



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/aldp2022

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; 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	Steve Crawford
Organisation (if relevant)	Halliday Fraser Munro
On behalf of (if relevant)	Mrs S Buyers
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 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

Which document(s) are you commenting on?	<ul style="list-style-type: none">• Main Issues Report• Strategic Environmental Assessment Environmental Report• Monitoring Statement	<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 see attached a response to the Local Development Plan Main Issues Report for Binghill House on behalf of Mrs S Buyers.

Please also find enclosed the following in support of the response:

- Indicative Layout
- Site analysis/concept diagram



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CHARTERED ARCHITECTS & PLANNING CONSULTANTS

**ABERDEEN CITY LOCAL DEVELOPMENT PLAN
RESPONSE TO MAIN ISSUES REPORT**

BINGHILL HOUSE, MILLTIMBER

May 2019

On behalf of
Mrs S Buyers



HALLIDAY FRASER MUNRO

CHARTERED ARCHITECTS & PLANNING CONSULTANTS



HALLIDAY FRASER MUNRO

CHARTERED ARCHITECTS & PLANNING CONSULTANTS

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1. Introduction

This Bid has been prepared on behalf of Mrs S Buyers by Halliday Fraser Munro Architects and Planning Consultants. We consider that Bingham House and its grounds are suitable for future development, are free from constraints and are viable and deliverable.

The proposals presented in this document have developed following a review of the site and planning context, an analysis of the opportunities and constraints of the site and the integration of new purpose-built retirement living as an appropriate extension of Milltimber. This is a response to the Main Issues Report (MIR) but also a bid to change the Proposed Local Plan zoning and have this site allocated. The LDP team has confirmed that new bids can be lodged at this stage.

2. The Site - Bingham House

The site sits immediately to the north of the settlement of Milltimber and contains the Category C listed building Bingham House and its grounds. Bingham House overlooks the village of Milltimber and dates back to 1840. It is a large Category C listed house set within its own well-defined grounds located adjacent to the edge of the Aberdeen suburb of Milltimber. The grounds are extensive and include dense woodland to the north helping to provide amenity, screening, defined enclosure and privacy. This mixture of open spaces and enclosure creates distinct opportunities for development, particularly suited to a bespoke active retirement village where a variety of accommodation can be provided across the site. This could include standalone housing, clusters of cottage style development, and flatted development as an extension to the existing house.

Bingham House has planning permission for a large modern extension to the rear and includes a number of garages, stables and other associated buildings across the site.



