

HALLIDAY FRASER MUNRO

P2020/PLDP/SL/NC

01 June 2015

Local Development Plan Team  
Aberdeen City Council  
Business Hub 4  
Ground Floor North  
Marischal College  
Broad Street  
Aberdeen  
AB10 1AB

(by email to [ldp@aberdeencity.gov.uk](mailto:ldp@aberdeencity.gov.uk))

Dear Sir / Madam,

**RESPONSE TO PROPOSED ABERDEEN LOCAL DEVELOPMENT PLAN  
KEY WORKER HOUSING  
SHIELHILL, BRIDGE OF DON, ABERDEEN (B0206)  
LANGLER INVESTMENTS**

We refer to the current consultation in respect of the Proposed Aberdeen Local Development Plan and write with reference to the above 'development bid' site at Shielhill, Bridge of Don.

**Background**

The site was the subject of a development bid in response to the 'pre – MIR consultation' and was promoted as being suitable for sand and gravel extraction. In response to the Main Issues Report consultation (March 2014), the concept of redeveloping the brownfield site for housing or commercial uses following the mineral extraction was then proposed. Submissions were also made by Burness Pauli promoting the concept of the site being developed for exclusively affordable housing.

Since the MIR consultation, substantial additional work has been done in establishing and refining a development concept to create key worker housing on the disused site at Shielhill. This is outlined below and through the enclosed plans.

In summary:

***The site is a disused area of scrubland on the northern edge of Dubford. It extends to 9 ha and is brownfield in nature due to previous quarrying activities and its use as a MoD driver training area.***

***There is a clear need (and demand) for housing, in Aberdeen City, that is accessible to those in medium income employment, such as key NHS health professionals, teachers and other public sector workers who are currently priced out of the market due to inflated housing prices in Aberdeen. Many key workers and their families are unable to progress up the property ladder***

CARDEN CHURCH  
6 CARDEN PLACE  
ABERDEEN  
AB10 1UR

TELEPHONE  
(01224) 388700

FACSIMILE  
(01224) 388777

E-MAIL  
[INFO@hfm.co.uk](mailto:INFO@hfm.co.uk)



OFFICES IN BELFAST,  
DUNDEE, EDINBURGH  
AND GLASGOW

CHARTERED  
ARCHITECTS  
CHARTERED PLANNING  
CONSULTANTS  
LAND USE  
CONSULTANTS  
URBAN DESIGNERS  
SPACE PLANNERS

PARTNERS

JOHN HALLIDAY  
DIP ARCH (ABDN)  
ARIBA ARIAS

DAVID HALLIDAY  
BSc (HONS)  
PG DIP ARCH (ABDN)

DIRECTOR OF PLANNING  
BOB G REID  
BA(HONS) MCD MRTPI FRICS

*to find suitable accommodation, presenting a barrier to remaining in Aberdeen. This also applies to those who may have studied in Aberdeen, but are unable to remain here in graduate employment due to housing costs.*

*There have been numerous news stories in recent months regarding recruitment issues with 'key workers' who are unable to locate to Aberdeen. Recent statistics also demonstrate that although those at the extremes of the salary brackets, both high and low have moved to Aberdeen, there is a clear gap in the middle, where key workers are unable to remain in, or relocate to Aberdeen due to property costs.*



*This analysis, and recognition of the issues, has resulted in the development of the concept of creating 'key worker housing' on the Shielhill site.*

*Shielhill lies adjacent to 550 houses (under construction) at Dubford (OP10) and other established residential areas at Denmore and Middleton Park. It is also close to the proposed new community at Grandholme (OP9). It occupies a strategic location in the north of Aberdeen, and is easily accessible to AWPR, Bridge of Don and Dyce employment centres (particularly Murcar OP1 and OP2 and the Science Park), and existing established residential areas within Bridge of Don by public transport. The proposed key worker housing would be a new complementary use close to established centres of population.*

*The site lies within the Energetica Corridor where sustainable development is promoted. Housing built in a sustainable manner to provide accommodation accessible to key workers who would otherwise be priced out of the market is a direct fit with the objectives of Energetica.*

Previous submissions in respect of the consultation on the Main Issues Report included an indicative layout plan and ecology report. The ecology report stated that surveys carried out in September 2014 by Nigel Rudd Ecology confirmed that the land was of very low ecological value from a natural habitat perspective with low level potential to support protected species, and no evidence of such species is present. This confirms previous representations confirming the low natural heritage value of the site due to its degraded nature from previous quarrying and driver training activities.

The Shielhill site lies directly adjacent to 'OP10 Dubford', allocated for 550 houses and now being built out, with most of the phases now completed.

We consider that the Shielhill site should be allocated, to deliver a new concept in residential development in Aberdeen City, namely Key Worker Housing that is available to wide range of people, to address the mid-market affordability issues currently experienced in the City. This is explained in more detail below.

### **Key Worker Housing**

The concept behind the Key Worker Housing at Shielhill is as follows:

***'To deliver affordable housing to meet an identified unmet need in northern Aberdeen'***

- 250 houses are proposed;
- 100% of these will be affordable – available to a range of people in need;
- 25% of these will be made available to those on the ACC housing waiting list;
- 75% of these will be sold at a 30% discount from open market value, to be made available to key workers, public sector / NHS / Council employees;
- A discount of at least 20% will be applied in perpetuity in relation to subsequent sales;
- 10 Homes for Heroes are proposed, with associated 30 sq m workshops.



The detailed mechanisms for controlling the tenure and sale of these properties will be set out in a Section 75 legal agreement associated with any planning application for the Shielhill development.

It is envisaged that the development will comprise a mix of the following house types:

- 2 & 3 bed semi detached / terraced houses;
- 3 bed bungalows;
- 1 & 2 bed flats.

### **Site Layout**

An indicative site layout plan showing 250 houses (based on the mix of house types described above) is enclosed. The 'urban design' approach taken through this plan is the creation of:

***'A village cluster laid out on a landscaped grid with overlooked pedestrian friendly streets and rear parking courtyards.'***

A number of key principles have influenced the indicative layout:

- Landscape fit, making use of the site's existing contours to minimise prominence from the south. It should be noted that there is inherent flexibility over the finished sites levels due to the potential for sand and gravel aggregate extraction;
- High quality landscaped amenity areas. These areas will be closely related to the existing landscaping around the adjacent Dubford housing and the wider 'green' areas towards Perwinnes Moss in the south;
- Enhanced pedestrian linkages to adjacent housing to east and south east;
- Pedestrian linkages to nearby bus stops;
- Enhanced pedestrian linkages to Perwinnes Moss to south;

- Direct access from Shielhill Road;
- A mix of house types;
- Workshop units;
- 200% car parking will be provided on site.

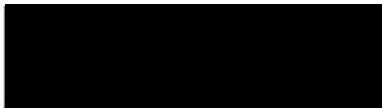
The indicative layout plan also clearly demonstrates a good 'fit' with the layouts and urban design approach already established through the adjacent Dubford housing and would be complementary to the development established there.



In summary, we would respectfully request that the land at Shielhill, bid reference B0206, is removed from the Green Belt / Green Space Network zoning as shown in the Proposed Local Development Plan and allocated as an **'Opportunity Site' suitable for up to 250 key worker houses. The allocation will be subject to a Masterplan to be agreed with the planning authority.**

Please do not hesitate to get in touch should require any additional information or wish to discuss any aspect of this further.

Yours faithfully,



**Scott Leitch**  
**Associate Planning Consultant**  
**Halliday Fraser Munro**

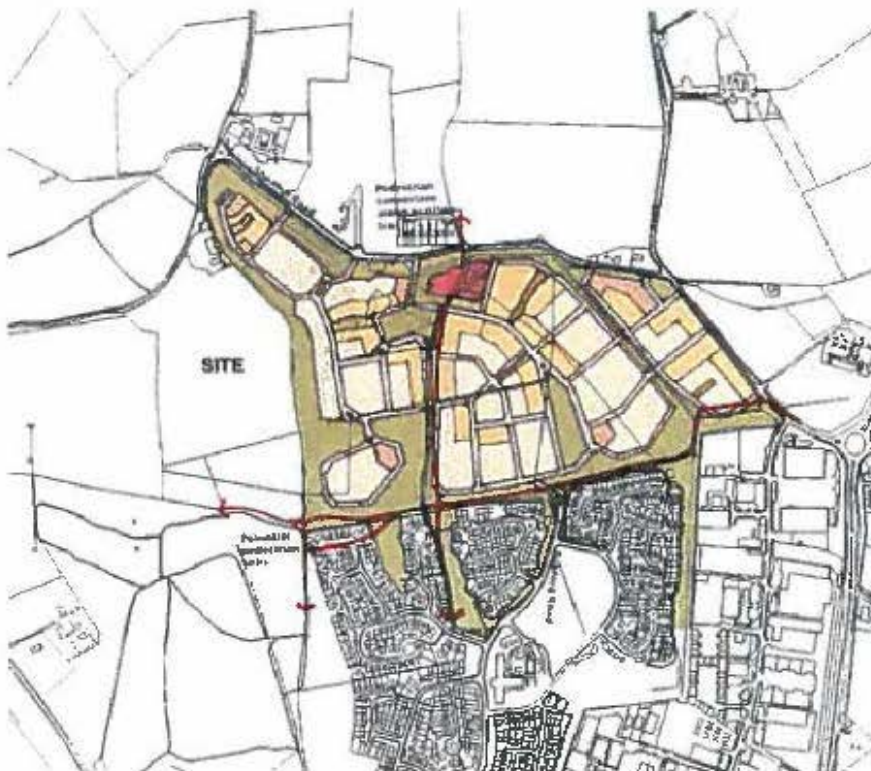
Encs.

