



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/alDP2022

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 Westwater
Organisation (if relevant)	Halliday Fraser Munro
On behalf of (if relevant)	Aberdeen City Council - Corporate Landlord Department
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 see attached report setting out in detail the representation to the MIR.

YOUR COMMENTS CONTINUED

**ABERDEEN CITY LOCAL DEVELOPMENT PLAN
RESPONSE TO THE MAIN ISSUES REPORT**

B0106 - LAND AT FORMER CORDYCE SCHOOL

B0222 – LAND AT DENMORE NORTH

B0402 – FORMER FACTORY, GRANITEHILL ROAD

B1101 – LAND AT GARTHDEE ROAD

B1102 – KAIMHILL OUTDOOR SPORTS CENTRE

ABERDEEN

MAY 2019

On behalf of
ABERDEEN CITY COUNCIL - CORPORATE LANDLORD



HALLIDAY FRASER MUNRO
CHARTERED ARCHITECTS & PLANNING CONSULTANTS



HALLIDAY FRASER MUNRO
CHARTERED ARCHITECTS & PLANNING CONSULTANTS

1. Introduction
2. Main Issues Report Comments
3. Specific MIR Questions
4. Conclusions



HALLIDAY FRASER MUNRO

CHARTERED ARCHITECTS & PLANNING CONSULTANTS

1. Introduction

1.1. This report has been prepared by Halliday Fraser Munro, Chartered Architects and Town Planning Consultants, on behalf of the Corporate Landlord Department at Aberdeen City Council. It is written in response to the Aberdeen City Local Development Plan Main Issues Report 2019 (MIR).

1.2. This representation specifically relates to five MIR Sites:

- B0106 – Former Cordyce School
- B0222 – Land at North Denmore
- B0402 – Former Factory, Granitehill Road
- B1101 – Land at Garthdee Road
- B1102 – Kaimhill Outdoor Sports Centre

1.3. This report seeks to support and promote the allocation of these five sites in the forthcoming Proposed LDP. We identify within the next section the officer's justification for the preferred status of each site and our views on allocating each site within the emerging LDP.

2. Main Issues Report Comments

2.1. B0106 – Former Cordyce School

"This is a largely brownfield site sitting between an abandoned sewage works to the east and farm buildings and houses around Mains of Dyce. The main issues around the site are flooding and the presence of significant trees. Both of these can be avoided if development is restricted to the higher ground around the existing school buildings and open space immediately behind them. The trees would provide shelter and screening from any development. Riverview Drive provides a sound green belt boundary in the area, so any re-zoning should be restricted to the development area. This may mean that accommodating all 100 houses on site will be challenging, so the actual number may be less than this.

There are 3 proposals for the site – housing, a health and fitness centre and a health centre. All 3 are considered suitable uses for the site, either on their own or in combination."

2.2. We agree with the officer's general assessment of the site and support its allocation in the forthcoming Proposed LDP. Whilst the site is supported for housing development, it has the potential to accommodate other uses and so we would support a future allocation providing some flexibility around this. We would support a boundary review of the greenbelt in this location to ensure that the site is not unduly constrained from its development potential. We agree that any issues around flooding and the presence of trees can be fully addressed at a detailed planning application stage and need not unduly constrain the development potential of the site or its effectiveness for delivery within the lifetime of the plan.



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2.3. B0222 – Land at North Denmore

“The site is high and exposed however this is mitigated to some extent by the surrounding residential development. It has good drainage, with little risk of flooding and has scored well in most of the criteria. In the extant local development plan, the site is currently zoned for community facilities. It has been marketed over a long period without any success. The site is well connected to the existing settlement and the proposed residential use would fit in well in the surroundings. The proposal to develop housing on the site is supported.”

2.4. We agree with the overall assessment of this site and support its allocation going forward within the forthcoming Local Development Plan. The site has good potential as a housing site to support the need for increased delivery of new housing across the city. The site is located within a desirable location and is fully deliverable within the LDP timescales.