Figure 1 – Site Photos – Bingham House and Bothy

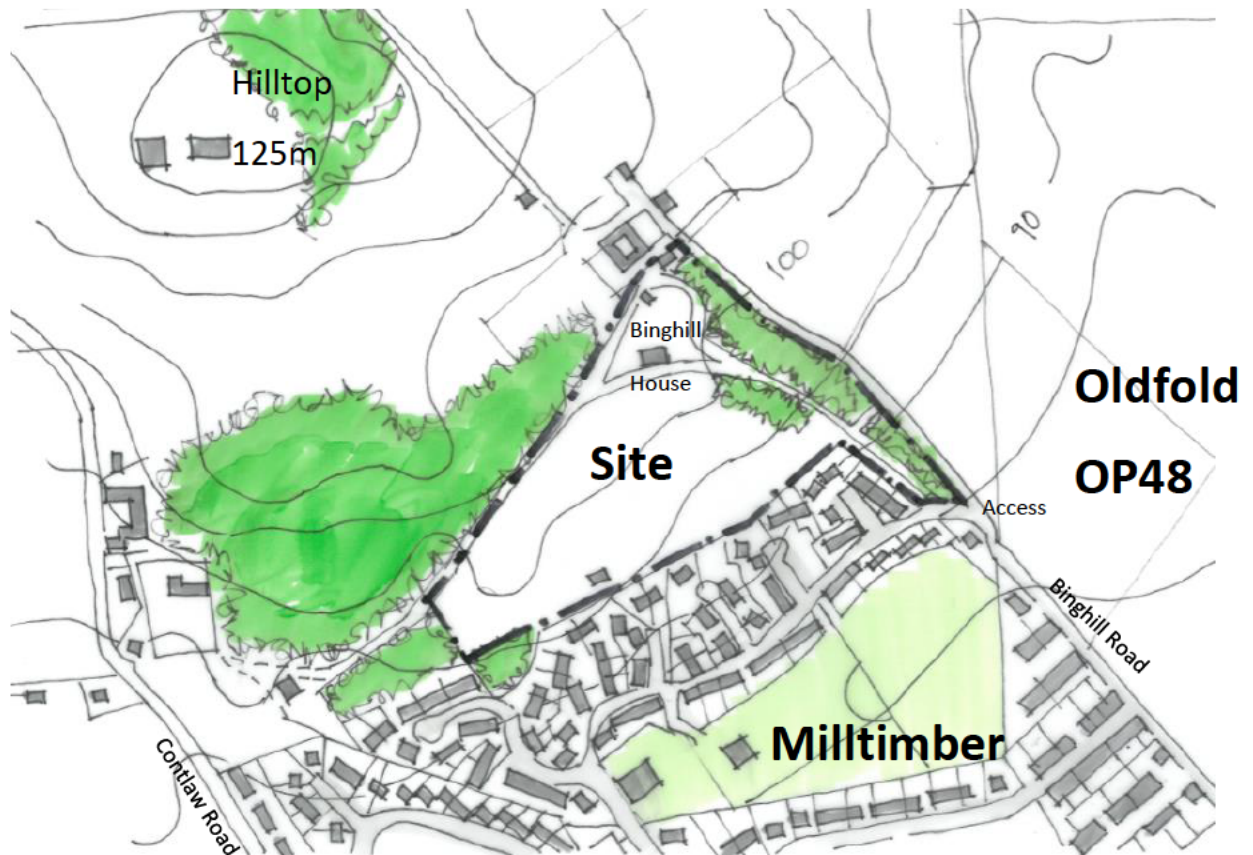


Figure 2 – Location Plan

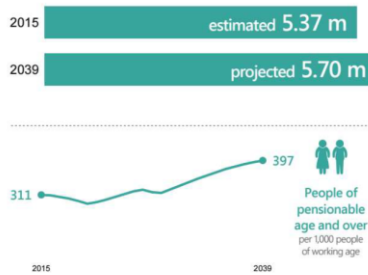
3. Bid/MIR Proposal

This bid/MIR response promotes a high-quality active retirement community consisting of individual properties in a parkland setting and the conversion and extension of Binghill House to provide both independent and supported accommodation. The proposed development aims to provide independent living in private residential properties and supported living with associated community resources in Binghill House. Elements of the proposed use could be open to the public, specifically a small local shop and café/tearoom.

The proposal would allow downsizing without compromising on location or quality of life. Retirement living should not be significantly different to any other well-designed residential accommodation. It should be welcoming, encourage social interaction and support a strong sense of community. The development at Binghill House is intended to deliver these characteristics, adding diversity to Milltimber's housing mix to allow residents the choice to remain in their community into their later years.



Scotland's population is projected to rise and to age



Scotland's population is also projected to age. The number of people of pensionable age and over per 1,000 people of working age is projected to increase from 311 in 2015 to 397 in 2039.

People are increasingly living alone or in smaller households. This is partly because Scotland's population is ageing, as older people are more likely to live alone or in smaller households.

