

Response ID ANON-B3JU-DSGE-Q

Submitted to **Local Development Plan Main Issues Report 2019 Consultation**
Submitted on **2019-05-13 15:01:10**

About You

What is your name?

Name:

Cameron Forbes

What is your organisation?

Organisation:

Forbes Homes Ltd

On behalf of:

Forbes Homes Ltd

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How to Complete

1 Introduction

Section 1 provides a context for the Main Issues Report Do you have any comments in relation to this section?

Do you have any comments in relation to this section?:

No Comments

2 Settlement Strategy

Question 1 New Housing Sites

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

Bid Site B0924 - Land at Loirsbank Road. Please find comments attached.

Question 2 Housing Allowances Beyond 2032

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

Question 3 Brownfield and other Opportunity Sites

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

Question 4 New Healthcare Facilities

Do you have any comments on these sites? Are there any other sites in these areas that we should be considering?:

Appendix 1 Proposed Draft New Policies

Policy D2 Amenity

Do you have any comments on the policy?:

Policy D5 Advertisements and Signage

Do you have any comments on the policy?:

Policy D8 Shopfronts

Do you have any comments on the policy?:

Policy D9 Windows and Doors

Do you have any comments on the policy?:

Policy H4 Housing Mix and Housing for Particular Needs

Do you have any comments on the policy?:

Policy H8 Residential Care Facilities

Do you have any comments on the policy?:

Policy H9 Student Accommodation Developments

Do you have any comments on the policy?:

Policy H10 Houses in Multiple Occupation

Do you have any comments on the policy?:

Policy NC9 City Centre Living

Do you have any comments on the policy?:

Policy NC10 24-hour City

Do you have any comments on the policy?:

Policy NC11 Visitor Attractions and Facilities

Do you have any comments on the policy?:

Policy NC12 Public Art Contribution

Do you have any comments on the policy?:

Additional Documents

Please include comments on other documents below:

Please include comments on other documents below::

Development Bid Assessment for Loirsbank Road (B0924):

Please the following attached documents:

Comments on Bid Assessment

Flood Risk Assessment

Letter from Community Council

Additional Files

If you have further information you would like to provide you may upload it here.:

B0924 - Response to Bid Assessment.pdf was uploaded

B0924

The recommendation that this site is “undesirable” is somewhat disappointing.

The reasons for this outcome appear to relate to three key aspects – flooding, drainage and landscape fit. The justification for the “undesirable” stance references the site being within the Green Belt and Green Space Network, and that the site is in the Medium to High flood risk area on the SEPA flood risk maps, causing a high risk of flooding, and drainage problems. The reasoning concludes to say that the siting would impact on the surrounding landscape due to the proximity to the River Dee and open aspect to the south from the associated land raising and remedial works involved in developing the site.

Flooding and Drainage – As outlined in the submitted bid form, and accompanying report from Fairhurst, flood risk and drainage concerns are not an issue with this proposed development. The development can be delivered with respect for the Medium to High flood risk identified on SEPAs flood maps through the well-considered siting of the dwellings and ensuring finished floor levels are appropriate. In the appeal against the refusal of application 111566, the Reporter was very clear in their response that there was no flood risk associated with a development of 4 houses on this site. It is disappointing that Aberdeen City Council’s Planning Team have failed to have regard for that material consideration, and indeed the findings of the robust report provided by Fairhurst that accompanied our initial bid. Quite simply, the flood risk associated with the site and adjacent land is manageable, and is not a barrier to development. The finished floor levels of the houses, as outlined in the refused application, would sit higher than those consented and built adjacent. This would be retained in any subsequent proposal, and remedies the risk of flooding to these properties – as outlined in the Fairhurst report, and as accepted by the Reporter in the previous appeal. The flooding of gardens is not an issue, there is no risk to human life. The use of garden ground, with appropriate boundary fencing that is raised and designed to be open to water and to stay free from obstruction in a flood event, is a perfectly appropriate form of development within the flood plain. Drainage is not an issue, public infrastructure exists and Scottish Water confirmed there is capacity during application 111566. This point, in relation to flooding and drainage, is therefore misplaced and should not be used as a reason to not allocate this site.

