



10 May 2019

Local Development Plan Team  
Aberdeen City Council  
Business Hub 4  
Marischal College  
Broad Street  
Aberdeen  
AB10 1AB

Dear Sirs

## **CBMCC Response to Main Issues Report**

Please find below and attached our detailed response to the Main Issues Report (MIR). This falls into two parts: A. our views on the issues raised and the questions asked in the MIR; and B. our judgements on the developer proposals submitted for the Lower Deeside ward. We have obviously focused on Cults, Bieldside and Milltimber but also comment where appropriate on proposals for neighbouring wards close to our Community Council boundary.

### **A. Response To MIR Questions:**

#### **1. Do you agree with the preferred housing sites?**

Yes. In particular we support the proposed refusal of most of the further housing development proposals in Lower Deeside until the existing approved developments are closer to completion and the better infrastructure needed to support further development has been implemented. We recommend that the site Milltimber South B0940, allocated for development by the Scottish Reporter in current LDP, be rezoned to greenbelt and part of the greenspace network. Are there any other sites suitable for housing? We offer conditional support for the proposed retirement community development between the North Deeside Road and Inchgarth Road, west of Pittfodels Station Rd., subject to the provision of the much-needed link road enabling bus transport between the North Deeside Road and Inchgarth Road and increased support for the local medical services. We also support the inclusion of smaller development sites in Peterculter, which the Peterculter community feel would provide a benefit in sustaining their community.

#### **2. Is there a need for us to identify any further housing allowance or sites for the period beyond 2032?**

No. There are sufficient plans and approvals in place for this cycle of planning. Building progress on the approved sites should be monitored to see the pace of development justifies additional sites being included in the next LDP.

Colin Morsley, Planning Liaison Officer CBMCC

**3. Are there any further brownfield sites or other opportunities which would be suitable for re development?**

No.

**4. Do you have any comments on these sites for NHS?**

Preference should be given to use of brownfield sites rather than open space. If open space is to be used, it should be replaced by an alternative site which should be appealing to the public.

**Are there any other sites in these areas that we should be considering for NHS?**

No, but it is worth reiterating the need for the timely delivery of a new medical service provision at Countesswells, which is part of the planned development.

**5. Do you agree that the local development plan should modify its centre boundary to match the city centre boundary shown on the city master plan?**

Broadly agree – the boundary for the CCMP could also be modified to incorporate the section of the LDP boundary that includes a section of King Street.

**6. Do you agree that the city centre master plan intervention areas should be identified as opportunity sites with the local development plan?**

Yes.

**7. Should the retail core be reduced to focus on a more compact area of Union Street and the existing shopping centres?**

The current limits for a central retail area defined by Union Square to the Bob Accord Centre and Broad Street to Huntly Street still appear to be appropriate. However this should not prevent conversion of some properties from retail to residential use if there is demand for this. Also see question 8 below.

**8. Should the Union Street frontages percentages be reviewed? Do the current target percentages ensure a balance between a strong retail focus and allowing for other uses?**

Some of the % levels could be reduced to encourage the occupation of unlet properties for non-retail use. We believe the public would rather see buildings occupied than left standing empty for lengthy periods, as long as there is control over the types of use e.g. limit gambling premises and fast food outlets.

**What other uses should we allow on the retail core of Union Street?**

We suggest the inclusion of local business hubs and innovation centres which are open to the wider community (Ref. Case study from Brighton in “ Innovation on the High Street: Journal of the RICS March/April 2019”). There could also be more residential and leisure sites.

**9. Should we direct high footfall uses to existing centres including city centres?**

Yes, but this goes together with the requirement for good public transport links to the city and city centre parking for rural area residents.

**Should we consider new out of town retail parks?**

No – retailers should be directed towards the existing city retail areas.

**What would be the impact of these be on Union Street and the city centre and Aberdeen's network of centres?**

We believe the impact of out of town retail parks will be negative and hence they should be refused planning permission.

**10. Should we continue to direct commercial leisure uses towards existing centres and the beach and leisure area?**

Yes. Cinemas and other visual attractions should be in the centre to increase footfall for restaurants etc.

However sports, gyms and other active facilities should be spread throughout the city area so their use by residents would be made easy for the benefit of a more healthy population. New large scale housing developments e.g. Countesswells, should incorporate a local leisure centre.

**11. How can we encourage more people to live in the city centre?**

Provide good quality accommodation and better public transport across the city.

**Would a document outlining the principles which need to be applied in converting a building into residential use be helpful?**

Yes

**12. Are there any other locations within the city centre where residential accommodation could be provided?**

No suggestions to offer.

**13. What can we do to support and encourage the creative sector to ensure a range of distinctive experiences so that Aberdeen city centre is like no other place?**

Create more art and cultural centres where people can use studios and meet to exchange ideas. Encourage and support more street art – sculptures, murals – in public places.

**14. Are there any other buildings or areas within Aberdeen that could accommodate the existing and support an emerging creative sector for desk based and studio artists?**

Use the old Scottish Water Pump House in Cults for a new creative centre. Support the creation of a museum showcasing the quarrying and use of granite in Aberdeen at the Rubislaw Quarry. Promote the creation of a dedicated oil & gas exploration and production museum (we note that the Maritime museum has a section addressing the O&G industry – perhaps this could be expanded).

**15. To ensure Aberdeen city centre retains its distinctiveness should developments with construction cost of £1m or over be required to allocate at least 1% of construction costs for the inclusion of art projects in a publicly accessible visible place or places within the development?**

Yes, culture is good for public wellbeing as demonstrated by the popularity of Nuart.

**16. Do you think that the amenity spaces currently delivered are of sufficient quality?**

Some of the recent new developments e.g. Friarsfield, Countesswells, have established some good quality amenity spaces. All new developments should provide spaces of a similar standard.

**Should we strive for a better quality quantity of private semi-public residential amenity space across the city and refuse permission to proposals which do not meet our high standard?**

Yes and importantly, ensure that the amenity spaces are well maintained, developers set up appropriate funding provisions for maintenance and that public access is allowed.

**What standards would you like to see set for new dwellings flats and conversions in respect of quality and quantity of external amenity space?**

There should be appropriate legal provisions that enable ongoing maintenance to be funded and these should be affordable for residents and the local authority going forward.

**17. Do you agree that the proposed list of policies for natural environment gives a clearer and more convenient structure than at present?**

We support simplification but it is impossible to provide further comment without seeing the details of the proposed new policies, to ensure that current provisions are protected. Too much compression could reduce clarity and make the policies difficult to use.

**18. How can the city local development plan support the delivery of food growing projects in the city?**

Provide more land to be used for allotments – review existing unused sites and make them available to communities e.g. some of the proposed redevelopment of the current Milltimber Primary School.

**Do you think food growing should be included in the next local development plan by way of a new policy or through existing policy and guidance?**

If there is a consensus that a policy would help encourage and enable more food growing then it should be considered.

**19. Should we reduce car parking in the city centre to support the city centre master plan?**

No – certainly not until a better and affordable public transport service can be delivered. The city needs to recognise that it supports a large rural population and retailers need those residents to visit their businesses.

**If so how?**

Careful planning and siting of car parks, rather than reduction of capacity, can help smooth traffic flows.

**20. Should high speed broadband be mandatory in all new residential developments with 5 or more units?**

Yes, absolutely.

**Do you wish to suggest any other changes to the digital infrastructure and telecommunications infrastructure policies?**

All new houses should be fitted with a fibre optic link from the house to the property boundary for a future tie-in to a street fibre network.

**21. Do we need to change our approach to securing developer obligations for future development proposals?**

There should be greater transparency on the setting and use of developer contributions and the constraints on their use should be less restrictive. Work with the Scottish Government to develop a more open process and policy for use of developer contributions. The requirements should be applied uniformly and enforced. Work more closely with communities on the use of developer contributions – it is currently haphazard and done at arms length.

**22. What methodology should the Council use in calculating compliance with policy R7 on Low and Zero Carbon Generating Technologies and Water Efficiency, specifically how should the target of reducing carbon dioxide levels be calculated?**

We are not able to comment on this question – a useful answer requires some specialist knowledge. The City Council should seek expert opinion.

**23. Do you agree that Solar Farms should be supported within the Council's policy on Renewable and Low Carbon Energy Developments and should specific guidance be included within Policy R8?**

Yes. Furthermore it should be a requirement that all new properties be fitted with solar panels and sited such that they can take advantage of solar power. Also start to assess the requirement for a policy around the use of heat pumps for space heating in new properties.

**24. Should we carry forward our current policy approach to safeguarding existing business and industrial areas from other development pressures into the next local development plan?**

Yes, we agree with this approach – minor amendments should be limited.