Most of the growth is among older age groups

Number of households by age of the head of household

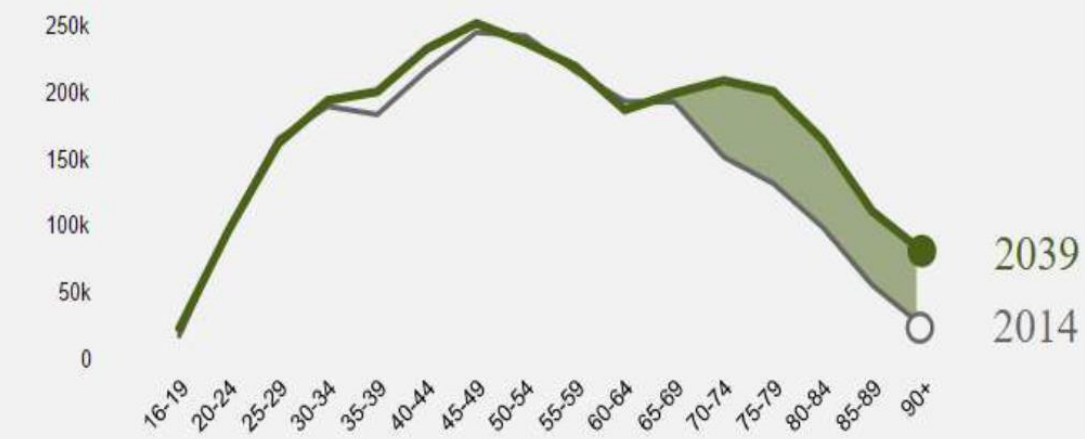


Figure 3 – Projected Population Source: National Records of Scotland

Scotland's population is ageing, increasing the demand for smaller homes more suitable for older generations. The National Records of Scotland (see infographics in Figure 3) has projected:

- People of a pensionable age per 1,000 people of working age will increase by 28% by 2039;
- People are increasingly living in smaller households;
- Household demand is therefore increasing;
- The majority of that growth is in the older age groups; and
- Older people are more likely to live alone.

The Scottish Government recognise this and have adopted a strategy for housing Scotland's Older People, *Age, Home and Community: A Strategy for Housing for Scotland's Older People: 2012 – 2021*. That strategy sets out the need for a range of new models of housing to increase choice and support independent living for older people. To do this the development of new and innovative models of housing that enable older people to maintain their independence in the community should be encouraged.



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Retirement age specific developments can provide an option for older people who wish to live in a community setting with support and care on site, or simply to have an option of a smaller home and like-minded people around them. They can offer independence and flexibility whether someone is completely self-sufficient or in need of some support. These types of development can also offer a wide range of facilities and various care options increasing choice when it comes to lifestyle, interaction and level of care.

Binghill House and grounds offer an opportunity to create an attractive retirement community to complement the existing community of Milltimber. The site analysis diagram in Figure 4 demonstrates the development concept and Figure 5 is an indicative development diagram indicating how the site can be developed. The grounds lend themselves to smaller cottage style accommodation and the main house to closer-care or supported flatted accommodation. The remainder of the grounds can provide communal landscaped parkland and recreational opportunities with strong links to an extensive network of paths and woodland areas. The development is also anticipated to include certain elements accessible to the public. Initially a small corner shop and café/tearoom are anticipated. These will serve the retirement community and neighbouring housing areas.

The character of Binghill House will remain dominant with its south facing frontage, lawn to the south and semi-formal gardens to the east. Development in the grounds will be sensitively designed to retain views from and to the house respecting its character and status. Access will generally be taken from the existing access road.

Milltimber itself is an attractive settlement in the Lower Deeside area to the west of Aberdeen. It is well connected to the city and to Cults, Bielside and Peterculter. Historically growth has been northward to the edges of the Binghill House site. Recent and continuing growth is eastwards (550 mainstream homes with 5Ha of employment land, shops and leisure uses at Oldfold).

This MIR response proposes the allocation of land for a purpose-designed retirement community in the grounds of Binghill House adjacent to the current northern edge of the village.

Bid B0920, on the neighbouring land at Binghill Farm, was submitted at the 'call for sites' stage of the Local Development Plan process. Bid B0920 proposed housing across the whole site. This is still the case, but we are now proposing that it includes flexibility to include the retirement accommodation linked to that proposed in this bid. This is likely to be in the form of bungalows or smaller homes with footpath links to this new proposal. These will offer independent retirement accommodation more akin to mainstream housing but with links to the support to be provided by the Binghill House proposal.

