

From: Maggie [REDACTED]
Sent: 08 May 2019 15:57
To: LDP
Subject: ALDP MIR consultation response
Attachments: MIR response - HIghview House.pdf

Hi there,

Please find attached a response to the MIR consultation on behalf of our client Michael Robertson in relation to his site at Highview House, Countesswells.

I would be grateful if you could please acknowledge receipt.

Thanks.

Maggie

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Aberdeen Local Development Plan Review

Main Issues Report Consultation Response

Question 1 – New Housing Sites

Are there any other sites that would be suitable for housing?

Yes, bid reference: B0925 – Highview House, Countesswells

Introduction

Our client, Michael Robertson, wishes to promote bid reference B0925 Highview House, Countesswells as a site that would be suitable for residential development and contests the officers' conclusion that it is undesirable.

The Proposed Aberdeen City and Shire Strategic Development Plan (PSDP) is clear that housing allocations should be small-scale. The Local Development Plan Main Issues Report then reiterates that point in stating that:

“Any greenfield housing allocations should be small scale, have limited impacts on the environment and infrastructure and should not be extensions to existing sites identified in the Aberdeen LDP 2017.”

The PSDP also emphasises that, where greenfield sites are to be considered, reducing travel distances and making walking, cycling and public transport more attractive to people will be particularly important considerations.

As set out in our client's initial response to the call for sites and in the following paragraphs, our client's site at Highview House complies with these criteria and as such, it should be looked on positively for inclusion in the new Local Development Plan.

Site assessment

The officers' assessment of bid reference B0925 demonstrates that the site is well protected from exposure, south facing, with good drainage, no risk of flooding, no contamination issues, no current or physical infrastructure constraints, and that development here would result in



no loss of built/cultural heritage elements. All of these factors support the allocation of the site for residential development. This notwithstanding, the assessment concludes that the site should remain as green belt on the basis that it is considered to have an unfavourable impact on the natural environment, to be poorly located in terms of public transport provision and accesses to services because there is a generous supply of housing land identified on better sites. As set out below, our client strongly disagrees with that conclusion.

In terms of the criteria against which the site has scored only 1, the following should be noted:

- **Slope** – the Council’s call for sites response form requested information on the extent of bid sites with a slope of 1:12 or steeper, thereby suggesting that any site with a lesser gradient would be acceptable for development in principle (or at least would not be excluded on the basis of that slope). Whilst it is acknowledged that parts of the site are relatively steeply sloping, in assessing the site at the time of the preparation of the extant Aberdeen Local Development Plan 2017, this was not considered to be a serious concern. In addition, the indicative plans submitted with our client’s response to the initial call for sites show that it is possible to deliver a well-designed development here that works well within the site’s topography, with housing accommodated on those parts which are shallower than 1:12. The site should accordingly be scored more highly in respect of this criteria.
- **Relationship to existing settlement/proximity to facilities and employment opportunities** – while it is appreciated that this may be perceived as an issue currently, the score of 1 given to the site in the officers’ assessment ignores the fact that development now taking place at Countesswells will entirely change this situation, such that development here will not be dependent on the facilities at Kingswells and Cults as suggested in the bid assessment. Rather, as stated in our client’s initial bid, Phase 1 of the Countesswells development (the phase closest to the bid site, and on which development is currently underway) includes a mixed use centre, with opportunities for both employment and commercial development. As set out in more detail in the Countesswells development framework, this is expected to provide a mix of office space, retail and leisure uses, as well as civic and community uses, such as a GP surgery, dentists and pharmacy. These will all be easily accessible from the site by foot, bike or car, being just over 800m away, with pedestrians and cyclists able to do this journey along the dedicated off-road paths which connect the site to the Countesswells development, as shown on the plans submitted with this bid.
- **Land use mix/balance/service thresholds** – it is accepted that, in general terms, the provision of housing here does not add to the mix of uses in the area. However, as the officers’ assessment acknowledges, the major mixed use development at Countesswells



which is being built out will add different uses in the long term. Hence it would seem that the allocation of a site for five houses here would not be significant in terms of the overall land use mix.

In addition, the allocation of this site would provide a residential offer not available elsewhere in the area as a result of their setting, sustainability credentials and self-build prospects, as well as the potential to provide dedicated live/work units. As such, the proposed allocation would contribute to achieving the Council's Local Housing Strategy 2018 to 2023 strategic outcome of there being *"an adequate supply of housing across all tenures and homes are the right size, type and location that people want to live in with access to suitable services and facilities."*

- **Accessibility** – again, whilst accessibility to the site by sustainable modes of transport may be perceived to be an issue currently, the Countesswells development will provide sustainable transport options in the longer term. Countesswells is just over 400m away, and the indicative plans submitted with our client's initial bid show that the site offers excellent foot and cycle links directly to Countesswells (including via core paths 50 and 55) and the facilities available there. At the same time, these will also provide a connection to the bus stops in Countesswells, providing public transport links to destinations further afield. Given that the Local Development Plan aims to look 10 years ahead and, within that time period, our client's site is expected to be very well connected by a range of modes of transport, it is submitted that the site should be assessed positively in this regard.
- **Service infrastructure capacity** – officers' assessment of the site indicates that Cults Primary School and Cults Academy will be over capacity in 2022. A development of 5 units will, however, result in only 2.5 additional primary school pupils and 1 additional secondary school pupil (based on the current school roll forecast pupils per household ratios). In addition, the assessment acknowledges that school provision will be delivered at Countesswells in the longer term. And so again it is submitted that, given the time period covered by the Local Development Plan, service infrastructure capacity should not be considered as a constraint for the allocation of this site.