Landscape – the site does have an open aspect to the south, however is not visible from any public thoroughfare; South Deeside Road is well screened by trees, with the Paul Lawrie Golf Centre and River Dee itself providing significant separation distance. Furthermore, the backdrop to the views from the south is a rising landform with existing residential properties that sit to the north of Lorisbank Road. The site is therefore not visible from the south, and even if it were the housing would be set against the establish backdrop of residential properties, therefore having very little prominence and barely any impact. The local character and context along Lorisbank Road, which is a minor road serving the local residential population, can accommodate the addition of housing. This form of development is consistent with the establish character of the area, most significantly the recently consented and built 8 dwellings to the immediate east of this site. Plot sizes, and subsequently building sizes would reflect that of the long established dwellings to the north, and recently built ones to the east. This proposal would very much continue the scale and pattern of development from those adjacent 8 dwellings, and effectively complete the street scene to create a safe and pleasant environment with houses fronting onto both sides of Lorisbank Road, aiding in road safety through speed reduction through the further creation of a residential street scene, and improving public safety through additional frontages enhancing security for residents. The site would result in a development that is well integrated to its surroundings. The proposal, by virtue of its scale, setting, lack of prominence and complete compatibility with the scale, density and form of

development immediately adjacent to the site, poses no impact on the wider landscape or character of the local area. This point is therefore not a substantial consideration to prevent the site being allocated for a modest form of development.

Green Belt – This point is not referenced in the determining constraints for the site, however is referred to in the justification for the “undesirable” recommendation. The site is currently recognised as green belt in the LDP. It previously was not. The site has been allocated in the past, in the 2008 plan for 10 dwellings (site OP124). The fact the greenbelt factor isn’t presented in the key reasoning perhaps suggests it is less of an issue, and the designation is perhaps easily reversible, given it only came about from the removal of the allocation of this site in a previous plan. The site was large, too large for 10 dwellings, so to gain consent for a deliverable proposal of appropriate scale, consent was gained for 8 dwellings, leaving this part of the allocated site undeveloped. The intention was to always build out the full site, however the removal of the allocation and reverting the remainder of the allocated site to greenbelt has prohibited this. The remaining part of OP124 presents ample opportunity for a modest development to complete the original site, and balance the street scene at Loirsbank Road.

SPP does steer Authorities away from using green belts, stating that “*other policies can provide an appropriate basis for directing development to the right locations*”. Furthermore, the purpose/function of a green belt to aid a spatial strategy, as identified in SPP, sets out to direct development to the most appropriate locations and support regeneration; protect and enhance the character, landscape setting and identity of the settlement; and protect and provide access to open space. This location is wholly appropriate, within an established community, modern development adjacent, and would complete the street scene in terms of frontage to both sides. As outlined above, the site is well screened and not prominent, therefore has little impact on the wider landscape setting or character and does not detract from the identity of the wider settlement/built form of the area. The open space to the south is not wholly public or widely usable, therefore development of the site does not impact on that. Opportunity does exist through development to enhance existing informal footpaths that lead from Loirsbank Road down to the riverside walk, and we would fully commit to incorporating this into our proposals.

The Community Council have aspirations to enhance the informal path along the river from Robert Gordons University to Culter, and the route is an aspirational core path which could be partially delivered through the allowance of our development. We will send you a copy of the letter we received from the Community Council to verify their interests and support for our intentions. This path link would be a great benefit to the local community, enhancing recreational walking routes and providing a greater ease of access to the outdoors, bringing significant social and health benefits. Furthermore, Deeside Golf Club have expressed an interest in expanding their golf course into the lower part of our site, which would retain the green nature of the site, and further enhancing the recreational value of the green space. The provision of footpath and recreational benefits is to the benefit of the public enjoyment of the wider green space network, and would have little to no impact on the greenbelt. Housing at the northern edge of the site, along the roadside and adjacent to the existing housing, would be insignificant in terms of landscape impact and loss of green space. The greenbelt designation of the site is onerous, and not necessary, and should be removed to permit this site as gaining allocation for a small development of 4-5 houses.

The allocation and development of this site would bring multiple benefits; it would complete the street scene, provide much needed family homes in the area which would help sustain local services

and the school role, and the development could facilitate improved access to informal waterside walks to the south to provide a valuable and thoroughly attractive riverside walk to Culter, and link that route through to the former railway line to the north. The site for housing is not at risk of flooding, as evidence in our submitted report by Fairhurst, and as accepted by the Reporter in the appeal against the refusal of application 111566. We therefore ask that you re-allocate this modest site for the development of 4-5 dwellings, and remove the greenbelt designation from this site and adjacent land to allow the site to deliver its full potential. Effectively, we are seeking restoration of the site to its allocated, non-greenbelt status from previous local plans.