2.5. B0402 – Former Factory, Granitehill Road

“The site is zoned as business and industrial land in the extant local development plan. The proposal to reuse brownfield land in this location is desirable. At present, the site is unattractive with overgrown shrubs/plants and a well-designed development would improve the appearance of the area. Housing would not be wholly inappropriate at this location given the wider area is residential in nature. Due to the site being adjacent to business/industrial units, development would have to keep a reasonable distance away from the industrial units on the south to avoid any overlooking. This site, along with B04/01 to the immediate north present an opportunity to plan a comprehensive housing development on under-utilised brownfield land.”

2.6. We support the allocation of this site within the forthcoming LDP for the development of new housing. The allocation of this site would support its redevelopment to the benefit of the local area by bringing the site into a use that is wholly compatible with surrounding housing. At present the site detracts from the appearance of the immediate area. It is unlikely to succeed for future employment uses given the availability of such land across the city area, many of which are in more desirable and marketable locations. The proximity to other business and industrial uses need not prevent the site from being delivered for new housing, as has been the case in other parts of the city. Any required mitigation solutions could be identified at a detailed planning application stage.

2.7. B1101 – Land at Garthdee Road

“The proposer indicates 15 units and 50 flats can be accommodated on the site. The site is located on open space within the Garthdee area of the City which sits on the north side of the River Dee. The site is neighboured on three sides by residential use. There are a number of community uses and other amenities in the Garthdee area which this site would benefit from. It is within commuting distance from the City’s employment areas (West End / City Centre). Frequent bus services pass the site with pavement space and adequate surfaces to encourage active travel.”



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It is understood that part of the site may be used for community planting/woodland. That being the case, it is suggested that the housing elements should be restricted to 20 houses, which should allow room for the community planting elements to take place.”

2.8. We agree with much of the officer’s assessment of this site. Its location within an established and built up residential neighbourhood with good transport connectivity makes it ideal as a location for much needed new housing within the city. We believe however that the site should not be limited to just 20 units and that a higher figure should be attached, caveated with a site allocation description requiring a portion of the site to be retained for community planting and woodland which should be agreed and included as part of any future planning application. Thereby allowing an appropriate solution to be identified without unduly compromising the development potential of the site.

2.9. **B1102 – Kaimhill Outdoor Sports Centre** *“The site is located on the site of a vacant outdoor sports facility, operated by Aberdeen City Council, within an existing residential area. Local scale development is proposed (35 units). The proposer indicates that the existing play park on the south corner of the site would be retained. The site sits within the fabric of an existing residential street with access to existing infrastructure and amenities in the Garthdee area. There is existing development on the site (brownfield), but it is currently zoned as Green Space Network in the Local Development Plan (2017).*

Most of the site has been disused for a number of years and a modest development of 35 houses would be reasonably well connected to services and facilities. This scale of development would not need the whole site, so it may be possible to improve the recreational value of the remainder. The children’s play area is fairly new and should be retained. School capacity would need to be addressed.”

2.10. We agree with much of the officer’s assessment of this site. Its location within an established and built up residential neighbourhood with good transport connectivity makes it ideal as a location for much needed new housing within the city. The greenspace allocation for the site should be removed and the site formally allocated for development in the emerging LDP, with the requirement to retain the children’s play area as part of any future development.

2.11. Whilst we are not opposed to a possible reduction in the development capacity of the site, we believe that this should be “indicative” in order to allow flexibility for a future detailed planning application to identify the optimum solution for the development of the site. This also allowing for school capacity issues to be realistically addressed without unduly comprising on the viability of the site being delivered.



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3. Specific MIR Questions

Section 2 – Settlement Strategy

Question 1 – New Housing Sites

a) *Do you agree with our preferred housing sites?*

We agree and support the allocation of the following five preferred MIR Sites in the emerging Local Development Plan:

- B0106 – Former Cordyce School
- B0222 – Land at North Denmore
- B0402 – Former Factory, Granitehill Road
- B1101 – Land at Garthdee Road
- B1102 – Kaimhill Outdoor Sports Centre

We have provided comments on each of the sites against the relevant justifications provided by planning officials at the Council.

