

From: Neil Strachan [REDACTED]
Sent: 13 May 2019 16:29
To: LDP
Subject: B0103 - Bleachfield House
Attachments: B0103 Consultation Response.docx

Please find attached response to MIR site reference B0103 - Bleachfield House.

Regards

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B01/03 - Bleachfield House

Bid for modest mixed-use development on brownfield site.

The bid assessment gives this bid a checklist score of 57 but makes a recommendation of “undesirable”. We do not agree with this recommendation.

Many other bid sites with the same or lower scores have been given recommendations of “possible” or “desirable”. We think that given the positive comments made in the justification comments, this site should have been given a “desirable” or, at the very least, a “possible” recommendation. We would request a reassessment of the bid and consideration of the following points.

A maximum score of 3 is given under the majority (16 out of a total of 21) of assessment criteria, with the site also scoring well under the remainder of the criteria, for all of which the site is given a score of 2. For no criteria is the site marked down with a score of 1. In this regards, the officers’ assessment does not support the conclusion that the site is ‘undesirable’, but rather supports the allocation as proposed by our client.

In awarding the site a score of 2 or 3 against all criteria, numerous positive comments are made regarding the proposed allocation, including that:

- The site is well sheltered, with a good south and west facing aspect, and is both flat and freely draining
- Converting or replacing the building to small scale retail, office and cultural uses would benefit the area
- The site is well-related to the Grandholm development
- Proposed mixed uses would contribute to the existing uses in the area, in particular the proposed cultural use
- Residents would have good access to a range of facilities and employment opportunities, including direct footpath and cycle links
- No present or future infrastructure capacity concerns are identified, nor are there any built or cultural heritage features, contamination or land use conflict issues that would constrain development
- The proposed development would be unobtrusive to the surrounding landscape
- The closest bus stop is around 380m away on Gordon Mill’s Road

Under the heading ‘other constraints’, the assessment refers to the fact that the site is part of the Green Space Network and the Greenbelt, with part of the site being a playing field. These matters have however already been addressed under the criteria of ‘natural conservation’ and ‘landscape fit’. As such, to mark the site down in respect of these designations under this heading represents double counting and, in the absence of any other constraints being identified, the site should again receive a score of 3 against this criteria.

The assessment does however raise some concerns with regards to flood risk, natural conservation, landscape features and fit and accessibility. Each of these are addressed in turn below.

Flood Risk

All of the site is within the 1:1000 river flood risk category. SEPA class this as:

A Low likelihood: A flood is likely to occur in the defined area on average once in every thousand years (1:1000). Or a 0.1% chance of happening in any one year.

The justification comments note that the site is in close proximity to the river. We recognise this but, due to the low flood risk, there will be a straightforward technical and design solution to mitigate any residual concerns. At the same time, it should also be recognised that until very recently, there was existing built development on the site in the form of Bleachfield House, and neither SEPA nor the Council’s own flood team objected to the planning applications that were made for the proposed extension of this in 2015 and 2016.

Natural Conservation

The justification comments note:

- The River Don Local Nature Conservation Site runs along the south and west of the site
- Ancient woodland is present within the site which would need to be preserved

- Site is part of the Green Space Network
- NESBReC data shows Japanese knotweed is present around the site and the presence of Double Dart, Black-Headed Gull and Herring Gull on site

We accept all these points but this is a large site which can easily accommodate the extremely modest development proposed. At the same time, development will facilitate the control of Japanese knotweed, with the proposed allocation allowing for improvements to this historically developed brownfield site in environmental, landscape and public amenity terms, while other features referred to will act as positive design constraints to be respected and which will all add to the sense of place which this development will provide. None of them are of such a nature that would prevent development.

Landscape Features

The justification comments note:

- Big mature trees surround the site, which overlooks the River Don
- Area is part of the River Don Valley, as per the Aberdeen Landscape Character Assessment (LCA). Development would need to stay a reasonable distance from the existing mature trees
- Site is also classed as Prime Landscape in the LCA

Similar to the heading above, we accept all these points and again would point out that these are all positive features which make this such a good brownfield site for the type and scale of development proposed.

Landscape Fit

The justification comments note that the site is zoned as Greenbelt in the 2017 ALDP and, although stating that the proposed development would be unobtrusive in the landscape, it indicates that the site should be retained as greenbelt in order to maintain the separation of Danestone from Aberdeen. Again though, this ignores the fact that this is a brownfield site on which there is already built development, such that the contribution to the separation of Danestone from Aberdeen is minimal. At the same time, given the officers' own assessment that development here would be unobtrusive in the landscape, it is not clear how this would have any effect on the separation between Danestone and Aberdeen. As such, it is submitted that the site should be assessed positively in terms of landscape fit.

Accessibility

The justification comments note that there is public transport available in reasonable proximity to the site, with the closest bus stop being within the Council's own guidance of having access to public transport within 400m. As highlighted in our client's original bid, the site is also of course extremely well connected to footpath and cycle routes.

The opening statement, in the bid appraisal comments, correctly notes that access in and out of the site would be particularly difficult as it is through a narrow road, and expresses the view that this would be a particular issue in the case of housing.

We recognise that there are access limitations but consider that a technical solution would be achievable by working with Council road's officials and planners to find the right balance of development in relation to the existing access road.

Conclusion

For the reasons given above, it is submitted that the officers' assessment of the site as 'undesirable' is not justified and the proposed allocation should be supported.

The site owner is very keen to work closely with the local community and other stakeholders to find an acceptable scale of development and mix of uses and would be willing to explore other ideas which would achieve a viable future use for this historic site.