



# Aberdeen Local Development Plan Review

## Main Issues Report Response Form 2019

Aberdeen City Council has published a Main Issues Report (MIR) which is part of the process of preparing a new Local Development Plan. It is designed to gather views on specific proposals and sets out options for dealing with the key planning matters facing Aberdeen over the next 20 years such as the location of new housing and employment development, the future of retailing and the City Centre, housing needs and tackling climate change. It also includes a number of potential new policies which would be used in the determination of planning applications.

The MIR has been published alongside a Monitoring Statement and Environmental Report. Copies are available to view at Marischal College, Broad Street, Aberdeen. These, and other supporting documents, are available at: - [www.aberdeencity.gov.uk/alp2022](http://www.aberdeencity.gov.uk/alp2022)

Everyone now has the chance to comment on the report and associated documents. All comments received will be considered and used to inform the preparation of the Proposed Aberdeen City Local Development Plan. There will be a further opportunity to comment on the Proposed Plan when it is published in early 2020.

**The consultation runs from 4 March 2019 to 13 May 2019.**

Responses to the published documents can be:

- made online at:- <http://consultation.aberdeencity.gov.uk/planning/mir2019>;
- emailed to:- [ldp@aberdeencity.gov.uk](mailto: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	SCOTT LEITCH
Organisation (if relevant)	HALLIDAY FRASER MUNRO
On behalf of (if relevant)	JOHN ADAM AND SON
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](mailto: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"><li>• Main Issues Report</li><li>• Strategic Environmental Assessment Environmental Report</li><li>• Monitoring Statement</li></ul>	<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 find attached response to the Main Issues Report in respect of Development Bid site B0922 Blaircara Village, West Craigton, Peterculter.



**HALLIDAY FRASER MUNRO**

CHARTERED ARCHITECTS & PLANNING CONSULTANTS

**ABERDEEN CITY LOCAL DEVELOPMENT PLAN**

**RESPONSE TO MAIN ISSUES REPORT**

**SITE B0922 – Blaircara Village, West Craigton,**

**Peterculter**

MAY 2019

On behalf of John Adam and Son



HALLIDAY FRASER MUNRO

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## 1. Introduction and Bid Summary

- 1.1. This report has been prepared by Halliday Fraser Munro, Town Planning Consultants and Chartered Architects, on behalf of John Adam and Son. It is written in response to the Aberdeen City Local Development Plan Main Issues Report 2019 (MIR).
- 1.2. Bid B0922 Blaircara Village presented a proposal for the establishment of an Assisted Living Village. The proposal would provide accommodation and facilities for the elderly and people living with dementia, with specific social affordable housing mix and community facilities provided on site.
- 1.3. A key factor in the proposal was the selection of a suitable site and location to successfully develop such a Village. We believe that the 6.2ha land subject of the B0922 bid is the right location for this, striking the right balance between a relatively secluded, rural location with a strong relationship with the natural environment to benefit the health of residents, but also not being too remote from Peterculter and wider transportation linkages.
- 1.4. The land lies on the western edge of Peterculter at a lower level than the surrounding, with mature established woodland boundaries.
- 1.5. Appendix 1 of this response reassesses the development bid using the Officers' criteria but accurately relating it to the specialist development proposal and site aspects. This results in the site scoring 59 out of a possible 63.

## 2. MIR Bid Assessment Summary

- 2.1. The Main Issues Report (officer's summary and assessment of bid) states:

*'B0922 Blaircara Village, West Craigton, Peterculter*

*This residential site would be located on a currently zoned Green Belt site which also lies within the Green Space Network. The site lies to the west of allocated site OP51 (Peterculter Burn). This site is considered to be undesirable for development. The proposer indicated the site could have a number of specialist residential use and zones. Zone one would comprise a supported care facility specializing in living accommodation for people with dementia. Zone two would comprise bungalows for the elderly, and zone three would provide accommodation for low paid workers, and people escaping from domestic abuse.*

*Development on this site would (without mitigation measures) impact on the surrounding landscape, and any development would only be partially related to the main settlement of Peterculter and is remote from the village centre. The Culter Burn runs to the west and south of*



*the site and part of the southern area the site is identified as at risk from flooding. The Culter Burn to the south is part of the River Dee and Culter Burn SAC and is an LNCS. Specialist needs housing (like any other housing) should be closer to services, facilities and public transport rather than in this relatively remote and isolated location.*

- 2.2. The Officers' view and associated issues can be broken down and will be examined in more detail below. In short, however, it is clear from the Officers' summary of the bid in the MIR that the development proposal has been assessed under the same approach and criteria if it has been for open market, private housing. The specific development concept has not been recognised through the bid assessment process. One of the key aspects of the development is to create an environmentally responsible village, in that it would retain and enhance the attractive environmental features of the site and its locale. This is considered in more detail below.
- 2.3. ***'This residential site would be located on a currently zoned Green Belt site which also lies within the Green Space Network. The site lies to the west of allocated site OP51 (Peterculter Burn). This site is considered to be undesirable for development.'***

From the outset, the site is described as 'residential'. This is not the case. The growing requirement for 'Residential Care Facilities' is recognised by the Council in the MIR (Main Issue 10). The proposed to be updated Policy H4 policy sets out support for new residential developments that include accessible housing and built to support varying needs to enable independent living.

