

Landscape Features

Again, the Council's assessment makes reference to trees and in particular, a fine sycamore on the western edge of the site. As above, this would be given full consideration in the layout prepared for the site as part of any formal application process.

Conclusion

To conclude, support is given to the identification of bid site B02/25 at Balgownie (Area 4) for the provision of 15 houses. The site is well located to existing development and the wider Bridge of Don area and scores well in the Council's assessment.

It is therefore respectfully requested that Green Space Network and Urban Green Space designations are removed from Area 4 and bid site B02/25 is identified as an Opportunity Site within the Proposed Aberdeen Local Development Plan.



Aberdeen Local Development Plan Review

Main Issues Report Response Form 2019

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The MIR has been published alongside a Monitoring Statement and Environmental Report. Copies are available to view at Marischal College, Broad Street, Aberdeen. These, and other supporting documents, are available at: - www.aberdeencity.gov.uk/aldp2022

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YOUR DETAILS

Name	Claire Coutts
Organisation (if relevant)	Ryden LLP
On behalf of (if relevant)	The University of Aberdeen
Address	
Postcode	
Telephone	
E-mail	

Thank you for taking the time to complete this response form. If you wish to be added to the LDP e-mailing list to be kept informed of our progress in producing the next Local Development Plan, please tick here



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YOUR COMMENTS CONTINUED

PAPER APART

Representations to the Aberdeen City Local Development Plan 2019 Main Issues Report on behalf of the University of Aberdeen in relation to Site No. B02/26, Balgownie (Area 5), Bridge of Don and in relation to the Settlement Strategy and Question 1.

Introduction

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One of the key development priorities of the University relates to physical infrastructure. This includes the need to work independently and in partnership to provide a suitable physical infrastructure within which cultural engagement can flourish. This includes developing infrastructure to enhance the University's support for cultural and community activity, in particular through major capital projects such as the new library and sports facilities.

Over the years, the University has undertaken an ambitious capital investment programme to create appropriate physical infrastructure for staff and students. This has amounted to over £200 million over the last decade, generating considerable employment opportunities for local industries. This investment has been led by three flagship projects, one of which is the Aberdeen Sports Village which opened in August 2009. The capital investment programme for the next decade is equally ambitious with more than £200 million allocated to be spent over the next ten years.

Aberdeen Sports Village was a joint development between the University, Aberdeen City Council and SportScotland who themselves invested £7 million in this development due to their desire for a regional sports facility in the City. This world-class facility provides a host of sporting amenities previously unavailable in the area, resulting in top class sporting facilities for the whole of the City, not just the University. These include: a sports hall with space for 9 badminton courts, a third-generation indoor

football pitch; a new athletics arena; an indoor athletics area; hockey pitches; squash courts; a gym; studio space; a fitness suite and performance clinic; and a café and crèche facilities. The facility also includes significantly improved disabled access. An aquatics centre with a 50m swimming pool opened in May 2014.

Settlement Strategy

On behalf of the University of Aberdeen, objection is made to the settlement strategy within the Aberdeen City Main Issues Report.

Paragraph 2.1 deals with housing allowances and states that the MIR puts forward new housing and employment allowances in line with the Proposed Strategic Development Plan 2018, which sets out a total allowance of 13,598 houses over three plan periods. This comprises 4168 in the period 2020-2032; 4500 in the period 2033-2035 and 4930 in the period 2036-2040. Any sites not identified as being 'effective' in the 2016 Housing Land Audit could be counted towards the 4168 allowances for 2020-2032. This includes 2449 constrained greenfield sites identified in the 2016 HLA; 120 greenfield sites in the current ALDP but not in the 2016 HLA; and 3048 brownfield sites. Aberdeen City Council have discounted the 2449 constrained greenfield sites as most are part of larger sites and may not be all be delivered in that period. That leaves 3528 units towards the 4168 allowances, leaving a shortfall of 640 units to be met through new allocations.

This is considered to be a low number of units, especially since local development plans are moving towards a 10 year timeframe in the ongoing review of the planning system. It is argued that the Council should take a more ambitious approach to growth and the housing supply target, housing land requirement and housing allowances.

Although the MIR provides a more positive approach to the delivery of new homes in later periods, through the identification of larger housing allowances in the periods 2033-2035 and 2036-2040, it is argued that the plan should be more aspirational in the first plan period, rather than increasing housing to later periods where delivery is less certain. This will support the recovery of the city following the recent downturn in the oil industry and boost economic growth.

