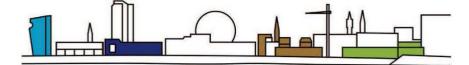
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Proposed Aberdeen Local Development Plan 2015 Representation Form

Please use this form to make comments on the Proposed Aberdeen Local Development Plan, ensuring that your comments relate to a specific issue, site or policy in either the Proposed Plan, Proposed Supplementary Guidance, Proposed Action Programme or Strategic Environmental Assessment Environmental Report. Please include the relevant paragraph(s) and use a separate form for each issue you wish to raise.

The consultation period runs between Friday 20th March and Monday 1st June 2015. Please ensure all representations are with us by <u>5pm on Monday 1st June</u>.

Name	Mr Mrs Miss Ms Roger Laird		
Organisation	Archial Norr		
On behalf of (if relevant)	Mr and Mrs A.N. Ironside/Midstocket Development Company		
Address	3 Bon Accord Crescent Aberdeen		
Postcode	AB11 6XH		
Telephone	01224 586277		
E-mail	rlaird@archialnorr.com		

Please tick if you would like to receive all future correspondence by e-mail	V
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What document are you Proposed Plan commenting on?			~
J	Proposed Supplementary Guidance		
	Proposed Action Programme		
	Strategic Environmental Assessment	Environmental Re	eport
Policy/Site/Issue	Directions for Growth - Deeside	Paragraph(s)	2.25 - Table 8
	Directions for Growth - Deeside	/	2.25 - Table 6

What would you like to say about the issue?

The land at Guttrie Hill West should be allocated for development. Please see the attached report for the justification.

What change would you like to see made?

Allocation of the land at Guttrie Hill West for development.



Commercial Public Buildings Lifestyle



Project Number:IAAB13-0070Project Title:Land at Guttrie Hill (West), Milltimber, AberdeenDocument Title:Proposed Plan ResponseDate / Revision:25th May 2015

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- 1.0 Introduction
- 1.1 This representation has been prepared in response to the Proposed Plan consultation opportunity, on behalf of Mr & Mrs A.N. Ironside/Midstocket Development Company Ltd. The council's MIR site reference is B0907, and it is known as Guttrie Hill West.
- 2.0 Background



Figure 1 - Aerial Photograph of Site

2.1 Historically it has been used for localised quarrying, and evidence of this can been seen in both historical Ordnance Survey maps, and current photographs. Examination of the Ordnance Survey map dated 1866 indicates no evidence of quarrying on site, as illustrated in Figure 2 overleaf:

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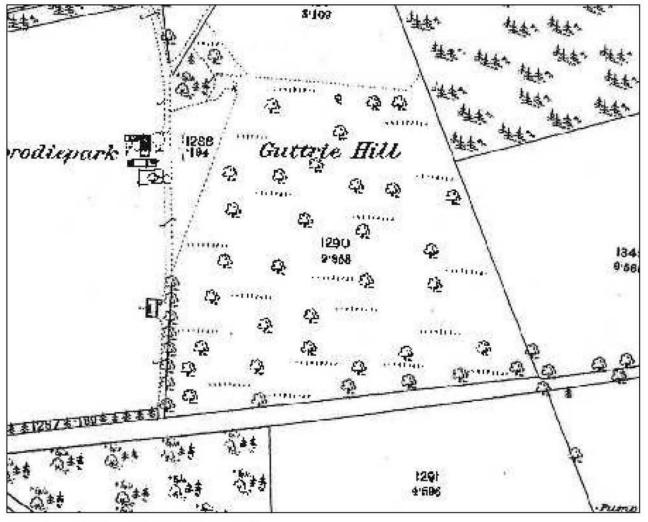


Figure 2 - Ordnance Survey Extract (1866)

2.2 However the next version of the map from 1900, included as Figure 3, shows that significant parts of the site were used for quarrying purposes, with 3 quarry pits shown in existence. This evidence remains on the 1965 version of the OS Extract.