Flood Risk Statement

This Flood Risk Statement has been prepared by Fairhurst on the instruction of Forbes Homes. It has been prepared in support of the proposed development of 4 units of housing at Loirsbank Road, Cults.

This statement will firstly describe the proposals and relevant local and national planning policies. It will then describe possible sources of flood risk and justify the basis for the view that the site is not at risk of flooding.

Development proposals

A residential development comprising 4 detached dwellings is proposed by Forbes Homes at Loirsbank Road, Cults. The development will front onto Loirsbank Road. The site is located in predominantly open ground to the south of Loirsbank Road in the vicinity of its junction with Deevie Road South. It is bounded to the south-east by open ground falling towards the banks of the River Dee. The site location is shown on Fairhurst drawing no. 91116/0001B.

The development comprises four medium to large detached houses. The plots have been numbered for reference Plots 1 to 4 running from east to west. The site layout is shown on Mackie Ramsay Taylor (MRT) drawing no. 1839/L(00)01 Rev E and 1839/L(00)05 Rev C.

The site of the proposed development lies to the west of an adjacent Forbes Homes development comprising 8 detached dwellings fronting onto Loirsbank Road. Planning consent was granted for the adjacent development in 2010.

The site of the proposed development is the subject of a separate planning consent for formation of an agricultural access, including field gates. The two proposals are mutually exclusive.

Existing site topography

Loirsbank Road falls gently to the east and west from a high point at a level of about 18.1m at its junction with Deevie Road South. A low point to the east of Plot 1 lies at around 15m and the road then rises again, reaching a level of approximately 16m at the location of the westernmost house, Plot 4 falling to about 15m at Plot 1. The existing ground within Plots 1 to 4 is set lower than adjacent road level, falling steeply away from the road to the south-east to a level of about 10m, and then falling more gently towards the banks of the River Dee.

The southern boundary of the site is set approximately 25m from the rear of the new houses and varies in level from about 7.2m to 9.7m. The lowest part of the site is at the south-eastern boundary of the site at the boundary between Plots 2 and 3, which is at approximately the 7.2m contour. The River Dee floodplain to the south-east is at a typical level of about 7m.

Proposed development levels

MRT drawings 1839/L(00)06 and 1839/L(00)07 also presents sections through the site at the location of each proposed house. The houses on Plots 1 to 4 are on infill in order to provide access at first floor level from Loirsbank Road. The designs involve a lower floor at the rear of the house. The lowest proposed house floor level is at Plot 1, where the proposed finished floor level of the lower floor is 12.30m. This compares to the finished floor level of 12.2m at Plot 8 in the recently completed houses to the east.

Planning policy

Local Planning Policy: At the time of submission of the planning application for the current proposals, the proposed development site was identified for housing in the extant 2008 Aberdeen Local Plan. The Main Issues Report for the subsequent Local Development Plan carried forward the site for development. However, it was excluded from the Local Development Plan when adopted in February 2012.

Flooding is considered within Section 3 of the current LDP. This explains that development will be assessed in accordance with the Scottish Planning Policy Risk Framework. To ensure that proper precautions are taken against the risk of flooding, Policy NE6 – Flooding and Drainage lists 4 criteria which if met would suggest that development should not be permitted. These can be summarised as:

1. it would increase the risk of flooding:
 - a) By reducing the ability of the functional flood plain to store and convey water;
 - b) Through the discharge of additional surface water; or
 - c) By harming flood defences.
2. it would be at risk itself from flooding;
3. adequate provision is not made for access to watercourses for maintenance; or
4. it would result in the construction of new or strengthened flood defences that would have a significantly damaging effect on the natural heritage interests within or adjacent to a watercourse.

Policy NE6 states that applicants will be required to provide an assessment of flood risk where a development is likely to result in a material increase in the number of buildings at risk of flooding or where it has been identified in the opportunity sites schedule that one will be prepared. Appendix 2 of the LDP indicates factors relevant to the opportunity sites. It is noted that planning permission has been granted for 8 houses within the adjoining OP136. No requirement for a flood risk assessment is noted.