4. Conclusions

- 4.1 The five sites identified in this submission are identified as preferred new sites within the MIR. We support the formal allocation of all these sites within the emerging local development plan. The sites are fully deliverable and collectively would make a significant contribution to support the city in meeting its housing needs within the plan period.
- 4.2 Whilst we generally agree and support the justifications provided by officers in their justifications for each of the sites, there are specific issues we would want to be considered and appropriately addressed within any future allocations, as is identified in this submission. This to ensure that the optimum development solution can be identified for each site and that any future allocation does not unduly limit the development potential of any of the sites.



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Name	Michael Westwater
Organisation (if relevant)	Halliday Fraser Munro
On behalf of (if relevant)	
Address	
Postcode	
Telephone	
E-mail	

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Please see attached report setting out in detail the representation to the MIR.

YOUR COMMENTS CONTINUED

**ABERDEEN CITY LOCAL DEVELOPMENT PLAN
RESPONSE TO THE MAIN ISSUES REPORT
OP65 - HAUDAGAIN TRIANGLE, MIDDLEFIELD, ABERDEEN**

MAY 2019

On behalf of
ABERDEEN CITY COUNCIL - CORPORATE LANDLORD DIVISION



HALLIDAY FRASER MUNRO
CHARTERED ARCHITECTS & PLANNING CONSULTANTS



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1. Introduction
2. Site and Area Context
3. Main Issues Report Comments
4. Specific MIR Questions
5. Conclusion



HALLIDAY FRASER MUNRO

CHARTERED ARCHITECTS & PLANNING CONSULTANTS

1. Introduction

- 1.1. This report has been prepared by Halliday Fraser Munro, Chartered Architects and Town Planning Consultants, on behalf of the Corporate Landlord Division at Aberdeen City Council. It is written in response to the Aberdeen City Local Development Plan Main Issues Report 2019 (MIR).
- 1.2. This representation specifically relates to an existing site allocation in the LDP:
 - OP65 – Haudagain Triangle, Middlefield - Residential/ Land for Transport.
- 1.3. This report seeks to provide a reasoned and evidence-based justification for a broader range of uses to be included in the current allocation of the site within the proposed plan. Key considerations identified in this report include the specific merits of the site as a viable and deliverable development opportunity.

2. Site and Area Context

- 2.1. This site is located to the north east of the Middlefield residential area, between North Anderson Drive and Auchmill Road. It sits within the existing urban area on land previously occupied by multiple blocks of post war tenement flats which have recently been demolished to allow for the road improvements to take place at the Haudagain Junction as described below. The site area remaining after development of the road and associated infrastructure is circa 3 hectares and is known locally as the Haudagain Triangle.
- 2.2. Surrounding uses include the Haudagain Retail Park which includes American Golf, The Carphone Warehouse, KFC and a recently closed Maplin Electronics. A petrol filling station and an Enterprise car rental outlet are also within close proximity. **The site is currently allocated within the Adopted Aberdeen City Local Development Plan 2017 for transport improvements and residential development (Site OP65).** An area of mixed-use is allocated a short distance to the north of the site lining the A96 Great Northern Road/Auchmill Road. This comprises a range of shops and commercial uses including hot food takeaways. Three sides of the Haudagain Roundabout are effectively fronted with mixed retail and commercial uses.
- 2.3. Significant road infrastructure improvements are currently taking place around the Haudagain Roundabout. This and other recent road improvements, including the AWPR and Third Don Crossing are having a major positive impact on traffic in the north of the city and eventually on this immediate stretch of road once works are completed. Farrans Construction have been commissioned to carry out the improvement works, which are expected to be completed in 2021. The project will involve the construction of a “bypass” linking North Anderson Drive and Auchmill Road to alleviate traffic pressures effectively creating the new subject development site.



