



# 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)	MR S KEENON
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 B0911 Land at Culter House Road.



**HALLIDAY FRASER MUNRO**

CHARTERED ARCHITECTS & PLANNING CONSULTANTS

**ABERDEEN CITY LOCAL DEVELOPMENT PLAN**

**RESPONSE TO MAIN ISSUES REPORT**

**SITE B0911 – Land at Culter House Road**

MAY 2019

On behalf of S Keenon



HALLIDAY FRASER MUNRO

CHARTERED ARCHITECTS & PLANNING CONSULTANTS



**HALLIDAY FRASER MUNRO**  
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## 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 Mr S. Keenon. It is written in response to the Aberdeen City Local Development Plan Main Issues Report 2019 (MIR).
- 1.2. Bid B0911 presented a proposal for the development of circa 100 affordable residential units and Garden Centre. The residential units were to be a mix of 2 and 3 bedroom semi-detached/terraced houses and 2 bed flats. Since the bid was submitted, cognisance has been taken of the Officers' comments resulting in the residential element of the proposed development being removed, resulting in the proposal now being for a garden centre development only.
- 1.3. Given its location directly adjacent to the AWPR's Milltimber Junction and benefiting from direct access onto the western slip road, the site is ideally located to accommodate a commercial garden centre development.
- 1.4. The site is deliverable and the landowner is fully in support of the proposal.

### 2. MIR Bid Assessment Strategy

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

*'B0911 Land at Culter House Road*

*The site is considered to be undesirable for development. Development on this site would significantly impact on the surrounding landscape, and any development would not be related to the closest settlement of Peterculter. The site would form an isolated 'island' of development which is detached from the rest of Culter. It is part of an area which serves to maintain the separate identities of Milltimber and Peterculter. This Green Belt function will become even more important with the development of the AWPR. Whilst the site is well sheltered, relatively flat and with a favourable aspect, its relationship with nearby settlements is poor both in terms of proximity and connectivity, particularly in respect of sustainable means of transport such as walking, cycling and public transport'.*

- 2.2. The Officers' view and associated issues can be broken down and will be examined in more detail below, however it is worthy of note that since the bid was submitted the proposal has been amended and the residential element has been removed. We consider that this addresses the negative points raised by Officers in the MIR regarding lack of connectivity to Peterculter or Milltimber.
- 2.3. The proposed development is now for a garden centre only and we would request that the land be zoned for commercial use from its current Green Belt / Green Space Network status to allow this to happen.



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- 2.4. The removal of the residential element of the development has significantly altered the proposal and we consider that removing this element also removes the Officers' identified site constraints of Green Space Network (GSN), Green Belt, relationship to existing settlements, accessibility and lack of nearby facilities.
- 2.5. Reassessment of the bid using the Officers' scoring criteria has resulted in a new score of 60 out of 63.
- 2.6. ***'Development on this site would significantly impact on the surrounding landscape, and any development would not be related to the closest settlement of Peterculter'***

We consider that the reduced scale of the proposal will have minimal impact on the surrounding landscape. The Garden Centre will be sited in the eastern of the site adjacent to the B979 and fronting onto Culter House Road. The mature tree belt to the west provides screening for the development.

The nature of the offering at Garden Centres means the majority of people travel to them by car. The location of the site adjacent to the strategic transport routes is therefore ideal for a Garden Centre.

The Garden Centre is easily accessed from the AWPR slip roads and is therefore ideally placed for passing traffic and can be reached easily from the north and south. The site also links to the A93 giving access to the settlements along this road including Peterculter, Milltimber, Bielside and Cults providing access to a wide market.

- 2.7. ***'The site would form an isolated 'island' of development which is detached from the rest of Culter'***

This comment was relevant when the proposal included residential uses but with these removed and the proposal for a garden centre only the view that the development is detached from the rest of Culter is not problematic. Garden centres are generally located outwith or on the edge of settlements. That is what is proposed here and we consider it an entirely appropriate location. The site relates well to Kippie Lodge and its associated golf course.