The Council fail to acknowledge the significant value the delivery of new homes makes to the City Region and it is therefore argued that additional allocations should be identified in the Proposed Local Development Plan, particularly in the period 2020-2032. This will support the delivery of new homes, including affordable housing and should be in locations that people want to live, close to employment opportunities and infrastructure.

Q1. Do you agree with our preferred housing sites? Are there any other sites that would be suitable for housing?

On behalf of the University of Aberdeen, general objection is made to the strategy of identifying only brownfield or small scale greenfield sites. It is argued that this does not provide an adequate range of

sites as required by SPP, to enable a variety of scale and choice of location to promote sustainable mixed communities.

Objection is also made to Aberdeen City Council's recommendation to identify bid site B02/25 at Balgownie (Area 5) as undesirable. This site is considered suitable for a residential development of 65 houses along with associated infrastructure and open space. This representation should be read in conjunction with the development bid submitted at the pre-MIR stage, along with the development bid submitted for the entire site (Ref: B0223). These demonstrate that the site is suitable for development and should be identified in the Proposed Aberdeen City Local Development Plan as an Opportunity Site for residential development.

The Balgownie Area 5 site scores well in the assessment by Aberdeen City Council, however, some issues are raised to which we wish to respond.

Natural Conservation

It is noted by Aberdeen City Council that the site lies within the Green Space Network and Urban Green Space within the 2017 LDP. Although development is proposed on this part of the site, the Council fail to recognise that a large part of the adjacent site to the south will be retained as open space to ensure that this designation will remain unaffected over the adjacent land.

In relation to the Green Space Network, the aim of this designation is to protect, promote and enhance the wildlife, access, recreation, ecosystem services and landscape value of the area. The current value in these terms is relatively low, considering the site is used as playing fields by the University and is not available to the wider community. There are no wildlife designations on the site there are significant opportunities to protect, promote and enhance wildlife on the site through the retention of existing trees and additional landscaping.

Access and recreation opportunities will be enhanced through the retention and improvement of the open space and recreational uses within Area 1 to the south-east, with links provided to and from this proposed residential area. As such, the current designations can be retained on the adjacent land to the south, allowing this bid site, which is considered to be less valuable and sensitive, to be developed. This will enable the improvement of University facilities to the north and elsewhere, which is fundamental to the University's capital investment programme.

In terms of Urban Green Space, Policy NE3 of the 2017 LDP states that development will only be acceptable where *"there is no significant loss to the landscape character and amenity of the site and adjoining area; public access is either maintained or enhanced; the site is of no significant wildlife or heritage value; there is no loss of established or mature trees"*. During a previous LDP examination, both Aberdeen City Council and the Reporter concluded that the site has no landscape value. It is argued that if the site is identified in the Local Development Plan for development, public access would be enhanced considering that it is currently for University use only. The site has no significant wildlife or heritage value and the areas of trees can be designed into any layout of the site. As such, there would be no significant loss of trees which would be retained where possible.

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Any funds realised by the University through the development of this site will be used towards other University infrastructure. This includes investing in modernising and upgrading the sports facilities at Balgownie within Area 1. If this site is identified for development, this will enable the University to improve the pavilion, drainage and pitch surfaces. Although the amount of pitches would reduce on the site, a substantial area of 7.1 ha would remain to the south-east of Area 5. They would be significantly enhanced, providing better quality facilities which would be available to the wider community. This is a significant improvement on the current position.

In addition to this, Aberdeen Sports Village at Linkfield, which was brought forward by the University in conjunction with the City Council and SportScotland, includes a full sized indoor sports pitch, 135m indoor running track, 9 court hall, 4 squash courts, performance gym, 2 exercise studios, sports science facilities, café and conference facilities. The indoor sports pitch was one of the first of its kind in Scotland, thereby highlighting the national importance of Aberdeen Sports Village. The Aquatics Centre provides a 50m, 10 lane training and competition pool, as well as a 25m pool and diving facilities, with spectator seating for 600. This centre provides an opportunity for Aberdeen to host national and international aquatics competition, being a base for local performance swimming. These facilities are open to the general public as well as University staff and students, unlike the Balgownie playing fields.

