

From: Pippa [REDACTED]
Sent: 09 May 2019 15:55
To: LDP
Subject: MIR Consultation Response - WTR and West Dubford
Attachments: MIR response - WTR and West Dubford.pdf; A-0027-06-01-000rev3-PAGE 01 - SHEILHILL - LOCATION PLANS.pdf; A-0027-06-01-000rev3-PAGE 02 - SHEILHILL - EXISTING SITE PLAN.pdf; A-0027-06-01-000rev3-PAGE 03 - SHEILHILL - EXISTING SECTIONS.pdf; A-0027-06-01-000rev3-PAGE 04 - SHEILHILL - PROPOSED BID SITE.pdf; A-0027-06-01-000rev3-PAGE 05 - SHEILHILL - PROPOSED SITE LAYOUT.pdf; Photographs showing evidence of previous development on the site.pdf

Hi

Please find attached a response to the MIR consultation with regards to bid reference B0208 – WTR site and bid reference B0209 – West Dubford, together with associated documents.

I would be grateful if you could acknowledge safe receipt.

Thanks

Pippa

Pippa Robertson
Aurora Planning Limited

[REDACTED]



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[REDACTED]



Aberdeen Local Development Plan Review

Main Issues Report Consultation Response

Question 1 – New Housing Sites

Do you agree with our preferred housing sites?

Yes, our client wishes to express support for the preferred housing sites, in particular the proposed allocation of Bid reference B0208 – WTR Site.

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

Yes, an extension to Bid reference B0208.

Question 2 – Housing Allowances beyond 2032

Is there a need for us to identify any further Housing Allowances or sites for the period beyond 2032?

Yes, Bid reference B0209 – West Dubford.

Question 3 – Brownfield and other Opportunity Sites

Are there any other brownfield or other opportunity sites which would be suitable for redevelopment?

Yes, an extension to Bid reference B0208.

Introduction

Our client welcomes the officers' assessment of bid reference B0208 – WTR site as desirable for a residential development of indicatively 20 flats, and supports the allocation of the site for this use. Further details in support of this allocation are provided below.

Our client also accepts that there may not be a sufficient requirement for additional housing land in the Bridge of Don area at present to justify a development of the scale proposed by



way of bid reference B0209 but, for the reasons set out below, believes that there would be merit in allocating the lower part of that site as an extension to the WTR site, as a single allocation. That proposed allocation is shown on the plans submitted with this response. As expanded on in more detail below, it is submitted that this third option would deliver the same benefits as the WTR site, providing more much needed housing units in a sustainable and suitable location.

At the same time, in light of support in the Proposed Aberdeen City and Shire Strategic Development Plan (PSDP) for additional allocations to be made for the period 2033 to 2040, and on the basis that concerns expressed in the officers' assessment of bid reference B0209 – West Dubford can be addressed as set out in detail below, our client believes that the wider site (excluding the proposed new allocation) should be supported and allocated for long-term residential development post 2032 accordingly.

Question 1 – New Housing Sites

Do you agree with our preferred housing sites?

Yes, Bid reference B0208 – WTR Site

The officers' assessment of this site recognises the benefit of its redevelopment, in particular noting that it is a brownfield site, and that its low-lying position and relatively flat topography mean that development here would not have a significant visual impact. Our client endorses this assessment.

The one concern raised by officers is that, while recognising that there is a bus stop relatively close by, there is said to be no direct footpath access to this. On the other hand, this statement is then somewhat contradicted by the statement elsewhere in the assessment that it would be relatively straightforward to provide direct pedestrian access into Dubford (including bus stops there). Our client would be happy to facilitate such access, although that could be significantly enhanced should a larger site area be allocated, as demonstrated below. The plans submitted with this response show how such an access could be provided.

Significant weight should also be given to the fact that, when the Reporter in the Examination of the current Local Development Plan (LDP) was considering the proposed allocation of land directly to the south of the WTR site, it was expressly stated that this would be well connected to development at Dubford. It is hard to see how anything other than the same conclusion can be reached in respect of the WTR site. Further details on this point are set out in the paper apart submitted with our client's original bid.



In light of the above, it is submitted that there should be no concerns about access to public transport, adding further support to the allocation of the WTR site for development in the new LDP in accordance with the officers' assessment.

Question 1 – New Housing Sites

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

Yes, WTR Site Extension

In addition, our client has assessed the topography of bid reference 0209, and a potential extension of the WTR site has been identified along the first contour line on the OS map (representing the point at which the site begins to rise towards the south, and below which the land is relatively flat, sheltered, and well contained within the landscape). Importantly, investigations in this area have revealed remains from earlier built development from the site's previous military use, including concrete bunkers and other physical infrastructure, demonstrating that this is a brownfield site (see photographs submitted with this response). Given that Scottish Planning Policy (SPP) policy principles include considering the re-use or re-development of brownfield land before new development takes place on greenfield sites, and the PSDP includes a clear expectation that brownfield sites should be considered before new greenfield allocations, the allocation of this site as proposed would allow the Council to deliver more much needed housing whilst making the most sustainable use of land in accordance with SPP and the PSDP.

The indicative plan submitted with this response shows this proposed extension, and how development could be accommodated within this. In particular, it shows that:

- the site can accommodate around 38 units of a mix of tenures, with generous public open space as well as private garden grounds;
- within public open spaces, there is scope to create footpath connections to development at Dubford to the east (including facilities and bus stops there) and to the wider Scotstown Moor area to the south; and
- development of the site provides an opportunity to introduce new native planting to enhance the biodiversity value of the site.

The development of this site has all the benefits associated with the development of the WTR site as outlined in the officers' assessment of that site, with the further benefit of delivering additional new housing in a sustainable and suitable location. As such, this should be assessed positively when considered against the Council's site assessment criteria as set out below.