Indicative Shielhill Site Layout Plan;  
Indicative House Types Plans and Elevations;  
MIR Responses for B0206.

cc. Langler Investments

# Supporting Planning Statement on behalf of Mr Langler

Land at Shielhill, Bridge of Don, Aberdeen





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## 1 INTRODUCTION

- 1.1 This statement is submitted on behalf of John Langler, in support of the allocation of 9.3ha of land at Shielhill, Bridge of Don for residential development in the review of the Aberdeen Local Development Plan 2012.
- 1.2 Bid reference B0206 was submitted on behalf of Mr Langler by Halliday Fraser Munro (HFM), seeking an allocation for sand and gravel extraction (Appendix 2). This bid was scored poorly by the Planning Officers on the basis that *“The use of this site as a quarry will conflict with the adjacent residential development at Dubford which is now under construction by causing noise and air pollution that is unlikely to be sufficiently mitigated through a buffer or tree screening. The site is also designated as a Local Nature Conservation Site.”*
- 1.3 In response to the Main Issues Report, further representations were submitted by HFM, 101000359919 (Appendix 3), highlighting that the extraction proposed would consist of site scraping and the site could then be developed for commercial or residential development.
- 1.4 Since submission of the bid and the response to the MIR, the landowner has carried out further studies on the land and has considered the housing market in Aberdeen. It is clear that there is an ongoing shortage of affordable housing for key workers. Mr Langler seeks to update Bid 0206 and representation 101000359919 to make it clear that the allocation which is sought is for residential development, comprising approximately 300 units, of predominantly affordable housing.
- 1.5 This statement supports the updated bid and includes an indicative layout demonstrating how the Site can be sensitively laid out in accordance with the Council’s policies for new development.

## 2 PROPOSAL

2.1 The Site extends to 9.3 ha and is located on the northern edge of Aberdeen City.

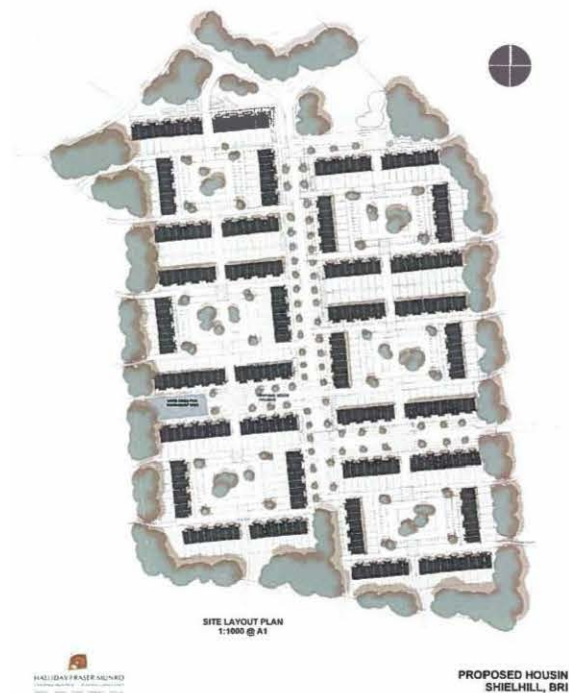


2.2 To the east of the Site is the opportunity site OP25 Dubford, which site is allocated for residential/urban green space development in the Aberdeen Local Development Plan 2012. To the north is the unclassified Shiehlhill Road and an existing commercial (office and yard) premises from which Walker Technical Resources Ltd operates.

2.3 Within the Aberdeen Local Development Plan 2012 (ALDP), the Site is covered by Policy NE2 Green Belt, Policy NE1 Greenspace Network and forms part of the Scotstown Moor/Perwinnes Moss Local Nature Conservation Site (LNCS).

2.4 It is submitted that the Site should be removed from the Green Belt and Greenspace Network and identified for residential development. The concept is that between 75 and 100% of the 300 units which could be constructed on the Site will be developed as affordable homes for those who are unable to access the mainstream market. It is envisaged that the units would be sold to key workers and other buyers, in line with the Council's affordable housing policies which stipulate the sale prices and criteria for purchasing such units. The units would be secured as affordable housing in perpetuity through a section 75 agreement and title restrictions, again in accordance with the Council's policies.

- 2.5 A small number of mainstream houses may be included to both help maintain the mixed tenure communities which the Council seek to achieve whilst ensuring an element of cross funding for the low cost housing units to be provided on the Site.
- 2.6 This LDP bid seeks to establish the principle of the residential development, with the design of the scheme to be worked up through the planning process, an indicative site layout plan has been prepared to illustrate how an appropriate form of housing development could be planned on the Site, which layout reflects the characteristics of the wider area, whilst ensuring links to the existing development proposals at OP25 and beyond (Appendix 1).



- 2.7 The indicative site layout also includes 80 square metres of workshop units which would also help to provide a mixed use community, in accordance with Council policy.
- 2.8 The indicative layout shows extensive landscaping on all sides of the Site and within the “housing courts” concept as shown, which helps to foster identity and a sense of place. A “boulevard” formed from the existing access off the unclassified road would run through the Site, from which the housing courts will be accessed and ensures a sense of arrival before entering the individual housing courts.
- 2.9 Connectivity across the site is an important aspect of the proposal with path networks to be introduced which will link up with the established development to the east and the associated facilities to be provided in that OP25 area. Any new path network would be overlooked to help promote self development forms and also to help maintain segregated routes between publicly assessable areas and those areas to be given over to nature conservation interests.

An appropriate phasing plan for the development would ensure that the site is delivered in line with identified affordable housing needs whilst ensuring that the traffic impact is managed should the site come forward for development before the Aberdeen Western Peripheral Route (AWPR) is in place.

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### 3 POLICY CONTEXT

- 3.1 Scottish Planning Policy (SPP) indicates that for most settlements, a Green Belt is not necessary as other policies can provide an appropriate basis for directing development to the right locations.
- 3.2 Paragraph 50 goes on to indicate that in developing the spatial strategy, Planning Authorities should identify the most sustainable locations for longer term development and, where necessary, review the boundaries of any Green Belt. The review of the ALDP provides an opportunity to review the Green Belt boundary at Shielhill.
- 3.3 The Site is a previously developed Ministry of Defence site and former quarry. As such it is a brownfield site. The Development Plan gives primacy to the redevelopment of brownfield land.
- 3.4 It is understood that the Site has been included within the Green Belt and Greenspace Network on the basis that it falls within the LNCS. The LNCS extends to 1.13km<sup>2</sup> of which the Shielhill land comprises 9.3 ha. As such, the Site comprises less than 10% of the total LNCS.
- 3.5 The landowner instructed Nigel Rudd Ecology to undertake an ecological assessment of the Site to ascertain the value of the land. The Ecological Report forms Appendix 4, however, the key points to note are:
- 3.5.1 The Site is species poor, virtually a monoculture and has negligible habitat value. The habitat resource of the land does not comprise habitat types for which the LNCS is valued.
  - 3.5.2 The most extensive habitat on the Site is dense scrub, dominated by gorse.
  - 3.5.3 Japanese knotweed is spreading in the northern areas of the Site which is capable of smothering native plant species and further diminishing the biodiversity status of the land.
  - 3.5.4 Acid grassland habitat threads across the Site. The more extensive areas of grassland are associated with large areas of bare ground from previous quarrying activity. In the northwest the grassland habitat has been colonised by giant hogweed. The grassland habitat is species poor and of very local value.
  - 3.5.5 There are two shallow water bodies on the Site, both in quarried areas with bare ground and very sparse vegetation. Whilst standing water is a valuable habitat for wildlife and is a UK biodiversity action plan priority habitat, the water bodies are poor examples of their type.

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- 3.5.6 The Site contributes very little to the LNCS and will contribute even less as the invasive plant species establish themselves and oust the native plant species. It is inevitable establishment will speed up as the leguminous gorse enriches the nutrient status of the soil.
- 3.6 Mr Rudd also carried out a survey of protected species. No evidence was found of badgers on the Site or within 100 metres of the boundary of the Site. It is anticipated that bats may forage around the boundary of the land in summer months but the forage associated with the Site is no better than the surrounding land. There is no habitat for otters, water voles or great crested newts on, or local to the Site.
- 3.7 In light of the findings in the Nigel Rudd report, it is submitted that removal of the Site from the LCNS will not detrimentally impact on the wider LNCS nor the SSSI.
- 3.8 In addition, the Site can be removed from the Green Belt without prejudicing the aims and objectives of the Green Belt in this area. The officers have confirmed that the Site is physically well related to the new community at OP25 Dubford.
- 3.9 There will remain a Green Wedge leading into the centre of Bridge of Don, thus maintaining *“the identity of Aberdeen and the communities within and around the city by defining the physical boundaries clearly, avoiding coalescence and urban sprawl, maintaining the landscape setting and providing access to open space”* as required by the Plan (page 36)
- 3.10 The Site does not provide ready access to green space for public recreational purposes as it is private ground, however, there is scope for new publicly accessible open space areas to be delivered as part of a properly planned layout which could take advantage of the links through to the neighbouring OP25 allocated site whilst also forming links to the LNCS, incorporating the Scotstown/Perwinnes Moss Moor to the south, making these areas more readily accessible for public use. The requirements of Policy NE1 would be enhanced by development of the Site.

There is a clear need for the provision of affordable housing within the City as demonstrated in the Housing Needs and Demand Assessment 2010 (HNDA 2010). The assessment of the market at the time of the HNDA 2010 identified a number of key issues which required to be addressed through the next Local Development Plan policies including constraints to the delivery of new housing in order to meet increasing demand; severe affordability pressures (especially within the Aberdeen Housing Market Area (AHMA)); the reduction in social rented sector housing and difficulties in delivering new social rented housing to meet needs including the type of stock that is delivered and where. The HNDA 2010 concluded that approximately 350 affordable units require to be provided each year for the next 10 years within the City. Development of the Site would help meet the identified need for affordable housing.

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#### 4 CONCLUSION

- 4.1 Mr Langler seeks to update Bid 0206 and representation 101000359919 to make it clear that the allocation which is sought is for residential development, comprising approximately 300 units, of predominantly affordable housing.
- 4.2 An indicative site layout plan has been prepared to illustrate how an appropriate form of housing development could be planned on the Site, which layout reflects the characteristics of the wider area, whilst ensuring links to the existing development proposals at OP25 and beyond. The indicative site layout also includes 80 square metres of workshop units which would also help to provide a mixed use community, in accordance with Council policy.
- 4.3 The review of the ALDP provides an opportunity to review the Green Belt boundary at Shielhill. The Site is a brownfield site and the Development Plan gives primacy to the redevelopment of brownfield land.
- 4.4 It is understood that the Site has been included within the Green Belt and Greenspace Network on the basis that it falls within the LNCS. The Site comprises less than 10% of the total LNCS and removal of the Site from the LCNS will not detrimentally impact on the wider LNCS or the SSSI.
- 4.5 There is a clear need for the provision of affordable housing in the City.
- 4.6 It is submitted that the Site should be removed from the Green Belt and Greenspace Network and identified for residential development.