The Sports Village therefore provides a modern facility which significantly improves both the range and quality of sports facilities in the City, with a wider variety of sporting opportunities available. It is in a convenient location, approximately 3.5 kilometres from the bid site, with good access by public transport available. It is also located to the north of the City, therefore users of the current pitches will not have significant distances to travel to access the new facilities. It enhances public access to high quality sporting facilities because it is available to the whole of the city rather than just University students.

Future development plans for the Aberdeen Sports Village include further expansion to accommodate growing demand and all future investment in sport and leisure facilities by the University, the City Council and SportScotland in the north of the city will be focused on this facility. The Balgownie pitches are therefore surplus to requirements and their long term use is under review by the University. They should not be relied upon to meet long term demand and should be identified for appropriate alternative uses in the Aberdeen City Local Development Plan.

It is argued that the provision of the Sports Village and the provision of improved facilities on the site which would be available for public use, more than meets the requirements of the Policy NE3 in relation to Urban Green Space and provides everything and more than the Balgownie pitches currently provide. Aberdeen City Council accept the loss of Urban Green Space and Green Space Network in relation to bid site B02/25 (Balgownie Area 4) as this sports area is hardly used and its sporting potential is limited. It is argued that the same position could be taken in relation to Area 5.

Landscape Features

The Council advise that the site is classed as Prime Landscape in the Aberdeen Landscape Character Assessment and that the playing field is largely urban greenspace within a residential/urban area. This assessment is dated 1996 and it is not clear from this report that the site is classed as Prime Landscape and objection is therefore made to this assessment. In relation to the "Braes of Don" area it states that **"in the main, this area cannot be seen from many other viewpoints"**. In any case, much of the landscape will have evolved in the 23 years since it was prepared and the development of parts of this site will have no significant impact on the landscape. It should also be emphasised that a large area of open space would be retained to the south-east of the site, to soften any landscape impact and retain a largely urban greenspace within the residential urban area.

Landscape Fit

The Council's assessment states that development would provide residential use to an existing residential/urban area. It is argued that the proposals fit well in the landscape and it is therefore questioned why the site does not score higher in this regard.

Proximity to Facilities

The assessment scores the site down on its proximity to facilities. However, the site is considered to be extremely well related to Bridge of Don and its many facilities. Public transport provision lies within 400m of the site which is within the accessibility requirements. Although other facilities are services are further away, the furthest (Braehead Primary) is only a 10 minute walk. This is considered to be within adequate walking distance of the site. The assessment fails to acknowledge the proximity of the public house and restaurant immediately adjacent to the north and the improved sport and recreation facilities that would be located within Area 1 to the south-east. The site is therefore well related to existing services and facilities in the area and is well placed for residential development.

Other Constraints

The main issue in relation to this site is the zoning of the site as Urban Green Space and the Council's contention that the site is a high quality recreational facility, is well used and no clear excess of provision has been demonstrated.

The Urban Green Space issue is addressed in full above.

In terms of the use and quality of the recreational facility, the Council's assessment contradicts the landowner's position. The development bid submitted at the pre-MIR stage highlighted that current use of the site for recreational use is low and as a result, the use of the pitches are under review in line with

the University's estate strategy. In the meantime, the pitches are appropriately maintained for University use, but are not available for use by the general public. This would suggest that they are not particularly well used, or high quality, compared with the new and better quality facilities at the Sports Village, which further reduces demand for the Balgownie pitches. If the pitches were in high demand and well used, the University of Aberdeen would not be seeking their redevelopment to invest in improving the remaining facilities within Area 1.

Conclusion

To conclude, it is argued that the housing allowances identified for Aberdeen City should be increased, with additional sites identified for housing in the Proposed Local Development Plan.

The identification of Area 5 for residential development would enable the retention and improvement of the recreational facilities within Area 1 to the south-east and allow their use by the whole community. Linkages would be provided to and from the site, ensuring good accessibility, again to the benefit of the wider Bridge of Don area. The retention of open space to the south east would ensure that a significant part of the site is retained as Urban Green Space and Green Space Network and existing trees would be retained where possible, reducing any impact from development.

It is therefore respectfully requested that the Urban Green Space and Green Space Network is removed from Balgownie Area 5 and bid site B02/26 is identified as an Opportunity Site for residential development in the Proposed Aberdeen Local Development Plan.