- 2.8. ***'It is part of an area which serves to maintain the separate identities of Milltimber and Peterculter. This Green Belt function will become even more important with the development of the AWPR'***

We agree that this comment may have been valid when the development proposed included residential accommodation, but we do not consider that the development of a Garden Centre would jeopardise the separate identities of Milltimber and Peterculter.

The AWPR marks a clear boundary between the two settlements. The reference to the Green Belt refers to the current zoning of the site in the 2017 Local Development Plan. From a Green





Belt perspective the development of a garden centre would not harm the function of the Green Belt.

- 2.9. *'Whilst the site is well sheltered, relatively flat and with a favourable aspect, its relationship with nearby settlements 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'*

We agree that the site is well sheltered with a favourable aspect and consider this to be ideal for a Garden Centre.

Garden centres sell goods that need to be transported by car, we therefore do not consider that sustainable means of transport are of great importance with regards to this development given that the residential element of the proposed development has been removed. However, we would still highlight that aspirational Core Path 4 will link the site to Milltimber and Peterculter as shown in Figure 1 and this will create an attractive active travel route to the garden centre, coffee shop and leisure walks.

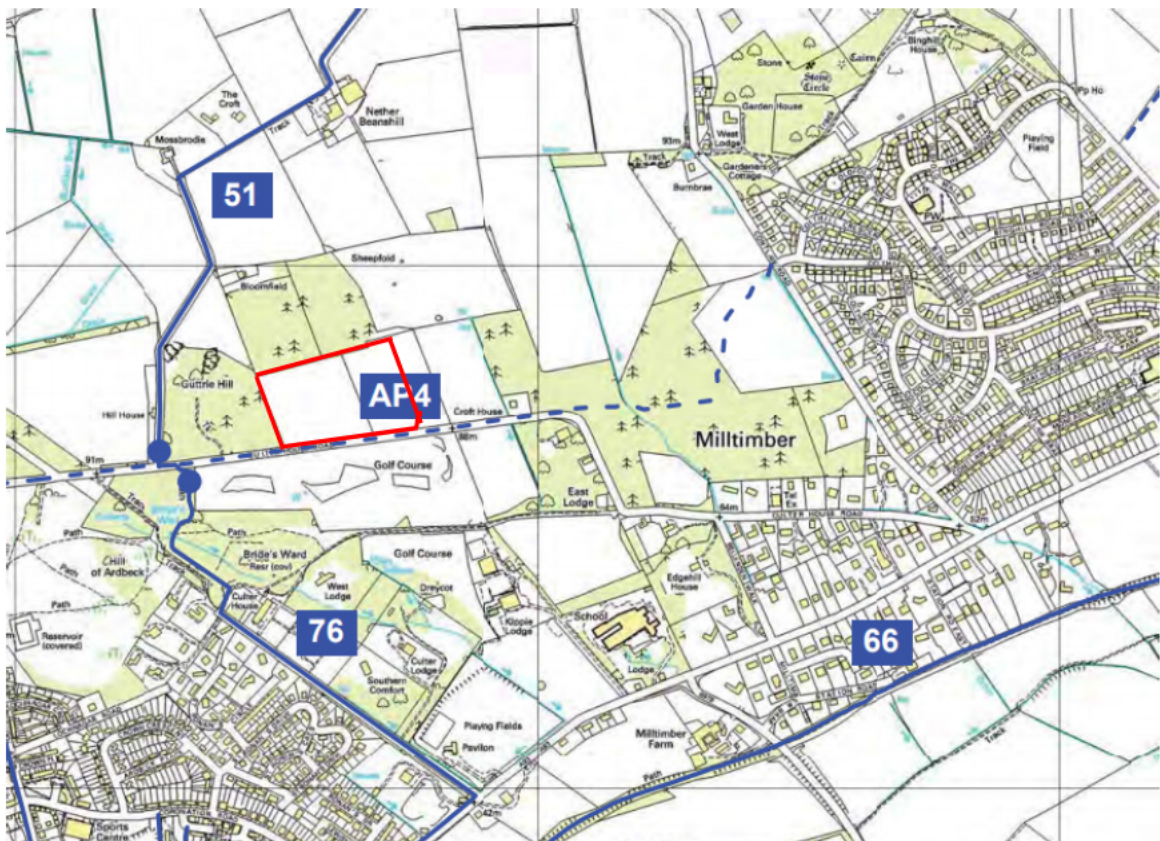


Figure 1: Site outlined in red with Aspirational Core Path 4 shown.