- **Exposure/aspect/slope** – the site is low lying, flat and sheltered from northerly winds.
- **Flood risk/drainage** – the site is not identified as being at risk of flooding, according to SEPA flood risk maps, and there is no evidence of waterlogging.
- **Built/cultural elements** – there is evidence of military structures on the site as outlined above, but these have no particular historic significance and, as recognised in the officers’ assessment of bid reference B0209, there are no constraining built or cultural elements on the site.
- **Natural conservation** – the environmental appraisal submitted with bid reference 0209 confirms that the site is of little natural conservation value, with the existence of previous development on the site reducing its natural conservation value even further.
- **Landscape features** – as recognised in the officers’ assessment of bid reference B0209, development here would not result in any likely loss of, or disturbance to, any trees, woods or stone walls.
- **Landscape fit** – as with the WTR site, the site’s low-lying position means that there would not be any significant landscape impact;
- **Relationship to existing settlement** – the site is well located relative to the new Dubford development.
- **Land use mix/balance/service thresholds** – the site would provide housing in a sustainable and suitable location.
- **Accessibility** – as outlined above and shown on the indicative plans submitted with this response, direct footpath access can be provided from this site into Dubford, including bus stops there.
- **Proximity to facilities, shopping/health/recreation** – the site is well located for access to the Denmore Commercial Centre, the Old Machar Medical Practice, Old Machar Academy and the Jesmond Centre.
- **Footpath/cycle connections** – the Perwinnes Moss core path leads directly to the site, and also adjoins the Scotstown Moor core path about 400m south of the site.
- **Proximity of employment opportunities** – Murcar and Denmore Industrial Estate and Denmore Commercial Centre are both located just over 1km from the site.



- **Contamination** – there are no known contamination issues.
- **Land use conflict** – the proposed residential use would be adjacent to residential use at Dubford, with there being no conflict of use.
- **Infrastructure capacity and other constraints** – no capacity issues or other constraints have been identified. In particular, while parts of the larger site are well used by dog walkers, there are limited footpaths or tracks on this part of the site, and development of this area would in fact improve the recreational value through the creation of footpath links through from Dubford. In terms of education, while it is recognised that Oldmachar Academy is projected to be over capacity in 2024, development of this site would generate only 0.1 pupils per household, the impact of which would be negligible. Greenbrae Primary is projected to be within capacity to at least 2025 (as far forwards as the most recent school roll forecasts look), at which time the roll is projected to have reduced from 89% in previous years down to 87%.

Question 2 – Housing Allowances beyond 2032

Is there a need for us to identify any further Housing Allowances or sites for the period beyond 2032?

Yes, Bid reference B0209 – West Dubford

It is recognised that, as stated in the MIR, neither SPP nor the PSDP require LDPs to identify land allocations beyond a 10 year period. At the same time, the PSDP does make provision for a Strategic Reserve of housing land to be identified for the period 2033 to 2040. Evidence from the north east of Scotland over the last 10 years would suggest that, with rapidly changing economic circumstances, there would be considerable benefit in doing that. That is particularly so if the current proposals in the Planning (Scotland) Bill giving LDPs a 10-year lifespan are implemented. Such longer-term allocations would ensure that Aberdeen is ready and able to respond immediately to any increase in demand for housing. In this regard it should be noted that, as set out in the PSPD, the total effective housing land supply across the region is currently 37,077, this being only just over half of the total housing land requirement of 64,272 units for the Plan area for the period 2016 to 2040.

Should a longer-term strategic approach be taken to the future development of the City, then our client would propose that bid reference B0209 – Dubford West be supported and allocated for long-term residential development in the period beyond 2032 for the reasons given below.



The officers' assessment of this site recognises that development here would be well located in terms of its relationship to the new Dubford development and proximity to services, facilities and employment opportunities, with access to buses within Dubford and the Scotsown Moor core path located less than 100m south of the site. At the same time, no constraints are identified in terms of infrastructure, contamination, flood risk, drainage or built/cultural heritage.

The officers' main concerns relate to the site's exposure and aspect, and the impact that development here would have on natural conservation and the landscape fit. As set out below, our client strongly disagrees with that conclusion.

With regards to the points in respect of which concerns have been raised by officers, these are addressed in turn below, with further detail set out in the paper apart submitted with our client's original bid.

- **Exposure and aspect** – the indicative layout plan submitted with the bid shows how the site could be developed in a way that maximises south facing aspects and incorporates extensive structured planting to provide shelter from northerly winds. As such, there is no reason why the site could not be developed to provide a high-quality residential environment, with the site's natural aspect being advantageous in offering stunning views to residents from well designed homes and sheltered outdoor spaces.
- **Natural conservation** – whilst the officers' assessment raises concerns regarding the potential for protected species to be found on the site, an environmental appraisal report was submitted with our client's original bid and confirms that there is limited biodiversity here, with no evidence of any protected species. The site is then considered to be of limited natural conservation value in its present state (it being the actual conservation interest present on the site that is relevant to the assessment, not merely the fact that it happens to be located within a designated site). In contrast, the environmental appraisal report indicates that development of the site would create opportunities to improve its nature conservation value and increase biodiversity. In this regard, whereas the officers' assessment raises concerns about potential bat habitats, the environmental appraisal shows no such current potential but specifically identifies opportunities for bats to benefit as a result of the site's development (see page 6 of the appraisal).
- **Landscape fit** – while the site as a whole rises towards the centre, the indicative plan submitted with our client's bid shows how development could be accommodated in the eastern part of the site such that visual impact would be minimised. At the same time, it must be recognised that the site is already in a degraded condition, compared with which sensitive residential development provides an opportunity for restoration and improvements that would enhance the site's landscape value and fit.

