

From: John Normanton [REDACTED]
Sent: 13 May 2019 17:28
To: [REDACTED] LDP
Cc: John Normanton
Subject: Objection to proposed allocation ALDP2018-B09-42-Milltimber South

For the attention of Aberdeen Local Plan Section

Objection to proposed allocation.

ALDP2018-B09-42-Milltimber South

Land adjacent to A93, Opposite Contlaw Brae Milltimber

Objection to proposed allocation.

This land is already allocated under policy OP114 for 60 houses and 1225 sq metres of commercial/retail space on approximately 11.5Ha of land including land not controlled by Bancon.

The proposed allocation is on solely the land controlled by option agreement by Bancon. This land area is approximately 17% smaller, and extends to approximately 9.5Ha. Overall this reduced land area cannot support as much development as the existing allocation.

The proposed allocation removes the 1225 sq metres of commercial/retail space and proposes 90 houses.

We welcome the removal of the commercial/retail space which was never appropriate for this location.

Even if development was ultimately able to go ahead we are concerned that the housing numbers are proposed to be increased so much.

Bancon have stated at public consultations that there will be 60 houses. Bancon have not told anyone that they are now proposing 90 houses, and on a smaller site.

The land area has been substantially reduced as stated above, by as much as 2 Hectares.

The proposed allocation should retain the same density as current approved allocation.

We have calculated that this means there should be 58 houses allocated on the reduced land area and no other uses. This number of houses is arrived at by reference to the 60 houses in the current allocation, an allowance of ten houses instead of the 1225 sq metres of commercial/retail space and then a pro rata 17 percent reduction in housing numbers to be developed on the smaller land area.

The proposal for allocation which is now to be considered by the Council is not sustainable. It would lead to a worse amenity for the occupiers .

The pre-app 170620/PAN notes the requirement for a Drainage Impact Assessment (DIA) before any planning application is determined. This land is in a very sensitive area within the immediate

catchment of the River Dee. The DIA must take special account of this. The greatly increased rates of run-off from buildings, roads and other impermeable structures and surfaces compares poorly with the ability of pasture to absorb and retain heavy downpours of rain.

Likewise a Flood Risk Assessment (FRA) is called for by the pre-app prior to planning determination. This FRA should be carried out with great care due to the complex nature of the local drainage systems and the risk of increased flooding both locally and further downstream the River. The effects of Climate Change with increased severity and frequency of major weather events must be taken into account.

Planning Advice Number 2 /2015 River Dee Special Area of Conservation states that: "The River Dee and its tributaries have been designated as a Special Area of Conservation (SAC) as they provide a valuable habitat for important populations of freshwater pearl mussel, Atlantic salmon and otter. SAC's form part of a network of internationally important sites for nature conservation, known as Natura 2000 sites. This leaflet provides guidance on how developments that may affect this site will be assessed."

And also:

"The Planning Authority has to consider whether a proposal is likely to have a significant effect on the Natura site either individually, or in combination with other plans and projects. Not only does this apply to works requiring planning permission, it also applies to works which could otherwise be carried out as permitted development in terms of the General Permitted Development Order. A prior notification application will be required."

If Permitted Development Rights are so tightly controlled for any deleterious effect on the River Dee SAC, is it right that this land should be allocated for a Major Development for 90 houses, or indeed at all.

This is a bad site for an allocation for a Major Development when the effects on the River Dee SAC are unknown and may be so serious that the land cannot be granted planning permission, thus failing to deliver on housing numbers.

Coupled with the other points noted above we submit that this site should not be allocated.

Special reference : Planning Advice Number 2 /2015 River Dee Special Area of Conservation.

This objection is made by John Normanton, Land Consultant, as agent for Steven Keenon [REDACTED]

Address and contact details for Agent:

John Normanton Land Consultant, [REDACTED]
[REDACTED]
[REDACTED]

John Normanton
[REDACTED]