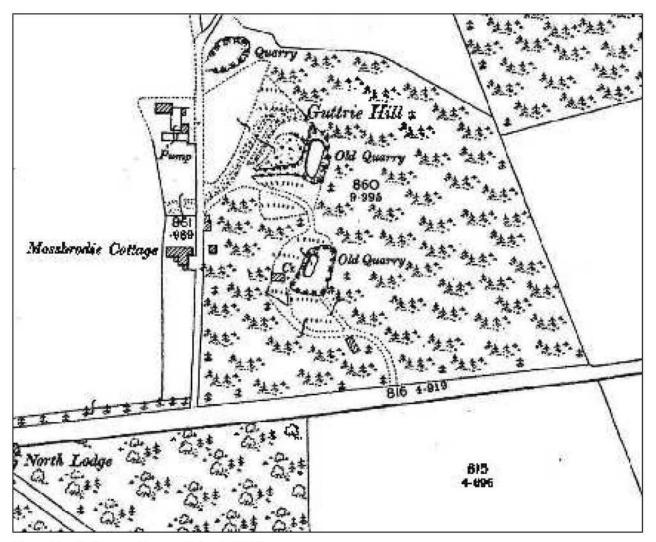


Figure 3 - Ordnance Survey Extract (1900)

2.3 Examination of the site today indicates that evidence of the historical quarrying activities which have taken place remains, as shown below:



Figure 4 – Photographs of Former Quarrying Activities

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2.4 The sheds associated with the former quarrying activities remain on site today, as illustrated in Figure 5 below.



Figure 5 - Shed on Site

- 3.0 Description of Proposal
- 3.1 The area of the proposed site is 4.1 hectares, and whilst it is large enough to accommodate a significant number of dwellings, its characteristics mean that this proposal is limited to 5 dwellinghouses. Limited tree removal would be required to facilitate the development, however this would be kept to a minimum to ensure that wooded character of the area remained intact. The restricted number of units would be coupled with the utilisation of high standards of contemporary design, which would incorporate good quality insulation and renewable energy technologies to reduce carbon consumption. The indicative designs

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which are included in Figures 6 & 7 below give a flavour of the appearance of the proposed dwellings.



Figure 6 - Indicative Design of Proposed Dwellinghouses (South Elevation)

3.2 The use of natural stone and timber on both elevations reflects the former quarrying uses which took place on site, together with its wooded character.



Figure 7 – Indicative Design of Proposed Dwellinghouses (North Elevation)

- 3.3 The housing would be spread throughout the site, with the plots being limited in size to minimise the extent of necessary tree removal. A single shared vehicular access would be taken directly onto Culter House Road, where satisfactory visibility exists. The existing drystane dyke which runs around the perimeter of the site would be repaired and maintained.
- 4.0 Justification for Proposed Development

Brownfield Development

4.1 One the key factors in support of the allocation of the land at Guttrie Hill West stems from its historical use for quarrying. SPP defines brownfield land as that which has been previously developed. The foregoing analysis of historical Ordnance Survey Map data, combined with the Pastmap description of the extensive

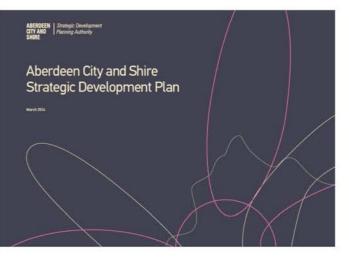
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quarrying activities which have occurred confirms that there is no question that the site has been used in the past, thereby qualify as brownfield land.

4.2 The support for the allocation of brownfield land for development purposes is clearly set out in both national and regional planning policy. Paragraph 40 of SPP states that decisions should be guided by a range of policy principles including:

Considering the re-use or re-development of brownfield land before new development takes place on greenfield sites.

4.3 The clear support which is contained in national planning policy is echoed in the statutory strategic development plan for the region. The Aberdeen City and Shire Structure Plan 2014 confirms that brownfield land is the preferred location for development. It stipulates that 7500 units require to be delivered on brownfield sites during the period until 2026. So far the Proposed Plan has identified between 5398 to 7287 units to be developed on brownfield land over this period (para 2.12). This indicates that



there could be a potentially large shortfall in the supply of sites on brownfield land, and that every effort should be made to take advantage of opportunities for development of this kind. The land at Guttrie Hill falls into this category, and as a result represents a suitable site for allocation in the next version of the Local Development Plan.

Strategic Environmental Assessment

- 4.4 The council have produced an assessment of the site as part of the Strategic Environmental Assessment (SEA) which has been prepared. This states that the site scores poorly on the basis that its biodiversity value would be adversely affected. In response to this we would comment as follows.
- 4.5 The site is included in the *Peterculter Local Nature Conservation Site*, which describes it as comprising upland birch woodland with small areas of mixed woodland, other broadleaved woodland, and pine woodland. The former quarry area which exists is described as being colonised by ferns and shrubs. The site is also identified as an ancient woodland, with the potential presence of bats and red squirrels being identified.