Our client supports the drafting of a specific planning policy to deal with such proposals, and the allocation of suitable sites, such as that proposed at Craigton through bid B0922. We suggest that the assessment and scoring of the site as a residential development is inappropriate in this case.

The site being within the Green Belt should not be treated as a constraint to development. In Aberdeen Local Development Plan 2017 it is stated that 'The aim of the Green Belt is to maintain the distinct identity of Aberdeen and the communities within and around the city, by defining their physical boundaries clearly. Safeguarding the Green Belt helps to avoid coalescence of settlements and sprawling development on the edge of the city, maintaining Aberdeen's landscape setting and providing access to open space'. The development proposed in Bid B0922 does not undermine this aim. The land lies on the western edge of Peterculter, sitting at a low level with established boundary landscaping that would be retained and enhanced. The proposed development will not result in coalescence between any settlements. It is well contained within the site and situated on the rural north western edge of Peterculter. The B0922 site's eastern boundary is contiguous with the western edge of Peterculter as defined in the current 2017 LDP and allocated development site OP51.





- 2.4 ***'The proposer indicated the site could have a number of specialist residential use and zones. Zone one would comprise a supported care facility specializing in living accommodation for people with dementia. Zone two would comprise bungalows for the elderly, and zone three would provide accommodation for low paid workers, and people escaping from domestic abuse.'***

We agree with this summary of the development proposal.

- 2.5 ***'Development on this site would (without mitigation measures) impact on the surrounding landscape, and any development would only be partially related to the main settlement of Peterculter and is remote from the village centre. The Culter Burn runs to the west and south of the site and part of the southern area the site is identified as at risk from flooding. The Culter Burn to the south is part of the River Dee and Culter Burn SAC and is an LNCS. Specialist needs housing (like any other housing) should be closer to services, facilities and public transport rather than in this relatively remote and isolated location.'***

Three main concerns are raised by Officers here – Landscape impact, lack of connectivity to the urban area of Peterculter and environmental impacts of the development.

Concerns regarding landscape impact are overstated in that the site sits low in the wider landscape setting, below the urban area of Peterculter when viewed from the open viewpoint of the A93 western approach. More visible in the landscape are the existing football pitches and allocated site OP51.

The relationship between the Blaircara village and Peterculter is secondary to the facilities and services available to residents on site. Even so, existing public bus services are located 400m away on Malcolm Road. One of the key factors behind the assisted living Garden Village is the peaceful location with easy access to a settled, rural environment. We do not agree that specialist housing as proposed requires to be closer to services.

In terms of the Culter Burn and the LNCS, no development is proposed adjacent to this. Allotments, woodland walks and additional riparian planting is proposed in this area, ensuring no adverse impact on the Burn from development or from development on the Burn.



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### 3. Conclusion

- 3.1. We do not consider that the Assisted Living Village concept proposed has been fully appreciated by the bid assessors and the bid has been assessed as if it was for a traditional residential development. Appendix 1 below analyses the proposal against the MIR assessment criteria correcting a number of points and provides a revised score of 59 out of 63.
- 3.2. The main objection presented in the assessor's report environmental impacts and connectivity to Peterculter and its services. We believe that the 6.2ha land subject of the B0922 bid is the right location for this, striking the right balance between a relatively secluded, rural location with a strong relationship with the natural environment to benefit the health of residents. The site is however within safe walking distance of Peterculter with its services and facilities and bus services to the wider area.
- 3.3. The proposed development does not threaten the function of the Green Belt and we do not consider Green Belt a justifiable reason not to allocate the site.
- 3.4. We would request that the land put forward as bid site B0922, Blaircara Village is included in the Proposed LDP as land for an assisted living village.