Aberdeen Local Development Plan Review

Main Issues Report Response Form 2019

Aberdeen City Council has published a Main Issues Report (MIR) which is part of the process of preparing a new Local Development Plan. It is designed to gather views on specific proposals and sets out options for dealing with the key planning matters facing Aberdeen over the next 20 years such as the location of new housing and employment development, the future of retailing and the City Centre, housing needs and tackling climate change. It also includes a number of potential new policies which would be used in the determination of planning applications.

The MIR has been published alongside a Monitoring Statement and Environmental Report. Copies are available to view at Marischal College, Broad Street, Aberdeen. These, and other supporting documents, are available at: - www.aberdeencity.gov.uk/alp2022

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- by post to:- Local Development Plan Team, Strategic Place Planning, Aberdeen City Council, Business Hub 4, Ground Floor North, Marischal College, Broad Street, Aberdeen, AB10 1AB.

Completed response forms should be with us no later than 13 May 2019.



YOUR DETAILS

Name	Claire Coutts
Organisation (if relevant)	Ryden LLP
On behalf of (if relevant)	The University of Aberdeen
Address	
Postcode	
Telephone	
E-mail	

Thank you for taking the time to complete this response form. If you wish to be added to the LDP e-mailing list to be kept informed of our progress in producing the next Local Development Plan, please tick here



If yes, please provide an e-mail address

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By submitting a response to the consultation, you understand that ACC can use the information provided in this form, including personal data, as part of the review of the Aberdeen City Local Development Plan. ACC will not share or disclose any personal data about you to any organization or person unless it is authorized or required to do so by law.

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YOUR DATA, YOUR RIGHTS

You've got legal rights about the way ACC handles and uses your data, which include the right to ask for a copy of it, and to ask us to stop doing something with your data. Please contact the Council's Data Protection Officer by e-mailing DataProtectionOfficer@aberdeencity.gov.uk or writing to Data Protection Officer, Aberdeen City Council, Governance, Level 1 South, Marischal College, Broad Street, Aberdeen, AB10 1AB. More information is available at: - <https://www.aberdeencity.gov.uk/your-data>

YOUR COMMENTS

<p>Which document(s) are you commenting on?</p>	<ul style="list-style-type: none">• Main Issues Report• Strategic Environmental Assessment Environmental Report• Monitoring Statement	<input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
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Please indicate the document and the specific Issue, Question, Site, Policy, Map or Table you are commenting on. Please provide your comments below and explain your reason for supporting, opposing or commenting on this specific part of the document.

Please refer to attached Paper Apart

YOUR COMMENTS CONTINUED

PAPER APART

Representations to the Aberdeen City Local Development Plan 2019 Main Issues Report on behalf of the University of Aberdeen in relation to Site No. B02/27, Land to the North of Balgownie Playing Fields, Bridge of Don and in relation to Question 1.

Introduction

The University of Aberdeen has a major influence on the city. Founded in 1495, it is the oldest University in Scotland with a student population of around 15,000, studying 700 programmes across 85 subject areas, taught across 12 schools. The University community represents a significant proportion of the city's population and contributes approximately £500m per annum to the local economy. The students are invaluable to local businesses and the city overall in terms of the money they spend and the part timework they take up during their studies.

Like every major university, The University of Aberdeen must compete globally to attract the highest quality of students and staff from around the world. To do this successfully, it has invested heavily in the campus, including medical research, where University staff have demonstrated their skills as world leaders in their field. The Institute of Medical Sciences, completed in 2002, was designed to provide state-of-the-art facilities for medical researchers and their students. This was followed in 2007 by the Health Sciences Building. The Foresterhill campus is now one of Europe's major biomedical research centres. The Suttie Centre for Teaching and Learning in Healthcare, a £20m healthcare training facility, opened in 2009 and 2012 saw the opening of the £57 million Sir Duncan Rice Library in Old Aberdeen. The most recent development, the Science Teaching Hub, is currently under construction.

One of the key development priorities of the University relates to physical infrastructure. This includes the need to work independently and in partnership to provide a suitable physical infrastructure within which cultural engagement can flourish. This includes developing infrastructure to enhance the University's support for cultural and community activity, in particular through major capital projects such as the new library and sports facilities.

Over the years, the University has undertaken an ambitious capital investment programme to create appropriate physical infrastructure for staff and students. This has amounted to over £200 million over the last decade, generating considerable employment opportunities for local industries. This investment has been led by three flagship projects, one of which is the Aberdeen Sports Village which opened in August 2009. The capital investment programme for the next decade is equally ambitious with more than £200 million allocated to be spent over the next ten years.