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Figure 8 - Indicative Location of House Plots within Site

- 4.6 The development proposal involves the erection of 5 dwellinghouses, with the location of these highlighted in Figure 8 above. This illustrates that the vast majority of the existing trees on site would remain. Figure 8 highlights the potential house plots in brown, and shows that few trees would require to be felled to allow the development to progress. The vast majority of the woodland would remain untouched, other than by woodland management to improve its overall health. As part of this woodland management, it would be possible to concentrate on the species of trees and supporting vegetation which would enhance the nature conservation site. The trees on site have not been the subject of any management over recent years and the overall quality of the woodland could be greatly improved by selective felling.
- 4.7 The owner has an in depth knowledge of the site, and can confirm that no red squirrels are present. Notwithstanding this, the council's identification of the potential presence of bats and red squirrels is noted. Any development which takes place would require to comply with all of the legal requirements which apply to development affecting such species. The necessary survey work would require to be conducted to confirm if Pippestrelle Bats or Red Squirrels were indeed present. In the unlikely event that these species were found, the development could only proceed in a way which did not cause harm to the resident population.

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- 4.8 The second point which is include in the SEA refers to the creation of large luxury homes, which would not contribute to the range of housing in the lower Deeside area. This is not necessarily the case, as the proposed house designs which are illustrated in Figures 6 and 7 are indicative. There is ample scope for the scale of the houses to be adapted to provide a range of sizes on the site.
- 4.10 The third point which is included in the SEA concerns the presence of rig and furrow features, together with the former quarry workings. Examination of Historic Scotland's Pastmap website indicates these features are present on site being highlighted by the 4 circles included in Figure 9 below. Features 1 and 2 are identified as traces of rig and furrow cultivation, with the rigs measuring 6 metres in breadth. Feature 3 lies to the west of the site, outwith the boundary, and comprises a former grouping of farm buildings which no longer exist. Feature 4 comprises the extensive evidence of quarrying on and around the wooded summit of Guttrie Hill.
- 4.9 Given the area of the site, it would be easily achievable to erect 5 dwellinghouses without leading to any adverse impact on the historical features which exist, and this is not considered to be a valid reason for its rejection.

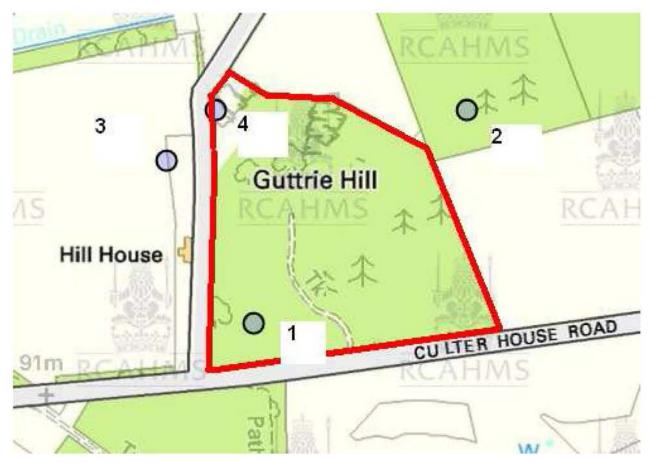


Figure 9 - Pastmap Extract

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4.13 The final point included in the SEA concerns the availability of capacity at Cults Primary School and Academy, stating that both of these schools are pressurised. Given the small number of houses which are proposed, no major impact on the local school rolls would occur.

Other Material Considerations

- 4.14 The retention of a belt of woodland around the perimeter of the site would ensure that no change to the existing landscape of the area would occur as a result of the development.
- 4.15 The land at Guttrie Hill lies on the northern edge of Peterculter, and within close proximity of Milltimber. It is therefore well related to the existing built up area of Aberdeen. This area will be the subject of major change over coming years as a result of the formation of the AWPR. Figure 10 overleaf shows the location of the proposed road (highlighted in yellow to the east of the site) and its proximity to the land at Guttrie Hill. The completion of the AWPR in 2018 will serve to further integrate this locality into the built form of the city. Furthermore this relationship will significantly enhance the accessibility of the site, thereby reinforcing its suitability for development.