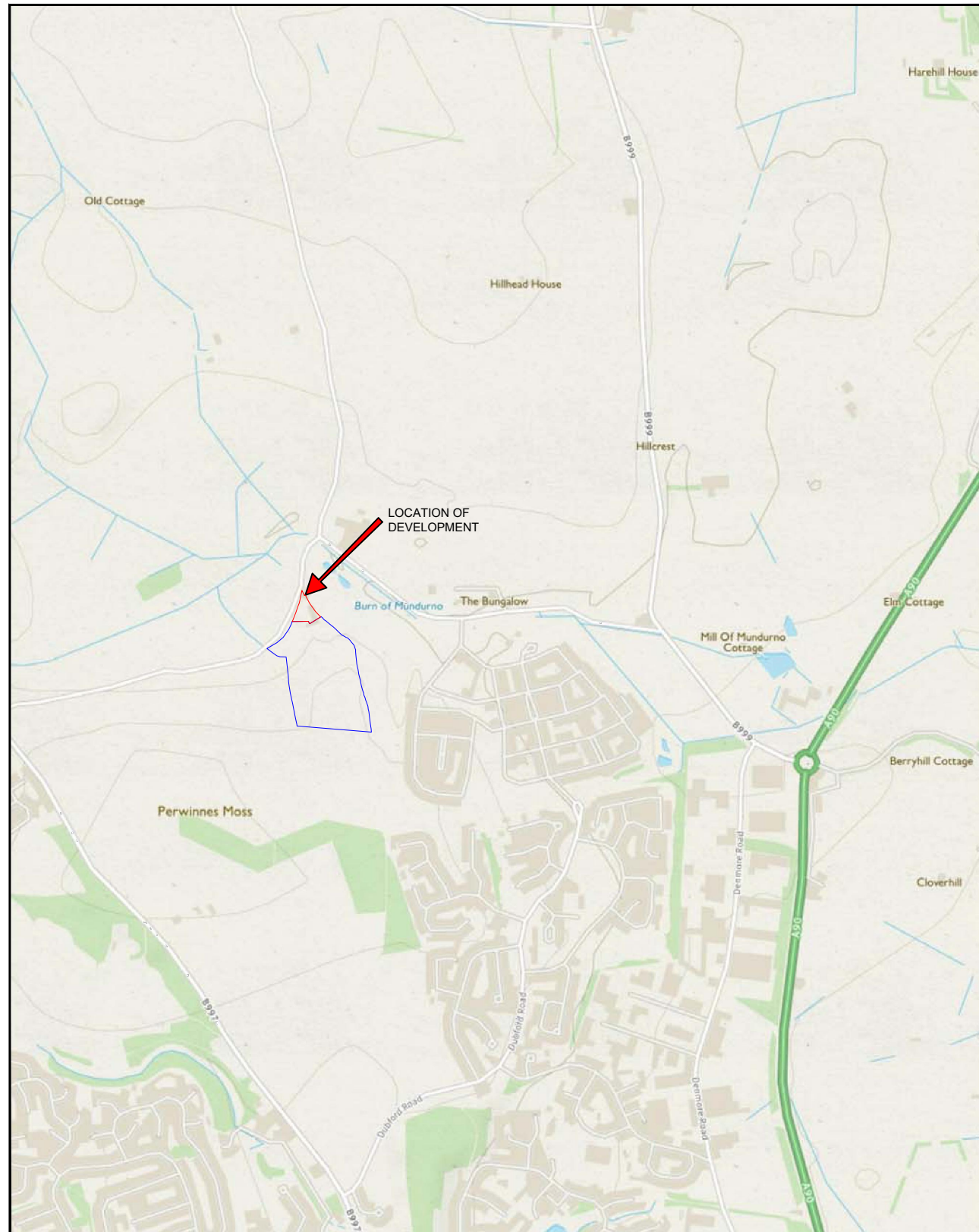


Conclusions

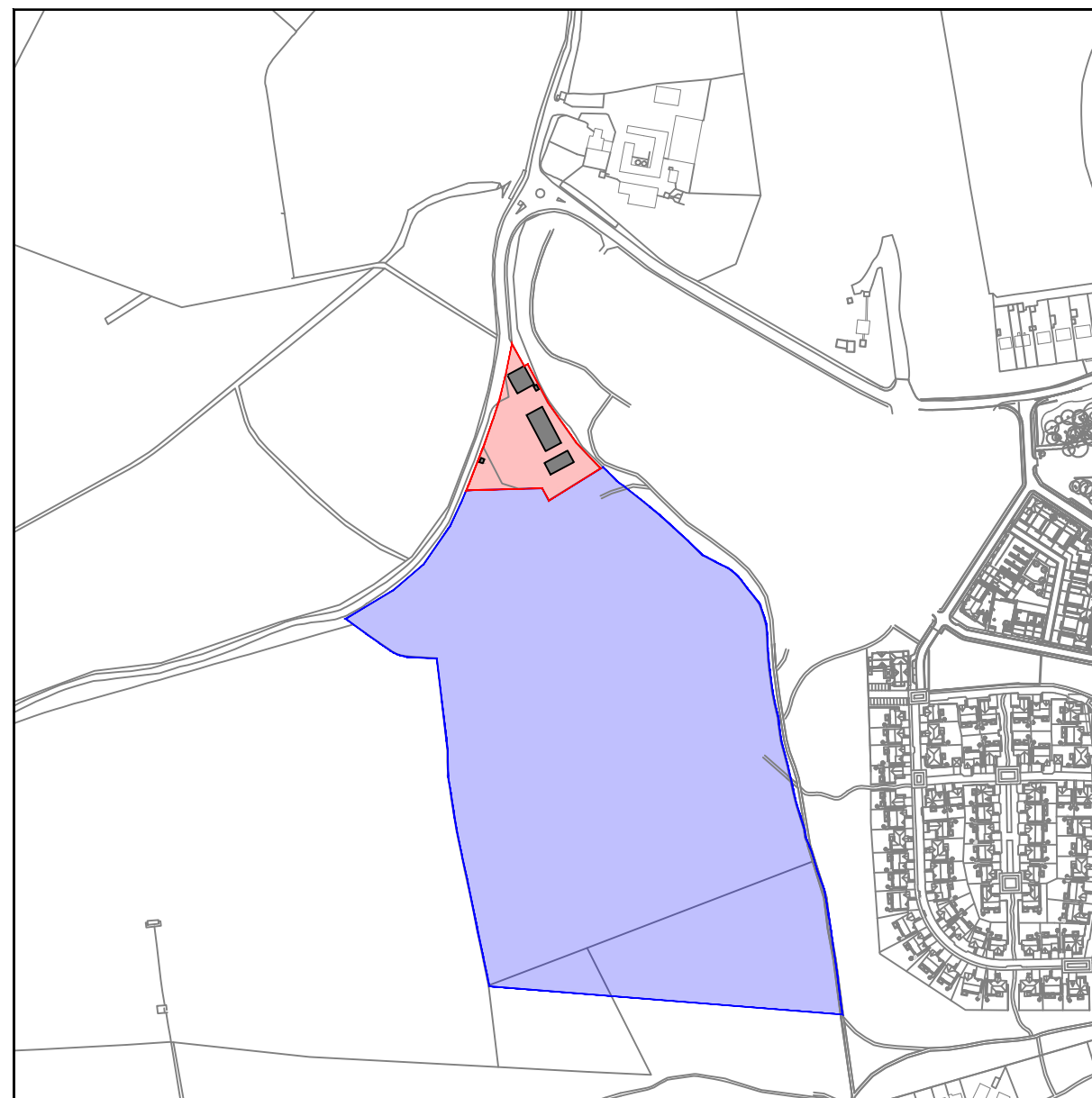
For the reasons set out above, as well as those given in our client's initial response to the call for sites it is submitted that:

- Bid reference B0208 – WTR site should continue to be considered desirable for allocation for residential development of indicatively 20 flats;
- alternatively, and preferably, an extended WTR site (as shown on the plan submitted with this response) should be allocated for residential development of around 38 units, on the basis that this is a brownfield site which would deliver the recognised benefits of development on the WTR site and provide much needed homes in a high quality residential environment; and
- Bid reference B0209 West Dubford (excluding the area now shown as being part of the proposed new allocation) should be supported and allocated for long-term residential development (in the period beyond 2032).