Scottish Planning Policy: Scottish Planning Policy (SPP) is a statement of Scottish Government Policy on land use planning. Published on 4 February 2010, the SPP consolidates the existing SPP and NPPG series of guidance.

The topic of flooding and drainage is discussed in paragraphs 196 – 211. It is explained that flooding is a natural process which although can not be prevented, can be managed. Paragraph 197 states that '*development which would have a significant probability of being affected by flooding or would increase the probability of flooding else where should not be permitted*'. It is therefore the responsibility of the planning authority to have regard to the risk of flooding when preparing development plans and determining planning applications.

Paragraph 204 describes the basis for planning decisions made in relation to flood risk. A risk framework is provided which divides flood risk into three categories and outlines an appropriate response to each. It goes on to list a number of criteria which should be considered when applying the framework. They are stated as:

- the characteristics of the site;
- the use and design of the proposed development;
- the size of the area likely to flood;
- depth of water, likely flow rate and path, rate of rise and duration;
- existing flood prevention measures – extent, standard and maintenance regime;
- allowance for freeboard;
- cumulative effects of development, especially the loss of flood storage capacity;

- cross boundary effects and the need for consultation with adjacent authorities;
- effects of flood on access including by emergency services;
- effects of a flood on proposed open spaces including gardens; and
- the extent to which the development its materials and construction are designed to be water resistant.

PAN 69 Planning and Building Standards Advice on Flooding (August 2004): PAN 69 provides background information on best practice to prevent development which would have a significantly high probability of being affected by flooding or would increase the probability of flooding elsewhere.

Sources of flood risk

The following potential sources of flood risk have been considered:

Fluvial flooding: The site is set on rising ground adjacent to the River Dee. Where sites are located in the vicinity of a watercourse it is necessary to consider fluvial flood risk. Accordingly, information has been obtained from a previous study. It has been concluded that the site is located outwith the functional floodplain of the River Dee and is protected against flooding to the standards required by national and local planning policy. This is set out in more detail below.

Overland flow: Flood risk arising from overland flow from extreme pluvial events that exceed the capacity of surface water sewers has been considered. A small area to the north and north-west of Loirsbank Road falls towards the site. However, any overland flow reaching Loirsbank Road is likely to flow down Loirsbank Road, towards the low point east of Plot 1. Water may pond to a shallow depth before spilling south towards the River Dee. The design of the entrance to each plot will ensure that surface water is directed away from the houses.

Sewer flooding: Flood risk from sewers has been considered. The proposed houses are set below the level of the adjacent road. The design of the entrance to each plot will ensure that any sewer flooding occurring outside the plot is directed away from the houses. The design of foul drainage and sanitary fittings within each plot will ensure that backflow of sewage cannot occur.

Groundwater flooding: The site is not considered vulnerable to groundwater flooding because of its sloping topography and location.

Infrastructure failure: No potential source of flooding from infrastructure failure has been identified.

Coastal flooding: The site is not subject to coastal flood risk as it is set above possible sea levels.

Previous studies on fluvial flood risk

A study on flood risk from the River Dee was carried out by consultants on behalf of Aberdeen City Council and Aberdeenshire Council. The study report, entitled River Dee Flood Study Final Report was issued in December 2004. This study extended from Aberdeen Harbour upstream to Park flow gauging station and covered the reach of the river adjacent to the Loirsbank Road site. The study included hydrological assessment of the River Dee and its various tributaries between Park and the sea, based on the Flood Estimation Handbook methodology, and construction of a numerical hydraulic model to allow prediction of water levels in flood events. The numerical model was based on extensive cross-section surveys of the river.

As part of the study, water levels were predicted for events up to 1 in 200 year return period. In addition, model runs were carried out for a 20% increase in flow rates to take account of the possible future effects of climate change.

Model output for the Loirsbank Road site for the 1 in 200 year event has been obtained from the study report Appendix D.1. Model output for the 1 in 200 year event plus climate change allowance has been obtained from the Councils' consultants.

Location	Water level (m AOD)	
	200 year	200 year + 20%
Left bank floodplain adjacent to Loirsbank Road	10.95	11.57

The recommended methods of flow prediction in the Flood Estimation Handbook have been revised since the Council study was carried out in 2004. In addition, further years of record are available at local gauging stations on the River Dee. A re-assessment has been carried out of the flow predictions at Park gauging station, which were used as input to the numerical model. Predicted flows using current methodology and data are significantly lower than those used in the 2004 study. It has been concluded that the 2004 study predictions are conservative and their use provides an additional factor of safety. Water level predictions used in this assessment originate from the 2004 study.