Figure 10 - Proximity to Aberdeen Western Peripheral Route

- 4.16 The nearest bus route is located 750 metres to the south on North Deeside Road, and is the no.19 service, which runs every 15 minutes during peak time. The site will also be able to take advantage of the public transport services which will be provided along the AWPR..
- 4.17 There are also a number of core path routes within close proximity as shown in Figure 11 overleaf. The nearest is route is number 51 which links with the Peterculter and the Deeside Railway footpath.
- 4.18 It is proposed that additional footpath connections would be provided throughout the site, branching off from route 51 to allow the creation of an attractive woodland walk.
- 4.19 The proposal would therefore enhance the quality and range of the Core Path Network in the area, to the benefit of the local community.

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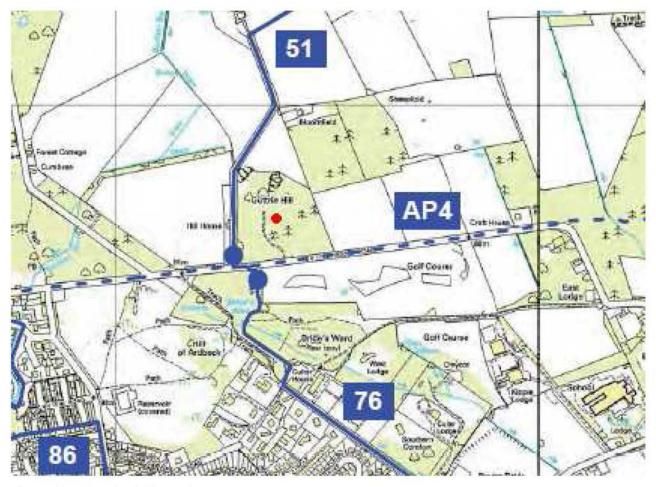


Figure 11 - Core Path Network

- 4.20 The centre of Peterculter lies 1500 metres to the south, and contains a range of shops and services. This separation distance is within the acceptable range which is set out by the Scottish Government in PAN 75. Moreover the major existing and proposed employment zones at Westhill and Kingwells exist 4 and 5 kilometres to the north of the site respectively.
- 4.21 The proposed design of the development is influenced by the local character, and the aim of achieving a highly energy efficient end product. The use of timber and stone as finishing materials would reflect both the historical quarrying which has taken place, and the wooded nature of the site. Whilst each of the proposed 5 dwellinghouses would exhibit a high standard of design, all would be extremely well screened by their wooded setting.
- 4.22 Furthermore the examples of house design which are proposed would ensure that very high standards of energy efficiency would be achieved.

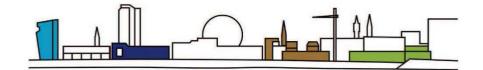
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- 5.0 Conclusion
- 5.1 One of the key factors in the suitability of the site for development purposes is based upon its brownfield status, and the contribution that it would make to the achievement of the target for development of land of this type, which is contained in the strategic development plan.
- 5.2 For the foregoing combination of reasons the site should be identified in the next version of the Local Development Plan as being suitable for a low density residential development.

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The consultation period runs between Friday 20th March and Monday 1st June 2015. Please ensure all representations are with us by <u>5pm on Monday 1st June</u>.

Name			
Organisation	Archial Norr		
On behalf of (if relevant)	Mr and Mrs A.N. Ironside/Midstocket Development Company		
Address	3 Bon Accord Crescent Aberdeen		
Postcode	AB11 6XH		
Telephone	01224 586277		
E-mail	rlaird@archialnorr.com		

Please tick if you would like to receive all future correspondence by e-mail	V
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What document are you commenting on?	Proposed Plan	~	
J	Proposed Supplementary Guidance		
	Proposed Action Programme		
	Strategic Environmental Assessment Environmental Report		
Policy/Site/Issue	Directions for Growth - Deeside	Paragraph(s)	2.25 - Table 8

What would you like to say about the issue?

The land at Guttrie Hill East should be allocated for development. Please see the attached report for the justification.

What change would you like to see made?

Allocation of the land at Guttrie Hill East for development.

Please return the completed form by:

- post to the Local Development Plan Team, Aberdeen City Council, Business Hub 4, Ground Floor North, Marischal College, Broad Street, Aberdeen AB10 1AB; or
- email to ldp@aberdeencity.gov.uk

The representation form can be filled in, saved, e-mailed and/or printed. You must "save as" to ensure the completed form is saved with the changes you have made. If you need more space, please fill out another representation form or send a word document attachment via e-mail with your completed representation form. **Please ensure all representations are with us by <u>5pm on</u> <u>Monday 1st June</u>.**

Thank you. For more information, please visit <u>www.aberdeencity.gov.uk/aldp2016</u> or to contact the Local Development Plan Team call 01224 523470.