Aberdeen Sports Village was a joint development between the University, Aberdeen City Council and SportScotland who themselves invested £7 million in this development due to their desire for a regional sports facility in the City. This world-class facility provides a host of sporting amenities previously unavailable in the area, resulting in top class sporting facilities for the whole of the City, not just the University. These include: a sports hall with space for 9 badminton courts, a third-generation indoor

football pitch; a new athletics arena; an indoor athletics area; hockey pitches; squash courts; a gym; studio space; a fitness suite and performance clinic; and a café and crèche facilities. The facility also includes significantly improved disabled access. An aquatics centre with a 50m swimming pool opened in May 2014.

Q1. Do you agree with our preferred housing sites? Are there any other sites that would be suitable for housing?

Objection is also made to Aberdeen City Council's recommendation to identify bid site B02/27, to the north of Balgownie Playing Fields as undesirable. This site is considered suitable for a residential development of 18 houses and complies with the Council's strategy to identify small greenfield sites for housing.

This representation should be read in conjunction with the development bid submitted at the pre-MIR stage, which demonstrates that the site is suitable for development and should be identified in the Proposed Aberdeen City Local Development Plan as an Opportunity Site for residential development.

The assessment by Aberdeen City Council raises some issues to which we wish to respond.

Flood Risk

The Council state that there is a 0.5% chance of flooding in any one year at the north east corner of the site, however, they acknowledge that it would not appear to be a significant constraint. This is welcomed and this issue could be investigated at the planning application stage. This is not an impediment to development.

Natural Conservation

It is noted by Aberdeen City Council that the site lies within the Green Space Network and Urban Green Space within the 2017 LDP. However it is considered that there is justification for the removal of these designations over bid site B02/27.

In term of the Green Space Network, Policy NE1 aims to protect, promote and enhance the wildlife, access, recreation, ecosystem services and landscape value of an area. However, the development of this site will have minimal impact on these. The site is unused open space adjacent to existing development and has little value in terms of access and recreation.

As part of a previous bid on land adjacent, the Council accepted that the land adjacent has no landscape value and this site should be viewed similarly. There are no wildlife designations on the site and there are opportunities to protect, promote and enhance wildlife of the site through the retention of existing trees and implementation of additional landscaping on the site. There are further opportunities to protect, promote and enhance wildlife on the adjacent land which is being promoted as part of a separate bid. As such, this designation can be retained on the adjacent site, with justification for bid site B02/27 to be developed for alternative uses.

Policy NE3: Urban Green Space of the extant Local Development Plan states that development will only be acceptable where *“there is no significant loss to the landscape character and amenity of the site and adjoining area; public access is either maintained or enhanced; the site is of no significant wildlife or heritage value; there is no loss of established or mature trees”*. Again it should be stated that both Aberdeen City Council and the Reporter to the LDP examination concluded that the adjacent site had no landscape value. There would be no significant loss of trees as these are concentrated along the boundaries of the site and would be retained where possible.

Policy also requires that *“replacement green space of similar or better quality is located in or immediately adjacent to the same community, providing similar or improved health benefits to the replaced area and is accessible to that community”*. It is argued that the land adjacent is owned and used by the University of Aberdeen as sports pitches, but current use is low. The use of the pitches are under review in line with the University’s estate strategy and in the meantime, the pitches are appropriately maintained for University use and are not available for use by the general public. Therefore, they do not currently provide facilities for the general local community and their loss will not impact the capacity for wider community sport in Aberdeen.

Any funds realised by the University through the development of this site will be used towards other University infrastructure. This includes investing in modernising and upgrading the sports facilities at Balgownie to the south. If bid site B02/27 is identified for development, this will enable the University to improve the pavilion, drainage and pitch surfaces. They would be significantly enhanced, providing better quality facilities which would be available to the whole community, rather than just University students as they currently do. This is a significant improvement on the current position.