**25. Do you agree with the local development plan's current affordable housing approach being carried forward?**

Yes – ensure that the 25% requirement is adhered to rather than allowing developers to negotiate a lower figure.

**What other methods could the council consider in order to assist with the delivery of affordable housing units via the local development plan?**

We suggest you give a higher level of support and encouragement to developers who offer a higher % e.g. 50%, of affordable housing units on preferred sites.

**Should the threshold of not applying affordable housing requirements to developments smaller than 5 units remain in place?**

Yes, this is reasonable.

**26. Are there ways that the local development plan can facilitate build to rent development through policy?**

The current property market would suggest that there is no need for the LDP to facilitate Build To Rent – there are over 1000 properties available for rent in Aberdeen 2Q2019.

**27. Is there anything else that the local development plan can do to support the objectives of our LOIP or the aims of community planning?**

No comments.

**28. Should large new developments that require public access provide changing places toilets? What type of venue should provide them?**

There should be a broader policy addressing the provision of public access to toilets, including 'changing places'.

**Responses to the Main Issues Proposed:**

**1. Living In The City Centre** – we support Option 2

**2. A 24 Hour City** – we support Option 2

**3. Visitor Attractions** – we support the intent of attracting more visitors to the city and a policy which achieves that would be welcome. We would like to see the details of such a policy before it is implemented.

**4. Minimum Internal Space Standards** – while a better than minimum internal space standard would be preferred, we recognise that Option 2 in line with a Nationally Described Space Standard is likely to be more acceptable to developers.

**5. Electric Vehicle Charging Infrastructure** – we support Option 2

**6. Low and Zero Carbon Generating Technologies and Water Efficiency** – we support Option 2. We also suggest that Aberdeen City Council together with Aberdeenshire Council should be pressing the Scottish and UK Governments to invest in new hydro-electric schemes, to complement the investment in wind and solar power schemes. Some loss of wilderness in creating reservoirs and dams can be tolerated for a greater benefit.

**7. Heat Networks** – we support Option 2 and could also support Option 3 if it included a provision that the developer should be required to do a technical and commercial appraisal of a heat network's economic viability to see if it can be supported.

**8. West End Office Area** – we support Option 2

**9. Inclusive Housing Mix** – we feel that the preferred Option 2 is insufficiently defined and open to negotiation and excessive flexibility. We prefer Option 3, where the City Council should provide more detailed guidance on methodology. This should include relevant demographic information for neighbourhoods to allow minimum standards to be set.

**10. Residential Care Facilities** – we support Option 2 and we suggest that the new policy and Policy H1 should include a requirement that the developer can demonstrate that a consultation on Health and Social Care provision has taken place with the relevant bodies and that an adequate service provision will be available for the new development.

**11. Student Accommodation** – we support Option 2

**12. Houses In Multiple Occupation** – we support Option 2. Regarding the questions on percentage limits, boundaries and thresholds for planning permission our views are;

- Percentage Limit of HMOs in each area – we support a level of 20%
- Geographical Boundary of each area – we support the use of Option 2, Intermediate data zones
- Threshold for when Planning Permission is required – we support Option 2.

## **B. CBMCC Judgement on Developer Proposals:**

We have summarised our view on each of the proposals affecting Cults, Bielside and Milltimber on the attached spreadsheet "CBMCC Review of Developer Proposals List". We also attach individual letters in respect of major proposals (50+ homes) and others we feel to be critical or problematic. As can be seen, with minor exceptions, we fully support the MIR recommendation that all these proposals are "unsuitable" for inclusion in ALDP2022. Our overarching views can be summarised as:

1. We agree that current housing land allocations are adequate through the plan period and that no further major allocations are required. We support development as far as possible on available brownfield sites closer to the city centre.
2. Loss of Green Belt and Green Space Network. This affects both visual landscape value and also recreational value for walkers, cyclists and riders through the core path network. There is a great danger that continued development encroachment could eventually kill the attractiveness of Lower Deeside and it would not be in developers' interests to erode the price premium currently available to them for building in the area.
3. A related issue is the danger of creeping coalescence between settlements. Many of these proposals would close or narrow the green gaps between Culter and Milltimber, Cults and Countesswells, thus losing their identity. Several proposals also take the built area above the 90/95m contour which has been widely recognised as a natural limit.
4. Many proposals are for land far from public transport, shops, schools and health facilities and therefore immediately become car-dependent to be viable. A more robust public transport model is needed to ensure that development is matched step by step by timely provision of bus services. Otherwise new residents will simply become wedded to their cars.
5. We are concerned about the capacity of healthcare and education services in our area to cope with the additional demand. Services already appear to be struggling to meet the demands of growth at Countesswells and should be allowed time to adjust.
6. Potential development growth around the AWPR junctions has been a community concern since the inception of the project. The AWPR provides a natural break between Peterculter and the main part of Milltimber and such growth would lead to substantial loss of green space and coalescence between the settlements. We would also be concerned about the possibility of traffic from a designated Special Road decanting immediately into a residential area as would happen with proposal B0906.
7. It is obvious that most proposals offer a preponderance of large detached houses, whether explicitly stated or implied by the proposed low housing density (in most cases not conforming to policy H3). We believe that the demography of our area (supported by input from our community) means that there is a demand for good quality smaller properties (which could be bungalows or suitably designed houses) for retirement living and with good access to local facilities and public transport.
8. Finally please note our specific comments about B0940 Milltimber South and B0944 Inchgarth Road at A1 above.

We trust that all the above and our attached documents are clear but please do not hesitate to get in touch if you require further clarification.

Yours sincerely,



Colin Morsley

Planning Liaison Officer

Copy to: Councillor Marie Boulton, Councillor Philip Bell, Councillor Tauqeer Malik,

Attachments: Spreadsheet "CBMCC Review of Developer Proposals List"

Comment/Objection Letters for major and critical proposals (18 no.)

Our letter 29 Aug 2018 re 181224/PAN



## CBMCC Review of Developer Proposals List

| Proposal No. | Name                                 | Community Council Area | No. Of Homes proposed | Proposer | More than 100 homes | ACC Checklist Score | ACC Planners recommendation | CBMCC Judgement    | CBMCC Comment  |
|--------------|--------------------------------------|------------------------|-----------------------|----------|---------------------|---------------------|-----------------------------|--------------------|--|
| B0901        | Culter House Road Ph 2               | CBM                    | 8                     |          | N                   | 45                  | undesirable                 | <b>undesirable</b> | Fully agree with recommendation. Ancient Woodland (but felled). Close to AWPR. Coalescence to Culter. Far from facilities or public transport so car-dependent. Extra traffic on Culter House Road. Visual impact on landscape. Does not meet H3 minimum density.  |
| B0902        | OP52 Malcolm Road                    | Peterculter            | 8                     |          | N                   |                     |                             |                    |  |
| B0903        | West Craigton Farm                   | Peterculter            | 150                   |          | Y                   |                     |                             |                    |  |
| B0904        | Land adjacent to Countesswells Woods | CBM                    | 50                    | D Suttie | N                   |                     | undesirable                 | <b>undesirable</b> | Not required to meet SDP housing land requirements. Green space, Ancient Woodland, accessibility to local services and facilities therefore car dependent. Accessibility to facilities including shopping, heath, recreation and education facilities is poor both in terms of proximity and connectivity, particularly in respect of sustainable means of transport such as walking, cycling and public transport links. Increases risk of coalescence between Bieldside and Countesswells. Does not meet H3 minimum density. Education capacity issue. |

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| B0905 | Culter House Road    | CBM | 5   |     | N | 43 | undesirable | <b>undesirable</b> | Ancient Woodland (but felled). Close to AWPR. Coalescence to Culter. Far from facilities or public transport so car-dependent. Extra traffic on Culter House Road. High density detached housing out of character. Possibly 1 house in keeping with properties to N would be acceptable. Does not meet H3 minimum density. Education capacity issue.                     |
| B0906 | Contlaw              | CBM | 800 | SMG | Y | 42 | undesirable | <b>undesirable</b> | Not required to meet SDP housing land requirements. Requires reworking of Deeside Junction giving a direct connection from a Special Road into a residential area! Exposed area. Far from facilities or existing public transport so car-dependent. Suggested public transport connections a fantasy! Heavy additional load on education, healthcare and other services. |
| B0907 | Albyn Playing Fields | CBM | 100 |     | N | 48 | undesirable | <b>undesirable</b> | Not required to meet SDP housing land requirements. Significant closing of gap between Culter and Milltimber. Far from most existing facilities except M&S convenience store. Can site not be redeveloped as Albyn School sports facility? Might be more acceptable if 100% affordable housing   |