Data Protection Statement

The comments you make on the Proposed Plan will be used to inform the Local Development Plan process and the Examination into the Local Development Plan by the Scottish Ministers' Reporter. You must provide your name and address for your representation to be considered valid, and this information will be made publicly available. Other personal contact details such as telephone and e-mail will not be made public, although we will share these with the Reporter, who may use them to contact you about the comments you have made. For more information about how Aberdeen City Council maintains the security of your information, and your rights to access information we hold about you, please contact Andrew Brownrigg (Local Development Plan Team Leader) on 01224 523317.

Commercial Public Buildings Lifestyle Transport









Project Number:IAAB13-0070Project Title:Land at Guttrie Hill (East), Milltimber, AberdeenDocument Title:Aberdeen Proposed Plan ResponseDate / Revision:22nd May 2015

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- 2 Line of Trees Along Southern Boundary & View of Site from West
- 3 Pastmap Extract
- 4 Proximity to Aberdeen Western Peripheral Route
- 5 Milltimber Junction on AWPR

1.0 Introduction

1.1 The site in question is located on the northern outskirts of Peterculter, 750 metres from the North Deeside Road. The line of Aberdeen Western Peripheral Route (AWPR) runs immediately to the east, and it is lined by trees along the southern boundary, as shown in Figure 2 overleaf.



Figure 1 - Aerial Photograph of Site

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Figure 2 - Line of Trees Along Southern Boundary & View of Site from West

2.0 Description of Proposal

- 2.1 The area of the site is 3.6 hectares, and its proposed use is as a sustainable energy vehicle refuelling station. This would create a charging point for electric vehicles, hydrogen refuelling for vehicles running on fuel cells, an LPG dispenser, in addition to conventional petrol and diesel. It would also include ancillary retail facilities, of the same scale as that found in a conventional petrol station.
- 3.0 Justification for Proposed Development

Response to Assessment of Development Option B0908 - Guttrie Hill East

3.1 The council have produced 2 assessments of the site since the MIR. The first of these is contained within the council's Schedule 4 assessment of the sites which have been promoted as part of the local development plan preparation process. This assessment welcomes the ambition to provide a sustainable energy refuelling station to support the use of these fuels in transportation. However it expresses a reluctance to allocate the site, primarily on the basis that the council consider it to be situated in an isolated and unsustainable location. To address these concerns the business and hotel elements which were proposed at the MIR stage have been deleted. Solely in terms of the refuelling station the Schedule 4 assessment states that:

The proximity of similar facilities within Aberdeen, a short distance from the AWPR, mean that there is insufficient need for a "service station" type development in this location.

3.2 The nature of this use is such that it requires to be located adjacent to a major road, and its central location on the AWPR is considered to the best possible within the city. The route which has been chosen for the

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AWPR means that there are no alternative sites located within settlements, which would be superior to encourage use of sustainable modes of transport.

3.3 It is clear that the creation of the AWPR, which is 28 miles in length, will create a requirement for refuelling stations along its route. In practical terms, these will require to be positioned at major junctions, and there are 8 of these proposed. The Milltimber junction lies at the mid-point of the by-pass of the city, and is grade separated, providing access from the north and the south. It is therefore ideally positioned to accommodate a sustainable energy vehicle refuelling station.





Scottish Planning Policy

3.4 The support for the development of proposals of this kind is provided at every level of the hierarchy of planning policy in Scotland. At the national level *Scottish Planning Policy*, within the section on transport states:

Reductions in emissions will also be achieved through changes in vehicle technology. The planning system should support the installation of infrastructure to support new technologies, such as charging points for electric vehicles. (para. 165)

Switched On Scotland: A Roadmap to Widespread Adoption of Plug in Vehicles

3.5 Also at the national level Transport Scotland have published the above document which stresses the Scottish Government's commitment to the almost complete decarbonisation of road transport by 2050. To achieve this goal a multi-faceted approach will be required, involving cross-cutting initiatives from a range of stakeholders. This document contains a range of actions to promote the use of renewably powered

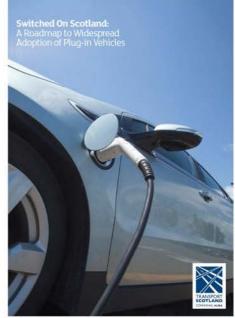
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vehicles. Those actions which are considered to be most applicable to the development in question are as follows:

Action 1 – Transport Scotland to continue to engage with colleagues across government and the wider public sector to promote inclusion of plug-in vehicles in relevant policies and strategies.

