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Sent: 08 May 2019 12:06
To: LDP
Subject: Comments in response to the consultation on the Main Issues Report, Local Development Plan, ACC
Attachments: Response to the consultation on the Main Issues Report ACC LDP 6 May 2019.pdf

The comments in the attached document are a supplement to the response submitted by Aurora on behalf of residents of Craigton Road, Craighbank and Corbie, Friarsfield North (bid reference B09/10; and Countesswells Expansion Areas 2 and 7 (both part of bid reference 09/21).

Please acknowledge receipt of this document, thank you

Lyn Bell

Response to the consultation on the Main Issues Report

This individual response is a supplement to the document submitted by Aurora on behalf of residents of Craighton Road, Craighbank and Corbie, reference

- Friarsfield North (bid reference B09/10; and
- Countesswells Expansion Areas 2 and 7 (both part of bid reference 09/21)

General comments:

Specific reference is made to the following policy documents which show how these proposed bids for development fail to meet with required criteria

- ACC's Proposed Strategic Development Plan
- ACC's Local Development Plan
- State of Nature 2016 Report
- Scotland's Economic Strategy
- Scotland's biodiversity: a route map to 2020
- A Strategic Plan for Biodiversity 2011–2020 [the UN Convention on Biological Diversity]
- Statement by the First Minister of Scotland 28 April 2019
- The Intergovernmental Science–Policy Platform on Biodiversity and Ecosystem Services (IPBES).

CALA have put forward the following summary their seven “Key benefits of Friarsfield North”. Not one of these so-called “key benefits” is credible, convincing or of substance. In several instances, as indicated below, CALA’s statements are positively false:

1. “Natural extension of existing Friarsfield neighbourhood”. There’s nothing “natural” about it. Until CALA came to Friarsfield, there were fields, as the name declares.
2. “Provides considered urban/rural edge to Cults”. Or, surely more accurately, their proposals offer ill-considered destruction of the greenbelt.
3. “Provides sense of arrival on approach from Aberdeen to Cults”. Sense of arrival? A key benefit? A translation is required. Does it, perhaps, better reflect the opportunity for one of the UK's largest house builders to advertise?
4. “Delivers much needed private and affordable homes”. No, it certainly does not, not for the people of Cults, see below.

5. "South facing gardens". Perhaps, but a significant proportion of the houses in the CALA Friarsfield OP41 /Cults Park development are not south facing, and have minimal south facing exposure when it would have been easy to orientate the houses for optimal solar gain.
6. "Enhances wildlife habitats and green corridors". This statement is categorically false. It is not credible to say that the proposed building over greenbelt can, in any way, "enhance wildlife habitats and green corridors". (The Friarsfield OP41 /Cults Park development, which had made similar claims, has positively destroyed habitats and green corridors. Where now is the marshland with its dragonflies, orchids, meadowsweet, rushes, lichens and mosses? How is wildlife expected to negotiate tarmac roads and bridges?).
7. "New structure tree planting creates discreet development pockets". How this can possibly be a "Key benefit"? The statement requires translation as it is incomprehensible.

Although CALA say (in ADLP2018-B09010-FriarsfieldNorth) that the amount of affordable housing provided in the development will be 25%, in their objections to ACC (Aberdeen Local Development Plan review ALDP2018-Q022-MichaelLorimer(Ryden)OBOCalaHomes) (hereafter referred to as "Q022"), they elect not to build affordable house on this site. Therefore their claim in their bid reference that it "delivers much needed private and affordable homes" is highly doubtful.

The steeply sloping topography of the land (ADLP2018-B09010-FriarsfieldNorth) the bids propose to build upon is eminently unsuitable for sustainable development, not least because there would have to be major land-structure quarrying and reconfiguration on a massive scale. This would be in direct contradiction of the policy documents ACC operate under.

CALA say the area of Friarsfield North has "little or no flood risk" and they have not developed a flooding strategy for the site. However flash flooding affecting this area (in August 2012) prove them wrong. Housing/hard landscaping on this site would only increase the likelihood of any future flash flooding again affecting Kirk Brae and Cults village. CALA's failure to implement a proper Suds policy and their failure to employ a temporary Suds during construction, as witnessed during their construction of Friarsfield OP41, would further increase the risk of flooding in the event of heavy rainfall.