BURNESS PAULL LLP  
Solicitors

Agent for Mr John Langler

13 October 2014

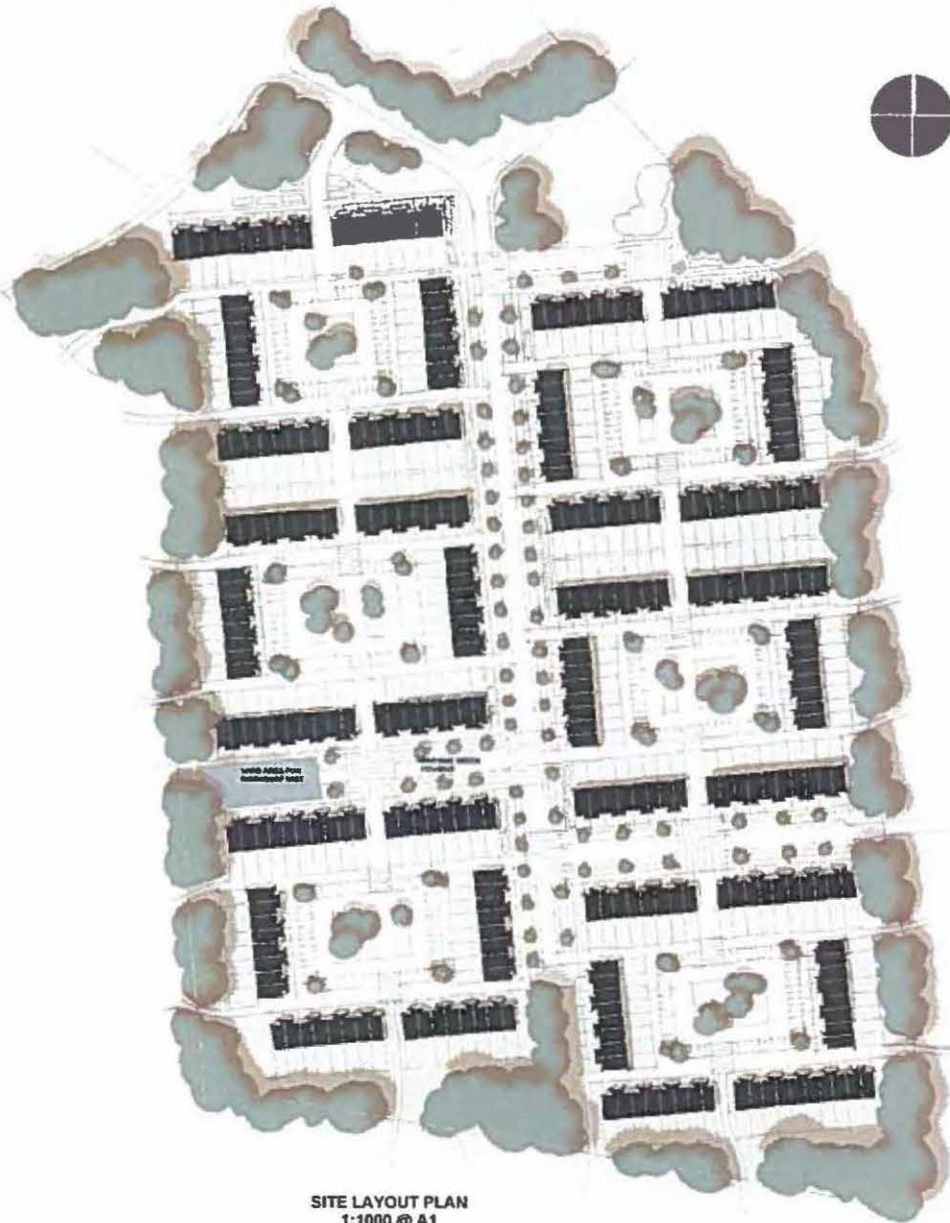




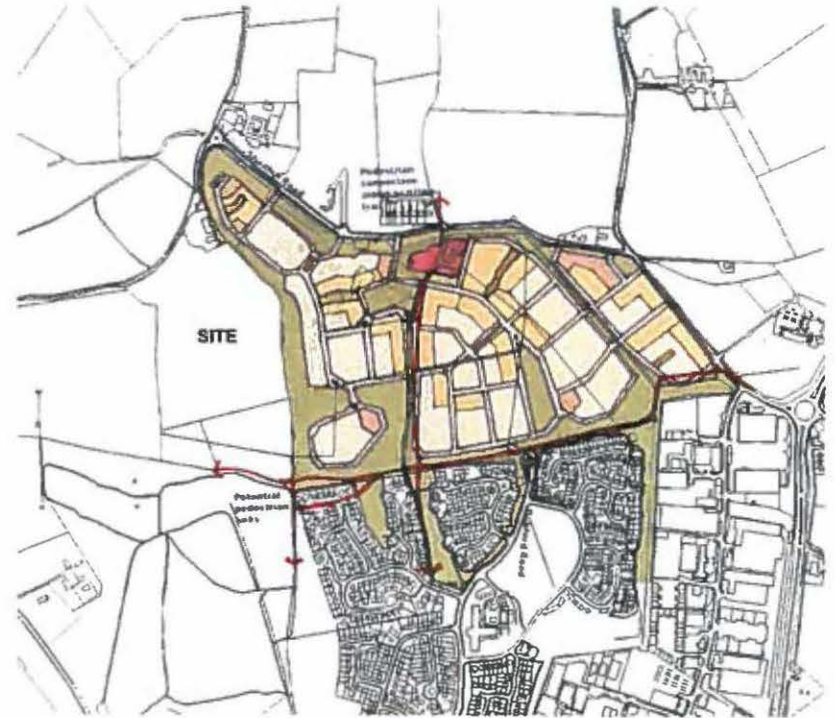
Appendix 1

Halliday Fraser Munro Drawing No SK01 April 2014





**SITE LAYOUT PLAN**  
1:1000 @ A1



**ACCOMMODATION:**

|                             |                               |            |
|-----------------------------|-------------------------------|------------|
| 3 BED HOUSES:               | 96 SQ.M.                      | 227        |
| 4 BED HOUSES:               | 188 SQ.M.                     | 87         |
| 3 BED HOUSES VARYING NEEDS: | 96 SQ.M.                      | 18         |
| <b>TOTAL</b>                |                               | <b>294</b> |
| <b>WORKSHOP UNITS:</b>      | <b>88 SQ.M.</b>               | <b>18</b>  |
| <b>GROSS SITE AREA:</b>     | <b>9.3 HA</b>                 |            |
| <b>NET DEVELOPABLE:</b>     | <b>7.8 HA</b>                 |            |
| <b>DENSITY:</b>             | <b>17.8 HOUSES PER ACRE</b>   |            |
| <b>COVERAGE:</b>            | <b>17,388 SQ.FT. PER ACRE</b> |            |
| <b>PARKING PROVISION:</b>   |                               |            |
| 100% WITHIN PARKING COURTS  |                               |            |
| 64% ON STREET PARKING       |                               |            |

**DESIGN PRINCIPLES:**

- PROVISION OF AFFORDABLE 3 AND 4 BEDROOM FAMILY HOMES
- MINIMISE ROADS INFRASTRUCTURE BY USE OF HOUSING COURTS OFF MAIN ACCESS AVENUE.
- STANDARDISE HOUSE FOOTPRINTS TO ALLOW FLEXIBILITY AND INCREASE OPPORTUNITIES OF PREFABRICATION.
- DEVELOP AS HOUSING COURTS TO FOSTER IDENTITY AND SENSE OF PLACE.
- MAXIMISE ACCESS TO SURROUNDING COUNTRYSIDE AND CORE PATHNETWORK
- HIGH QUALITY LANDSCAPING WITHIN HOUSING COURTS.
- ALLOW FOR VEHICULAR AND PEDESTRIAN CONNECTIONS TO NEIGHBOURING DEVELOPMENT



Appendix 2

Bid reference B0206





## **Aberdeen Local Development Plan Review**

### **Proposal for a site to be included in the Main Issues Report**

The Proposed Strategic Development Plan does not require us to allocate extra housing or employment land in the next Local Development Plan (LDP). Because the 2012 LDP identified a significant number of greenfield sites to accommodate these requirements, we are not looking to allocate any more greenfield housing or employment land in this plan. It is for this reason that we are not asking for greenfield development options this time around. However, we are always keen to identify new brownfield sites for housing or for other uses. Please use this form to provide details of the site that you wish to have included in the Main Issues Report for consideration as a proposal in the next Aberdeen Local Development Plan.

One of the purposes of this form is to inform a public debate on the merits of the different sites being proposed. All information submitted will therefore be made available to the public to promote a transparent and open process.

Please feel free to provide any further information you feel appropriate to support your submission. The City Council has produced a Sustainability Checklist which provides guidance on the issues which will be used to help us judge the merits of competing development options. This can be found on [www.aberdeencity.gov.uk/localdevelopmentplan](http://www.aberdeencity.gov.uk/localdevelopmentplan)

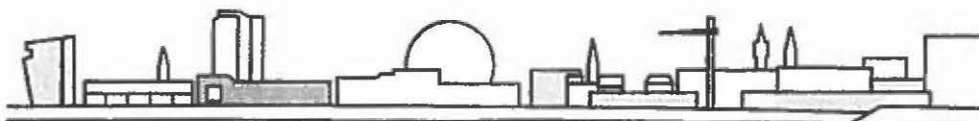
**Please ensure your proposal is with us by 14th June 2013.**

#### **Using your personal information**

Information you supply to Aberdeen City Council (ACC) in this form will be used to prepare the Local Development Plan. The information provided will be made public and will be placed on the Council's website. This will include the name and address of the proposer and landowner.

The Local Development Plan team may also use your contact details to contact you about the information you have provided.