- 2.10. We consider that this site is entirely suitable for development of a garden centre given its strategic location in the Dee Valley. The site is well situated to take advantage of the AWPR Milltimber junction making the site easily accessible from the north and south and its proximity



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to the A93 provides good east to west access. From a commercial perspective visibility of the site is a positive aspect.

### **3. Conclusion**

- 3.1. The comments raised by Officers who assessed bid B0911 have been taken into consideration and this response presents an amended proposal for a garden centre only. We consider that this site close to the AWPR Milltimber junction and the A93 is an excellent location for a garden centre that would serve and benefit the wider Lower Deeside area.
- 3.2. The proposal does not harm the function of the Green Belt or the Green Space Network therefore rezoning this site would not undermine the aim of the Green Belt and Green Space Network policies. The majority of sites are zoned as Green Belt until they are allocated for development, we therefore do not consider Green Belt a justifiable constraint to development.
- 3.3. We would request that the land put forward as bid site B0911, Land at Culter House Road is included in the Proposed LDP as land for a commercial garden centre development.



**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	3	Site is currently an area of agricultural/grazing land. Guttrie wood is located west, and the AWPR is located east. Golf course to the south. There is some shelter from northerly winds, the site sitting on the lee side of the hill. There is a sparse tree belt along the northern edge of the site.	3	Agree with justification.
Aspect	3	The site is south-east facing.	3	Agree with justification.
Slope	2	Approximately 1 in 12 slope; very little undulations.	3	We do not consider the gentle slope is a constraint to development.
Flood Risk	3	According to the SEPA indicative flood map, the site is not at risk of flooding. There are no recorded flooding incidents on the site and no small watercourses are present.	3	Agree with justification.
Drainage	3	Site appears to be well drained.	3	Agree with justification.
Built/Cultural Elements	3	No built or cultural elements present on the site. Culter House (a Category A listed building) is located c.400m to the south-east.	3	Agree with justification.
Natural Conservation	2	No natural conservation designation covers the site, however, it is located to the west of and bordered by Guttrie Hill (Ancient and Semi-Natural Woodland), forming part of the Peterculter Local Nature Conservation Site (no.54). It is also designated as Green Belt and Green Space Network. The site is identified	3	The proposed garden centre will be sited in the eastern corner of the site 180m from Guttrie Hill and the Peterculter Local Nature Conservation Site. Therefore, we do not consider that these sites will be negatively impacted by the proposed garden centre.



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		as an area of potential bat habitat (wooded features) and there are records of Brown Pipistrelle bats adjacent to the site. Eurasian Red Squirrel ( <i>Sciurus Vulgaris</i> ), a designated species on the UK BAP list of Priority Species, have been spotted just outwith the site boundary.		
Landscape Features	2	The site is currently open agricultural land and as such there are limited landscape features on the site itself; it is bounded by a low drystone wall with the Guttrie Hill woods to the west and a sparse tree belt along the northern boundary. It is likely there will be only limited loss of features.	3	We consider that as the assessment states there will be only limited loss of features the scoring is not justified. We also consider that as the residential element has been removed from the proposal and a much smaller area of the site is to be developed there will be almost no loss of features.
Landscape Fit	1	Lower Deeside Landscape Character Area (wooded farmland). Development at this location would be highly visible from surrounding areas, particularly from the AWPR and would intrude significantly into the landscape at this point.	3	We do not consider that the proposed development would intrude significantly into the landscape. The garden centre will be sensitively designed to ensure that any landscape impact will be minimal. Degree of visibility and prominence is advantageous for a commercial development, especially one of this nature which will benefit from capturing passing trade. We don't consider that being visible from surrounding areas and the AWPR would be a disadvantage to anyone. Visibility is beneficial to a commercial development of this nature.