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| B0908 | Countesswells             | CBM | 500 | Scotia | Y | 39 | undesirable                                | <b>undesirable</b> | Fully support recommendations. Not required to meet SDP housing land requirements. The site is partly located within the Foggieton Local Nature Conservation Site, contains priority habitat. Due to the remote location the site is isolated from community facilities, public transport and active travel options are limited therefore likely to be car dependent. Severely increases risk of coalescence between Cults and Countesswells. Education capacity is an issue. Does not meet H3 minimum density. |
| B0909 | Pineacres<br>Contlaw Road | CBM | 12  |        | N | 47 | undesirable –<br>but see note on<br>zoning | <b>undesirable</b> | Substantial tree loss. Proposed density in keeping with housing E of Contlaw Rd but not Culter House Rd. Concern at potential integration with OP112. If OP112 proceeds, less concern compared with more distant developments as site is rezoned as residential. Additional traffic load (perhaps 18 additional cars) onto Contlaw Road. Acceptable access to public transport. Does not meet H3 minimum density.   |

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| B0910 | Friarsfield North         | CBM                 | 280 | CALA | Y | 45 | undesirable | <b>undesirable</b> | Agree with recommendations. Not required to meet SDP housing allocation target. Does not meet H3 density requirement. School Capacity, Landscape, car dependency are issues. The proposed site is categorized into three distinct parts, Craighbank and Corbie and Newton. Newton sits to the east of the other two areas. The site is in an area of green belt which acts as a green backdrop to the existing development at Friarsfield and to Aberdeen as a whole. It serves to maintain the separate identities of Cults, Countesswells and Aberdeen. Increased risk of coalescence between cults and Countesswells. Landscape issues - would be highly visible from the South. Beyond 90m contour line. Poorly located relative to public transport and community facilities. See also B0919. |
| B0911 | Land at Culter House Road | CBM                 | 100 |      | N | 46 | undesirable | <b>undesirable</b> | Agree with recommendations. Not required to meet SDP housing allocation target. Places affordable housing at significant distance from public transport and facilities. Exposed site. Coalescence risk. Education capacity an issue.   |
| B0912 | Craigton Road South (1)   | Braeside/Mannofield | 75  |      | N | 47 | undesirable | <b>undesirable</b> | Not required to meet SDP housing allocation target. Does not meet H3 density requirement. Green belt, greenspace network, Pitfodels  |

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|       |                             |                     |    |               |   |    |             |                    | Conservation Area. Danger of coalescence.  |
| B0913 | Craigton Road South (2)     | Braeside/Mannofield | 30 |               | N | 47 | undesirable | <b>undesirable</b> | Green belt, greenspace network, Pitfodels Conservation Area. Danger of coalescence.  |
| B0914 | Craigton Road South (3)     | Braeside/Mannofield | 0  |               | N | 53 | undesirable | <b>undesirable</b> | Green belt, greenspace network, Pitfodels Conservation Area. Danger of coalescence.  |
| B0915 | Land at Sunnyside           | CBM                 | 2  | Private owner | N | 39 | undesirable | <b>undesirable</b> | Agree with recommendations. Woodland, green belt boundary. At western edge of OP41 Friarsfield (280 homes). The woodland to the west of Friarsfield forms a strong and defensible green belt boundary. Although small – this development would erode these features  |
| B0916 | Craigton                    | Peterculter         | 20 |               | N |    |             |                    |  |
| B0917 | Land East of Inchgarth Mews | CBM                 | 15 |               | N | 43 | undesirable | <b>undesirable</b> | Does not meet H3 density requirement. Green belt. River Dee Corridor LNCS. Development on this site would impact on the surrounding landscape, and any development would only be partially related to the main settlement of Cults and would presumably add to traffic on Westerton Rd. The area helps to maintain the separate identities of Cults and Aberdeen and the overall landscape setting of the city. Seen from S of the R Dee this area is part of a clear green gap between Cults and settlements nearer the city. Education capacity is an issue. |

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| B0918 | Land at Mill of Brotherfield | CBM | 15  | ACC Estates | N | 47 | undesirable | <b>undesirable</b> | Not required to meet SDP housing allocation target. Does not meet H3 density requirement. Within green belt. Isolated - far from facilities and would be car-dependent. Surprised that ACC Estates is promoting for housing!  |
| B0919 | Land at Craigton Road        | CBM | 16  |             | N | 49 | undesirable | <b>undesirable</b> | Green belt. Not required to meet SDP housing allocation. Does not meet H3 density requirement. Part of an area which serves to maintain the separate identities of Cults, Countesswells and Aberdeen so increases risk of coalescence between cults and Countesswells. Development will have impacts on landscape and would be visible from the south. Above 90m contour line. Car dependent and due to its size would not encourage additional community facilities. Is intended to be accessible from OP41 Friarsfield. Education capacity issue. |
| B0920 | Binghill Farm                | CBM | 100 |             | N | 45 | undesirable | <b>undesirable</b> | Not required to meet SDP housing land requirements. Does not meet H3 density requirement. Significantly extends Milltimber housing Northwards and away from NDR and facilities. Relies on Oldfold delivering facilities! Car-dependent - more traffic on Binghill Rd. Education capacity is an issue.   |

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| B0921 | Countesswells Expansion | CBM         | 545 | SMG    | Y | 41-46 | undesirable | <b>undesirable</b> | Agree with recommendations. Not required to meet SDP housing allocation and represents an expansion of an existing Masterplan area (OP38). Does not meet H3 density requirement.Green Belt. Wait until Contesswells fully developed and schools built. Unless and until services to Countesswells are fully developed, this area will remain remote from public services and transport and car-dependent. Increases risk of coalescence between Countesswells and Cults/Bieldside. |
| B0922 | Land at West Craigton   | Peterculter | 70  |        | N |       |             |                    |  |
| B0923 | Hillhead of Pitfodels   | CBM         | 300 |        | Y | 49    | undesirable | <b>undesirable</b> | Not required to meet SDP housing land allocation. Green belt open space that serves to separate communities of Cults and Airyhall, helping them to maintain their separate identities. Education capacity issues. Public transport would require revision to serve this area - otherwise car-dependent.  |
| B0924 | Loirsbank               | CBM         | 5   | Forbes | N | 48    | undesirable | <b>undesirable</b> | Agree with recommendations. Flooding medium-high risk, drainage, landscape fit. Development on this site would have a significant impact on the surrounding landscape due to the proposal's proximity to the River Dee and open aspect to the south, and the land raising/   |

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|       |                |     |    |  |   |    |             |                            | remedial works required to prevent the site being flooded. Completion of the previous phase of development S of Loirsbank Rd does not justify this further development on a vulnerable area.   |
| B0925 | Highview House | CBM | 5  |  | N | 42 | undesirable | <b>undesirable</b>         | Green belt, slope, isolation so car dependent. It would be an isolated development in the countryside with no relationship to any existing settlement or easy access to facilities and likely to be highly visible from S. Adjacent to Ancient Woodland.   |
| B0926 | Huxterstone    | CBM | 0  |  | N | 48 | undesirable | <b>undesirable</b>         | Healthcare and Commercial. Pylons on east side. Greenbelt. Sits on slope so seen from a distance from N. The A944 provides a very strong and easily identifiable green belt boundary in this location which clearly separates Prime Four and Kingswells from the countryside to the South. It should therefore remain as green belt. Increases risk of coalescence between Kingswells and settlements to S. Commercial development with possible private healthcare facility would likely attract traffic movements at an already busy area. |
| B0927 | Contlaw Road   | CBM | 35 |  | N | 43 | undesirable | <b>conditional support</b> | Now subject to planning application 190409 for 30 houses. CBMCC conditional support. See our letter of 3 April 2019.   |



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| B0928 | Land West of Malcolm Road | Peterculter | 10 |     | N |    |             |                    |   |
| B0929 | Guttrie Hill West         | CBM         | 5  |     | N | 41 | undesirable | <b>undesirable</b> | Green Belt and Ancient Woodland. Places housing at distance from Milltimber or Culter facilities and public transport - car dependent.  |
| B0930 | Guttrie Hill East         | CBM         | 0  |     | N | 43 | undesirable | <b>undesirable</b> | Not the best site for a fuel stop - exposed location, A944/AWPR junction much better commercial prospect and local residents will not use. Risk of coalescence with Culter. Only car access available to reach proposed employment units.   |
| B0931 | Friarsfield Woodley       | CBM         | 0  | SMG | N | 60 | undesirable | <b>undesirable</b> | The proposal is unnecessary – access arrangements to the Friarsfield development are set out in the Friarsfield Development Framework and there is no need to depart from this.   |
| B0932 | Hillhead of Countesswells | CBM         | 4  |     | N | 43 | undesirable | <b>undesirable</b> | Agree with recommendation. The site is poorly related to both the Cults settlement and the western edge of the City in terms of public transport provision, community facilities and other amenities, and would therefore be car dependent. It may result in the loss of locally significant trees and would appear sporadic and isolated in a rural context. |