For further information on how your information is used, how ACC maintain the security of your information, and your rights to access information ACC holds about you, please contact Andrew Brownrigg, Team Leader, Local Development Plan Team, Enterprise Planning and Infrastructure, Aberdeen City Council, Business Hub 4 Marischal College, Broad Street, Aberdeen AB10 1AB



1

Name of proposer: MR J LANGLER (PER HALLIDAY FRASER MUNRO)

Date: 13/06/2013

Address: CARDEN CHURCH, 6 CARDEN PLACE,  
ABERDEEN

Postcode: AB10 1UR

Telephone: [REDACTED]

Email: [REDACTED]

2

Name of landowner: MR J LANGLER

Address: PTR AGENT

### The site and your proposal

3 What name would you like the site to be known as?  
[The site name could be descriptive or an address]

SHIEL HILL, BRIDGE OF DON

Have you any information for the site on the internet? If so please provide the web address:

N/A

4 Please provide a map showing the exact boundaries of the site you would like considered.

✓ Map Provided

5 Please provide the National Grid reference of the site.

NJ 935 125

6 What is the current use of the site?

SCRUB LAND

Has there been any previous development on the site?

Yes ✓ No

If so, what was it?

THE SITE WAS FORMERLY USED AS AN MOD TRAINING RANGE AND FOR SAND AND GRAVEL AGGREGATE EXTRACTION.

7 What do you propose using the site for?

SAND AND GRAVEL AGGREGATE EXTRACTION.



8 If you are proposing housing on the site please provide details of what you think would be appropriate, both in terms of the number of dwellings, and their forms (flats, detached houses, terraces etc).

N/A

9 It is likely that there will be a requirement for 25% of the housing within the development to be affordable. If applicable, are you considering more or less than this figure? N/A

25%  More  Less

10 If you are proposing business uses please provide details of what you would market the land for? [Please make sure the area of land proposed for business use is shown on the site plan] N/A

Business and offices (Use Class 4)

General industrial land (Use Class 5)

Storage and distribution (Use Class 6)

Do you have a specific occupier in mind for the site? Yes  No

11 If you are proposing uses other than housing or business please provide as much detail as possible on what you propose. [Examples could include retailing, tourism, renewable energy, sports, leisure and recreation, institutions and education.]

THE SITE IS PROPOSED TO BE SAFEGUARDED FOR SAND AND GRAVEL AGGREGATE EXTRACTION.

12 Will the proposed development be phased? Yes  No

If yes, then please provide details of what is anticipated to be built and when

EXTRACTION OPERATIONS ARE TO BE PHASED OVER A TEN YEAR PERIOD.

13 Has the local community been given the opportunity to influence/partake in the development proposal?

Yes  No  Not Yet

If there has been any community engagement please provide details of the way in which it was carried out and how it has influenced your proposals. If no consultation has yet taken place, please detail how you will do so in the future.

PUBLIC CONSULTATION WILL BE UNDERTAKEN IN LINE WITH THE PROGRAMME SET OUT BY ACC AS PART OF THE LDP PROCESS. A FLEXIBLE APPROACH WILL BE TAKEN.

## Sustainable Development and Design

14 Have you applied principles of sustainable siting and design to your site? The City Council has produced a Sustainability Checklist which provides guidance on the principles of sustainable siting and design and other issues which can be found on [www.aberdeencity.gov.uk/localdevelopmentplan](http://www.aberdeencity.gov.uk/localdevelopmentplan)

Please provide the following information: SEE ATTACHED SUPPORTING STATEMENT FOR FURTHER INFORMATION

A) Exposure – does the site currently have

- Little shelter from northerly winds
- Some shelter from northerly winds
- Good shelter to northerly winds

B) Aspect – is the site mainly

- North facing
- East or west facing
- South, south west or south east facing

C) Slope – do any parts of the site have a gradient greater than 1 in 12?

Yes

If yes, approximately how much (hectares or %)

- No

D) Flooding – are any parts of the site at risk of flooding?

Yes

If yes, approximately how much (hectares or %)

- No

E) Drainage – do any parts of the site currently suffer from poor drainage or waterlogging?

Yes

If yes, approximately how much (hectares or %)

- No

F) Built and Cultural Heritage – would the development of the site lead to the loss or disturbance of archaeological sites or vernacular or listed buildings?

- Significant loss or disturbance
- Some potential loss or disturbance

- No loss or disturbance

G) Natural conservation – would the development of the site lead to the loss or disturbance of wildlife habitats or species?

- Significant loss or disturbance
- Some potential loss or disturbance

- No loss or disturbance

H) Landscape features – would the development of the site lead to the loss or disturbance of linear and group features of woods, tree belts, hedges and stone walls?

- Significant loss or disturbance
- Some potential loss or disturbance

✓ No loss or disturbance

I) Landscape fit – would the development be intrusive into the surrounding landscape?

- Significant intrusion
- Slight intrusion

✓ No intrusion

J) Relationship to existing settlements – how well related will the development be to existing settlements?

- Unrelated (essentially a new settlement)
- Partially related

✓ Well related to existing settlement

K) Land use mix – will the development contribute to a balance of land uses, or provide the impetus for attracting new facilities?

No contribution

✓ Some contribution

Significant contribution

L) Accessibility – is the site currently accessible to bus, rail, or major road networks?

|                            | Bus Route | Rail Station | Major Road |
|----------------------------|-----------|--------------|------------|
| Access more than 800m away |           | ✓            |            |
| Access between 400-800m    |           |              |            |
| Access within 400m         | ✓         |              | ✓          |

M) Proximity to services and facilities – How close are any of the following?

|                           | 400m | 400m-800m | >800m |
|---------------------------|------|-----------|-------|
| Community facilities      |      |           | ✓     |
| Local shops               |      | ✓         |       |
| Sports facilities         |      |           | ✓     |
| Public transport networks | ✓    |           |       |
| Primary schools           |      |           | ✓     |

N) Footpath and cycle connections – are there any existing direct footpath and cycle connections to community and recreation facilities or employment?

- No available connections
- Limited range of connections

✓ Good range of connections

O) Proximity to employment opportunities – are there any existing employment opportunities within 1.6km for people using or living in the development you propose?

- None
- Limited
- Significant

P) Contamination – are there any contamination or tipping issues with the site?

- Significant contamination or tipping present
- Some potential contamination or tipping present
- No contamination or tipping present

Q) Land use conflict – would the development conflict with adjoining land uses or have any air quality or noise issues?

- Significant conflict
- Some potential conflict
- No conflict

If there are significant conflicts, what mitigation measures are proposed?

R) Physical Infrastructure – does the site have connections to the following utilities?

- Electricity
- Gas
- Water and Sewage

If you are proposing housing, is there existing school capacity in the area?

- Secondary Capacity
- Primary Capacity

Are there any further physical or service infrastructure issues affecting the site?

NONE.

15 No site is going to be perfect and the checklist above will inevitably raise some potential negative impacts from any development. Where negative impacts are identified, please provide details of their nature and extent and of any mitigation that may be undertaken. Listed below are examples of further information that may be included in your submission:

|   | Included | Not applicable |  |
|---|----------|----------------|--|
| Contamination Report  |          | ✓              | SPECIFIC SUPPORTING REPORTS CAN BE PROVIDED AT A LATER STAGE IF NECESSARY. |
| Flood Risk Assessment   |          | ✓              |  |
| Drainage Impact Assessment  |          | ✓              |  |
| Habitat/biodiversity Assessment   |          | ✓              |  |
| Landscape Assessment  |          | ✓              |  |
| Transport Assessment  |          | ✓              |  |
| Other as applicable (e.g. trees, noise, dust, smell, retail impact assessment etc please state) |          | ✓              |  |

16 Does the development proposal give any benefits to the community? If so what benefits does the development bring, and how would they likely be delivered?

Community benefits can include new community facilities (such as local shops, health, education, leisure and community facilities), affordable housing, green transport links and open spaces. Include elements which you anticipate may be required as developer contributions from the development. (Please note, specific contributions will have to be negotiated with the Council on the basis of the proposal.)

SEE ATTACHED STATEMENT

17 If you have prepared a framework or masterplan showing a possible layout for the site, please include it with this form.

✓ Masterplan/ Framework attached

If you need help reading this document (for example if you need it in a different format or in another language), please phone us on 01224 523317.

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pod numer: 01224 523317



Thank you for taking the time to complete this form.  
Please return completed forms to:

Local Development Plan Team  
Enterprise, Planning and Infrastructure  
Aberdeen City Council  
Business Hub 4  
Ground Floor North  
Marischal College  
Broad Street  
Aberdeen  
AB10 1AB

Or email it to: [ldp@aberdeencity.gov.uk](mailto:ldp@aberdeencity.gov.uk)

March 2013  
[www.aberdeencity.gov.uk](http://www.aberdeencity.gov.uk)

# Development Bid Supporting Statement

Shielhill,  
Bridge of Don,  
Aberdeen

On behalf of Mr J Langler

June 2013

## Halliday Fraser Munro

Chartered Architects & Planning Consultants

Carden Church 6 Carden Place Aberdeen AB10 1UR  
Tel: 01224 388700 Fax: 01224 388777

Aberdeen - Belfast - Dundee - Edinburgh - Glasgow

e-mail: [planning@hfm.co.uk](mailto:planning@hfm.co.uk)

## 1.0 INTRODUCTION

This supporting statement is to be read in conjunction with a development bid submitted to Aberdeen City Council proposing the safeguarding of 9.3 ha of land for mineral extraction (sand and gravel aggregate extraction) at Shielhill, Bridge of Don, Aberdeen. The bid is submitted on behalf of Mr J Langler, the landowner. Detailed site and laboratory testing has shown that the site supports a high quality gravel aggregate and sand resource capable of being extracted. This resource should be considered in the context of major future development taking place to the north of Aberdeen, such as the AWPR, major housing at Dubford, major commercial development at Murcar and various developments in the Energetica Corridor. The location of this resource at Shielhill presents a highly sustainable solution to serve these future developments with the necessary gravel aggregate and sand for construction.

Submissions are being made to the Local Development Plan process in order to safeguard this resource through the LDP zoning process. The site is currently zoned as Green Belt / Green Space Network in the 2012 LDP. It lies adjacent to a Local Nature Reserve. The site has been the subject of quarrying operations in the past and was also used as a MoD off road driving training centre. It is understood that the site has an extant planning permission for quarrying. There are also various quarrying and land restoration operations and a concrete batching plant in the Shielhill area. Planning Permission was granted earlier this year for an office and storage yard development in a former quarry adjacent to Shielhill Farm. These existing and proposed uses have established the semi-industrial nature of the area and road network. It should of course be noted that quarrying operations on the site will be finite and the site restored at a future date. Initial investigations have shown that the site would be quarried over a ten year period through a phased programme. The following statement explains the bid in more detail and is structured around the Council's bid pro-forma.