The site has been given a score of 2 against a number of other assessment criteria, and again our client would stress the following in relation to each of these:

- **Natural conservation** – although it is accepted that the site is currently in the green belt and green space network, the purpose of the review of the ALDP is to identify appropriate locations for future development, which will inevitably result in the allocation of some part of the current green belt and green space network for housing and other uses.



Specifically in relation to this criteria, it is important to note that the fact that the site is within these designations does not in itself mean that it has any nature conservation value, or that any value that it does have cannot be maintained (or indeed enhanced) if the site is allocated. In this case, the officers' assessment highlights nature conservation features close to the site but does not identify any on the site itself. As such, there is no reason to score the site anything other than 3 for this criteria.

Our client's initial bid also sets out clearly that the continued designation of this site as green belt does little or nothing to achieve the objectives of the green belt as articulated in Scottish Planning Policy and the extant ALDP in that:

- it provides no public access to open space;
- its contained nature means that its development would not cause any coalescence or undermine the identity or setting of existing settlements, in particular Countesswells; and
- retaining the site as green belt does nothing to support regeneration.

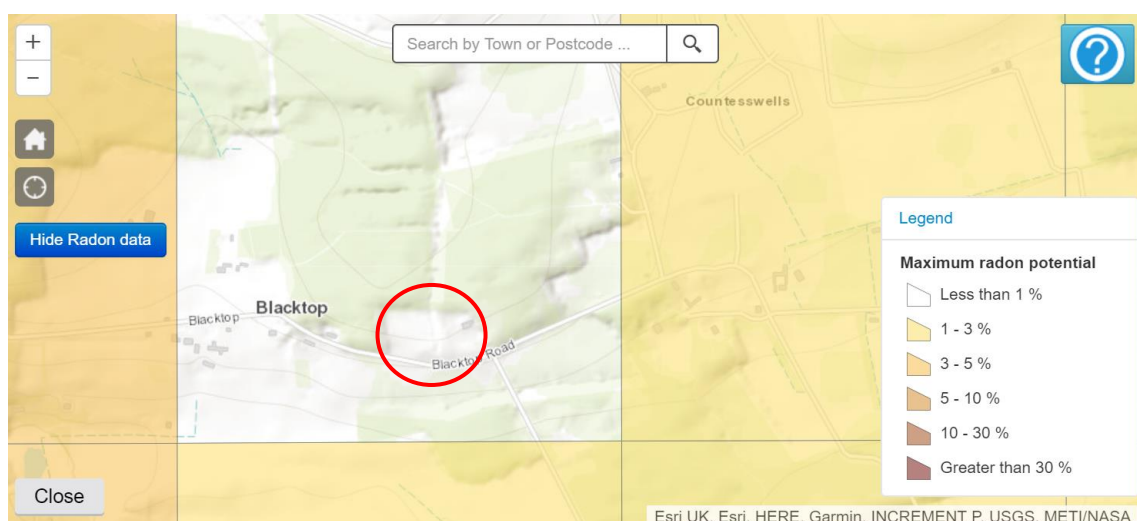
Importantly, removal of this site from the green belt and its allocation as proposed in terms of this bid would not affect the separation of Countesswells from Cults.

In terms of the green space network, the site is described as 'linkage' green space comprising woodland, such that its value is in the connection it provides between green spaces, rather than being a valuable habitat in its own right. And, while described as comprising woodland, it should be recognised that there are no trees on the land to which this bid relates, such that it does not actually contribute to the greenspace network's function in this regard. This is reflected in the Council's view, as expressed during the last ALDP review, that the site is of limited habitat value. This notwithstanding, the indicative layout plans submitted with the bid show how development on the site would deliver a high percentage of open green space (as described in more detail in the bid form), ensuring that green space links are maintained and improved.

- **Landscape features** – the assessment notes that Countesswells Woods are located to the north of the site, and that there are the remains of a considerable stony dyke/wall fronting the road. The allocation of the site for housing would have no impact on the woodland, while the dyke/wall could be retained as part of any development of the site. Finally, the assessment states that there are tree belts around Highview House. Again, these could be retained if the site was developed. There is therefore no reason why the site does not score 3 for this criteria.



- **Landscape fit** – the site is located within the Wooded Estates – Aberdeen Landscape Character type, key characteristics of which include well-wooded areas and residential buildings well screened by woodland. The allocation of this site for a small-scale development of five houses within an existing woodland area would be entirely consistent with that. Indeed, the officers’ assessment of the site in terms of the exposure criteria explicitly refers to the fact that it is bound on three sides by woodland and difficult to see from the roadside. It is therefore difficult to understand how the site can be scored as anything other than 3 in terms of landscape fit.
- **Direct footpath/cycle connection to community and recreation facilities and resources** – as stated above in terms of the **accessibility criteria**, the indicative plans submitted with our client’s initial bid show that the site offers excellent foot and cycle links directly to Countesswells (including via core paths 50 and 55) and the facilities available there. And so again it is difficult to understand how the site can have been scored down in terms of this criteria.
- **Land use conflict** – in this case the officers’ assessment states that *“There is unlikely to be any conflicts arising from a residential use on this site.”* That being the case the site should score 3 for this criteria, rather than 2.
- **Other constraints** – whilst the assessment states that there is Class 1 Radon potential on the site, it is clear from the map extract shown below that this site is in fact one of the few areas of Aberdeen which has less than 1% radon potential. In addition, as the assessment recognises, the indicative site layout shows that five houses can easily be accommodated on the site avoiding the existing pylon line. There are therefore no other constraints and the site should score 3 in this regard.



For the reasons set out above, as well as those given in our client's initial response to the call for sites, it is submitted that Highview House is well located and suited for residential development, and should be allocated accordingly in the review of the ALDP.