Initial discussions with the local community suggest that the area would benefit from a better mix of smaller housing units and bungalows. Binghill House could therefore provide a more intimate development of smaller cottage style accommodation and supported living flats with associated facilities whereas the neighbouring site could provide housing that supports active independent retirement and a choice of housing to meet local needs.



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Figure 4 – Site Analysis Diagram



Figure 5 – Indicative Development Diagram – indicating how the site could be developed



4. Main Issues Report Response

Section 8, Sustainable Mixed Communities, of the Main Issues Report addresses the changing demographics in Scotland and specifically in Aberdeen. It reports that *“Nationally, the over-65 population is predicted to be one of the fastest growing age groups”*. Scottish Planning Policy (SPP 2014) states that where a demand is identified through Housing Need and Demand Assessment (HNDA), policies should be put in place to meet it through the provision of suitable housing. The Aberdeen City and Shire HNDA (2017) identified that the percentage growth rate in the ‘pensionable age’ group for 2014-2039 is 20%. The growth change for age 75+ is around 65%.

Housing for these sectors of the community has therefore been deemed a Main Issue for the next Aberdeen Local Development Plan and the MIR states *‘It is important that the LDP recognises this change in demography and is proactive to the challenges that will arise’*. We agree. The Proposed Local Development Plan has a 5-year lifespan with the proposals to alter that to a 10-year lifespan. The need and demand for homes to suit an ageing population should be tackled now and sites allocated for this specific use to avoid ad hoc planning over the next 5-10 years.

The MIR recognises that the provision of attractive housing for older people has benefits for the wider population as it will support downsizing and help to free up much needed and presently under occupied family housing. The Binghill House proposal will assist in supporting an ageing population as part of an existing community on a site that is already used for housing. It can provide attractive housing in a variety of styles and sizes. Accommodation will be provided for visiting relatives to support the retirement community. Proposed housing will have a mix of smaller private gardens, public spaces and allotments.

We recognise that a one-size fits all approach to retirement living is not the best solution and that providing choice and variety is more likely to encourage older people to consider downsizing. The MIR states *“Older people want to have good quality housing, good transport links and local facilities”*. The proposed active retirement community at Binghill House can provide these.

The proposed development will fit well within the landscape setting of Milltimber and Binghill House and garden. It is substantially screened by trees and will have no visual impact on the surrounding setting of Milltimber and the wider Dee Valley. Existing woodland forms a distinct landscape feature bordering the site.

4.1 Main Issue 9 – Inclusive Housing Mix (Housing for the Elderly and Accessible Housing) How can the Local Development Plan ensure a greater mix of housing types is achieved in new developments?

Response – the Proposed Local Development Plan should identify retirement-specific allocations to meet the current need for homes for an ageing population. The proposed housing strategy is constrained by relying on larger existing allocated and consented sites for future housing. In most cases the Council can’t require those sites to include a greater mix of house types and therefore can’t deliver the increased mix sought. Allocating retirement-specific sites in or at the edge of existing settlements is therefore an effective way to provide a better housing mix that form part of existing communities, take advantage of existing services and facilities and allow ageing members of those communities to continue to live there.

The Binghill House site should be allocated for a new retirement community, potentially linked operationally to the neighbouring Binghill Farm site (B0920).



4.2 Green Belt

The MIR states that '*Any greenfield housing allocations should be small scale, have limited impacts on the environment and infrastructure*'. The development at Bingham House is of a small-scale (less than 100 units as suggested by the Proposed Strategic Development Plan), will have limited impacts on the environment and can make best use of existing infrastructure.

Green Belt release is necessary in order for the Council to meet their own requirements for new greenfield housing sites of 100 houses or less. All of the City's non-urban area is Green Belt and a re-allocation from that use to housing use is inevitable. That was the case at Oldfold to the south east of this site. Prior to its allocation for housing the Oldfold site was zoned as Green Belt and Green Space Network (GSN) demonstrating that a Green Belt designation need not be treated as an absolute constraint to development.