Fluvial flood risk to site

The extent of the 1 in 200 year event plus 20% increase in flows to allow for climate change is shown on Fairhurst drawing no. 91116/2600. The majority of the area of the plots is below the 1 in 200 year plus climate change event level, but the access to Loirsbank Road at the front of the plots is well above the predicted flood level.

Flood protection proposals

The proposed infill within the house plots will bring ground levels in front of and around the houses above predicted flood levels. The proposed minimum house floor level of 12.30m at Plot 1 provides a freeboard of 730mm above predicted flood level of 11.57m in the 1 in 200 year event plus 20% increase in flows to allow for climate change.

Parts of the rear gardens of all four plots will remain within the functional floodplain of the River Dee based on the 2004 Aberdeen City/Aberdeenshire study and may be subject to periodic inundation.

Access and egress during emergencies

A safe egress route to higher ground and access for emergency services during flood events on the River Dee is available. The route is from Loirsbank Road via Deeview Road South and St. Devenick's Place to the A93 North Deeside Road.

Floodplain storage

Infilling is referred to within SPP as landraising, which involves permanently elevating a site above the functional flood plain. Landraising within the functional floodplain of the River Dee will result in a loss of floodplain storage volume. The loss of storage volume is very small relative to the natural storage within the River Dee system and is unlikely to result in any detectable alteration in flood levels. However, SPP requires that proposals for landraising should:

- be linked to the provision and maintenance of compensatory flood water storage to replace the lost capacity of the functional flood plain,
- have a neutral or better effect on the probability of flooding elsewhere, including existing properties,
- not create a need for flood prevention measures elsewhere,
- not create islands of development but should adjoin developed areas outwith the functional flood plain, and
- be set back from the bank of the watercourse.

In order to comply with SPP requirements on landraising, compensatory storage proposals have been prepared. The proposals are shown on Fairhurst drawing no. 91116/2601 Rev J. The compensatory storage has been designed to provide at least level-for-level compensation in accordance with SEPA guidance. The storage volumes lost and provided are detailed on the table on drawing no. 91116/2601 Rev J. The volumes of compensatory storage provided exceed the volume lost at each increment of level.

Conclusion

The proposed development site is protected against flood risk from fluvial flooding from the River Dee to an acceptable standard. A freeboard has been provided above the 1 in 200 year flood level including allowance for climate change. The standard of protection is in accordance with local and national planning policy. Potential flood risk from other sources has been addressed in the design of the plots.

Part of the site lies within the functional floodplain of the River Dee. There is a loss of floodplain storage associated with the proposal. Compensatory storage on a level-for level basis is required and has been allowed for in the proposal in accordance with Scottish Planning Policy.

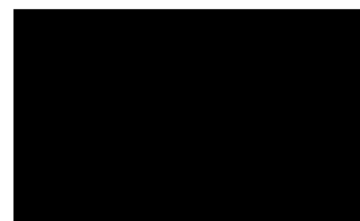
No effects on flood risk elsewhere are anticipated due to the replacement of lost floodplain storage with compensatory storage at the appropriate level.

It is concluded that the site can be developed in accordance with national and local policy regarding flood risk.

W A Fairhurst & Partners	14 March 2014
Aberdeen office	91116/01 Rev 3

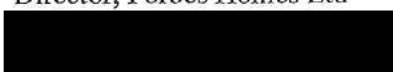
24 JAN 2019

**CULTS BIELDSIDE AND MILLTIMBER
COMMUNITY COUNCIL**



23/01/2019

Mr. D A Forbes
Director, Forbes Homes Ltd



Dear Mr. Forbes,

I am the chair of the Footpath Group of the Cults, Bieldside and Milltimber Community Council and also co-ordinator of our community plan.

We would like to improve the path along the river from Robert Gordons University to Culter. Currently the path is tricky in places and there are no signposts, however it is an aspirational Core Path. There is also a Core Path from Allen Park down to the river.