Supplementary Location Plan
Scale 1:10,000 (on A3)



Location Plan
Scale 1:5000 (on A3)

A02	Revisions	06.05.2019
A01	Client Approval	27.03.2019
DIP	Draughting In Progress	18.03.2019
Rev:	Description:	Date:

ak architecture



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 Telephone: 01224 789715 | Mobile: 07399 873227
 Email: info@ak-architecture.co.uk | Website: www.ak-architecture.co.uk
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Client: | Mr J. Langler
Project: | Site Development - WTR (expanded op)
 Perwinnes Moss
 Scotstown Moor Base
 Bridge of Don
 Aberdeen
 AB23 8NN

Title: | Location Plans
Drawing: | A-0027-06-01-001 **Rev:** | A03
Scale: | n/a on A3 **Date:** | 07.05.2019
Status: | Pre-bid Proposal **Drawn By:** | A.Keenon

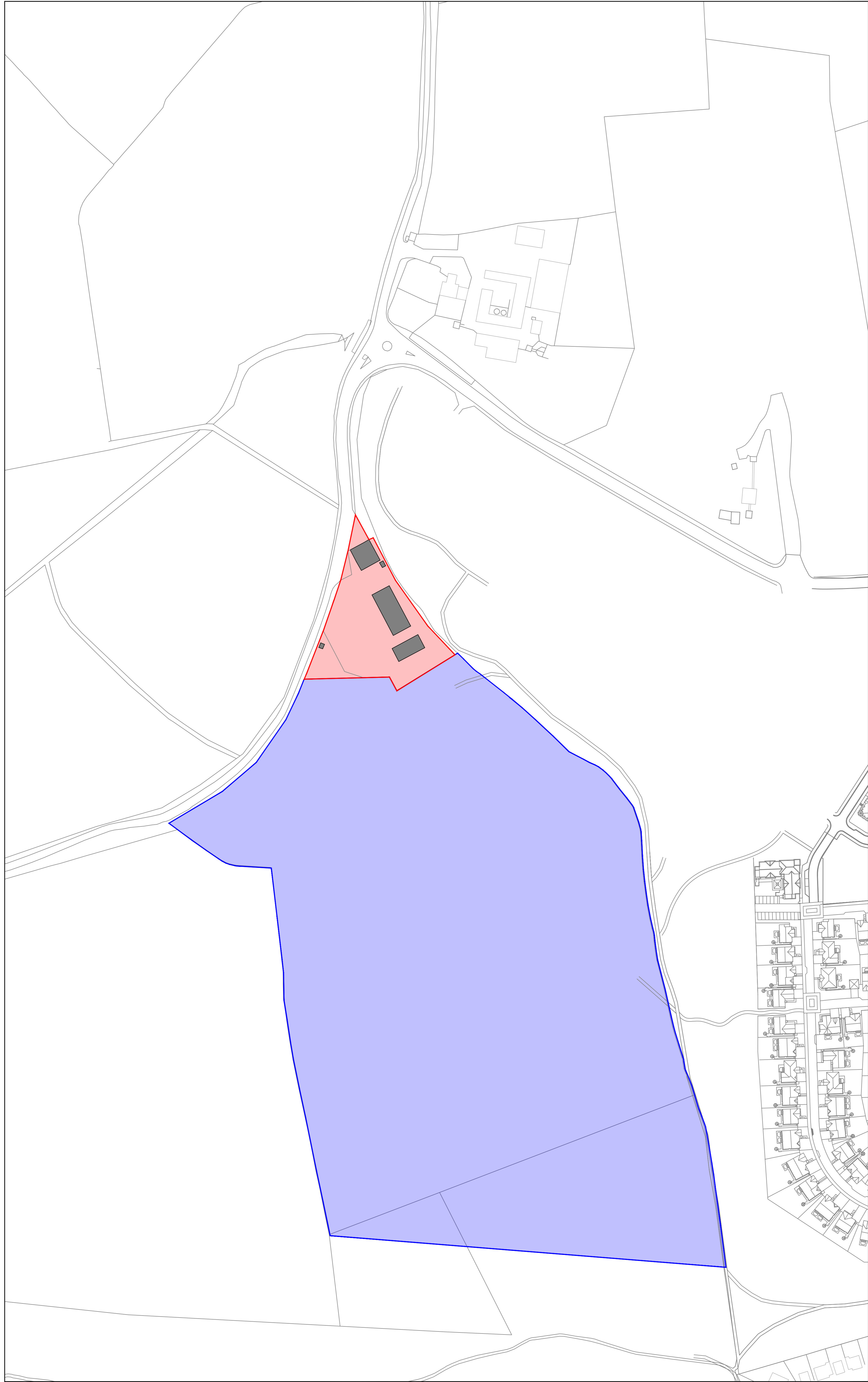
All dimensions in 'mm' unless noted otherwise. No dimensions are to be scaled from this drawing. Discrepancies must be reported to architect / engineer.



