



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	Michael Lorimer
Organisation (if relevant)	Ryden LLP
On behalf of (if relevant)	
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.

PAPER APART

Representation to the Aberdeen City Local Development Plan 2019 Main Issues Report on behalf of Mr Dave Robb

Site No. B0905 Site at East Lodge, Culter House Road, Milltimber

Introduction

On behalf of our client, Mr Dave Robb, objection is taken to the failure of the Main Issues Report (MIR) to identify Site No: B0905, Site at East Lodge, Culter House Road, Milltimber, as a preferred site for a small scale residential development of up to five dwellings. The site would form a logical extension to the existing popular residential suburb of Milltimber and should therefore be preferred for development in the first Plan period as an appropriate allocation within the Proposed Local Development Plan (LDP) 2022.

This representation requires to be considered in conjunction with the previous Development Bid and supporting indicative housing layout submitted at the pre-MIR 'Call for Sites' stage.

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

At the outset, concern is raised in respect of Paragraph 2.1 of the MIR, which sets out housing allowances and new sites for development. It is contended that additional sites require to be allocated to ensure that a 5 year housing land supply is in place at the end of the Local Development Plan period. There appears to be a significant overreliance on the redevelopment of brownfield sites in order to meet housing allowances as set out within the Proposed SDP. Brownfield sites by their very nature can pose issues with deliverability, therefore suggestion that some 3,408 units (over 80%) should account towards the SDP allowance of 4168 homes is concerning. It is maintained that such an approach would contravene Paragraph 119 of Scottish Planning Policy (SPP) which requires local development plans in city regions to allocate a "range of sites" which are effective or expected to become effective in the plan period. It is considered that the MIR in its current form does not allocate an appropriate range of sites and to ensure a range and choice of sites which are capable of delivery, it should therefore be supplemented with an additional greenfield release.

Aberdeen City Council state that any greenfield allocations should be small scale and should not be extensions to existing sites identified in the 2017 LDP. Site B0905 reflects these requirements, being small-scale in nature and is not attached to any existing LDP sites. It is therefore capable of immediate delivery and would be entirely suitable for a small scale housing development.

Response to MIR Assessment of Bid Site B0905

The Development Options Assessment Report, which accompanied the publication of the MIR, provides a scoring matrix for each Bid site and provides a summary justification for the Officers' recommendation as to whether the site should, or should not, be included in the proposed Plan.

The justification contained within the Site Assessment highlights that the site is perceived to be undesirable for development, due to the presence of ancient woodland, greenspace and greenbelt designations. Additionally, suggestion has been made that the development would have an impact on the Dee Valley Landscape Character Area. The Assessment also suggests that there are limited opportunities for active travel and a lack of public transport, which could lead to increased car dependency. For these reasons, the site has scored lower on a number of related criteria contained within the scoring matrix.

Given the context of the site, which lies within the popular suburb of Milltimber, immediately adjacent to existing residential development, extant LDP allocations for housing and the recently opened AWPR, it is concerning that the Assessment fails to give due consideration to the established land uses which would clearly be read in conjunction with the proposed small scale development of 5 homes. Had these matters been given due consideration, it is contended that the site would have scored higher. As such, issue is taken with a number of the comments and findings contained within the Assessment and our client would wish to respond as follows.

Slope

It is noted that the site slopes on a north to south gradient, however this is more prevalent on the land further to the north, located outwith the proposed site boundary. It is therefore envisaged that there would be relatively modest cut and fill / earthworks required to prepare the site for development, however this should not be deemed preventative to the delivery of the site. The gradient must also be considered in the context of the existing OP113 allocation for 8 units on the opposite side of Cutler House Road. A similar gradient is evident on that site, which is more prevalent due to the elongated nature of the allocation running north to south, yet it has been deemed suitable for residential development by Aberdeen City Council. A similar approach should therefore be adopted for the proposed site.

Natural Conservation

The Assessment places significant weight on perceived impacts on existing designations covering Greenbelt and Greenspace Network designations. As was specifically highlighted within the supporting documentation submitted with the development bid at pre-MIR stage, the presence of major new road infrastructure associated with the AWPR, which effectively dissects the land between Milltimber and Peterculter, has led to significant fragmentation and erosion of these designations. The western boundary of Milltimber is now defined by this physical infrastructure rather than what was previously undeveloped and protected land. It is therefore disappointing that the MIR assessment falls silent on

this matter. It is imperative that these designations are reconsidered in the context of the AWPR, as their original purpose to protect the City's landscape and habitat corridors has been severely compromised. Accordingly, the site no longer forms a logical connection to any adjacent wildlife corridors to the north or south. Instead the site now consists of a small isolated pocket of dense, poorly managed woodland cover.