Action 16 – The Scottish Government, Scottish Enterprise and partners in the public and private sector to promote Scotland as an attractive location to introduce new consumer offerings and modify services for plug in vehicles.

Action 25 – Transport Scotland to deploy rapid charge points at intervals of at least 50 miles on Scotland's primary road network to enable extended all-electric journeys.

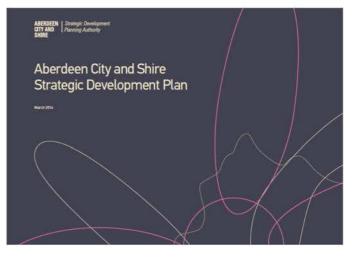


3.6 In summary these actions seek to support the provision of facilities for plug-in vehicles in planning policy documents. Encouragement is also given to the private sector to provide enhanced offerings to consumers. Furthermore Transport Scotland is encouraged to create a network of rapid charge points along primary routes throughout the country.

Aberdeen City and Shire Strategic Development Plan 2014

3.7 This message is reinforced at the regional level in the *Aberdeen City and Shire Strategic Development Plan 2014*, under the objective of sustainable development and climate change. Paragraph 4.8 states:

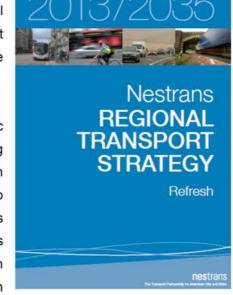
> Significant changes will also be needed to reduce the effects of transport on climate change. As well as increasing energy efficiency, we need to encourage the use of alternative fuels and take opportunities, such as providing electric vehicle charging points to encourage people to use them.



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Regional Transport Strategy Refresh 2013/2035

- 3.8 Further guidance is provided by Nestrans in their *Regional Transport Strategy Refresh 2013/2035.* This is an important material consideration in the preparation of the development plan and it contains a strong message of support in relation to the encouragement of the use of alternative fuels.
- 3.9 Specifically the Nestrans document contains a range of strategic objectives, with number 3 addressing the environment and seeking to reduce the effects of transport on climate, noise and air quality in line with national targets. This broad objective is translated into more detail by a range of proposals for action. This includes *Proposal CR1 Carbon Reduction, Noise and Air Quality.* This gives strong encouragement to the use of alternative fuels with hydrogen fuel cells, electric vehicles and biodiesel growing in



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importance, with a view to the north-east being recognised as a leading player in the development of new energy sources. The document states that:

Nestrans will continue to support initiatives to promote and establish Aberdeen City and Shire as an alternative energy capital, including the trial of hydrogen vehicles. We will work with the councils and the Scottish Government to facilitate and encourage the expansion of energy efficient vehicles and charging points across the region and investigate the feasibility of other alternative fuels as appropriate. p52

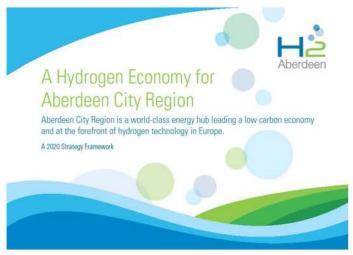
Local Transport Strategy (2015-2020) Consultative Draft

- 3.10 Further relevant guidance is contained in Aberdeen City Council's Local Transport Strategy. This includes the objective of facilitating the uptake of ultra-low and low emission vehicles as a contribution towards improving air quality in the city. It notes that whilst the network of charging points for electric vehicles is not yet widespread, Aberdeen City has been making strides in this regard, and this is translated into the following specific actions which are included in the draft strategy:
 - Continue to develop Aberdeen's Electric Vehicle Charging Network and Hydrogen Refuelling Station Network with Partners
 - Encourage installation of both EV infrastructure in new developments via Planning policies/process

The proposed development is firmly in line with these council objectives.