The LDP review provides an opportunity to rezone land from the green belt where it is appropriate for development. Paragraph 50 of Scottish Planning Policy (SPP) states that in identifying the most sustainable locations for longer-term development, planning authorities should review the boundaries of the greenbelt where necessary. Using zonings in the previous plan to rule out new opportunities in the next plan runs contrary to the LDP review process. Each bid should be fully considered against planning related criteria, including an up-to-date Greenbelt review, and rezoned if considered acceptable.

We therefore suggest that Bingham House should not be constrained by the Green Belt zoning. The site is an existing house and garden ground and should probably not have been designated Green Belt or Green Space Network in the first instance.

Green Belt policy generally sets out to protect land for four main reasons:

- To maintain the **distinct identity** of Aberdeen and the communities within and around the city
- To safeguard the Green Belt to help **avoid coalescence and sprawling** development on the edge of the city;
- To **maintain Aberdeen's landscape** setting; and
- To **provide access to open space**.

Each of these roles is considered below:

- **Identity** – This area of Milltimber has already seen significant change. Development at Bingham Farm would be in keeping with this new identity. It would not harm the community and its identity, rather, we consider that development here can enhance it. Over generations the Donald family have helped to shape the identity of Milltimber by gifting land to the village for a Community Centre and a Church and are committed to protecting and enhancing this Deeside community.
- **Coalescence and Sprawling Development** - The site does not create coalescence or sprawling development. Milltimber has been expanding eastwards with development at Tor-Na-Dee and most recently at Oldfold, both of which have not been considered as coalescence and sprawling development by the Council. This site is small, self-contained and to the north of Milltimber.



- **Landscape Setting** - The landscape setting of Aberdeen is not affected by this proposal. It can't be seen from neighbouring areas and the mature woodland around its edge will hide it from longer-distance views.
- **Access to Open Space** – The site is currently a private house and gardens. The general public do not have formal access to it. Development of the type proposed, however, will allow for public access through the site increasing accessibility to the wider countryside. The new development will provide useable open space and, ultimately development at Binghill House will improve access to the wider countryside benefitting the existing and new communities.

The land at Binghill House is therefore not required to protect the character, landscape setting and identity of Aberdeen and will improve access to open space and the wider countryside.

The Green Belt should not and cannot be treated as an absolute constraint to development as almost all land outside the built-up area of the city is designated as Green Belt. It is restrictive and unrealistic to expect housing delivery targets to be met purely through brownfield sites and existing allocations. The aim of the Green Belt is to direct planned growth to the most appropriate locations. **Binghill House is ideally suited to accommodate further limited growth in an appropriate location already considered for major housing expansion.**

4.3 The 95m Contour

MIR criticism of the neighbouring Binghill Farm site suggests a notional limit of development at the 95m contour. We have disputed that and provided evidence to the contrary in the MIR response to site B0920 – we refer you to that.

However, this site is somewhat different in context and form. The southern wooded boundary sits at 90m to 95m and the northern boundary between 105m and 110m with Binghill House itself sitting around 103m AOD.

The basis for the notional 95m contour seems to be visibility. This site is substantially screened by woodland and any development here would not be visible locally or from further afield and given the existing house already sits well above the 95m contour this notional restriction is not relevant. See figure 2.

4.4 Local Services and Facilities

As an extension to the local community at Milltimber this site will benefit from existing and planned services and facilities. The Oldfold development (OP48) immediately south of the site has consent for 5ha of business use, leisure and retail, providing new facilities for the Binghill House site within 800 metres. That site also includes a new Primary School that we assume will provide scope for new community uses. These new facilities will be within walking distance of the site and the development at Binghill will have the added benefit of being able to help create the critical mass to attract and sustain new employment and service uses.



Figure 6 - Retail and Leisure Units currently being Marketed at Oldfold.

The opening of the AWPR and one of the few junctions along its route close to this site creates substantially better access to major service areas in Westhill and Prime Four, Kingswells. The current LDP (see extract below) also allocates OP114 for housing and retail use with the expectation that the site would attract a small supermarket or office use. This would be around 900m from the site offering additional services and employment opportunities in the vicinity of the site.