EXISTING SITE BOUNDARY  

SURROUNDING LAND IN OWNERSHIP  

1. EXISTING SITE AREA
 - 5171.56 m²
 - 0.52 ha
 - 1.28 ac
2. SURROUNDING LAND
 - 91888.92 m²
 - 9.19 ha
 - 22.71 ac



Existing Site Area
Scale 1:1250 (on A1)



A02	Revisions	06.05.2019
A01	Client Approval	27.03.2019
DIP	Draughting In Progress	18.03.2019
Rev:	Description:	Date:



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 Telephone: 01224 789715 | Mobile: 07399 873227
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Client:	Mr J. Langler
Project:	Site Development - WTR (expanded op)
	Perwinnes Moss Scotstown Moor Base Bridge of Don Aberdeen AB23 8NN

Title:	Existing Site Area
Drawing:	A-0027-06-01-002
Rev:	A03
Scale:	1:1250 on A1
Date:	07.05.2019
Status:	Pre-bid Proposal
Drawn By:	A. Keenon

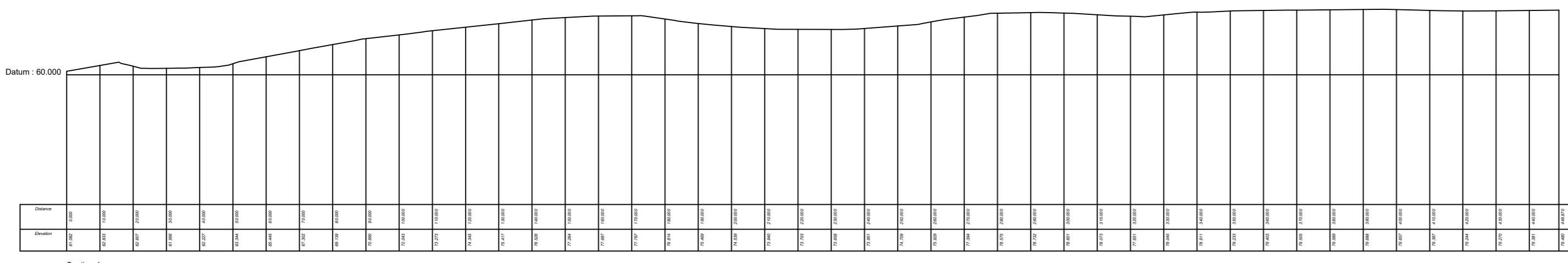
All dimensions in 'mm' unless noted otherwise. No dimensions are to be scaled from this drawing. Discrepancies must be reported to architect / engineer.