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| B0933 | Damhead Cadgerford | CBM                 | 750 | SMG | Y | 43-45 | undesirable | <b>undesirable</b> | Not required to meet SDP housing land allocation target. Significant Southward extension of Westhill creating risk of coalescence with Lower Deeside and with Kingswells and loss of green landscape. SEPA flood map shows Brodiach Burn at high risk of flooding. Concern re capacity of education and other services - although the bulk of the development is within Aberdeen City it appears to be suggested that resident children could go to schools in Aberdeenshire. Any suggestion of rerouting or upgrading the Forties Pipeline is unlikely to be supported by the pipeline operator! |
| B0934 | Kennerty Farm      | Peterculter         | 25  |     | N |       |             |                    |   |
| B0935 | Newmill Farm       | Peterculter         | 50  |     | N |       |             |                    |   |
| B0936 | Treespark 1        | Braeside/Mannofield | 10  |     | N | 47    | undesirable | <b>undesirable</b> | See B0937.  |
| B0937 | Treespark 2        | Braeside/Mannofield | 40  |     | N | 47    | undesirable | <b>undesirable</b> | Not required to meet SDP housing allocation target and does not meet H3 density requirement. Green Belt. Land provides separation between Cults and settlements to E - risk of coalescence.   |
| B0938 | Lovers Walk        | Peterculter         | 12  |     | N | 47    | undesirable | <b>undesirable</b> | Would be adjacent to a much-loved riverside walk. Sloping site very visible from S. Could impact on sensitive Camphill School residents during construction.  |

|       |                    |     |     |        |   |    |             |                    |  |
|-------|--------------------|-----|-----|--------|---|----|-------------|--------------------|--|
| B0939 | Peterculter East 1 | CBM | 100 | Bancon | N | 47 | undesirable | <b>undesirable</b> | Not required to meet SDP housing allocation target or conform to H3 density policy. Green Belt/Green Space. Would impact seriously on the sensitive residents of Camphill School during and after construction . Appears on SEPA flood maps as medium risk. Increases danger of coalescence between Milltimber and Culter. Education capacity issue.   |
| B0940 | Peterculter East 2 | CBM | 30  | Bancon | N | 47 | undesirable | <b>undesirable</b> | As for B0939. Once approved would increase likelihood of further application to build on vacant adjacent land ie as B0939.   |
| B0941 | Peterculter East 3 | CBM | 50  | Bancon | N | 48 | undesirable | <b>undesirable</b> | As for B0939 and B0940.  |
| B0942 | Milltimber South   | CBM | 90  | Bancon | N | 49 | undesirable | <b>undesirable</b> | Not required to meet SDP housing land allocation or met H3 density policy. Now no retail/commercial facility. 90 homes may impede landscape views further and density is out of keeping with area. Does move to 90 invalidate Reporter's recommendation in LDP2022? Proposal's view on education capacity (Cults Academy only full by 2023) is inconsistent with completion schedule (0-10 years from 2022)! Additional traffic load (130+ cars?) onto North Deeside Road. CBMCC would strongly support this site reverting to Green Belt! |

|       |                          |             |     |          |   |    |             |                            |  |
|-------|--------------------------|-------------|-----|----------|---|----|-------------|----------------------------|--|
| B0943 | Milltimber Farm          | CBM         | 70  |          | N | 46 | undesirable | <b>undesirable</b>         | Not required to meet SDP housing allocation target or meet H3 density policy. Green Belt. Increases risk of coalescence between Milltimber and Culter. Land should be kept available in case existing junction design at A93/B979 junction later proves unviable and a roundabout is required.   |
| B0944 | Inchgarth Road           | CBM         | 95  | D Suttie | N | 45 | undesirable | <b>conditional support</b> | CBMCC conditionally supports a suitable proposal for this site provided that it delivers a modern link road between North Deeside Rad and Inchgarth. Strong public support received in 2018 for this road and for additional retirement housing in Lower Deeside. See our letter 29th Aug 2018 re 181224.                                |
| B0945 | Shepherds Retreat        | Peterculter | 0   |          | N |    |             |                            |  |
| B0946 | Malcolm Road             | Peterculter | 59  |          | N |    |             |                            |  |
| B1003 | Phase 1 NE Countesswells | CBM         | 355 | SMG      | Y | 41 | undesirable | <b>undesirable</b>         | Not required to meet SDP housing allocation target. Extension to an existing Masterplan area. Does not conform to H3 density policy. In Greenbelt, would sever Green Space Network, impact on protected species, habitats, local designations, tree loss & post-development impacts. Not required to meet SDP housing allocation target. |

|  |  |  |  |  |  |  |  |  |   |
|--|--|--|--|--|--|--|--|--|---|
|  |  |  |  |  |  |  |  |  | Extension to an existing Masterplan area. Does not conform to H3 density policy. Significant impact on the landscape and creates coalescence between Countesswells and Kingswells, risking their landscape setting and separate identities . Sits on crest of rising ground, therefore, visible from surrounding areas. Important green belt function. In close proximity to Crematorium and the Garden of Remembrance, therefore may be issues with conflicting land uses. |
|--|--|--|--|--|--|--|--|--|---|

|       |                |     |      |     |   |    |             |                    |  |
|-------|----------------|-----|------|-----|---|----|-------------|--------------------|--|
| B1005 | Bellfield Farm | CBM | 1000 | SMG | Y | 41 | undesirable | <b>undesirable</b> |  |
|-------|----------------|-----|------|-----|---|----|-------------|--------------------|--|

|  |  |  |  |  |  |  |  |  |  |
|--|--|--|--|--|--|--|--|--|--|
| <p><b>Total CBM - 5442</b></p> <p><b>Total Peterculter- 404</b></p> <p><b>Total Braeside/Mann - 155</b></p> <p><b>Total - 6001</b></p> <p><b>Milltimber area</b></p> |  |  |  |  |  |  |  |  |  |
|--|--|--|--|--|--|--|--|--|--|



10 May 2019

Local Development Plan Team  
Aberdeen City Council  
Business Hub 4  
Marischal College  
Broad Street  
Aberdeen  
AB10 1AB

Dear Sir/Madam

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We agree with comments made by the Local Development Plan (LDP) Team regarding all the Developer Proposals in our Community Council area within Ward 9 Deeside. A spreadsheet detailing all the proposals and our comments has been sent to the Development Team and we are also submitting individual letters of objection for proposals over 50 homes. Please see below objection for:

**09/04 Land adjacent to Countesswells (residential major 50 units)**

**Constraints:** Green Space Network, Greenbelt, proximity and accessibility to local services and facilities, school capacity

This site is considered to be undesirable for development as its accessibility to facilities including shopping, health, recreation and education facilities is poor both in terms of proximity and connectivity, particularly in respect of sustainable means of transport such as walking, cycling and public transport links. The majority of the site is zoned to Cults Primary School, which is over capacity, and Cults Academy, which will be over capacity by 2021. CBMCC think that the issue of school space needs to be addressed before any more homes are built in the area. The residential proposal would not contribute to better land use or mix.

The Proposed Strategic Development Plan asks the Local Development Plan to allocate a limited amount of housing land. These allocations should take place on brownfield sites and utilise the current "constrained" supply in the first instance. Reducing travel distances and making walking, cycling and public transport more attractive to people will be important considerations, particularly for any new greenfield development sites that are proposed. In addition, allocations should be small scale in nature, and should not be extensions to any existing, strategic, development sites that have been subject to a master planning exercise (in this case Countesswells). Because of this, the allocation of this site is likely to be contrary to the Proposed Strategic Development Plan.

Colin Morsley, Planning Liaison Officer CBMCC

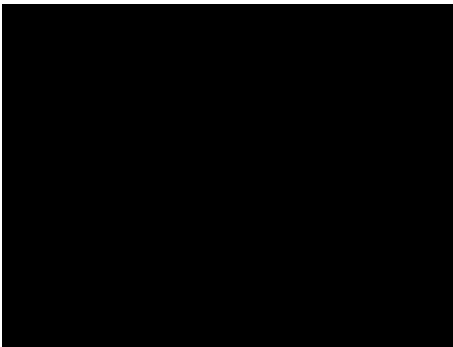
For the reasons outlined above CBMCC believes that this site:

1. Would remove valuable green space, and increase the risk of coalescence between Bieldside and Countesswells
2. Does not have easy accessibility to local services and facilities so would be car-dependent
3. Creates school capacity and healthcare issues ,

so consider the site unsuitable for development.