A community centre and church are located a few hundred metres to the south of Binghill House.

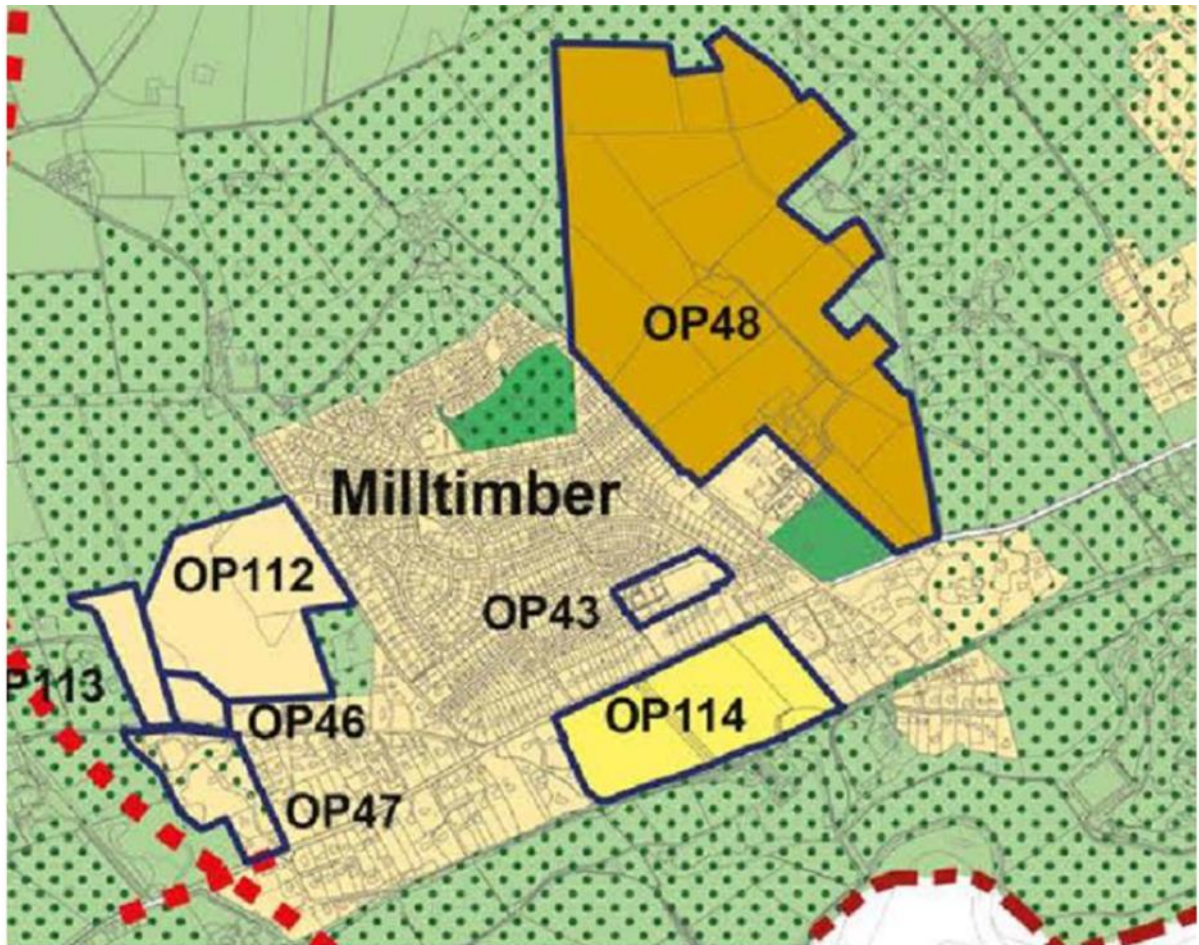


Figure 7 – Extract Aberdeen City Local Development Plan

5. Conclusion

The Binghill House bid is located immediately adjacent to Milltimber on the site of an existing house and screened from the wider area. It's located close to existing and proposed local facilities and will include further local facilities of its own (local shop/café) to serve residents and the wider community. The proposed new retirement community is entirely in line with national policy and the City Council's Housing Need and Demand Assessment which identify a local requirement for new accommodation to serve the ageing population.