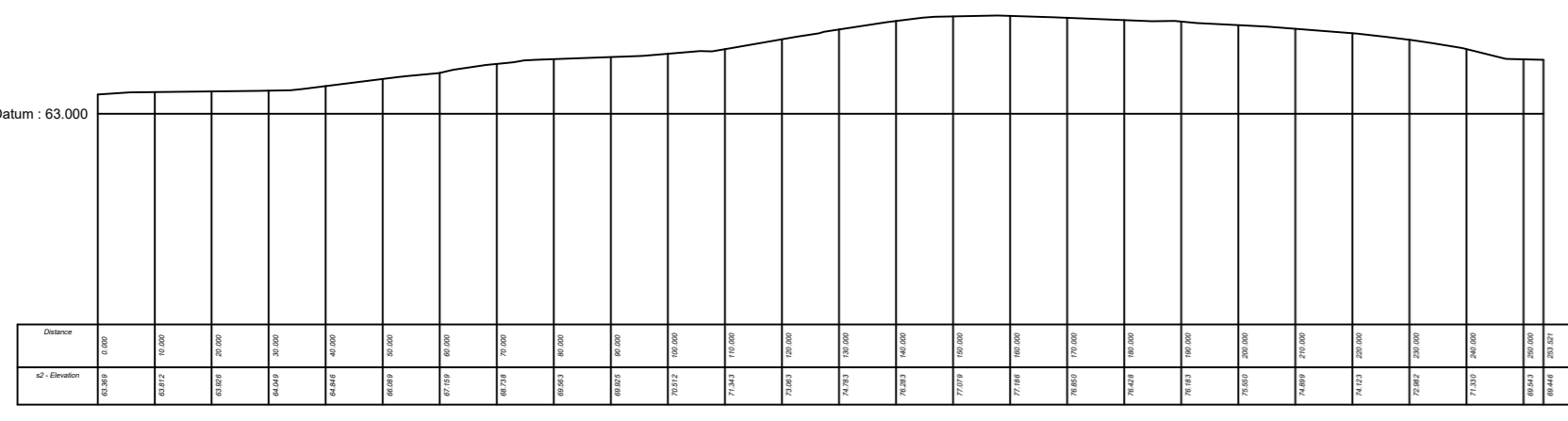
EXISTING SITE BOUNDARY █

SURROUNDING LAND IN OWNERSHIP █

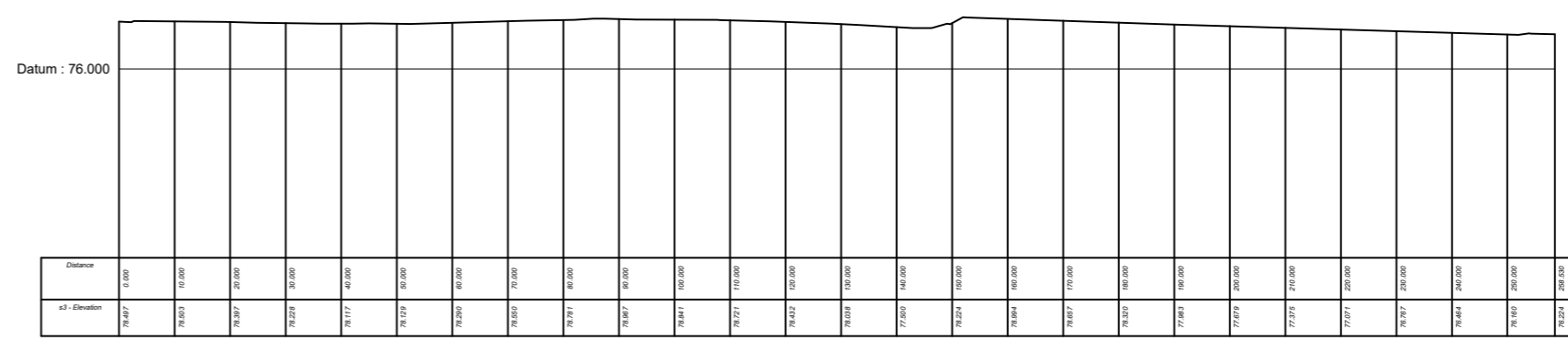
1. EXISTING SITE AREA
5171.56 m²
0.52 ha
1.28 ac
2. SURROUNDING LAND
91888.92 m²
9.19 ha
22.71 ac