Please contact me if you have any questions regarding the CBMCC objection.

Yours faithfully



Colin Morsley

Planning Liaison Officer

Copy to: Councillor Marie Boulton, Councillor Philip Bell, Councillor Tauqeer Malik



10 May 2019

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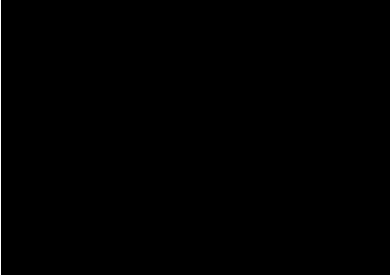
**B0906 Contlaw**

1. This development is not required to meet SDP housing land allocation requirements.
2. It would require reworking of Deeside Junction giving a direct connection from a Special Road into a residential area!
3. It would represent a substantial extension to the built area of Milltimber. Much of it would be above the 90m contour and contrary to what is said in the submission it would be in a very exposed area.
4. We recognise the proposal to provide a primary school, shopping and community facilities. Experience suggests that it may difficult to materialise these facilities in a timely manner. Meanwhile the development would be far from existing facilities or public transport so residents would be likely to be car-dependent from an early stage. We are not confident of the developer's ability to materialise services to the projected "transport interchange" and bus operators may not be willing to divert existing routes from the A93 or AWPR.
5. Even accepting that the proposed primary school would be delivered there would be a heavy additional load on secondary education, healthcare and other services.



Please contact me if you have any questions regarding the above.

Yours faithfully



Colin Morsley

Planning Liaison Officer

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**B0907 Albyn Playing Fields**

1. It is not required to meet SDP housing land allocation requirements.
2. Currently the playing fields offer part of the green space between the built areas of Culter and Milltimber. This proposal would create a significant loss of Green Belt.
3. It is close to the AWPR junction adding to conflicting traffic movements and against the stated desire in the MIR to avoid such development.
4. It would be distant from most existing public facilities except the M&S convenience store.
5. Can site not be redeveloped as Albyn School's sports facility?
6. It might be more acceptable if 100% affordable housing.

Please contact me if you have any questions regarding the above.

Yours faithfully



Colin Morsley

Planning Liaison Officer

Copy to: Councillor Marie Boulton, Councillor Philip Bell, Councillor Tauqeer Malik



10 May 2019

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Aberdeen City Council  
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**09/08 Countesswells (Mixed-Use; Residential (500 units) and Business/Retail)**

**Constraints:** Local Nature Conservation Site, Ancient Woodland, Green Space Network, Green Belt, School Capacity

The development is proposed for 500 residential units and 75m<sup>2</sup> of business and office space. The site is partly located within the Foggieton Local Nature Conservation Site and contains priority habitat. It is located within a green space network and green belt. Due to the remote location the site is isolated from community facilities, public transport and active travel options are limited. Therefore, development is likely to be car dependent.

The Proposed Strategic Development Plan asks the Local Development Plan to allocate a limited amount of housing land. These allocations should take place on brownfield sites and utilise the current "constrained" supply in the first instance. Reducing travel distances and making walking, cycling and public transport more attractive to people will be important considerations, particularly for any new greenfield development sites that are proposed. In addition, allocations should be small scale in nature, and should not be extensions to any existing, strategic, development sites that have been subject to a master planning exercise (in this case Countesswells). Because of this, the allocation of this site is likely to be contrary to the Proposed Strategic Development Plan.

Colin Morsley, Planning Liaison Officer CBMCC

For the reasons outlined above CBMCC believes that this site:

1. would remove valuable green space and green space network, increasing the risk of coalescence between Cults and Countesswells
2. contains priority habitat including Foggieton LNCS
3. does not have accessibility to local services and facilities making it car-dependent
4. introduces school capacity issues,

so consider the site unsuitable for development.

Please contact me if you have any questions regarding the CBMCC objection.

Yours faithfully

Colin Morsley

Planning Liaison Officer

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**09/10 Friarsfield North (Residential 280 units)**

**Constraints:** Green Belt, School Capacity, Landscape, Trees

The proposal is for a residential development of 280 units. CBMCC agrees with the MIR recommendation that the development is undesirable.

The proposed site is categorised into three distinct parts, Craigbank and Corbie and Newton. Newton sits to the east of the other two areas. The site is located in an area of green belt which acts as a green backdrop to the existing development at Friarsfield and to Aberdeen as a whole. This greenfield area should be retained to keep a balance of housing and green belt for the Cults area. It is part of an area which serves to maintain the separate identities of Cults, Countesswells and Aberdeen. Development will have significant impacts on landscape and would be highly visible from the south. The settlements along Deeside are contained within the 90m contour line and this development would go beyond this. The development is poorly located to public transport and community facilities and therefore would be car dependent. CBMCC think that the issues of school capacity and healthcare needs to be addressed before any more homes are built in the area.

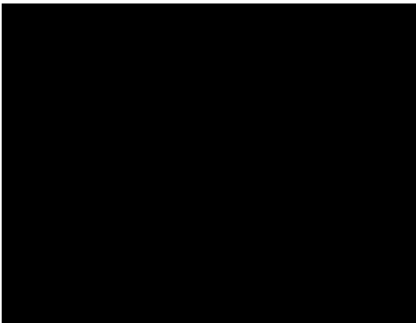
The Proposed Strategic Development Plan asks the Local Development Plan to allocate a limited amount of housing land. These allocations should take place on brownfield sites and utilise the current "constrained" supply in the first instance. Reducing travel distances and making walking,

Colin Morsley, Planning Liaison Officer CBMCC

cycling and public transport more attractive to people will be important considerations, particularly for any new greenfield development sites that are proposed. In addition, allocations should be small scale in nature, and should not be extensions to any existing, strategic, development sites that have been subject to a master planning exercise (in this case Frairsfield). Because of this, the allocation of this development is likely to be contrary to the Proposed Strategic Development Plan.

Please contact me if you have any questions regarding this CBMCC objection.

Yours faithfully



Colin Morsley

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Dear Sir/Madam

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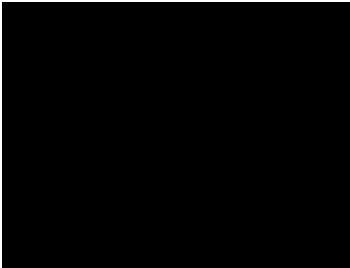
**B0911 Culter House Road**

1. We agree with the MIR recommendations.
2. This proposal is not required to meet SDP housing allocation target.
3. It claims to offer 100% affordable housing yet places it at a significant distance from public transport and facilities.
4. Exposed site close to AWPR and therefore conflicts with MIR preference to avoid development there.
5. Increases coalescence risk reducing green space between Milltimber and Culter.
6. Primary and secondary education and healthcare capacity is an issue.



Please contact me if you have any questions regarding the above.

Yours faithfully



Colin Morsley

Planning Liaison Officer

Copy to: Councillor Marie Boulton, Councillor Philip Bell, Councillor Tauqeer Malik



Local Development Plan Team  
Aberdeen City Council  
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Aberdeen  
AB10 1AB

Dear Sir/Madam

**Objection and Comments from Cults Bieldside and Milltimber Community Council  
on Developer Proposals for the 2022 Aberdeen City Local Development Plan**

I am writing on behalf of the Cults Bieldside and Milltimber Community Council (CBMCC) to raise our objection and concerns relating to Developer Proposals for 2022 Aberdeen City Local Development Plan.

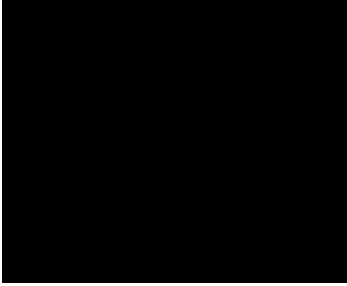
With minor exceptions we agree with comments made by the Local Development Plan Team regarding all the Developer Proposals in our Community Council area within Ward 9 Lower Deeside. A spreadsheet detailing all the proposals and our comments has been sent to the Development Team and we are also submitting individual letters of objection for proposals over 50 homes. Please see below our objection for:

**B0912 Craighton Road South (1)**

1. This proposal is not required to meet the SDP housing allocation target.
2. It does not meet the H3 density requirement.
3. The site is Green Belt, Greenspace Network, and in the Pitfodels Conservation Area.
4. It increases the danger of coalescence between Cults and settlements to the E.

Please contact me if you have any questions regarding the above.

Yours faithfully



Colin Morsley

Planning Liaison Officer

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10 May 2019

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**09/20 Bingham Farm (Residential up to 100 units)**

CBMCC agrees with the MIR recommendation the development is undesirable.

**Constraints:** Green Belt, Green Space Network

The proposal is for a residential development of up to 100 units.