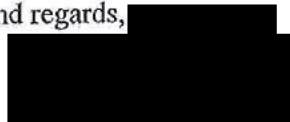
We need to establish ownership of the river bank so we can talk to the land owners. I have looked at your development bid B09/24 at Loirsbank, Cults, for the LDP2022. I would be most grateful if you could confirm that Forbes Homes owns the river bank from Cults burn to the start of the Deeside golf course. Also, that the Core Path from Allan Park to the river is on your land, apart from the first section adjacent to Allan Park?

I note the statement "Furthermore, my client proposes to enhance the area of land to the south, to allow potential future expansion of the Deeside Golf Course, thereby safeguarding this area of Greenspace network and Greenbelt land in perpetuity". The Community Council would be very interested in discussing, at an appropriate time, the possibility of some form of community ownership of a strip along the river so the river path can be developed and the ecology enhanced.

I would be very happy to receive a reply by email.

This letter is of course entirely separate from any comments the Community Council may make about the development bid.

Kind regards,



Dr. Peter H S Smith
Leader of Footpath Group
Cults, Bieldside and Milltimber Community Council.

<http://cbmcommunity.org.uk/>

website: www.cbmcommunity.org.uk

Response ID ANON-B3JU-DST8-Q

Submitted to **Local Development Plan Main Issues Report 2019 Consultation**
Submitted on **2019-05-13 15:10:19**

About You

What is your name?

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Cameron Forbes

What is your organisation?

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On behalf of:

Forbes Homes Ltd

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1 Introduction

Section 1 provides a context for the Main Issues Report Do you have any comments in relation to this section?

Do you have any comments in relation to this section?:

No comments in relation to section 1

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Do you have any comments on these sites? Are there any other sites in these areas that we should be considering?:

Additional Documents

Please include comments on other documents below:

Please include comments on other documents below::

Response in relation to the Bid Assessment for B1305 - Peterseat Drive, Altens

Please find response attached.

Additional Files

If you have further information you would like to provide you may upload it here.:

B1305.pdf was uploaded

The recommendation that this site is “undesirable” is somewhat disappointing.

The reasons for this appear to relate to two key aspects – the site is currently designated as green belt, and insufficient “need”. The scoring matrix is inconsistent with comparable sites, and does seem to score down certain aspects merely to provide a lower overall “score” to perhaps fit with the notion that there is no need for allocating multiple smaller employment sites in already established industrial areas. Some matters which have been unfairly scored low are;

“accessibility” – road infrastructure, bus service provision and footpath/cycle links are all well established, yet the site received a score of 2;

“flood risk” – the subsequent comment relating to drainage states “area appears well drained – 3” and the comment for flooding states “limited areas of surface water flood risk” – which with development a full SUDS strategy coupled with the issue barely existing in the first place, a score of 2 is unjust.

“proximity to facilities” – to score only a 1 for a site that is easily accessed by a varied means of mode of transport is extremely harsh, particularly when the site is already in an established industrial area. Industrial sites should never be immediately adjacent to housing and the amenities of a town due to the potential noise nuisance and compatibility issues, but have sustainable links - therefore siting in a location like this, with good road infrastructure, served by public transport, and within reasonable walking and cycling distances, is in fact the ideal proximity to the amenities of a town in terms of accessibility, whilst being far enough removed to allow for the peaceful enjoyment of those amenities without the disturbance that could come from industry.

“physical infrastructural capacity” – to score a 2 when there is water capacity to serve the site seems odd. Discussion has been had with Scottish Water who confirm there are no capacity issues, therefore a score of 3 would be more appropriate here.

Rather than contest every score that is perhaps unfair, we’d rather highlight issues that relate to more strategic planning considerations, and the benefits our site has.

Whilst not yet adopted, the emerging Strategic Development Plan (SDP) has been endorsed by Aberdeen City Council, and does not appear to alter the green belt. That could change, and at this point in time there is no adopted SDP to help inform the strategic land supply or indeed the green belt. However, assuming no change to the green belt, we would highlight that our site is outwith the Green Space Network, therefore is arguably of lesser value in a broader sense – landscaping and the retention of the valuable open and accessible green network to the North West would be retained. Landscaping on the north western boundary would ensure a suitable buffer was retained, and indeed such landscaping can enhance the area for the public.

SPP does steer Authorities away from using green belts, stating that “*other policies can provide an appropriate basis for directing development to the right locations*”. Furthermore, the purpose/function of a green belt to aid a spatial strategy, as identified in SPP, sets out to direct development to the most appropriate locations and support regeneration; protect and enhance the character, landscape setting and identity of the settlement; and protect and provide access to open space.