Section 1
Horizontal Scale 1:500
Vertical Scale 1:500

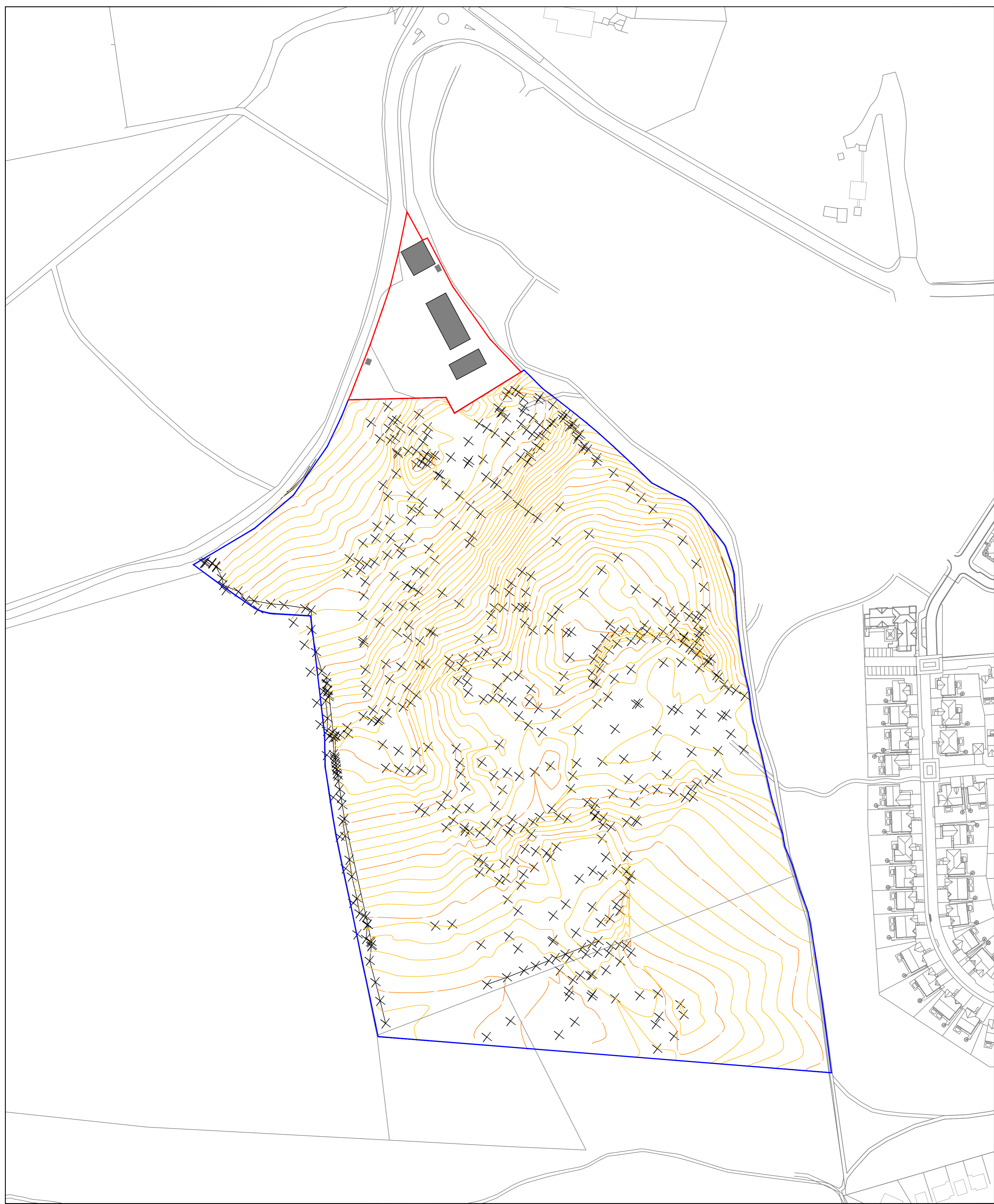


Section 2
Horizontal Scale 1:500
Vertical Scale 1:500



Section 3
Horizontal Scale 1:500
Vertical Scale 1:500

Existing Site Longitudinal & Cross Sections
Scale 1:500 (on A1)



Existing Site Topography
Scale 1:1000 (on A1)

A02	Revisions	06.05.2019
A01	Client Approval	27.03.2019
DIP	Draughting In Progress	18.03.2019
Rev:	Description:	Date:



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Client: | Mr J. Langler

Project: | Site Development - WTR (expanded op)
Perwinnes Moss
Scotstown Moor Base
Bridge of Don
Aberdeen
AB23 8NN

Title: | Existing Topography & Sections

Drawing: | A-0027-06-01-003 **Rev:** | A03

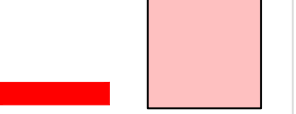
Scale: | 1:1250 on A1 **Date:** | 07.05.2019

Status: | Pre-bid Proposal **Drawn By:** | A.Keenon

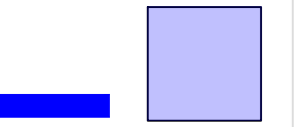
All dimensions in 'mm' unless noted otherwise. No dimensions are to be scaled from this drawing. Discrepancies must be reported to architect / engineer.