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Relationship to existing settlement	1	The site is completely unrelated to existing settlements and would form an isolated 'island' of development which is detached from the rest of Culter. It is part of an area which serves to maintain the separate identities of Milltimber and Peterculter. The Green Belt function will become even more important with the development of the AWPR. It is acknowledged that the development would be accessible from the AWPR junction, however, this does not alter the isolated and unrelated nature of this development.	3	<p>New development will provide enhanced access opportunities into the wider countryside area and GSN.</p> <p>The development would not harm the separate identities of Milltimber and Peterculter. The AWPR is a significant buffer between the two settlements.</p> <p>The development would benefit from its proximity to the AWPR, A93, Milltimber and Peterculter. We consider that it is ideally located to take advantage of its proximity to all 4 and is not isolated.</p>
Land Use Mix / Balance / Service Thresholds	3	Large scale residential and employment use proposed, no similar development in close proximity. The planned garden centre would improve the mix of land uses in the area however this is negated by the sites isolated and inaccessible location, heavily reliant on vehicular movements facilitated by the AWPR.	3	We agree with this justification with regard to the garden centre. The removal of the residential proposal means that accessibility to the site via public and active travel is not of great relevance. Proximity to the AWPR is a great advantage for the garden centre.
Accessibility	2	Nearest bus stop c.770m from the site (adjacent to A93 entrance to Kippie Lodge).	3	Do not consider distance to a bus stop for a Garden Centre development of great importance as the majority of goods purchased in a Garden Centre require to be transported by car/van. It is possible to walk to the site from Peterculter via informal path networks and Aspirational Core Path 4.



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Proximity to facilities / shopping / health / recreation	1	There are a limited range of available facilities within 800m of the site. Kippie Lodge Sports and Country Club is located immediately adjacent to the site, however Peterculter neighbourhood centre is located c.1.2km from the site, with the nearest medical facility over 800m. Culter Primary and Cults Academy are located over 800m from the site.	3	No longer of relevance as proposal is now for a garden centre only.
Direct footpath / cycle connection to community and recreation facilities and resources	1	Culter House Road is a narrow country road with no pedestrian footpath; its use for access to Culter would be dangerous for both pedestrians and cyclists. There are no designated cycle routes serving the site. Core Path 76 connects Culter House Road with A93, however, its closest point is some 350m to the west of the site.	2	Aspirational Core Path 4 will improve direct footpath and cycle connections to the site. Informal path network provide walking routes to the site from Peterculter.
Proximity of employment opportunities	2	There are limited employment opportunities within 1.6km of the site within Culter itself. Prime 4 and Arnhall Business Park are located c.5km from the site. Thjs proposal would involve the creation of some employment and ancillary uses, but the positive impact of this is negated by its inaccessibility to surrounding settlements.	3	No longer of relevance as proposal is now for a garden centre only.
Contamination	3	No contamination constraints identified.	3	Agree with justification.
Land Use Conflict	2	Development will result in some land use conflicts. The western site boundary abuts the western edge of the AWPR carriageway and slip roads. Potential for noise and/or air	3	As residential use has been removed from the proposal we do not consider there to be any land use conflicts.





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		quality conflicts with residential uses.		
Physical Infrastructural Capacity	2	Unknown whether the site is currently connected to physical infrastructure networks. The small scale of the development is unlikely to place significant pressure on local capacity.	3	Agree that the small scale of development, reduced further with removal of residential use, will not place significant pressure on local capacity.
Physical Infrastructure Future	2	Some constraint to future infrastructural capacity. Proposer states that the site has access to high speed broadband.	2	Agree with justification.
Service Infrastructure Capacity	2	Culter Primary School – 2019 80%, 2020 78%, 2021 76%, 2022 76% Cults Academy – 2019 95%, 2020 97%, 2021 102%, 2022 104% The site would be zoned to Culter Primary and Cults Academy. There is adequate capacity in Culter Primary, however Cults Academy is forecasted to exceed capacity in 2021.	2	No longer of relevance as proposal is now for a garden centre only.
Other Constraints	3	No known other constraints.	3	
	<b>46</b>		<b>60</b>	