## 2.0 SITE DESCRIPTION

The development bid site comprises undulating scrubby land. The north west boundary of the site lies adjacent to the unclassified Shielhill Road linking the B977 with the B999. Existing commercial (office and yard) premises lie immediately to the north. The site is served by an existing direct access off the Shielhill Road. The eastern boundary is shared with the OP 25 Dubford housing site allocated in the current LDP for 550 houses. Planning permission exists for the first phases of this large scale development. To the south and west the Shielhill site is surrounded by Perwinnes Moss. It is important to draw a distinction between the bid site and Perwinnes Moss. The previous quarrying and MoD uses have reduced any natural heritage value when compared with surrounding 'moss' areas.





AERIAL VIEW OF SITE AND SURROUNDING AREA — Note surrounding quarry and landfill operations.



SITE VIEWED FROM NORTH—Note minimal landscape impact, existing commercial operations and separate access to site adjacent to road.



### 3.0 SUSTAINABILITY CHECKLIST

We believe that the proposed bid site at Shielhill is deliverable, with no constraints being identified. The site is reviewed below, using the headings in the Council's Sustainability Checklist. The review should be considered in the context of the safeguarding the site for quarry use as proposed, rather than a new housing or employment site allocation.

#### 3.1 Exposure

The proposed bid site is not particularly exposed. The landscape character is one of undulating moss areas adjacent to open agricultural land to the east (allocated for development). The existing landform provides some shelter and opportunities for additional landscaping and shelter belt planting as necessary. Mineral extraction operations on the bid site would not dramatically alter the character of the Shielhill area, given its existing range of land uses.

#### 3.2 Aspect

The site is principally north facing.

#### 3.3 Slope

The site does not have any sloping areas that would require mitigation in relation to quarrying operations.

#### 3.4 Flood Risk

The site is not subject to any flood risk.

#### 3.5 Drainage

The site is not subject to any waterlogging issues.

#### 3.6 Built / Cultural Heritage

The site is not subject to any built or cultural heritage features or constraints.

#### 3.7 Natural Conservation

Although the site is noted as a small part of a 'District Wildlife Site' in the current LDP, its former uses for quarrying and as an MoD training facility has degraded its natural heritage assets (as seen on the aerial view opposite). The site does not have the same natural heritage value as the adjacent Perwinnes Moss, which is also designated as a 'Local Nature Reserve'. This presents scope to alter the current designation in the LDP to permit the extraction of the identified sand and aggregate resource. It should be noted that the proposed method of mineral extraction is to be by 'scraping' the site rather than 'blasting', reducing any impacts.

#### 3.8 Landscape Features

The site does not have any strong landscape features which set it apart from the surrounding areas.

#### 3.9 Landscape Fit

The surrounding undulating landscape will be useful in minimising the visual impact of any extraction operations. A 10 metre wide safety zone / landscape buffer is required around the site perimeter which will assist in this.

### **3.10 Relationship to Existing Settlements**

The bid site is well related to existing commercial developments and is also directly adjacent to the proposed future residential development at OP 25 Dubford.

### **3.11 Land Use Mix**

The proposed land use is sand and gravel aggregate extraction. This will present no conflict with adjacent commercial uses and can be adequately screened from and future residential development. The agreed development framework for the Dubford site indicates considerable areas of green space and landscape planting along the western boundary shared with the bid site.

### **3.12 Accessibility**

The site is well-connected to the local road network leading to the B997 and B999. This provides a high standard of access that would be suitable to support quarry operations, as it already serves existing commercial and industrial development and links the B997 and B999. The A90 trunk road is only 1.6 km to the west, providing a direct link to the centre of Aberdeen and all areas to the north.

### **3.13 Proximity to Services and Facilities**

The development bid site is well-related to existing services and facilities in Bridge of Don and Murcar.

### **3.14 Footpath and Cycle Connections**

The area has various existing foot / cyclepath connections around the bid site. These would not be particularly relevant to the proposed quarry operations.

### **3.15 Proximity to Employment Opportunities**

The site is directly adjacent to existing commercial operations and is close to existing employment hubs at Murcar, The Core, Dubford and the Science and Technology Park.

### **3.16 Contamination**

There are no known sources of contamination on the site through previous use.

### **3.17 Land Use Conflict**

The adjacent existing and proposed uses are entirely compatible with the uses proposed through the development bid.

### **3.18 Physical Infrastructure**

There are no known constraints to development on the site. The proposed sand and gravel aggregate extraction has been considered in detail by engineering and ground work consultants who have confirmed its feasibility and suitability.

### **3.19 Community Benefits**

Development on the bid site would bring benefits in the form of additional commercial activity in the area and employment opportunities. A further benefit is the sustainable sourcing of construction material from the site,

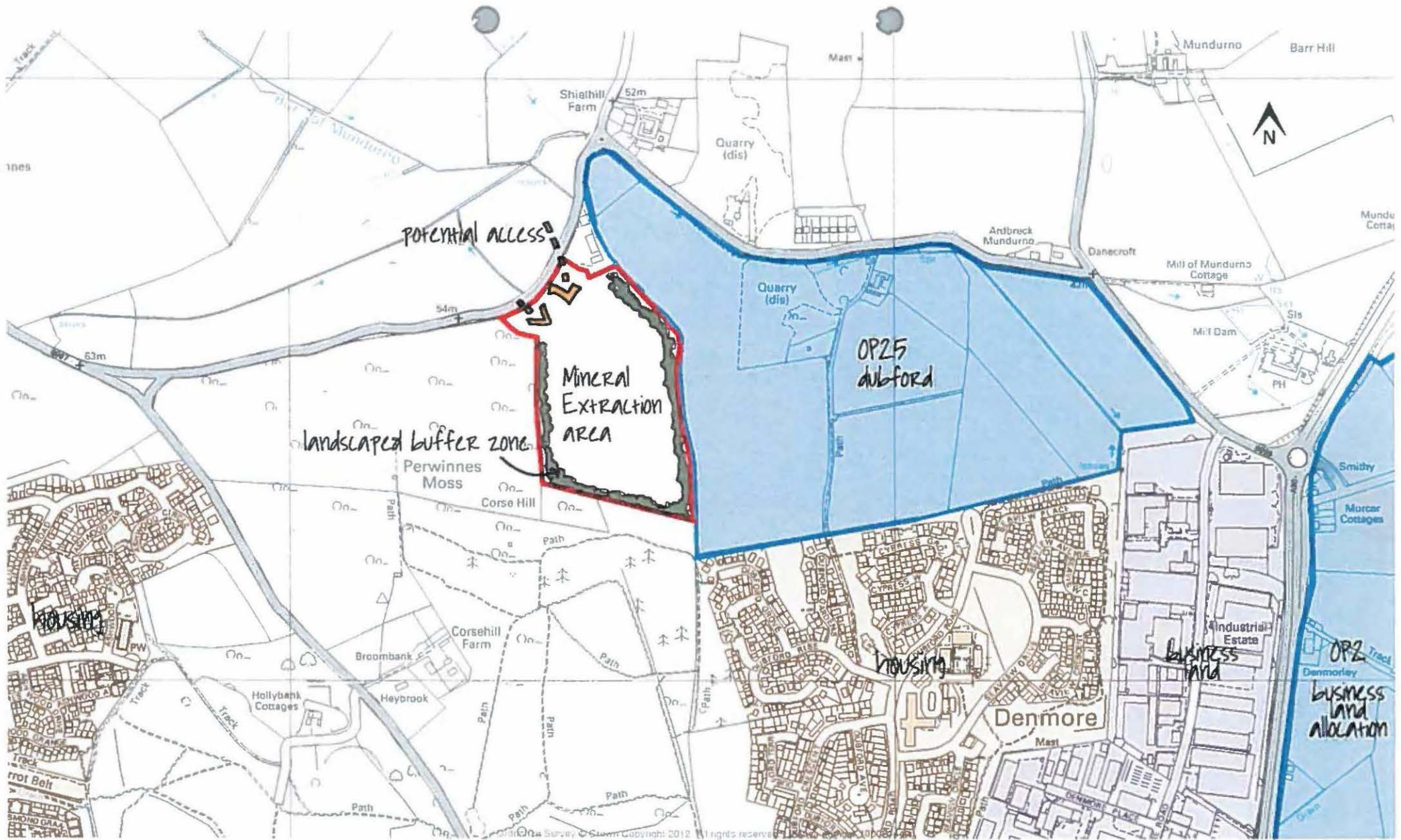
\* reducing transportation of such material through residential areas from source to construction site.

#### **4.0 THE PROPOSAL**

9.3 ha of land at Shielhill, Bridge of Don are proposed to be safeguarded for sand and gravel aggregate extraction. The site has been fully investigated and highlighted as an appropriate, sustainable mineral resource. Extraction operations on the site are compatible with adjacent commercial uses and the various other landfill / quarry / land restoration workings in the area. The site is already degraded and contributes little to the adjacent District Wildlife Site and Local Nature Reserve. The site has constraints to its development.

#### **5.0 CONCLUSION**

The foregoing sections have considered various aspects of the bid to safeguard the quarry resource at Shielhill. It has been shown that the site is deliverable, and represents an important sustainable sand and gravel aggregate resource in the north of Aberdeen. The site will be restored following the completion of extraction operations. It is respectfully requested that the land is safeguarded in the forthcoming Aberdeen Local Development Plan for sand and gravel aggregate extraction.



**BID SITE PLAN (nts)**

Shielhill, Bridge of Don – Mineral Extraction

Mr J Langler



**HALLIDAY FRASER MUNRO**

ESTABLISHED ARCHITECTS • PLANNING CONSULTANTS

MEMBERS • BELFAST • DUBLIN • EDINBURGH • GLASGOW

## Appendix 3

MIR representation 101000359919





P1899/SL/lc

21 March 2014

Local Development Plan Team  
Planning and Sustainable Development  
Aberdeen City Council  
Business Hub 4  
Ground Floor North  
Marischal College  
Broad Street  
Aberdeen  
AB10 1AB

Dear Sir / Madam

**FUTURE MINERAL EXTRACTION / RESIDENTIAL / EMPLOYMENT SITE  
SHIELHILL, BRIDGE OF DON, ABERDEEN (B0206)  
Response to Local Development Plan Main Issues Report  
Mr J Langler**

We refer to the current consultation on the Aberdeen City Local Development Plan Main Issues Report (MIR).