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- 2.4. The site was marketed for sale by the Corporate Landlord team at Aberdeen City Council in 2018 who sought proposals for the redevelopment of the site to meet following objectives:
- To maximise the opportunity to regenerate the Middlefield area via **creation of employment opportunities** during construction and beyond.
 - To meet community expectations and aspirations for the Middlefield area in terms of **retail provision** and greenspace.
 - To **improve environmental and aesthetic quality** of the Middlefield area.
 - To **improve economic performance** of the Middlefield area.
 - To **improve financial viability** of Aberdeen City Council regards asset performance.
- 2.5. Following successful marketing of the site, Dandara were selected as the preferred bidder to redevelop the Middlefield Triangle. This was following a decision by the Aberdeen City Council's City Growth and Resources Committee in September 2018.
- 2.6. Middlefield is a priority for Aberdeen City Council and Community Planning Aberdeen for neighbourhood regeneration. Significant community engagement and developments have been carried out and are ongoing. A Locality Plan, developed with the community and community planning partners sets out a 10-year plan to improve social, economic and environmental outcomes. The redevelopment of this site is recognised as presenting an opportunity to support the regeneration aspirations for the area. The Middlefield Neighbourhood Audit published in May 2018 reported that figures show that Middlefield consistently ranks below the median level for deprivation across the country, with one SIMD datazone for employment and three Income ranking in the worst 25%.
- 2.7. The site was previously allocated in the 2012 LDP as OP19 for 'retail park and urban green space' and therefore has been accepted for such uses in the past. This allocation featured in the 2013 Aberdeen City and Aberdeenshire Retail Study and was considered as part of the Proposed Development Strategy for Retail Floorspace. This indicated a gross floorspace of 6500 square metres could be delivered at the site between 2020 – 2025 within the retail commitments for Aberdeen City.
- 2.8. To summarise, this proposed site is already allocated for development, has been marketed by the Corporate Landlord department at Aberdeen City Council, is highly accessible and will support local regeneration in the area. Its retention as a viable location for new housing development is supported. However, for it to optimise its full potential and meet the objectives of the Council and identified priorities expressed by the local community, it should be allowed to support a broader range of uses which is expanded upon in Section 3 of this report.



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3. Main Issues Report Comments

- 3.1. In the Main Issues Report the site is identified as one of the Local Development Plan Sites 2017 that is to be retained in the next LDP. We support the ongoing allocation of the site within future development plans, including for housing development which is needed across the city. However, the sites location adjacent to a key junction at a gateway arrival point into Aberdeen offers a greater potential than just being delivered for new housing, as does its existing proximity to a mix of uses.
- 3.2. The Council's selected bidder for the site, Dandara, have identified an opportunity to deliver a mixed-use development for the 'Haudagain Triangle'. Given the mix of uses already in the area we believe that the site can support a broader range of possible future uses and should not be limited just to residential development once the road improvements are complete.
- 3.3. The emerging local development plan should make positive provision for a broader range of uses to be included in the site, that would be compatible with the proposed new residential use and acknowledging the mixed-use character and nature of the surrounding area, including retail and commercial uses. In fact, we believe that there is merit in extending the existing mixed-use allocation located to the north so that it includes the area to the south of the road.
- 3.4. The Council should acknowledge that three sides of the Haudagain Roundabout are already fronted with mixed retail and commercial uses, and that it is already performing the role of a neighbourhood centre for this area. This being comparable to other nearby Neighbourhood Centres identified in the LDP such as Cornhill and Byron, or indeed larger retail "District" centres at Danestone and Middleton Park. This would also provide a preference for this site to include retail and commercial uses which would support the ongoing regeneration of the Middlefield area. This helping to improve the quality of place and support the creation of new jobs and economic investment in the area. The 2012 LDP had previously allocated the site as OP19 for 'retail park and urban green space' and therefore there has been acceptance of such uses in the past for this site. The allocation also featured in the 2013 Aberdeen City and Aberdeenshire Retail Study and was considered as part of the Proposed Development Strategy for Retail Floorspace. This indicated a gross floorspace of 6,500 square metres could be delivered at the site between 2020 – 2025.
- 3.5. Broadening the potential range of uses for this site would be entirely consistent with the vision, aims and objectives of the Council, including those outlined within the MIR. The opportunity presented by this site is for the regeneration of this once dilapidated part of the city on a key gateway location from the northwest. This would help to support sustainable economic growth and regeneration, and the creation of well-designed, sustainable places within the north of the city. Furthermore, it would also support the objectives set out by Aberdeen City Council:
 - To maximise the opportunity to regenerate the Middlefield area via creation of employment opportunities during construction and beyond.