PROPOSED SITE
BOUNDARY



SURROUNDING
LAND IN OWNERSHIP

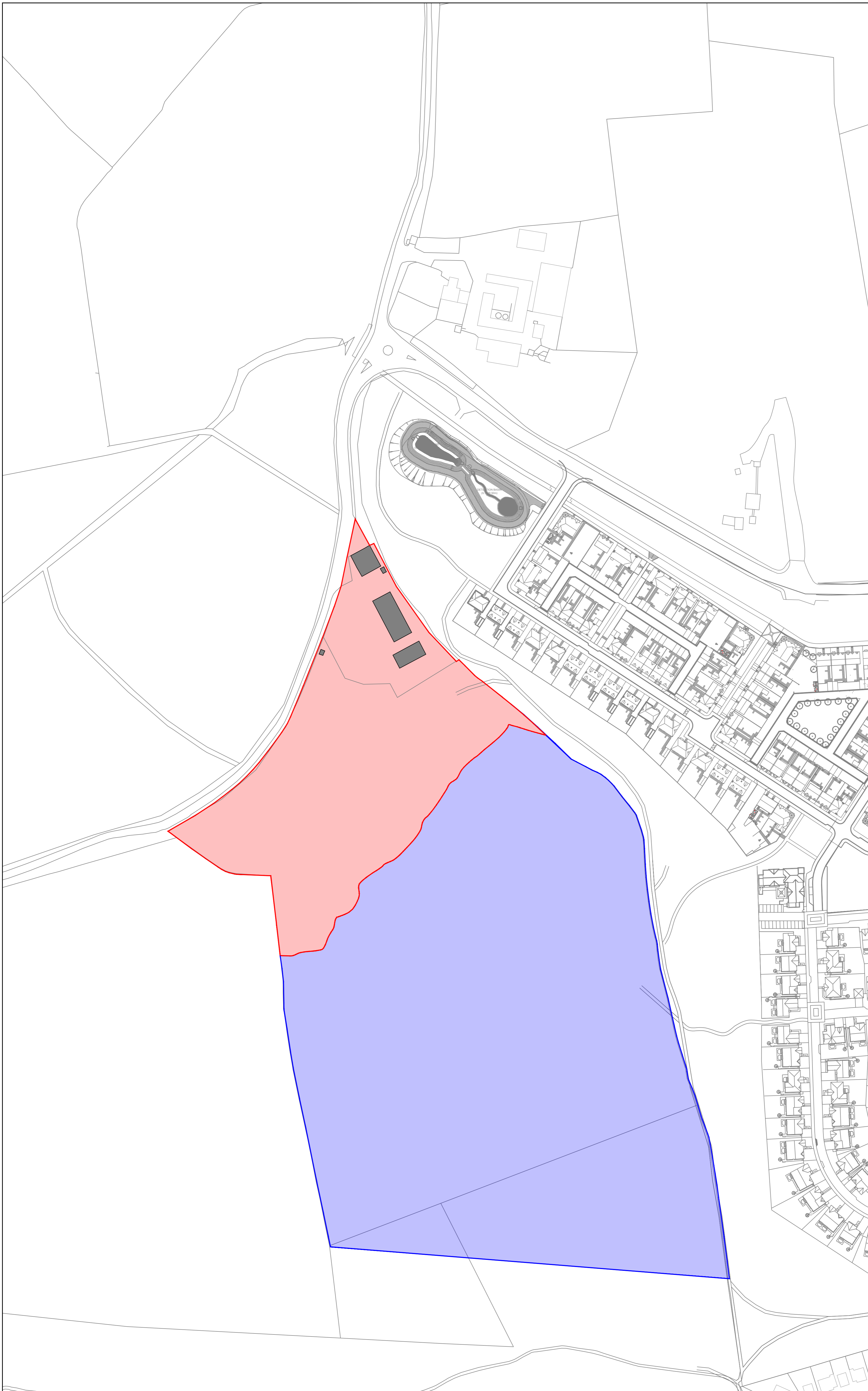


1. PROPOSED SITE AREA

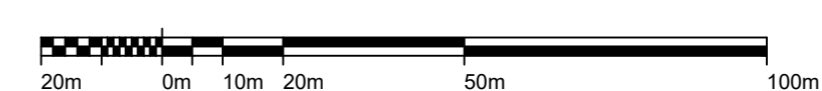
25073.08 m²
2.51 ha
6.19 ac

2. SURROUNDING LAND

72093.25 m²
7.21 ha
17.81 ac



Proposed Bid Site Area
Scale 1:1000 (on A1)



A02	Revisions	06.05.2019
A01	Client Approval	27.03.2019
DIP	Draughting In Progress	18.03.2019
Rev:	Description:	Date:

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Client: | Mr J. Langler

Project: | Site Development - WTR (expanded op)

Perwinnes Moss
Scotstown Moor Base
Bridge of Don
Aberdeen
AB23 8NN

Title: | Proposed Bid Site Area

Drawing: | A-0027-06-01-004 **Rev:** | A03

Scale: | 1:1250 on A1 **Date:** | 07.05.2019

Status: | Pre-bid Proposal **Drawn By:** | A.Keenon

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PROPOSED SITE BOUNDARY █

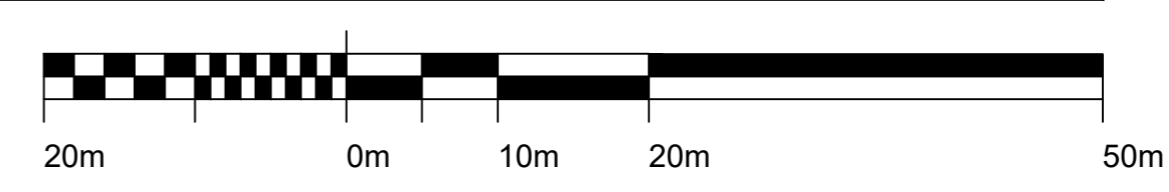
SURROUNDING LAND IN OWNERSHIP █

1. PROPOSED SITE:
22071.08 m²
2.21 ha
5.45 ac
- SURROUNDING LAND:
75097.79 m²
7.51 ha
18.56 ac
2. MAIN SITE ENTRANCE TO BE SITED AT EXISTING OPENING. EXISTING OPENING TO BE UPGRADED & DESIGNED TO THE SATISFACTION OF THE COUNCIL IN ACCORDANCE WITH GEOMETRIC DESIGN OF MAJOR / MINOR PRIORITY JUNCTIONS, THE SCOTTISH OFFICE DEVELOPMENT DEPARTMENT AND IN CONJUNCTION WITH STATUTORY CONSULTEES.
3. PRIMARY DEVELOPMENT ACCESS ROADS.
4. DEVELOPMENT HOME ZONE AREAS.
5. PUBLIC PAVEMENT AND LINK PATHS.
6. PUBLIC FOOTPATH LINKS TO NEIGHBOURING SITES.
7. TURNING HEADS.
8. PUBLIC OPEN SPACE AMENITY AREAS. (EXCLUDING ROADS PAVEMENT & SUDS.)

9224.01 m² = 242m² PER UNIT
0.92 ha
2.28 ac
- PUBLIC OPEN SPACE TO BE PLANTED WITH STRUCTURED PLANTING AND TREES
NATIVE BIRCH ROWAN BLOCK PLANTING WITH HEATH SHRUB EDGE PLANTING.
9. SUDS POOL.
10. RESIDENTIAL MIXED HOUSING. APPROX. 38 UNITS.
a. 12 TERRACED 2 STOREY 2-3 BED UNITS.
b. 12 SEMI-DETACHED 2 STOREY 2-3 BED UNITS.
c. 14 DETACHED 2 STOREY 3-5 BED UNITS.
- CAR PARKING PROVIDED ON PLOTS.
PRIVATE RESIDENTIAL GARDEN AREA.
11. EXISTING WTR SITE BOUNDARY.
12. SOUTH BOUNDARY TO FOLLOW NATURAL ORGANIC LAND CONTOUR.



Proposed Site Layout
Scale 1:500 (on A1)



A02	Revisions	06.05.2019
A01	Client Approval	27.03.2019
DIP	Draughting In Progress	18.03.2019
Rev:	Description:	Date:

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Telephone: 01224 789715 | Mobile: 07399 873227
Email: info@ak-architecture.co.uk | Website: www.ak-architecture.co.uk

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Client: | Mr J. Langler

Project: | Site Development - WTR (expanded op)

Perwinnes Moss
Scotstown Moor Base
Bridge of Don
Aberdeen
AB23 8NN

Title: | Proposed Site Layout

Drawing: | A-0027-06-01-005 **Rev:** | A03

Scale: | 1:500 on A1 **Date:** | 07.05.2019

Status: | Pre-bid Proposal **Drawn By:** | A.Keenon

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Photographs showing evidence of previous development on the site