A 'development bid' was submitted as part of the pre-MIR consultation proposing the allocation of 9.3 ha of land at Shielhill, Bridge of Don, Aberdeen for mineral extraction (sand and gravel aggregate extraction).

Detailed site and laboratory testing has shown that the site supports a high quality gravel aggregate and sand resource capable of being extracted. This resource should be considered in the context of major future development taking place to the north of Aberdeen, such as the AWPR, major housing at Dubford, major commercial development at Murcar and various developments in the Energetica Corridor. The location of this resource at Shielhill presents a highly sustainable solution to serve these future developments with the necessary gravel aggregate and sand for construction.

**MIR - Main Issue 1 – Greenfield Housing and Employment Allocations**

In terms of the Settlement Strategy and allocation of new greenfield development allocations, the general approach taken by the MIR is that if the existing allocations are carried over, there is no requirement to allocate additional greenfield sites. The exception to this approach however, is the proposed allocation of 'a number of additional small sites (amounting to 98 houses) around Peterculter to increase housing choice there and to support the primary school'. This suggests there is some flexibility in the allocation of appropriate greenfield development sites.

Issue 1 set out in the MIR asks whether the Council need to add to the greenfield housing and/or employment land supply by allocating more sites. We suggest that the alternative 'Option 2' should be pursued and additional greenfield land should be allocated for housing and employment uses, in order to provide a range of large, medium and small sites, which in turn will increase the deliverability of new development in the City. We believe that there is an over-reliance on large scale sites and there is a requirement for smaller allocations such as that which could be accommodated at Shielhill. The justification for the allocation of land at Shielhill is however based on the location of an existing resource.

### **Mineral Extraction / Phased Development Strategy**

The land at Shielhill presents an opportunity for mineral extraction in the first instance, on a temporary basis, then the potential for residential or commercial development following restoration. This strategy removes potential for any conflicts with adjacent residential or commercial uses.

In terms of mineral extraction operations, these would not involve the entire site and would be undertaken through scraping processes rather than blasting. Existing bunds would be used to limit any impacts within the site. In terms of the adjacent residential development, there is already a substantial landscaped area proposed along the western boundary of the Dubford development (see planning application ref P131614). The western boundary of this site also sits at a higher level relative to the Shielhill site, and the Shielhill site level will lower through scraping operations. This will ensure an adequate buffer between any housing built and occupied and any mineral extraction operations.

### **Future Residential / Commercial Use**

The boundaries of the land at Sheilhill are contiguous with the Dubford residential allocation of 550 houses to the east, and to existing business and quarrying developments to the north. Following completion of mineral extraction operations, the site presents an ideal opportunity for the next phase of housing or commercial development in the area.

Although there are large scale employment land allocations in the area being built out at present, there is an absence of small-scale start up business units in the area which are affordable and accessible to new enterprises. The land at Shielhill would be ideal for this use, given its location adjacent to the existing buildings occupied by Walker Technical Resources. The site is also close to a large existing and proposed population, presenting a sustainable employment location.

### **Brownfield Sites**

It is noted that the MIR allocates a number of brownfield sites as preferred future options for residential or commercial development at Craiginchies, Grove Nursery, Raiths Farm and Woodend. The land at Shielhill is also a

brownfield site. It is understood to have extant planning permission for quarrying and has been used for quarrying operations in the past. The site has also been used as a MOD driver training centre. The site is degraded from previous usage. This is evidenced through the majority of the site's present condition as worn down scrub land covered in gravel vehicle tracks.

### **Sustainability Checklist**

We have reviewed the 'Sustainability Checklist' of the Shielhill site. It scores 40 out of 100. The Sustainability Checklist confirms that there are no concerns regarding built and cultural heritage, flooding, drainage, contamination, landscape impact, relationship to existing settlement, creation of employment opportunities, contamination or infrastructure capacity. The development bid is however classed as 'undesirable', with 'Land use conflict with neighbouring residential and nature conservation' identified as constraints.

The proposal to allocate the site for mineral extraction is based on the existing mineral resources that are present within the site. This makes much of the site assessment criteria academic, as its location and characteristics are based on the natural occurrence of the minerals. It represents a phased sustainable resource in high demand that can be used to provide natural materials necessary for the range of development projects taking place in the area. The exhaustion of this resource then leaves a brownfield site adjacent to an established centre of population.

We comment of the perceived constraints as follows:

### **Harmonisation of Neighbouring Uses**

The proposed mineral extraction operations will only be temporary. Any land use conflicts will be appropriately mitigated in the short term through boundary treatments on both sites. There will not be any long-term conflicts. We therefore do not believe that 'land use conflict' presents a constraint to the development of the site. The Sustainability Checklist states that 'The use of this site as a quarry will conflict with the adjacent residential development at Dubford which is now under construction by causing noise and air pollution that is unlikely to be sufficiently mitigated through a buffer or tree screening.' In summary however:

- Mineral extraction through site scraping is proposed. This does not involve the same level of impact as quarrying through blasting operations;
- Mineral extraction operations would be subject to a detailed planning permission. Such a permission would be supported by appropriate detailed reports on noise and air quality impacts. This would highlight appropriate mitigation measures would be identified if necessary, that in turn would be controlled through appropriate planning conditions or licensing;

- Detailed designs for the proposed residential development adjacent to the site indicate a large landscaped buffer area. This, added to a 10m wide mineral extraction buffer proposed around the perimeter of the scraped area would result in a distance of at least 60m between plots and mineral extraction areas. Landscape buffers would also be provided within this area;
- The site benefits from existing use rights for mineral extraction.

Having regard to the above, we do not believe that perceived 'land use conflict' represents a reason not to allocate the site for development.

### **Nature Conservation**

The site is presently within a District Wildlife Site. It does however benefit from extant planning permission for mineral workings and is largely of a degraded nature. This leads us to question the continued allocation of the site as a DWS.

In the current Local Development Plan 2012, the wider Scotstown / Perwinnes Moss area includes a number of natural heritage designations. The most valuable of these is the Site of Special Scientific interest (SSSI) designated in the southern area at Scotstown Moor. The second most valuable is the Local Nature Reserve (LNR) north of the SSSI, but outwith the Shielhill bid site. The District Wildlife Site represents the less valuable area, and the Shielhill bid site is only a small part of this. We understand the justification for the allocation of the SSSI, the LNR and part of the DWS. The continued zoning of the Shielhill site as a District Wildlife Site / Local Nature Conservation Site does however make little sense, given the site's current degraded condition and minimal nature value.

The Council's website states that:

'District Wildlife Sites are sites identified by the former District Council with assistance from Scottish Natural Heritage as sites of city-wide importance for nature conservation. DWS's are considered to represent the best examples of habitat types in the city and cover a wide range of habitats including semi-natural woodland, heathland, wetland, river systems and large stretches of Aberdeen's coastline.'

We understand that DWSs are now referred to as Local Nature Conservation Sites. The physical condition of the Shielhill site is however not sufficient to warrant the continued designation of the site as part of a DWS / LNCS. This designation should not be seen as a constraint to development due to the current condition of the land.

### **Conclusion**

In conclusion, we do believe that there are compelling arguments to allocate the land at Shielhill in the Proposed Local Development Plan as a phased development to permit mineral extraction operations, then site restoration

and future residential or commercial development. This would result in the delivery of future sustainable development adjacent to an established and growing centre of population in the north of Aberdeen.

The housing and employment land strategy set out in the MIR is not to allocate any further greenfield land. We believe that further sites should be allocated to provide a range of deliverable development opportunities.

Having regard to the foregoing, we would respectfully request that 9.3 ha of land at Shielhill, Bridge of Don is allocated in the forthcoming Aberdeen City Proposed Local Development Plan for mineral extraction.

Should you have any queries regarding any aspect of the above please do not hesitate to contact me.

Yours faithfully

**Scott Leitch**  
**Associate Planning Consultant**  
**Halliday Fraser Munro Planning**



## Appendix 4

Ecological Assessment by Nigel Rudd Ecology dated September 2014





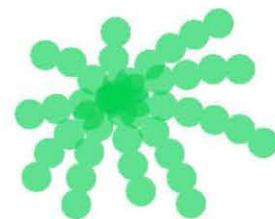
# Shielhill Bridge of Don

Mr Langler



Ecological Assessment

**Nigel Rudd**  
BSc CBiol MSB CMLI



September  
2014



**Nigel R Rudd**

Nigel Rudd Ecology

15 Bonaly Grove

Edinburgh

EH13 0QA

Tel/fax        0131 441 7955

Mobile        07976 954 642

Email         [nigel@nigelruddecology.com](mailto:nigel@nigelruddecology.com)



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## 1.0 INTRODUCTION

- 1.1 This report is commissioned by Mr Langler in respect of proposals for allocation of land at Shielhill, Bridge of Don for residential development. (NJ935124)
- 1.2 The land is on the north edge of Bridge of Don to the west of the A90. To the north and west is farmland, to the east is a development site and to the south is plantation woodland.
- 1.3 The land is a north-facing slope dominated by gorse scrub. Within the area there are numerous signs of disturbance and constant use.
- 1.4 The Shielhill land is within the boundaries of the Scotstown Moor/ Perwinnes Moss Local Nature Conservation Site (LNCS).
- 1.5 The proposal is to develop the land for housing. It is important this is achieved with no adverse impact on biodiversity and no adverse impact on the LNCS. The purpose of the survey, the findings of which are reported below, is to ensure the wellbeing of protected species is safeguarded during construction and operation of the development and to ensure there is no adverse effect of development on the LNCS and other designated sites.
- 1.6 The report will set out the survey methods, the findings of the survey, an assessment of the impact of development and recommendations for planting and habitat creation.



## **2.0 THE SURVEY**

- 2.1 The survey was undertaken in September 2014.
- 2.2 The Phase 1 Habitat Survey method was augmented by inspection for signs of the presence of species protected under the Wildlife and Countryside Act 1981, The Wildlife and Natural Environment Act 2011, the Protection of Badgers Act 1992 and European Protected Species as listed in Annex A of the EC Directive 92/43/EEC, the Conservation of Natural Habitats and of Wild Flora and Fauna ('The Habitats Directive') as enacted into domestic legislation by the Conservation (Natural Habitats &c) Amendment (Scotland) Regulations 2007.
- 2.3 The particular species sought were badgers and bats. There was no suitable habitat for water voles, otters, roosting bats or great crested-newts.
- 2.4 The findings of the surveys are set out below.
- 2.5 The survey findings are complemented by consideration of recorded data available from the National Biodiversity Network Gateway (NBN Gateway), The North East Scotland Biological Records Centre (NESBReC).