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- To meet community expectations and aspirations for the Middlefield area in terms of retail provision and greenspace.
- To improve environmental and aesthetic quality of the Middlefield area.
- To improve economic performance of the Middlefield area.
- To improve financial viability of Aberdeen City Council regards asset performance.

3.6. The A90/A96 Haudagain improvement is due to complete by 2021, within the timescales associated with the new LDP. Once completed the site would be development ready and so the site would be effective and deliverable within the relevant plan period. The junction upgrades will free up capacity on the local road network and support more sustainable patterns of travel through the area.

3.7. On this basis we would request the following changes to the existing LDP allocation to allow the site to fully meet its potential:

OP65	Haudagain Triangle, Middlefield	4.34 ha Circa 3 ha	Residential/ Land for Transport Mixed use	Following road improvements in this area, land will become vacant and surplus. Vacant land made available as part of the Haudagain Improvements. Site is capable of accommodating a mix of residential, retail, commercial and community uses to support the regeneration of this area.
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OP 65
HAUDAGAIN TRIANGLE, MIDDLEFIELD

1:2,500



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Figure 1 - Indicative proposed development site area boundary



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4. Specific MIR Questions

Section 2 – Settlement Strategy

Question 3 – Brownfield and other opportunity sites.

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

We support the ongoing allocation of site OB65 within future development plans, including for housing development which is needed across the city. However, the emerging local development plan also should make allowances for a broader range of uses to be included in the site, that would be compatible with the proposed new residential use and acknowledging the mixed-use character and nature of the surrounding area. In fact, we believe that there is merit in extending the existing mixed-use allocation located to the north so that it includes the area to the south of the road, including this site.

Question 9 – Out of Town Retailing

- b) Should we consider new out of town retail parks?*
- c) What would the impact of these be on Union Street and the city centre, and Aberdeen's network of centres?*

We believe that there is merit in allocating the southern sections and northwestern section of the Haudagain Roundabout as a formal neighbourhood centre within the emerging LDP. This should be inclusive of site OB65 "Haudagain Triangle, Middlefield". This would formally acknowledge the role played at present by the three sides of the Haudagain Roundabout where there are existing shops and commercial services. The road improvements taking place within the area will reduce traffic to a more manageable level and improve accessibility to the shops and services in this area.

There would be no impact on the city centre in allocating a new neighbourhood centre at this location as the area is already performing that role and has been for some time. The allocation would have more positive benefits on supporting the ongoing regeneration of the Middlefield area and the desire locally for improved access to jobs and retail facilities. The site features in the 2013 Aberdeen City and Aberdeenshire Retail Study and was considered as part of the Proposed Development Strategy for Retail Floorspace. This indicated a gross floorspace of 6,500 square metres could be delivered at the site between 2020 – 2025. Therefore, the site has been considered in the context of available retail capacity within the city.

5. Conclusions

- 5.1 This site is already allocated for development in the 2017 LDP for road improvements and residential development. The site is highly accessible which will be further strengthened by the road improvements being delivered for the Haudagain Improvement project.
- 5.2 We support its retention as a viable location for new housing development. However, we believe that for it to optimise its full potential, it should be allowed to support a broader range



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of uses. Furthermore, that consideration should be given to allocating the site specifically for mixed uses, including provision for retail and include it within an expansion of the existing mixed-use allocation located to the north or as part of a formal neighbourhood centre, recognising the existing character and nature of the surrounding area.