This development site would be located on a currently zoned Green Belt and Green Space Network site. The site is located above the 95m contour line on the Deeside Valley which generally marks the northern limit to development of the north Deeside settlements. Breaching this could lead to urban sprawl northwards and a negative impact on the Dee Valley character. The development would only be partially related to the main settlement of Milltimber, however, it is noted that the site is located near the allocation of OP48: Oldfold. The site also has limited facilities within 800m and this will not encourage sustainable travel.

The Proposed Strategic Development Plan asks the Local Development Plan to allocate a limited amount of housing land. These allocations should take place on brownfield sites and utilise the current "constrained" supply in the first instance. Reducing travel distances and making walking, cycling and public transport more attractive to people will be important considerations, particularly

for any new greenfield development sites that are proposed. In addition, allocations should be small scale in nature, and should not be extensions to any existing, strategic, development sites that have been subject to a master planning exercise. Because of this, the allocation of this development is likely to be contrary to the Proposed Strategic Development Plan.

Please contact me if you have any questions regarding this CBMCC objection.

Yours faithfully



Colin Morsley

Planning Liaison Officer

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**09/21 Countesswells Settlement Expansion (approx. 545 units over 6 sites)**

CBMCC agrees with the MIR recommendations.

**Constraints:** Green Belt, Green Space Network, Coalescence, loss of woodland, disturbance to designated species

The proposal is separated into six separate units, called area two through to area seven. Area 2 is proposed for 175 units, area 3 for 54 units, area 4 for 75 units, area 5 for 84 units, areas 6 for 76 units and area 7 for 80 units. The areas are within the greenbelt and all are deemed undesirable for development.

The existing allocated site, OP38: Countesswells, sits within a natural basin, and is not readily visible from the wider Aberdeen area. However, the proposed sites would be visually intrusive and would have a detrimental impact on the landscape. The development of the sites would lead to loss of woodland and disturbance to designated species and their habitats.

All six proposed units have been subject to Examination as part of Issues 10: Alternative Sites: Countesswells in the Examination into the extant 2017 Aberdeen Local Development Plan, as bid site B09/18: Countesswells expansion and bid site B09/24: Thornhill.

Area 2 and Area 7 were considered to be a major intrusion into the green belt separating Cults, the new development at Countesswells, and the existing built-up area of Aberdeen lying to the east. There would be an unacceptable landscape impact and the isolated

Colin Morsley, Planning Liaison Officer CBMCC

development in the green belt would undermine the separation between Cults and the western edge of Aberdeen.

Area 5 and 6 The Reporter noted, are on steeply sloping land with woods to the north and south and would constitute a finger of development projecting westwards into the green belt. They would not relate well either to the main Countesswells site or to the rural character of the surrounding area.

Areas 3 and 4 The Reporter felt, as area 3 adjoins the south-west boundary of OP38 and is well screened by trees, subject to their retention, it would be an acceptable site for expansion if one were required. Area 4, though more prominently located at a road junction, is backed by trees to the north and west, and adjoins the western boundary of site OP38, making it a credible enlargement of the main site. If a need to expand site OP38 arose areas 3 and 4 would offer opportunities worthy of further consideration. However, at this time the Proposed SDP states that the expansion of existing master planned sites should not be considered for allocation and CBMCC agrees with this.

The Countesswells allocation (OP38) is anticipated to build out at a rate of about 200- 250 units per year and is not expected to be complete until beyond this LDP period. Adding additional land to the OP38 allocation is not likely to increase housebuilding on this site in the next plan period so should not be included in this LDP.

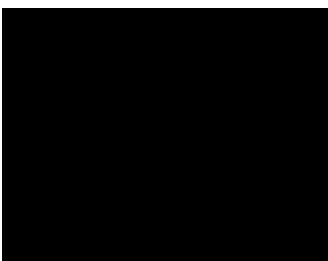
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The CBMCC believes that these six sites:

1. Are not required to meet SDP housing allocation targets and do not appear to meet the H3 density policy requirement
2. would remove valuable green space increasing the risk of coalescence merging Cults, the new development at Countesswells, and the existing built-up area of Aberdeen lying to the east,
3. would have a detrimental impact on the landscape and trees and
4. disturbance to designated species and their habitats.

Please contact me if you have any questions regarding this CBMCC objection.

Yours faithfully



Colin Morsley  
Planning Liaison Officer

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**09/23 Hillhead of Pitfodels (approx. 300 units)**

**Constraints:** Green Belt, Coalescence

The proposal is for 300 units. The site is located within the greenbelt separating north of Cults and Aberdeen and is an open air recreational use which is appropriate in the green belt. The site is not particularly well connected to services and facilities and it is considered that its green belt role is justified and appropriate.

The CBMCC believes that this site would remove valuable green space causing coalescence with Cults and Airyhall and would have a detrimental impact on the landscape and therefore objects to the site.

The Proposed Strategic Development Plan asks the Local Development Plan to allocate a limited amount of housing land. These allocations should take place on brownfield sites and utilise the current "constrained" supply in the first instance. Reducing travel distances and making walking, cycling and public transport more attractive to people will be important considerations, particularly for any new greenfield development sites that are proposed. In addition, allocations should be small scale in nature, and should not be extensions to any existing, strategic, development sites that have been subject to a master planning exercise. Because of this, the allocation of this development is likely to be contrary to the Proposed Strategic Development Plan.

Colin Morsley, Planning Liaison Officer CBMCC



Please contact me if you have any questions regarding this CBMCC objection.

Yours faithfully

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**B0924 Loirsbank:**

Although this is a very small site we are entering a specific objection on the following grounds:

1. We agree with the MIR recommendations.
2. The SEPA flood map shows the site as at medium-high risk of river flooding (and much closer to the flood margin than the previous development (101384) to the E).
3. Development on this site would have a significant impact on the surrounding landscape due to the proposal's proximity to the River Dee and open aspect to the south, and the land raising/ remedial works required to mitigate the site being flooded.
4. Completion of the previous phase of development S of Loirsbank Rd (101384) does not justify this further development on a vulnerable area. We understand that this was only approved following a recommendation of refusal by officers and a heavily caveated response from SEPA.

CBMCC therefore strongly opposes inclusion of this proposal in ALDP2022.

Colin Morsley, Planning Liaison Officer CBMCC

Please contact me if you have any questions regarding this CBMCC objection.

Yours faithfully



Colin Morsley

Planning Liaison Officer

Copy to: Councillor Marie Boulton, Councillor Philip Bell, Councillor Tauqeer Malik



10 May 2019

Local Development Plan Team  
Aberdeen City Council  
Business Hub 4  
Marischal College  
Broad Street  
Aberdeen  
AB10 1AB

Dear Sir/Madam

**Objection and Comments from Cults Bielside and Milltimber Community Council on Developer Proposals for the 2022 Aberdeen City Local Development Plan**

I am writing on behalf of the Cults Bielside and Milltimber Community Council (CBMCC) to raise our objection and concerns relating to Developer Proposals for 2022 Aberdeen City Local Development Plan.

We agree with comments made by the Local Development Plan (LDP) Team regarding all the Developer Proposals in our Community Council area within Ward 9 Deeside. A spreadsheet detailing all the proposals and our comments for each one has been sent to the Development Team and we are also submitting individual letters of objection for proposals over 50 homes. Please see below objection for:

**09/33 Cadgerford Backhill Damehead** (Mixed used development (750-900 housing units and 9-10 hectares of employment land))

CBMCC agrees with the MIR recommendation that the site is undesirable.

**Constraints:** Green Belt, Pipeline, Flooding, Coalescence, Landscape views

The proposal, a large mixed site for 750-900 residential units and 9-10 hectares of employment land that crosses the Aberdeen City and Aberdeenshire Council local authority area. Backhill and most of Cadgerford falls in Aberdeen City Council's area, while Damhead sits in Aberdeenshire's local authority area. Backhill and Cadgerford form the majority of the site, and will include around 6 hectares of employment land, the housing numbers are not broken down between the Aberdeen City and Aberdeenshire areas. The presence of a major gas pipeline to the west of this site significantly constrains the proposal that has been submitted. The Brodiach Burn is located to the west of the site and there is a significant area of the site at risk from flooding. The landscape surrounding Westhill is rolling agricultural and development in this location would be highly visible. It is part of the open countryside which separates Kingswells and Westhill and serves the green belt function of maintaining their separate identities and landscape setting. Development would also have a significant impact on services in Westhill. Allocating this site for development is mainly going to impact on Westhill, which is within Aberdeenshire. On its own this site does not relate well

Colin Morsley, Planning Liaison Officer CBMCC

to the settlement of Westhill. Development of this scale (although technically in Aberdeen) would have to be considered as an expansion of Westhill.