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- 3.11 The Energetica Project to the north of the city is at the forefront of the plans to promote the use of renewable fuels to power vehicles in the north-east. Examination of the brochure which has been prepared to support the Energetica concept, confirms that 3 hydrogen refuelling stations are proposed at Balmedie, Ellon and Peterhead. Whilst the AWPR at Milltimber does not fall within the Energetica corridor, it would be worthwhile to extend the provision of such facilities in a southerly direction.
- 3.12 In the period since the submission of the initial local development plan bid, the council have progressed *H2 Aberdeen*, which is an initiative which has been developed to create a hydrogen economy in the Aberdeen city region. The vision of this document is for the Aberdeen city region to be a world class energy hub leading a low carbon economy and at the forefront of hydrogen technology in Europe. To achieve this, the document highlights that it will be necessary to develop hydrogen refuelling infrastructure.



3.13 There can be few other development proposals which are supported so comprehensively at every level of the hierarchy of planning policy. Backing is provided by the SPP, Transport Scotland's guidance on the subject, the Strategic Development Plan, regional and local transport policy, and the council's own strategy for promoting hydrogen. Coupled to this is the fact that the Milltimber junction represents the most suitable along the route of the AWPR to accommodate the proposal, being located at the mid-point, and benefitting from access from both the north and south. These factors provide very strong support for the allocation of the site at Guttrie Hill (east) as being suitable to accommodate a sustainable vehicle refuelling station.

Strategic Environmental Assessment

- 3.14 The second assessment of the site is included in the Strategic Environmental Assessment (SEA) which has been prepared as part of the local development plan preparation process. This states that notwithstanding the fact that all of the trees on site were felled some years ago, that the site is classified as an Ancient Woodland. Moreover it has been recorded as being an important habitat for Pippistrelle Bats, Red Squirrel and Wych Elm trees.
- 3.15 A simple examination on site and of Figure 2 confirms that all of the trees have been felled (by the previous owner). It is therefore not accurate to suggest that it provides a habitat for bats or Red Squirrels. Whilst it may retain its technical status as an ancient woodland, for all practical purposes the removal of the trees

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means that this designation is now outdated. There are therefore no natural heritage reasons which would prevent its development.

- 3.16 The site is recognised as scoring well in terms of its contribution towards the council's encouragement of sustainable fuel sources, and the provision of a unique new facility which would serve the whole of the city and those travelling on the AWPR.
- 3.17 Finally in terms of the SEA it is noted that archaeological sites are present in the form of rig and furrow and former quarry workings. The Pastmap extract which has been included as Figure 3 below shows the location of the evidence of rig and furrow, which is highlighted by the blue circles. The proposed development would be well away from this part of the site, and no adverse effects would therefore arise in terms of impact on built and cultural heritage.



Figure 3 - Pastmap Extract

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Other Material Considerations - Relationship to Existing Settlement

3.18 The land at Guttrie Hill (east) lies on the northern edge of Peterculter, and within close proximity of Milltimber. It is therefore well related to the existing built up area of Aberdeen. This area will be subject to major change over coming years as a result of the formation of the AWPR. Figure 4 below shows the location of the proposed road (highlighted in yellow to the east of the site), and its proximity to the land at Guttrie Hill. The completion of the AWPR in 2018 will serve to further integrate this locality into the built form of the city. Furthermore this relationship will significantly enhance the accessibility of the site, thereby reinforcing its suitability for development.



Figure 4 - Proximity to Aberdeen Western Peripheral Route

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Landscape Setting

3.19 The site in question is located immediately to the west of the grade separated junction, in the wooded area illustrated in Figure 5 below. The trees on the site were felled prior to the proposers purchasing the site. The construction of the AWPR will result in a significant change to the landscape of the area, introducing a major item of strategic infrastructure and the proposed development should be viewed in this context.



Figure 5 - Milltimber Junction on AWPR

3.20 As part of the proposed development it is proposed that strategic landscaping in the form of tree planting on all of the boundaries would be provided. This would ensure that the site would be well screened when viewed from the surrounding area.

4.0 Conclusion

4.1 The construction of the AWPR represents a milestone in the provision of strategic infrastructure for the city. The quality and attractiveness of this route will be enhanced by the provision of associated services including refuelling stations for vehicles. The proposal to create a sustainable vehicle refuelling station is provided with comprehensive support and encouragement at every level of policy within the planning hierarchy, and in particular would work towards the council's own hydrogen promotion strategy. This policy alignment gives the site strong backing for inclusion in the next version of the LPD. For the foregoing reasons, the site represents an ideal opportunity for future development.

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