Further visual evidence of this fragmentation can be seen within Map 6 for Deeside, as contained within the MIR. The Map illustrates the bid site shaded in blue as "undesirable", yet directly abutting three existing 2017 LDP sites to the north and south east. The route of the AWPR is clearly marked to the west, forming a new physical boundary to Milltimber. This serves to demonstrate the degree of separation the site has from any surrounding Greenspace Network and that its designation as Greenbelt no longer serves any relevant purpose. It is therefore requested that these designations are removed from the next LDP as they are no longer fit for purpose and the site appropriately allocated as a logical infill development to supplement the neighbouring LDP allocations and established residential development immediately adjacent to the site.

Whilst the assessment notes NESBReC records show that a bat survey would be required, it is much more likely that bats in the area would be roosting within adjacent residential properties, which enjoy more constant temperatures, providing more suitable habitat than any trees on site would provide. This is evident at the old Gardeners cottage which lies approximately 100m from the site, which has been retained as an existing bat roost following construction works associated with the AWPR. As highlighted within the Development Bid, bat boxes would be incorporated into the new development.

Reference is made to the River Dee catchment area within the assessment, however, no comment is provided in relation to why the site has been scored down on that basis. The River Dee Catchment forms an expansive area, covering all of Aberdeen City and a significant portion of Aberdeenshire. Any development will be required to demonstrate to the satisfaction of SEPA and Scottish Natural Heritage that it will not have an adverse impact on the River Dee Special Area of Conservation. With regard to water abstraction, whether the development is in Deeside or elsewhere within the city this is an issue that will require to be addressed as the supplies drawn from the ground waters of the River Dee serve an expansive area covering the majority of the city, not just the Deeside corridor. It should not, therefore, be used as a reason to discount development in this area.

It is acknowledged that the site is located within an area designated as ancient woodland, as part of a larger designation encompassing land to the north and east. In reality however, the site does not contain any ancient trees, all are relatively young through self-seeding. The site therefore contains a dense and unmanaged mix of both native and non-native species, which at present, provides little nature conservation value due to recent major development outlined above. The proposal therefore presents the opportunity to adopt an appropriate woodland management scheme, which would see compensatory planting of native species to provide context and character to the proposed development.

Considering Aberdeen City Council have accepted significant loss of this Ancient Woodland through existing allocations to the north and east, as well that associated with the construction of the AWPR, this should not be deemed sufficient reasoning to discount the site.

Landscape Features

The Council's assessment notes the low stone dyke to the south of the site. This would be retained and incorporated as a feature boundary, giving contact to the proposed residential development.

The justification suggests that the development would lead to the loss of trees which link to a larger treed area. It is assumed that this means trees from the same group which lie immediately north, which would remain unimpeded by the development? As highlighted above, this is an isolated grouping of trees which has been fragmented from the wider established greenspace network through the construction of the AWPR. Additionally, the Council has accepted loss of trees to the north east through existing LDP allocations. In reality, not all trees would be felled, instead an appropriately managed landscaping plan would be implemented as part of the redevelopment. This would allow for retention of trees as a landscape feature along the southern and western boundary to provide an attractive woodland setting.

It should also be highlighted that over 3,000 young trees have recently been planted to the south of East Lodge by the AWPR Contractor. Furthermore, approximately 10,000 new trees have been planted along the embankment to the west between the site and the AWPR, extending from Milltimber Bridge up to the new Deeside junction to the north of the site in order to provide visual and acoustic attenuation. Once established, these will form a significant new landscape feature as well as additional screening to the proposed site.

Landscape Fit

As highlighted within the MIR assessment, the site is located within the Deeside Character Area. The immediate surrounding area has undergone significant landscape change through the development of the AWPR and major Deeside/Milltimber junction which lies to the immediate north west of the site. Suggestion that development of the site would erode the character of the area is therefore completely unjustified. The site would be read in relation to a major piece of infrastructure, as small scale development at the edge of a well-established residential area. Whilst slightly elevated from the new road on approach from the south, the development would be viewed no differently in terms of landscape impact from the numerous properties within Milltimber and along the North Deeside Road which are clearly visible from the AWPR.

Considering the presence of the AWPR, which clearly intersects and forms a physical barrier between Peterculter and Milltimber, suggestion that the site could lead to coalescence between the two

settlements is unacceptable. It is physically impossible to extend Milltimber further west beyond the confines of the new carriageway. The proposed site forms a natural continuation of existing and allocated residential development at Milltimber, with the AWPR forming a new physical boundary to the west of the built up area. The site would remain some 600m from the existing edge of Peterculter, therefore no coalesce between the two suburbs would be experienced by way of the development.