The site in question here sits adjacent to the usable open space, the loss of this site will not impact on the area designated as part of the “Green Space Network”. The character of the site is industrial, so the proposed allocation is appropriate, and as mentioned previously would not result in the loss of the functional and important green space. Access to the green space can be protected where it already exists, and enhanced with connectivity provided through this site to allow access from the west. The proposed bid site therefore satisfies the requirements of SPP with regards to not impacting on the characteristics of the green belt in this location, and we would suggest the removal of the greenbelt designation of this site, and allocate it for employment use. The green belt designation, as exists in the current plan, is not necessary and can be removed to allow this site to be allocated. The green space network beyond our bid site should be retained.

In response to the lack of need, the SDP highlights a focus and states an objective is to ensure new development is provided that *meets the needs of the whole community, both now and in the future, and makes the City Region a more attractive and sustainable place for residents and businesses to remain, grow and relocate to.*

This sentiment is highly relevant for this bid site – allowing the growth of an established business park would help sustain the business sector in this location and provide for future growth and new businesses to locate. As outlined in our bid submission, we have had to turn down major industrial companies due to a lack of space on our existing/consented sites. The allocation of this site would allow the expansion of a successful and desirable industrial premises to grow and prosper, with significant economic benefit coming from expanded or new companies locating to the site.

The notion that there is no “need” for an allocation here is perhaps overly reliant on a wider strategic view of allocating larger sites in fewer locations. That model fails to deliver sites in an effective manner, fails to offer choice in location, and fails to provide a sustainable means of meeting the demand for employment land. The objectives of the SDP include providing *“opportunities which encourage sustainable economic growth and create new employment in a range of areas that are both appropriate for, and attractive to, the needs of different industries.”* Our existing enterprise at Peterseat Drive, and the wider employment uses located there, is successful and well established, and allowing it to expand would be a sustainable means of delivering additional employment land in an accessible location, and provide a more diverse offering of commercial land available for interested companies.

The growing population close to the site at Charlestown, coupled with the established population in Cove and Kincorth, and the greatly improved access via the Aberdeen Western Peripheral Route, makes Peterseat Drive the ideal setting for further employment allocation. The inability to grow and expand the site could result in the loss of business from the City Region, most likely to sites within Aberdeenshire at Badentoy or within the Gateway Business Park, which seems to only have vacant land in Aberdeenshire, or further afield to Westhill or north of the City in the “energetica corridor” on the A90 north of Aberdeen.

The allocation of our site would enhance the employment offering in the City Region, providing a modest provision of space to give choice to prospective tenants/occupants, and being of modest scale and adjacent to an established industrial area the site is deliverable in a short timescale – which is extremely valuable in terms of meeting the demand for employment land and ensuring the LDP actually delivers what is required.

Importantly, the 2017/18 Employment Land Audit (ELA) signals a concern about the “constrained supply” in both the City Region and Aberdeenshire, with the reason for delivery problems being that

larger sites have more complex infrastructure requirements that result in them progressing slower and being delivered in a medium term timescale rather than short term. This is a significant problem and raises huge issues about the viability of the strategy taken in the previous Strategic Development Plan and associated Local Plans. The ELA outlines the need for 60Ha of marketable land to be available in Aberdeen City, which is currently exceeded in a simple sense, however the majority of that, perceived, excessive provision of land is not “immediately available”. The level of immediately available employment land within the City Region is 8Ha short of the 60Ha target. We therefore contest that our site has an important role to play in ensuring that an appropriate level of immediately available employment land can be achieved.

To conclude, deliverability of sites for employment uses is crucial for Aberdeen to recover from the recent economic slump. Smaller sites, or the expansion of existing sites, plays a crucial role in delivering this much needed economic stimulant, and our site is the perfect combination of a modest sized site adjacent to a well-established employment site, which is close to a large population to minimise potential commute, and most importantly the site is easily access by a varied means of mode of transport. Furthermore, the location adjacent and with ease of access to the A90 and A92, the site is well connected to attract and allow ease of operation for employment and industrial uses. As outlined in our bid submission, the site can be delivered within the 0-5 year period, and poses no issues in terms of constraints. The site, therefore, should be allocated for immediate delivery in the next Aberdeen City Local Development Plan.