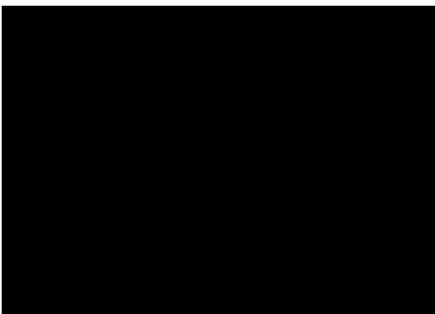
The Proposed Strategic Development Plan asks the Local Development Plan to allocate a limited amount of housing land. These allocations should take place on brownfield sites and utilise the current "constrained" supply in the first instance. Reducing travel distances and making walking, cycling and public transport more attractive to people will be important considerations, particularly for any new greenfield development sites that are proposed. In addition, allocations should be small scale in nature, and should not be extensions to any existing, strategic, development sites that have been subject to a master planning exercise. Because of this, the allocation of this development is likely to be contrary to the Proposed Strategic Development Plan.

The CBMCC also believes:

1. That this site is not required to meet SDP housing land allocation target.
2. It represents a significant Southward extension of Westhill creating risk of coalescence with Lower Deeside and with Kingswells and loss of green landscape and would be highly visible.
3. SEPA flood map shows Brodiach Burn at high risk of flooding.
4. Concern re capacity of education and other services - although the bulk of the development is within Aberdeen City it appears to be suggested that resident children could go to schools in Aberdeenshire.
5. Any suggestion of rerouting or upgrading the Forties Pipeline is unlikely to be supported by the pipeline operator!

Please contact me if you have any questions regarding this CBMCC objection.

Yours faithfully



Colin Morsley

Planning Liaison Officer

Copy to: Councillor Marie Boulton, Councillor Philip Bell, Councillor Tauqeer Malik



10 May 2019

Local Development Plan Team  
Aberdeen City Council  
Business Hub 4  
Marischal College  
Broad Street  
Aberdeen  
AB10 1AB

Dear Sir/Madam

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**B0939 Peterculter East (also B0940/B09041)**

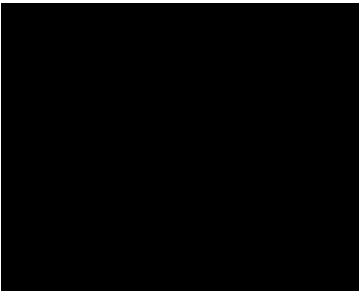
1. This proposal is not required to meet SDP housing allocation target nor conforms to H3 density policy.
2. The site is valued Green Belt/Green Space between the built areas of Culter and Milltimber containing archaeological interest. It would seriously detract from the semi-rural feel of the Deeside way at that point to the detriment of DW users.
3. It is close to the AWPR and the A93/B979 Milltimber junction and conflicts with MIR stipulations.
4. Development would impact seriously on the sensitive residents of Camphill School during and after construction.
5. The site appears on SEPA flood maps as medium risk and is understood to have flooded during Storm Frank.
6. Development would Increase the danger of coalescence between Milltimber and Culter.
7. Education and healthcare capacity are also issues.

Colin Morsley, Planning Liaison Officer CBMCC

Please note that all the above comments apply to proposals B0940 and B0941. We regard these as subsets of B0939 which would merely be regarded by the developer as waystations towards the full B0939 development.

Please contact me if you have any questions regarding the above.

Yours faithfully



Colin Morsley

Planning Liaison Officer

Copy to: Councillor Marie Boulton, Councillor Philip Bell, Councillor Tauqeer Malik





10 May 2019

Local Development Plan Team  
Aberdeen City Council  
Business Hub 4  
Marischal College  
Broad Street  
Aberdeen  
AB10 1AB

Dear Sir/Madam

**Objection and Comments from Cults Bielside and Milltimber Community Council on Developer Proposals for the 2022 Aberdeen City Local Development Plan**

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**B0942 Milltimber South**

1. This proposal is not required to meet SDP housing land allocation targets and does not meet H3 density policy.
2. Since a Proposal of Application Notice 170260 was issued in May 2017 no further progress appears to have been made towards submitting a Masterplan for this site.
3. The current proposal for 90 homes differs markedly from the allocation of 60 houses and 1225m<sup>2</sup> of retail/commercial space mandated by the Scottish Government Reporter and included as OP114 in ALDP2017. We believe that this represents a significant and material change which justifies a complete review of the status of this site.
4. 90 homes may impede landscape views further and density is out of keeping with area. The development will be highly visible from across the Dee Valley.
5. The proposal's view on education capacity (Cults Academy only full by 2023) is inconsistent with completion schedule (0-10 years from 2022)! This implies that school places would only be required after the Academy is full! We are also concerned about the continuing strain on healthcare capacity in the CBM area.

Colin Morsley, Planning Liaison Officer CBMCC



6. The proposed development could entail additional traffic load (130+ cars?) making conflicting traffic movements onto North Deeside Road.
7. Anecdotal evidence is that this site is valued as Green Belt by those living both in and outwith the CBM area. It is often cited as the first clear view across the Dee Valley when leaving Aberdeen on the A93.

**CBMCC therefore urges that this site reverts to its previous Green Belt classification!**

Please contact me if you have any questions regarding the above.

Yours faithfully



Colin Morsley

Planning Liaison Officer

Copy to: Councillor Marie Boulton, Councillor Philip Bell, Councillor Tauqeer Malik



10 May 2019

Local Development Plan Team  
Aberdeen City Council  
Business Hub 4  
Marischal College  
Broad Street  
Aberdeen  
AB10 1AB

Dear Sir/Madam

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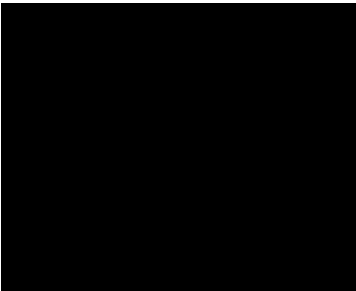
With minor exceptions we agree with comments made by the Local Development Plan Team regarding all the Developer Proposals in our Community Council area within Ward 9 Lower Deeside. A spreadsheet detailing all the proposals and our comments has been sent to the Development Team and we are also submitting individual letters of objection for proposals over 50 homes. Please see below objection for:

**B0943 Milltimber Farm**

1. This proposal is not required to meet SDP housing allocation targets and does not meet H3 density policy.
2. The site is Green Belt and Green Space Network and is the last piece of unbuilt land between Milltimber and Culter S of A93. It conflicts with the intent of the MIR to maintain some green space between the settlements and to avoid development close to the AWPR.
3. The SEPA flood map suggests some risk of surface water flooding.
4. Part of the site should be kept available in case the existing signalised junction design at the A93/B979/AWPR junction proves unviable in future and a roundabout is required.
5. Education and healthcare capacity are concerns.

Please contact me if you have any questions regarding the above.

Yours faithfully



Colin Morsley

Planning Liaison Officer

Copy to: Councillor Marie Boulton, Councillor Philip Bell, Councillor Tauqeer Malik



10 May 2019

Local Development Plan Team  
Aberdeen City Council  
Business Hub 4  
Marischal College  
Broad Street  
Aberdeen  
AB10 1AB

Dear Sir/Madam

**Comments from Cults Bielside and Milltimber Community Council on Developer Proposals for the 2022 Aberdeen City Local Development Plan**

I am writing on behalf of the Cults Bielside and Milltimber Community Council (CBMCC) to raise our objection and concerns relating to Developer Proposals for 2022 Aberdeen City Local Development Plan.

With minor exceptions we agree with comments made by the Local Development Plan Team regarding all the Developer Proposals in our Community Council area within Ward 9 Lower Deeside. A spreadsheet detailing all the proposals and our comments has been sent to the Development Team and we are also submitting individual letters of objection for proposals over 50 homes. Please see below our comments for:

**B0944 Inchgarth Road**

1. CBMCC conditionally supports a suitable proposal for this site provided that it delivers a modern link road between North Deeside Road and Inchgarth suitable for bus services.
2. During consultation on Proposal of Application Notice 181224 in 2018 we received strong public support for this road and for additional retirement housing in Lower Deeside.
3. Please see our letter 29th Aug 2018 re 181224 for more details.

Please contact me if you have any questions regarding the above.

Yours faithfully



Colin Morsley

Planning Liaison Officer

Copy to: Councillor Marie Boulton, Councillor Philip Bell, Councillor Tauqeer Malik



10 May 2019

Local Development Plan Team  
Aberdeen City Council  
Business Hub 4  
Marischal College  
Broad Street  
Aberdeen  
AB10 1AB

Dear Sir/Madam

**Objection and Comments from Cults Bielside and Milltimber Community Council on Developer Proposals for the 2022 Aberdeen City Local Development Plan**

I am writing on behalf of the Cults Bielside and Milltimber Community Council (CBMCC) to raise our objection and concerns relating to Developer Proposals for 2022 Aberdeen City Local Development Plan.