In addition to this, the Aberdeen Sports Village at Linksfield, which was brought forward by the University in conjunction with the City Council and SportScotland, includes a full sized indoor sports pitch, 135m indoor running track, 9 court hall, 4 squash courts, performance gym, 2 exercise studios, sports science facilities, café and conference facilities. The indoor sports pitch was one of the first of its kind in Scotland, thereby highlighting the national importance of Aberdeen Sports Village. The Aquatics Centre provides a 50m, 10 lane training and competition pool, as well as a 25m pool and diving facilities, with spectator seating for 600. This centre provides an opportunity for Aberdeen to host national and international aquatics competition, being a base for local performance swimming.

The Sports Village therefore provides a modern facility which significantly improves both the range and quality of sports facilities in the City, with a wider variety of sporting opportunities available. It is in a convenient location, approximately 3.5 kilometres from the bid site, with good access by public transport available. It is also located to the north of the City, therefore users of the current pitches will not have significant distances to travel to access the new facilities. It enhances public access to high quality sporting facilities because it is available to the whole of the city rather than just University students.

It is argued that the provision the Sports Village and the provision of improved facilities on the site which would be available for public use, more than meets the requirements of the Policy NE3 in relation to Urban Green Space and provides everything and more that the bid site provides.

Landscape Features

The Council advise that the site is classed as Prime Landscape in the Aberdeen Landscape Character Assessment, that there are mature trees on the site which would potentially be lost for access.

It is argued that the site could be accessed from the A90 to the north where existing access to the public house could be utilised. The requirement for tree removal would be investigated as part of any planning application and would be minimised.

In terms of the Landscape Character Assessment, this is dated 1996 and it is not clear from this report that the site is classed as Prime Landscape and objection is therefore made to this assessment. In relation to the "Braes of Don" area it states that "**in the main, this area cannot be seen from many other viewpoints**". In any case, much of the landscape will have evolved in the 23 years since it was prepared and the development of parts of this site will have no significant impact on the landscape. It is well contained by existing development and landscaping to the north, west and south. As a result, any residential development would be well screened within a mature landscape setting. In fact, the assessment acknowledges that the any development "would be unobtrusive in the landscape" under the Landscape Fit section.

Landscape Fit

The Council's assessment states that the proposal would provide housing in an established residential area and would therefore be unobtrusive in the existing landscape. This is welcomed and supported. It goes onto state that it sits to the east of the A90/Gordon Brae roundabout and directly to the south of the A90. This is considered a benefit to the site, given the good accessibility this achieves to the site. It is not anticipated that 18 houses would create a significant impact on the local road network, however, this would be investigated as part of any planning application process.

Proximity to Facilities

The assessment scores the site down on its proximity to facilities. However, the site is considered to be extremely well related to Bridge of Don and its many facilities. Public transport provision lies within 400m of the site which is within the accessibility requirements. Although other facilities are services are further away, the furthest (Braehead Primary) is only a 10 minute walk. This is considered to be within an acceptable walking distance of the site. The assessment fails to acknowledge the proximity of the public house and restaurant immediately adjacent to the north and the improved sport and recreation facilities that would be located to the south-east. The site is therefore well related to existing services and facilities in the area and is well placed for residential development.

Other Constraints

The main issue in relation to this site is the zoning of the site as Urban Green Space. However, the Council acknowledge that recreational value is more limited than other parts of the site. This demonstrates that the site does not significantly contribute to the Green Space Network or Urban Green Space designation and it is argued that this should be removed from the site to allow this small scale

residential development to proceed. This position has been accepted by the Council in relation to bid site B0225, Balgownie (Area 4) and a similar position could be taken here.

Noise is considered to be a constraint by Aberdeen City Council, however, the landscaping would mitigate some of this, which would be investigated in full at the planning application stage and further mitigation implemented if required. This is not considered to be an impediment to development, given the proximity to other residential properties adjacent to the A90.

Conclusion

To conclude, it is argued that the identification of this site as a small scale greenfield development would comply with the Council's settlement strategy. It contributes little to the current Green Space Network or Urban Green Space zonings and should instead be identified for residential development, given its accessible location.

The identification and development of this site would enable the retention and improvement of the recreational facilities on land to the south-east, which would benefit the local community. It would also ensure that a significant part of land in this area is retained as Urban Green Space and Green Space Network, with improved linkages.

It is therefore respectfully requested that the Urban Green Space and Green Space Network is removed from bid site B02/27 to the north of Balgownie Playing Fields and the site identified as an Opportunity Site for small scale residential development in the Proposed Aberdeen Local Development Plan.