Locating this proposal in an existing community will provide both links for the new residents and an opportunity for existing residents to downsize within their own community.

The proposed development will fit well within the landscape setting of Milltimber and Binghill House and garden. It is substantially screened by trees and will have no visual impact on the surrounding setting of Milltimber and the wider Dee Valley. Existing woodland forms a distinct landscape feature bordering the site. Green belt function in the area will not be affected by this proposal.

This MIR response therefore proposes the allocation of land for a purpose-designed retirement community in the grounds of Binghill House adjacent to the current northern edge of the village.



APPENDIX 1: Development Options Assessment Report

Development Options Assessment Report

The site assessment process undertaken by Officers for bid sites comprised an assessment of sites against a sustainability checklist and used the outcomes of the strategic environmental assessment to inform the decision on whether a site was suitable. This site has not been subject to that process so the following represents an initial review of the criteria in respect of this site.

Table 1 – Binghill House Sustainability Checklist Review Assessment

Criteria	Proposed Score	Justification
Exposure	3	The site is sheltered.
Aspect	3	The site is south facing.
Slope	3	The site slopes gently north to south on areas suggested for development.
Flood Risk	3	SEPA maps indicate no flooding on the site.
Drainage	3	The site is well drained.
Built/Cultural Elements	3	No loss or disturbance to archaeological sites or vernacular buildings. Binghill House is to be retained.
Natural Conservation	3	No known loss or disturbance of wildlife habitat or species. Site to be designed to increase biodiversity
Landscape Features	3	Development to be designed around landscape features where possible and retain as much as possible to create new and maintain character.
Landscape Fit	3	Site is self-contained with limited local and wider views.
Relationship to existing settlement	3	Development will be contiguous with Milltimber along its southern boundary.
Land Use Mix / Balance / Service Thresholds	3	The site is promoting retirement residential development rather than mainstream, increasing choice and creating additional critical mass to attract services to this area.
Accessibility	2	The site is more than 800m from a bus stop but there are numerous residential properties in Milltimber over 1,000m to a bus service. This is not unusual in this area. Accessibility to services, including public transport, will be considered and supplemented where appropriate at the planning application stage. Use is aimed at “active” retirement and will promote walking/cycling etc.
Proximity to facilities / shopping / health / recreation	3	A new primary school is to be located close to the western boundary of the Oldfold development. Similarly, shops/leisure uses to be delivered at Oldfold and existing community facilities a few hundred metres away.



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Direct footpath / cycle connection to community and recreation facilities and resources	3	The site is approx. 485m from an Aspirational Core Path 10. An informal path links north to Core Path 89. New footpath connections will be included linking to the wider footpath network. Connections will be as good as those at the allocated site at Oldfold.
Proximity of employment opportunities	3	Proposal is for retirement use so access to employment is significantly less important. However, there will be 5ha of employment land at Oldfold (adjacent) and there 10ha of business land proposed at Countesswells which is only 3.5 miles from the site.
Contamination	3	No known contamination.
Land Use Conflict	3	No known land use conflict.
Physical Infrastructural Capacity	3	No infrastructure capacity issues anticipated.
Physical Infrastructure Future	3	There is fibre enabled broadband close by. The scale of development is unlikely to be suitable for district heating. Where appropriate buildings will be designed in accordance with low and zero generating technologies.
Service Infrastructure Capacity	3	School capacities not impacted.
Other Constraints	3	No known other constraints.
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BINGHILL RETIREMENT VILLAGE
MILLTIMBER, ABERDEEN

INDICATIVE LAYOUT

Scale: 1:1000 (A2)

Date: MAY 2019

Dwg No: 11503 / SK-003

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