We agree with comments made by the Local Development Plan (LDP) Team regarding all the Developer Proposals in our Community Council area within Ward 9 Deeside. A spreadsheet detailing all the proposals and our comments for each one has been sent to the Development Team and we are also submitting individual letters of objection for proposals over 50 homes. Please see below objection for:

**10/03 Land at Phase 1 North East Countesswells** (355 units) which borders CBMCC so we have made comment

**Constraints:** Greenbelt, GSN, impact on protected species, habitats, local designations, tree loss & post development impacts.

The site proposed would be located on Greenbelt and Green Space Network. Development of the site would result in the loss of a significant number of established trees, which at present, cover the entirety of the site with the exception of the existing path network. The site is exposed with a north facing aspect, and as a result of its topography and elevation, would likely have a significant impact on landscape character. Further, the proposal would have a significant impact upon nature conservation, resulting in the loss/ disturbance of wildlife habitat and species. The proposal would sever the Green Space Network in this location and would pose threats to natural designations within and surrounding the site, both during and post construction. There is a limited range of available facilities within 800m of the site.

The Proposed Strategic Development Plan asks the Local Development Plan to allocate a limited amount of housing land. These allocations should take place on brownfield sites and utilise the current “constrained” supply in the first instance. Reducing travel distances and making walking, cycling and public transport more attractive to people will be important considerations, particularly for any new greenfield development sites that are proposed. In addition, allocations should be small scale in nature, and should not be extensions to any existing, strategic, development sites that have been subject to a master planning exercise. Because of this, the allocation of this development is likely to be contrary to the Proposed Strategic Development Plan.

For the reasons outlined above CBMCC believes that this site would remove valuable green space causing coalescence with Countesswells and Cults as well as having significant impact on landscape character, protected areas and species so consider the site unsuitable for development.

Please contact me if you have any questions regarding this CBMCC objection.

Yours faithfully

Colin Morsley

Planning Liaison Officer

Copy to: Councillor Marie Boulton, Councillor Philip Bell, Councillor Tauqeer Malik



10 May 2019

Local Development Plan Team  
Aberdeen City Council  
Business Hub 4  
Marischal College  
Broad Street  
Aberdeen  
AB10 1AB

Dear Sir/Madam

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We agree with comments made by the Local Development Plan (LDP) Team regarding all the Developer Proposals in our Community Council area within Ward 9 Deeside. A spreadsheet detailing all the proposals and our comments for each one has been sent to the Development Team and we are also submitting individual letters of objection for proposals over 50 homes. Please see below objection for:

**10/05 Bellfield Farm** (Residential development of c.1000 units) which borders CBMCC so we have made comment

**Constraints:** Pylons, Landscape fit, Coalescence

The site is proposed as a residential development comprising 1000 units. Development on the site would have significant impact on the landscape as the site sits on the crest of rising ground, and therefore will be visible from surrounding areas. It occupies land which serves to separate Kingswells from Countesswells, thus maintaining their landscape setting and separate identities. This is an important green belt function. The site is also in close proximity to the crematorium and the Garden of Remembrance, therefore, there may be issues with conflicting land uses.

The Proposed Strategic Development Plan asks the Local Development Plan to allocate a limited amount of housing land. These allocations should take place on brownfield sites and utilise the current "constrained" supply in the first instance. Reducing travel distances and making walking, cycling and public transport more attractive to people will be important considerations, particularly for any new greenfield development sites that are proposed. In addition, allocations should be small scale in nature, and should not be extensions to any existing, strategic, development sites that have been subject to a master planning exercise (in this case OP38 Countesswells). Because of this, the allocation of this development is likely to be contrary to the Proposed Strategic Development Plan.

Colin Morsley, Planning Liaison Officer CBMCC



For the reasons outlined above CBMCC believes that this site would remove valuable green space causing coalescence with Countesswells and Kingswells as well as having significant impact on landscape character, so consider the site unsuitable for development.

Please contact me if you have any questions regarding this CBMCC objection.

Yours faithfully



Colin Morsley

Planning Liaison Officer

Copy to: Councillor Marie Boulton, Councillor Philip Bell, Councillor Tauqeer Malik



Mr Nicholas Lawrence  
Development Management  
Planning and Sustainable Development  
Aberdeen City Council  
Business Hub 4, Marischal College  
Broad Street  
Aberdeen  
AB10 1AB

29 Aug 2018

Dear Mr Lawrence,

**Planning Application 181224: Residential led development for the retired/elderly (including affordable housing), a 50 bedroom care home and approximately 500sqm of ancillary retail/community use, together with public open space and associated infrastructure including a link road**

I am writing on behalf of the Cults Bieldside and Milltimber Community Council (CBMCC) to offer our conditional support for Planning Application 181224 for the construction of a retirement community and link road on land sitting between the North Deeside Road and Inchgarth Road at Pitfodels.

At the outset I should say that we have had significant feedback from our own community and others prompted by the submission of this proposal. So far we have received over 150 responses which have almost all concentrated on support for both the proposed link road and the housing development. Many have also commented on the current poor state of the land, the potentially improved access to the Deeside Way and public green space, the provision of a wildlife corridor and the possibility of local retail and health services. We assess that many of those who have responded positively to us have also made formal supportive comments to yourselves in respect of this proposal. We have also noted many supportive responses from people outwith our immediate area or even Aberdeen City who suffer inconvenience travelling through Cults and Pitfodels and in turn seriously affect Westerton Road, Deeview Road South and Pitfodels Station Road residents. Also in this respect, prompted by Aberdeen City Council's Dee Crossing consultation in 2016, we surveyed the local community and received over 200 expressions of support for a new link road.

We fully understand the concerns of the objectors to this proposal and are aware that it is not included in the current Local Development Plan and also results in the loss of some green space. However the latter concerns should be balanced against potential overall benefit to the community.

We have some further comments:

1. Irrespective of the disposal of this current application it is clear that there is strong public support for an improved road connection between North Deeside Road and Inchgarth Road to relieve traffic on Pitfodels Station Road and Westerton Road and to open up a possible more efficient public transport service between Culter and the Garthdee retail area. With continued housing development to the West of Cults and Pitfodels we can only expect the traffic load on these roads to increase. Indeed the Community Council would object to any application for this area that did not include the link road.

Peter Roberts, Planning Liaison Officer CBMCC



2. Although CBMCC has been consulted by the developers on previous similar proposals we were not consulted on the current proposal prior to issue. Given the significant changes from previously-discussed proposals we would expect the developers to carry out further public consultations as they have before.
3. While we accept that the proposal is very preliminary, being a Planning Application in principle, it does seem to lack imagination, for example with houses set out linearly. We would expect a detailed planning application to address the following points:
  - a. The proposed housing density is greater than envisaged in previous applications, presumably driven by the economics of the developer funding the link road 100%. We think that it is out of keeping with the area.
  - b. We would prefer a greater variety of property types, to include 1/2/3 bedroom apartments and cottages or bungalows with small gardens to allow for as wide as possible mix of families and individuals.
  - c. The layout should be less linear in placement, as the Planning Department has recently required at other developments.
  - d. Parking should be available as close as possible to properties to assist those with poor mobility.
  - e. A small parking area should be provided in the green area to allow non-resident users of the Deeside Way to visit the area without impact on the residents.
4. While there is clearly strong support in the community for more retirement-friendly housing we are concerned about possibly creating a “retirement ghetto” with little age diversity. We will continue to seek further information from the developer on how this development would be managed.
5. It is important that some green space is maintained for separation from existing developments and to maintain the character of the area along the North Deeside Road.
6. We are disappointed that the re-positioning of the link road in the current application makes it impossible to create a sports facility as included in previous applications and sites the junction with Inchgarth Road further West than originally planned. We understand that the present proposed design results from conversations between ACC Road Department and the developer but we find it difficult to see what was wrong with the previous proposal which maintained a similar average gradient between North Deeside Road and Inchgarth Road.

Finally, taking together points 1 and 3 above, we suggest that Aberdeen City Council should consider contributing to the cost of the link road (perhaps from developer contributions) in order to alleviate the traffic problems already highlighted and to allow the developer to put forward a detailed proposal with a lower housing density.

Please contact me if you have any questions on the above.

Yours sincerely,



Peter Roberts

Planning Liaison Officer

Copy to: Councillor Marie Boulton, Councillor Philip Bell, Councillor Tauqeer Malik