From: Claire Coutts [REDACTED]
Sent: 08 May 2019 11:08
To: LDP
Cc: Donaldson, Angus A. M.
Subject: MIR Representation - Aberdeen City Centre
Attachments: MIR Representation - City Centre Masterplan.pdf

Dear Sir/Madam

On behalf of my client, the University of Aberdeen, please find attached a representation in relation to Aberdeen City Centre.

I trust that this is appropriate and that we will receive confirmation of this in due course.

Kind regards
Claire

--

Claire Coutts BLE (Hons) MRTPI
Associate (Planning & Research)



www.ryden.co.uk



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Twitter and [Linked In](#)

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Aberdeen Local Development Plan Review

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YOUR DETAILS

Name	Claire Coutts
Organisation (if relevant)	Ryden LLP
On behalf of (if relevant)	
Address	
Postcode	
Telephone	
E-mail	

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YOUR COMMENTS

<p>Which document(s) are you commenting on?</p>	<ul style="list-style-type: none">• Main Issues Report• Strategic Environmental Assessment Environmental Report• Monitoring Statement	<input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
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Please indicate the document and the specific Issue, Question, Site, Policy, Map or Table you are commenting on. Please provide your comments below and explain your reason for supporting, opposing or commenting on this specific part of the document.

Please refer to attached Paper Apart

YOUR COMMENTS CONTINUED

PAPER APART

Representations to the Aberdeen City Local Development Plan 2019 Main Issues Report on behalf of the University of Aberdeen in relation to section 3: Aberdeen City Centre and the Network of Centres

Introduction

The University of Aberdeen has a major influence on the city. Founded in 1495, it is the oldest University in Scotland with a student population of around 15,000, studying 700 programmes across 85 subject areas, taught across 12 schools. The University community represents a significant proportion of the city's population and contributes approximately £500m per annum to the local economy. The students are invaluable to local businesses and the city overall in terms of the money they spend and the part timework they take up during their studies.

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One of the key development priorities of the University relates to physical infrastructure. This includes the need to work independently and in partnership to provide a suitable physical infrastructure within which cultural engagement can flourish. This includes developing infrastructure to enhance the University's support for cultural and community activity, in particular through major capital projects such as the new library and sports facilities.

Over the years, the University has undertaken an ambitious capital investment programme to create appropriate physical infrastructure for staff and students. This has amounted to over £200 million over the last decade, generating considerable employment opportunities for local industries. This investment has been led by three flagship projects, one of which is the Aberdeen Sports Village which opened in August 2009. The capital investment programme for the next decade is equally ambitious with more than £200 million allocated to be spent over the next ten years.

Aberdeen Sports Village was a joint development between the University, Aberdeen City Council and SportScotland who themselves invested £7 million in this development due to their desire for a regional sports facility in the City. This world-class facility provides a host of sporting amenities previously unavailable in the area, resulting in top class sporting facilities for the whole of the City, not just the University. These include: a sports hall with space for 9 badminton courts, a third-generation indoor

football pitch; a new athletics arena; an indoor athletics area; hockey pitches; squash courts; a gym; studio space; a fitness suite and performance clinic; and a café and crèche facilities. The facility also includes significantly improved disabled access. An aquatics centre with a 50m swimming pool opened in May 2014.

Section 3.3 – City Centre Intervention Areas

On behalf of the University of Aberdeen, support is given to the Queen's Square Intervention Area and the vision to transform this into a new mixed use urban quarter. Proposals include the refurbishment of the eastern annex of Marischal College for Use Class 4 (Offices) and Class 11 (Assembly and Leisure).

This is welcomed, however, it is requested that the eastern annex area is expanded to include additional space owned by the University of Aberdeen which is currently underused. The inclusion of this additional land would bring this area back into meaningful use to the benefit of the area, as well as the vision of Queen's Square. It forms part of the identified eastern annex and will ensure that this space is not severed from the rest of the building.

Shoe Lane Cottage to the east should also be included and the extent of the land holding is identified on the plan below.

Conclusion

To conclude, the vision of the Queen's Square Intervention Area is supported, however, this should be expanded slightly to include additional land associated with the eastern annex of Marischal College, which is owned by the University of Aberdeen. This will ensure their future use and prevent them becoming inaccessible.

It is therefore respectfully requested that the Proposed Aberdeen Local Development Plan is amended to include these areas and the wording changed to reflect this addition.

Intervention area – Queen’s Square