Relationship to Existing Settlement / Land Use Mix

The Council's assertion that the site is "detached from the settlement of Milltimber / Peterculter" and would not add to the land use mix is completely unfounded. To reiterate, the site lies directly adjacent to the existing designated residential area of Milltimber and as highlighted within the MIR justification it abuts LDP allocations (OP113 and OP46) for housing development to the east. The established land use within the immediate locale is therefore housing development. Accordingly, a small scale development of 5 houses would be entirely appropriate, adding to the range and choice of family homes in this popular suburb of the city. It is however accepted that the site is separate from Peterculter, which further demonstrates there would be no coalesce with that area, as set out within the response to 'Landscape Fit' outlined above. The Councils justification therefore appears contradictory and misinformed.

Accessibility / Proximity to facilities

The site scores low in these criteria, with the Council implying that there is a lack of footpaths and connections to public transport, community facilities and recreation in close proximity to the site. This suggestion appears odd, considering the proximity of the site to existing LDP allocations (OP113, OP46 and OP112) which have clearly been accepted without similar concern over their accessibility and proximity to facilities. The site forms part of an established suburb of Aberdeen and would make use of the same infrastructure and footpath connections as the adjacent allocations. North Deeside Road acts as a major public transport corridor between the city and the communities along Deeside. Therefore, contrary to the Council's suggestion, there is a bus stop just over 400m to the south at Milltimber Brae which is easily accessible by foot to the south via Bellenden Walk, offering direct access to services and retail provision located in Peterculter, Cults and the City Centre. The local Primary School is located approximately 1.2km from the site, with the medical practice approximately 2km from the site. Further sports and recreational facilities are located a short walk or cycle away at Kippie Lodge. The site's accessibility and proximity to local services and amenities is therefore typical of a residential suburb of the City.

Contrary to what the Council suggests, it should also be stressed that the site is closely located to direct cycle links. There is an established cycle lane along North Deeside Road, which is easily accessible to the south via Bellenden Walk. The Deeside Line offers a non-trafficked core path across much of Deeside, with direct linkage to the City Centre. This can be easily accessed by travelling across the North Deeside Road and south via Milltimber Brae, which connects to the existing route. Furthermore,

a new pedestrian / cycle / bridle path has been created to the north of the site off Culter House Road, leading to the new major Deeside/ Milltimber AWPR junction. This provides access to the road leading to Kippie Lodge, the golf course, riding stables and the existing woods to the west.

Proximity to Employment

Milltimber is a well-established and popular residential suburb of Aberdeen. Therefore the natural employment draw for the majority of residents will of course be the opportunities located within the established employment centres located within the confines of the city. The site is therefore excellently located, offering direct links with the city centre via public transport and cycle opportunities as outlined within the paragraphs above. The AWPR has also further strengthened strategic links north and south of the City, offering much improved access between key employment areas associated with the business and industrial parks at Dyce, Prime 4 at Kingswells, Arnhall at Westhill, as well as those established at Altens and more recent developments to the south of the City. The site is located within very close proximity to the major AWPR Junction at Deeside/Milltimber, therefore accessibility to local employment opportunities are excellent.

Service Infrastructure Capacity

In terms of education provision, the Council suggest that site would be zoned to Culter Primary School which is currently under capacity and could therefore support the development of these 5 properties. It is however understood that Milltimber Primary is due to be replaced as part of the ongoing development of Oldfold to the east. It is therefore anticipated that additional capacity for primary school pupils will be provided within Milltimber to accommodate the development. The scoring matrix highlights that Cults Academy is forecast to be over capacity by 2021. As highlighted within the development bid, Developer Obligations would likely be required to mitigate any overcapacity issues, therefore a slight overcapacity of the Secondary School should not therefore be deemed reason to discount the proposed site.

It is also understood that the proposed Countesswells Academy will have capacity for some 1100 pupils, with housing at Countesswells accounting for approximately half of this. This would suggest that there could be spare capacity for this development if so required.

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. As such, bid site B0905 at East Lodge, should be identified for a small scale development of 5 dwellinghouses within the Proposed Local Development Plan, given its location immediately adjacent to neighbouring housing and a number of existing allocated residential development sites at Culter House Road, Milltimber.

The site is currently designated as Greenbelt and Greenspace Network, however, given the substantial changes to the area and landscape brought about through the development of the AWPR, the underlying aims of these designations have been significantly diluted and fragmented. The designations are therefore no longer fit for purpose and should be removed from the site within the Proposed LDP.

Whilst the proposal would result in the loss in a small amount of ancient woodland, the area itself would benefit from an appropriate woodland management scheme to remove non-native species and implement an appropriate landscaping proposal to integrate the development on site. This would include provision for compensatory planting. The Ancient woodland designation has not precluded the allocation of existing LDP housing opportunity sites to the north east.

The site is within walking distance of public transport links and offers direct linkage to established cycle links to the city, as well as surrounding services and amenities and the settlements along Deeside. It is also strategically placed, within close proximity of the recently opened AWPR, offering excellent transport links to employment areas to the north and south of the City.