### **3.0 THE SURVEY FINDINGS**

#### **3.1 Habitats**

- 3.2 The site presents seven habitats; dense scrub, acid grassland, dry dwarf shrub heath, wet dwarf shrub heath, wet heath/acidic grassland, standing water and bare ground. The habitat distribution is indicated in Figure 2.
- 3.3 Common plant names are used in the text and a list of plants recorded is set out in Appendix 2.
- 3.4 The most extensive habitat is dense scrub, dominated by gorse. In places the gorse bushes attain a height of three metres and there is extensive colonisation of open spaces by this species. The habitat is species poor with a few shrubs associated with the gorse. These species are elder, rowan, bramble and raspberry. It appears areas have been burnt and in others the plants have died back leaving long bare trunks. The stands are subdivided by footpaths and tracks and areas where there appears to have been some quarrying activity. The habitat occupies approximately two thirds of the proposed development site.
- 3.5 In the northern areas of this habitat there are significant stands of Japanese knotweed which is clearly spreading. This is a controlled species, under the Wildlife & Countryside Act 1981 as amended, capable of smothering native plant species and diminishing the biodiversity status of the land on which it grows.
- 3.6 Dense scrub habitat is common throughout the UK, the Shielhill example is species poor, virtually a monoculture, and has negligible habitat value.
- 3.7 Acid grassland habitat threads across the Shielhill land. There are narrow strips along the edge of paths and larger tracts with apparent areas of disturbance. Yorkshire fog, bent, fescue and hair grass dominate. The sward varies in height according to whether it has been grazed by rabbits or trampled. Where the ground is damp soft rush appears. Elsewhere cross-leaved heath, heather, sorrel and ragwort are represented.
- 3.8 The more extensive areas of grassland are associated with large areas of bare ground. It looks like these locations have been disturbed, probably quarried in recent years.
- 3.9 In the north-west the grassland habitat has been colonised by giant hogweed. At the time of survey there were no tall flowering plants. It looked as though the plants had been treated with herbicide in 2013. There were no sizeable hogweed plants but numerous seedlings. The small plants will mature over the next two years unless controlled.
- 3.10 The grassland habitat is species poor and of very local value.
- 3.11 Most of the dry shrub occurs in an area that appears to have been burnt resulting in sparse vegetation and areas of bare ground. The scattered vegetation is



- dominated by ericaceae; cross-leaved heath, bell heather and heather. Other species include sedges. The habitat is restricted in area on the land and has been modified in recent years. This is a poor example of its type, it is structurally simple and has a negligible habitat value.
- 3.12 Wet dwarf shrub heath and wet heath/acid grassland are found in the south of the land. The ground is saturated in these areas and there are small pools. In the wet dwarf heath there are vehicle ruts which had filled with water at the time of survey. Sphagnum mosses are locally dominant, as are bents and fescues, rushes and heathers and heaths. Cotton grass indicates the relative permanence of these habitats in this location. The habitats are good examples of their type but occupy a relatively small area of the site. The habitats are part of a larger area that extends to the south of the site. The habitat has very local value.
- 3.13 There are two shallow water bodies on the land, both in 'quarried' areas with bare ground or very sparse vegetation. In the north is a small pond with no aquatic vegetation. The second, larger, pond is in the east centre of the land and supports a simple aquatic flora dominated by algae but also including grass of Parnassus and sedges.
- 3.14 Standing water is a valuable habitat for wildlife and is a UK biodiversity action plan priority habitat.
- 3.15 Bare ground habitat is found in two locations in the north and east centre of the land. In both locations there is evidence of level changes as a consequence of quarrying activity. In both locations there are spoil mounds and sand cliffs of varying heights. In the north there is an aggregate mound, the material appears to be in use for surfacing tracks in the north of the land.
- 3.16 The habitat has negligible habitat value.
- 3.17 Habitat summary – Habitat diversity and structure is very low. The component habitats have low value. Standing water is a valuable habitat but the two water bodies on the land are poor examples of their type.
- 3.18 The habitat resource of the land has arisen from only localised use. Gorse scrub has developed because there is no active use of the land for farming and this has then be cleared in places by quarrying activity or fire, promoting heath and acid grassland development. It appears there may have been some tipping on the land which has introduced Japanese knotweed and giant hogweed.
- 3.19 The habitat resource of the land does not comprise habitat types for which the LCNS is valued.
- 3.20 **Species**



- 3.21 The only protected species anticipated as resident on the land was badgers and bats. There is no suitable habitat for great crested-newts, otters or water voles. There is no roost habitat for bats on the land.
- 3.22 Signs showing potential for or evidence of badgers using the land were sought during the survey. The ecology, legislative context and survey information for badgers is set out in Appendix 1.
- 3.23 Badgers – No evidence was found of the species on the site or within 100m of the boundary, where accessible for survey.
- 3.24 The NBN gateway records indicate presence of badgers in the 10km grid square (NJ91) that includes the land and the nearest record is local to Shielhill and dates from 1984. NESBReC holds no records of badgers within 1km of the land.
- 3.25 Bats – There is no opportunity for bat roosting on the land. It is possible the species forage over the land.
- 3.26 Records held by NBN Gateway show common pipistrelle (*Pipistrellus pipistrellus*), and soprano pipistrelle (*P. pygmaeus*) in grid square (NJ91) containing the land. NESBReC holds records of bats within 1km of the land.
- 3.27 It is anticipated that bats may forage around the boundary of the land in summer months but the forage associated with the land is no better than surrounding land.
- 3.28 NESRC holds records of three UK BAP priority species within 100m of the land; skylark (*Alauda arvensis*), small heath butterfly (*Coenonympha pamphilus*), and lesser butterfly orchid (*Plantathera bifolia*). They also hold records of snipe (*Gallinago gallinago*) a UK Species of Conservation Concern (UK SCC) on the land. These species are widespread in the UK and Scotland.
- 3.29 Summary – No evidence was found of badgers on the site or the surrounding land but there are records of badgers local to Shielhill dating from 1984.
- 3.30 There is no bat roost potential on the land but it is accepted that bats probably forage around and over the land.
- 3.31 There is no habitat for otters, water voles or great crested-newts on, or local to, the land.
- 3.32 **Designated Sites**
- 3.33 The land is within the Scotstown/Perwinnes Aberdeen City Local Nature Conservation Site (LNCS). The LNCS encompasses the Scotstown Moor Site of Special Scientific Interest (SSSI).
- 3.34 **Scotstown LNCS** is described thus '*Scotstown Moss contains a good example of a mire and this has been designated as an SSSI. The habitat is now uncommon due to drainage and agricultural improvement of such areas.*





- Scotstown Moor supports an interesting range of mosses and flowering plants typical of wet, acid conditions. The presence of mineral rich springs allows a greater diversity of plants to grow, some of which are uncommon in the north eastern lowlands. To the north of the mire, improved grassland, gorse scrub, plantation woodland and dry heathlands are present. These habitats support a variety of plants, birds, mammals and insects.'*
- 3.35 The Scotstown/Periwinnes LNCS extends to 1.13 km<sup>2</sup>, of which 12.9ha is Scotstown Moor SSSI. Part of the south of the LNCS (52 ha) is Scotstown Moor Local Nature Reserve (LNR).
- 3.36 **Scotstown Moor SSSI** is a biological site, comprising fens and springs. The mixture of wetlands includes fen-meadow, wet heath and springs and flushes. The mineral rich springs and flushes provide habitats for a number of plant species now rare in the north-eastern lowlands, including black bog-rush (*Schoenus nigricans*), lesser butterfly orchid, greater sundew (*Drosera anglica*) and lesser tussock sedge (*Carex diandra*).
- 3.37 The SSSI is located on a shallow south-facing slope to the south of the Shielhill. The two tracts of land are separated by the crown of the hill.
- 3.38 The SSSI was first designated in 1971 to secure the conservation status of the land. Prior to this there had been steady degradation of the wetland habitats in the vicinity of the SSSI. The degradation comprised ploughing up of moorland to produce cattle grazing land during the Second World War. In the nineteenth century most of the land within the LNCS was moorland and bog, however, now most of the land is grassland arising from 'improvement' by draining and grazing.
- 3.39 Management of the SSSI has involved clearance of gorse to prevent degradation of the flora by smothering and nitrogen enrichment. SNH funds gorse removal campaigns.
- 3.40 **Corby, Lily and Bishops' Lochs SSSI** - The SSSI comprises three lochs which have fringing reedbeds and bogs to make up one of the best and least disturbed wetland sites in the north-eastern highlands. The seral progression from open water to woodlands is illustrated perfectly at Corby and Lily Lochs.
- 3.41 The lochs range from eutrophic, Corby Loch, to mesotrophic, Bishops' Loch. Corby and Lily Loch support five species of pondweed (*Potamogeton spp.*) and the fringing reedbeds are dominated by club-rush (*Schoenoplectus lacustris*), bottle sedge (*Carex rostrata*) and common reed (*Phragmites australis*).
- 3.42 Northern poor-fen, tussocky heather-cottongrass bog and birch-willow scrub of recent origin are associated with Corby and Lily Lochs.