**Appendix 1: Development Options Assessment Report**

**Development Options Assessment Report on the Pre-Main Issues Submissions 2018 (Appendix 3 to the Main Issues Report)**

Criteria	Officers Score	Justification	Proposed Score	Justification
Exposure	2	Some shelter is provided due to topography. There are trees located along the eastern boundary and part of the southern boundary.	2	Agreed, the site creates a good environment for the development proposed with scope for solar gain.
Aspect	3	The site is for the most part on a south facing slope.	3	Agreed, the site creates a good environment for the development proposed with scope for solar gain.
Slope	2	The site rises from 35-40 AOD. At its steepest the gradient is roughly 1 in 8 however the majority of the site is roughly 1 in 20.	3	Agreed, but suggest higher score.
Flood Risk	2	The Culter Burn forms the south and west edge of the site. The SEPA flood maps indicate there is a high likelihood of river flooding from the Culter Burn, and the southern part of the site is affected by flooding. Surface water flooding is also present in the middle of the site and to the north east. The indicative site layout indicates the areas affected by fluvial flooding will accommodate footpaths, planting and dispersed allotments. A flooding incident at Linn Moor Road to the west of the site is also noted (surface run off).	3	Site layout arrangement and development will be designed to avoid any flood risk.
Drainage	3	There appear to be no drainage issues on the site.	3	Agree.
Built/Cultural Elements	3	There is no expected loss or disturbance of built and natural elements. Waulkmill	3	Agree.



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		Bridge (a Category B listed building) is noted to the west of the site, crossing the Culter Burn		
Natural Conservation	1	There is some loss or disturbance of wildlife habitat or species. The Culter Burn LNCS lies to the south and west of the site. A Tree Preservation Order (ref 80) lies to the south east. The River Dee and Culter Burn SAC runs along the west and southern edges of the site. The site is all within the greenspace network. Protected Species may be an issue. Site associated with bat habitat/ activity.	3	We consider the Officers scoring is not justified. There will be no loss of or disturbance to natural conservation. The site will not impact on the River Dee SAC. Natural habitats will be retained and enhanced by the development proposal.
Landscape Features	2	There would be some potential loss or disturbance to landscape features. There are trees located along the Culter Burn, and to the east of the site. There are stone walls along the boundary.	3	We consider the Officers scoring is not justified. There will be no loss of or disturbance to landscape features due to the low density design and retention of existing features.
Landscape Fit	2	Development will intrude into the surrounding landscape. The development will be very visible from the A93 from where it will appear prominent and disjointed from Peterculter.	3	We do not consider that the proposed development would intrude significantly into the landscape.  The site benefits from existing boundary features and sits at a lower level than surrounding land. It is adjacent to allocated site OP51 and the Culter Burn and backdrop of Peterculter provides a landscape with capacity to accommodate the development.
Relationship to existing settlement	2	The site is located to the west of Peterculter, and to the west of the allocated site OP51 Peterculter Burn.	3	The site has contiguous boundaries with the Peterculter settlement. It is connected enough for the



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		Development would only be partially related to the existing settlement of Peterculter and is remote from the centre.		character of the use proposed.
Land Use Mix / Balance / Service Thresholds	2	<p>The proposer outlines a number of potential specialist residential provision on the site including assistance living for the elderly and those with dementia, with affordable housing for people working on the healthcare sector, and people escaping from domestic abuse. The mix of specialist residential within a predominantly residential area will not increase land use mix.</p> <p>The proposer also indicated there will be community facilities and small-scale retail to support the village.</p>	2	Land use mix is appropriate.
Accessibility	2	Direct access to the rail or bus network would be within 800 metres away (on Malcolm Road)	3	Bus stop accessible in 400m.
Proximity to facilities / shopping / health / recreation	1	There are no available facilities within 800 metres of the site	2	The proposed development will provide facilities on site and is also accessible to Peterculter.
Direct footpath / cycle connection to community and recreation facilities and resources	2	There is a limited range of available footpath / cycle path connections to community, recreation and employment facilities. Core Path 52 lies adjacent to the northern boundary of the site.	3	Facilities will be provided on site. Core Path 52 is advantageous in linking to Peterculter.
Proximity of employment opportunities	1	There are no significant employment opportunities within 1.6 kilometres of the site.	2	The development will provide development opportunities.
Contamination	2	West Craigton Quarry site	3	Former quarry is historic



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		located within the site to the east. Waulkmill is located to the northern west boundary of the site.		and not located within B0922 site, it is adjacent to OP51. Waulkmill is a house so unsure of relevance.
Land Use Conflict	3	There would be no expected conflict with any adjoining land uses.	3	Agreed.
Physical Infrastructural Capacity	3	The proposer indicated the site has connections to utilities.	3	Agreed.
Physical Infrastructure Future	3	The proposer indicated the development will have access to high speed broadband. Low and Zero Carbon generating technologies will be completed through design layout.	3	Agreed.
Service Infrastructure Capacity	2	The site lies within the area zoned for Culter Primary and Cults Academy. Culter Primary School has capacity; however, Cults Academy will be over capacity by 2021. School capacity will only be relevant to a small proportion of the site.	3	Limited pupils generated by development.
Other Constraints	3	Oil and Gas Notification Zone noted to the west.	3	Does not apply to site so not relevant to development.
	<b>46</b>		<b>59</b>	