CALA say there will be "no loss or disturbance of wildlife habitats or species". This is unequivocally incorrect. The land in question is currently mostly under grazing, it

is not intensively managed and, as such, supports an important variety of native flora and fauna. It has drystone dykes and rough field margins which are further beneficial to plants and wildlife. In summer the fields are an important feeding ground for swallows, house martins and swifts. Year round, the fields are important feeding and resting grounds for wildlife. We regularly see and hear wildlife, including bats, a wide variety of birds including owls, woodcock, yellowhammers, buzzards, corvids, fieldfares, redwings, nesting oystercatchers, wrens, hedgehogs, swallows, house martins and swifts, siskins, bullfinches, butterflies, hoverflies, bees and other pollinating insects, frogs and toads, foxes and roe deer. Not to mention all the plants, lichens, earthworms and insects.

CALA say there will be “no loss or disturbance of landscape features, including stone walls”. This statement is impossible to reconcile with their proposed development. It should also be noted that, despite promises of preservation of the drystone dykes in what is now Cults Park (Friarsfield OP41), these structures were demolished and ground to gravel. Any walls that have been rebuilt are cemented and therefore are NOT drystone dykes, and so they are no longer appropriate wildlife habitats.

CALA say there would be “no intrusion of the development into the surrounding landscape”. This is wholly incorrect.

CALA say that the development “will be not conflict with the adjoining land nor have any air quality or noise issues”. This statement is not credible.

While saying that the proposed development will satisfy the Council’s Low and Zero Carbon Policy, at the same time CALA have lodged, in “Q022”, their objections to complying, stating (in Q. 2.12 Resource Management / Sustainability) “CALA recognise the importance of addressing climate change, however, the requirements set out in Policy R7 –Low and Zero Carbon Buildings and Water Efficiency are too onerous”. The clear and present danger of catastrophic climate change is widely acknowledged. It would be indefensible to allow a housebuilding organisation be allowed to circumvent requirements which have been made in the interest of the common good. The First Minister of Scotland said on 28 April 2019 “I am declaring that there is a climate emergency. And Scotland will live up to our responsibility to tackle it.”

CALA says “The requirement to provide smaller 1 and 2 bed units should not be a blanket policy across all sites. In that respect, my client provides a large range of house types and sizes. Their 4 and 5 bedroom units range from 1,200sqft to 2,800sqft”. CALA is ignoring the facts that households consisting of only one person have been the most common type in Scotland since 2010 and the number of

households containing three or more people has been falling since 2001 (National Records of Scotland 2018).

CALA say (“Q022”) “Objection is also taken to the ever growing list of services and infrastructure which developers are expected to contribute to, which ultimately impacts on the viability of development projects and often results in long and protracted negotiations and significant and unnecessary delays”. It is not acceptable that a housebuilding organisation, whose aim is to “grow the company” and return dividends to their shareholders, should be allowed to circumvent requirements which have been made in the interest of the common good. Housebuilders such as CALA should be required to provide all necessary infrastructure and services to support their developments. It should not fall to existing communities to subsidise the profits of housebuilders by shouldering the burden of the provision of infrastructure and services to new developments. Such a model is unsustainable.

With reference to Community benefits of their proposed development, CALA say “Yes”, citing “affordable housing”. But this has not materialised for the Friarsfield OP41 development, despite similar claims. Also, CALA have lodged objections to implementing this policy (“Q022”). Their “yes” response is therefore apparently knowingly false.

Further Observations

With relation to all the points raised elsewhere in this document, it is clear that the Friarsfield North and Countesswells Expansion Areas 2 and 7 submissions do not pass ACC’s Proposed Strategic Development Plan criteria, which include the following three principles:

- a) “We will be recognised for The City Region’s unique built, historic and natural environment, which will be protected and, where appropriate, enhanced as key asset in underpinning a high quality of life and place”.
- b) “Councils will have taken a proactive approach towards development that: ensures the sustainable use of natural resources, the ability to live within the area’s environmental capacity, can deal with climate change, and creates a more open, inclusive society”.
- c) “The Local Development Plan should contribute to the conservation, enhancement, enjoyment and understanding of the natural environment” and

“Apply LDP Natural Environment policies which ensure the protection of non-designated natural heritage, trees, woodland and watercourses”.

It is also clear that the Friarsfield North and Countesswells Expansion Areas 2 and 7 submissions do not pass ACC’s Biodiversity, Flora and Fauna policy nor do they reflect best practice:

Three of ACC’s Biodiversity, Flora and Fauna policy aims are to

1. “Conserve, protect and enhance the diversity of species and habitats and natural heritage of Aberdeen”.
2. “Maintain and enhance the populations of protected species, including European Protected Species, including protection of their resting places or roosts”.
3. “Maintain or enhance existing green networks and Improve connectivity/function and create new links where needed”.

Scotland's Economic Strategy states “protecting and enhancing this stock of natural capital, which includes our air, land, water, soil and biodiversity and geological resources is fundamental to a healthy and resilient economy”.

In addition, the State of Nature 2016 Report says that the UK being recognised as being one of the “most nature-depleted countries in the world” with one in seven species facing extinction and more than half in decline. They further state “Our urban wildlife is under constant pressure from development and changes to building practices, especially where the value of green space and other space for wildlife is not properly recognised in planning decisions. It is also apparent that without the integration of green networks and other measure to provide space for wildlife, urban areas can pose increasingly difficult barriers to the movement and dispersal of insects and other wildlife. The increasingly urbanised human population is also suffering as a result of disconnection from nature, which has negative effects on health and well-being”.

It is clear the Friarsfield North and Countesswells Expansion Areas 2 and 7 submissions do not pass Scotland's Economic Strategy criteria. The submissions also fail to meet the requirements of “Scotland's biodiversity: a route map to 2020” (which sets out the priority work needed to meet the international Aichi Targets for biodiversity and improve the state of nature in Scotland), particularly in relation to

Big Step 1 – Ecosystem Restoration: 2020 Challenge Outcome: Scotland's ecosystems are restored to good ecological health so that they provide robust ecosystem services and build our natural capital.

Big Step 3 – Quality greenspace for health and education benefits: 2020 Challenge Outcome: Improved health and quality of life for the people of Scotland, through investment in the care of greenspace, nature and landscapes.

the Friarsfield North and Countesswells Expansion Areas 2 and 7 submissions fail to meet the requirements of A Strategic Plan for Biodiversity 2011–2020, (agreed in 2010 by the UN Convention on Biological Diversity (CBD), signed by the UK government and 158 other world leaders, pledged to stop the global loss of species, habitats and genetic resources). The CBD reports that Scotland's biodiversity indicators and targets show that renewed and sustained effort over a longer period is required to halt Scotland's loss of biodiversity. "Sustainability is an integral part to Scotland's economy and enshrined within the Government Economic Strategy." "Current indicators show we still have work to do to ensure the economy is operating within safe ecological limits" (CBD). "All public bodies in Scotland have a biodiversity duty and are required to publish their compliance with it" (CBD).

The proposed building over of the greenbelt (Friarsfield North and Countesswells Expansion Areas 2 and 7) is also in direct conflict with the findings of the IPBES report (6 May 2019) which states:

"The overwhelming evidence of the IPBES Global Assessment, from a wide range of different fields of knowledge, presents an ominous picture; the health of ecosystems on which we and all other species depend is deteriorating more rapidly than ever. We are eroding the very foundations of our economies, livelihoods, food security, health and quality of life worldwide." (IPBES) and "To increase the policy-relevance of the Report, the assessment's authors have ranked, for the first time at this scale and based on a thorough analysis of the available evidence, the five direct drivers of change in nature with the largest relative global impacts so far. These culprits are, in descending order: (1) changes in land and sea use; (2) direct exploitation of organisms; (3) climate change; (4) pollution and (5) invasive alien species." and "Loss of biodiversity is therefore shown to be not only an environmental issue, but also a developmental, economic, security, social and moral issue as well".

In summary:

These comments are a supplement to the response submitted by Aurora on behalf of residents of Craigton Road, Craigbank and Corbie, Friarsfield North (bid reference B09/10; and Countesswells Expansion Areas 2 and 7 (both part of bid reference 09/21) and can be summarised thus:

- The size of the proposed developments are not “small-scale”
- The area is greenbelt and it serves to define the boundaries of Cults, Aberdeen and Countesswells
- The topography is largely unsuitable – often too steep – for sustainable development and any building processes will necessarily squander our natural resources
- Greenbelt would be destroyed
- Any development here will be disastrous for the local flora and fauna
- Ancient woodland would be impinged upon
- The proposed developments would have a dominant and skyline profile from Cults and south of the River Dee and would serve to morph Cults, Aberdeen and Countesswells into one
- Public transport links are inadequate and inaccessible
- Shops and amenities are too far away to access without having to be reliant on using a car
- Cycling is not catered for and there are road safety concerns
- Employment opportunities within easy reach are almost non-existent
- Local school capacities are predicted to be unable to cope
- Current GP medical services would similarly be unable to meet demand
- There are flooding risks which have not been acknowledged

- Individually and collectively the above points clearly indicate that the proposed submissions fail to meet a wide range of criteria, not just local but national and international
- The area should remain as intended: green belt.

L Bell

6 May 2019