#### 4.0 THE IMPACT OF THE PROPOSAL

- 4.1 The proposal is to develop land at Shielhill for housing through the allocation of the land in the Aberdeen City Local Development Plan for housing.
- 4.2 In consideration of a change of use for the land attention has been drawn to the nature conservation interest on and in the vicinity of the land. The issues raised are:
- The location of the Shielhill land within the Scotstown Moor/Perwinnes Moss LNCS,
  - The proximity to the Scotstown Moor SSSI,
  - Loss of potential bat habitat,
  - Impact on skylark, small heath butterfly, common snipe, and lesser butterfly orchid.
- 4.3 It is appropriate to address the above points before dealing with the more general aspects of development of the land.
- 4.4 In addition, it is appropriate to consider the impact of residential development in the context of the impact of leaving the land unmanaged.
- 4.5 **Location within the LNCS** – The LNCS extends to 1.13km<sup>2</sup> of which the Shielhill land comprises 9ha. The site comprises 10% of the total LNCS, most of the area comprising very low grade habitat which has been degraded by lack of management and disturbance for quarrying. The Shielhill land contributes very little to the LNCS and will contribute even less as the invasive plant species establish themselves and oust the native plant species. It is inevitable establishment will speed up as the leguminous gorse enriches the nutrient status of the soil.
- 4.6 Development for housing would have less impact than leaving the land unmanaged with the resultant spread of gorse scrub and non-native invasive species across the land.
- 4.7 **The proximity to Scotstown Moor SSSI** – The SSSI is 500m to the south of the Shielhill land. The SSSI is on a south-facing slope which drains to the south, whereas the Shielhill land is on a north-facing slope draining to the north. The SSSI is valued for its wetland habitats. The Shielhill land and the SSSI are at similar levels on the north and south faces of Corse Hill such that development of the Shielhill land would not compromise the hydrological integrity of Scotstown Moor with a negative impact on the SSSI.
- 4.8 **Loss of bat habitat** – there would be no loss of bat roost opportunity as a consequence of development of the land at Shielhill. It is anticipated bats forage over the Shielhill land but the forage resource is poor quality and no better than the surrounding land and even private housing developments which present much more varied insect habitat opportunity.



- 4.9 Allocation of land for development would be less damaging to bat forage than would leaving the land unmanaged. The latter would reduce the habitat resource of the land to gorse scrub with areas of Japanese knotweed and giant hogweed.
- 4.10 **Impact on species** – This will be dealt with by species.
- 4.11 Skylark – is a UKBAP priority species which is an historic listing reflecting a decline in numbers as a consequence of habitat disruption and loss. The listing is retained because even though the decline has halted there has been no recovery.
- 4.12 The species is widespread and numerous with 1,500,000 territories recorded by the Royal Society for the Protection of Birds (RSPB). The species is clearly not threatened and the breeding opportunities for the species on the Shielhill land are negligible even in the context of those available on adjacent land.
- 4.13 Small heath butterfly – Like the skylark, this species is widespread and found over most of the British Isles with the exception of Orkney and Shetland and mountainous regions.
- 4.14 The small heath is not restricted to heathland but found in a number of open habitats including grassland, heathland, railway embankments, disused quarries meadows and sand dunes. It is attracted to shorter grassland swards. There is little suitable habitat for the species at Shielhill.
- 4.15 Snipe – is a wading bird, which is also widespread in the UK. Their habitat varies during the year as do their numbers. In spring they are most easily found in moorland whereas in the winter they occupy well vegetated wetlands. RSPB indicate there are 80,000 breeding pairs in the UK but winter migrants boost the numbers to 1.1million birds.
- 4.16 Some breeding habitat is found on the Shielhill land but there is no quality feeding habitat.
- 4.17 Lesser butterfly orchid – The species is found across the UK and Ireland but is most common in Wales. It is found mostly in wet acid conditions but can be found on neutral or basic land.
- 4.18 The species has not been recorded on the Shielhill land but on the low wet grassland to the north.
- 4.19 There will be no impact on the conservation status of the four species discussed above. Three of the species are numerous and widespread in the UK and the potential numbers using the Shielhill land would be very small in the context of the UK populations. One of the species, the lesser butterfly orchid, is not recorded on the land but on the land to the north and therefore not threatened by allocation of the Sheilhill land for housing.



- 4.20 The threats to all of the species posed by allocation of the land for housing would be less than that arising from the spread of gorse scrub habitat. Dominance of gorse scrub and non-native invasive plant species would remove the preferred habitat of the four species.
- 4.21 Development of the land would result in the loss of mainly gorse scrub habitat. In addition there would be loss of small areas of acid grassland, dry and wet heath, standing water and bare ground.
- 4.22 Development would also result in the removal of a number of stands of invasive weeds; Japanese knotweed and giant hogweed.
- 4.23 The habitats lost will be replaced by houses, private garden ground, public open space and boundary tree planting. The house footprints will represent a permanent loss of semi-natural habitat but creation of garden ground and boundary planting will represent a change in habitat type. The new habitats will be more diverse than the habitat they replace.
- 4.24 There was no evidence of badgers using the site but there are records of the species locally. The presence of the species locally represents a risk to their wellbeing during the construction process. A precautionary approach is recommended, putting measures in place to ensure mammals do not come to harm during this time; open pipes should be closed up at the end of each working day, and trenches should be covered or a ramp provided to permit animals that fall in a means of exit, to prevent animals becoming trapped. Chemicals and materials should be stored securely.
- 3.43 Corby, Lily and Bishops' Lochs SSSI is located 2km to the of Shielhill land. The separation of the land from the SSSI means there will be no impact on the Site as a consequence of the development of the Shielhill land.
- 4.25 Summary
- 4.26 The impact of the release of the Shielhill land for housing has to be considered on its merits but also in the context of being left unmanaged.
- 4.27 Development of the land for either purpose will result in the loss of semi-natural habitat within the LNCS but the resource lost is already degraded by recent activity, lack of management and colonisation by invasive plant species such that there will be no adverse impact on the LNCS.
- 4.28 There will be no impact on badger populations but precautionary measures should be put in place to safeguard mammals during construction.
- 4.29 There will be a potential enhancement of bat forage resource and no loss of roost habitat. There will be a temporary loss of forage habitat during construction of housing but permanent habitat loss as a result of leaving the land unmanaged.



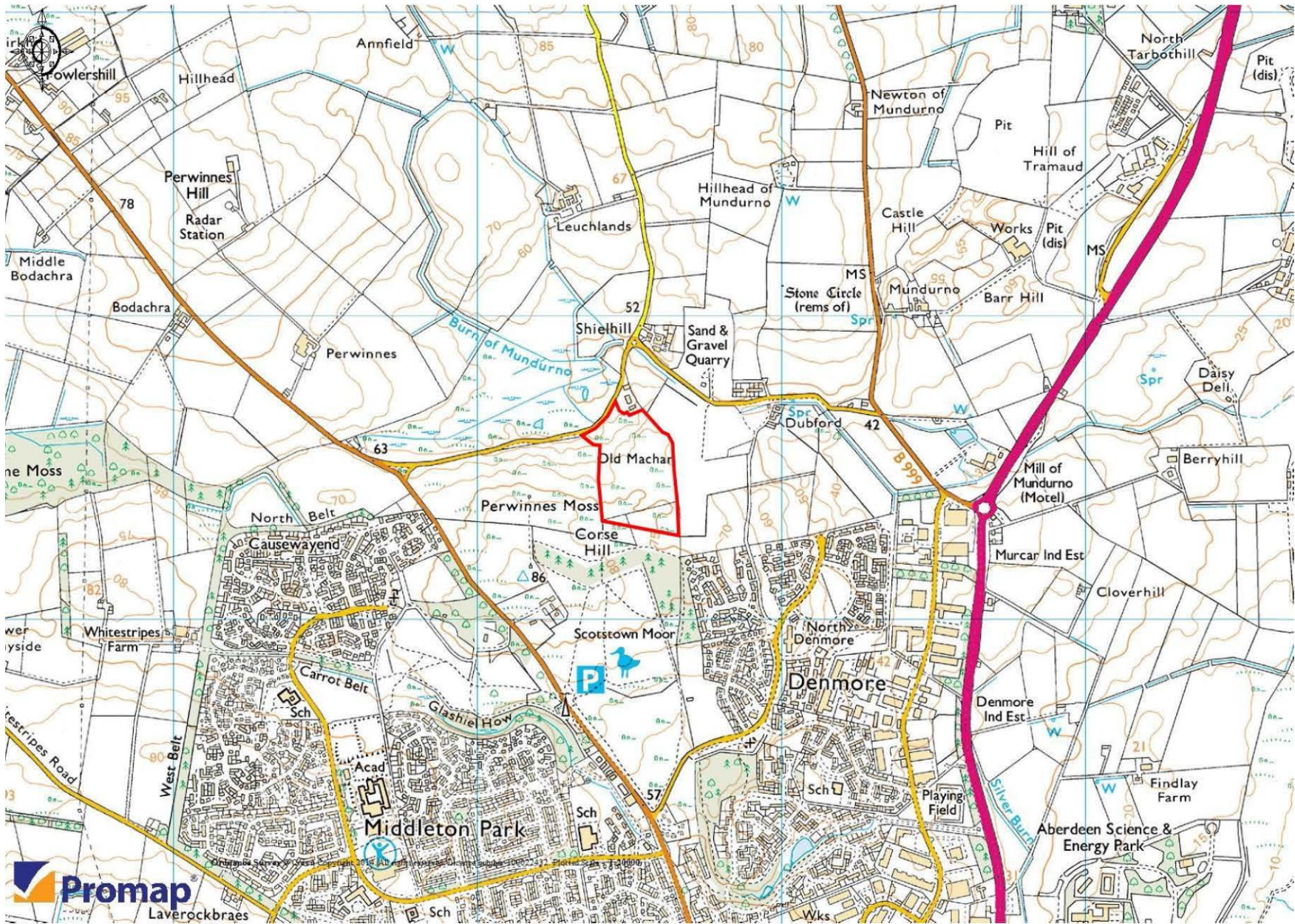
- 4.30 The existing semi-natural habitat will be lost for housing will result in a more diverse habitat resource in the longer term. There would be progressive simplification of the habitat resource if there was no management of the land.
- 4.31 There will be no impact on nearby SSSIs as a consequence of housing development but there is potential for quarrying to adversely affect Scotstown Moor SSSI to the south.
- 4.32 Four species with elevated conservation status have been recorded on the land or close by. Three of the species, skylark, snipe, and small heath butterfly are widespread in the UK and have substantial populations. The proposals will affect very small numbers of the animals and there will be no compromise of the conservation status of the species. The fourth species, lesser butterfly orchid is not found on the land.
- 4.33 It is anticipated that there will be a positive impact on biodiversity as a consequence of development as proposed.



## Figure 1

### Location Plan

**Figure 1**



**Shielhill  
Bridge of Don  
Location Plan  
September 2014**

**Nigel Rudd Ecology**

15 Bonaly Grove  
Edinburgh  
EH13 0QA



Tel/fax 0131 441 7955  
Mobile 07976 954 642

[nigel@nigelruddecology.com](mailto:nigel@nigelruddecology.com)



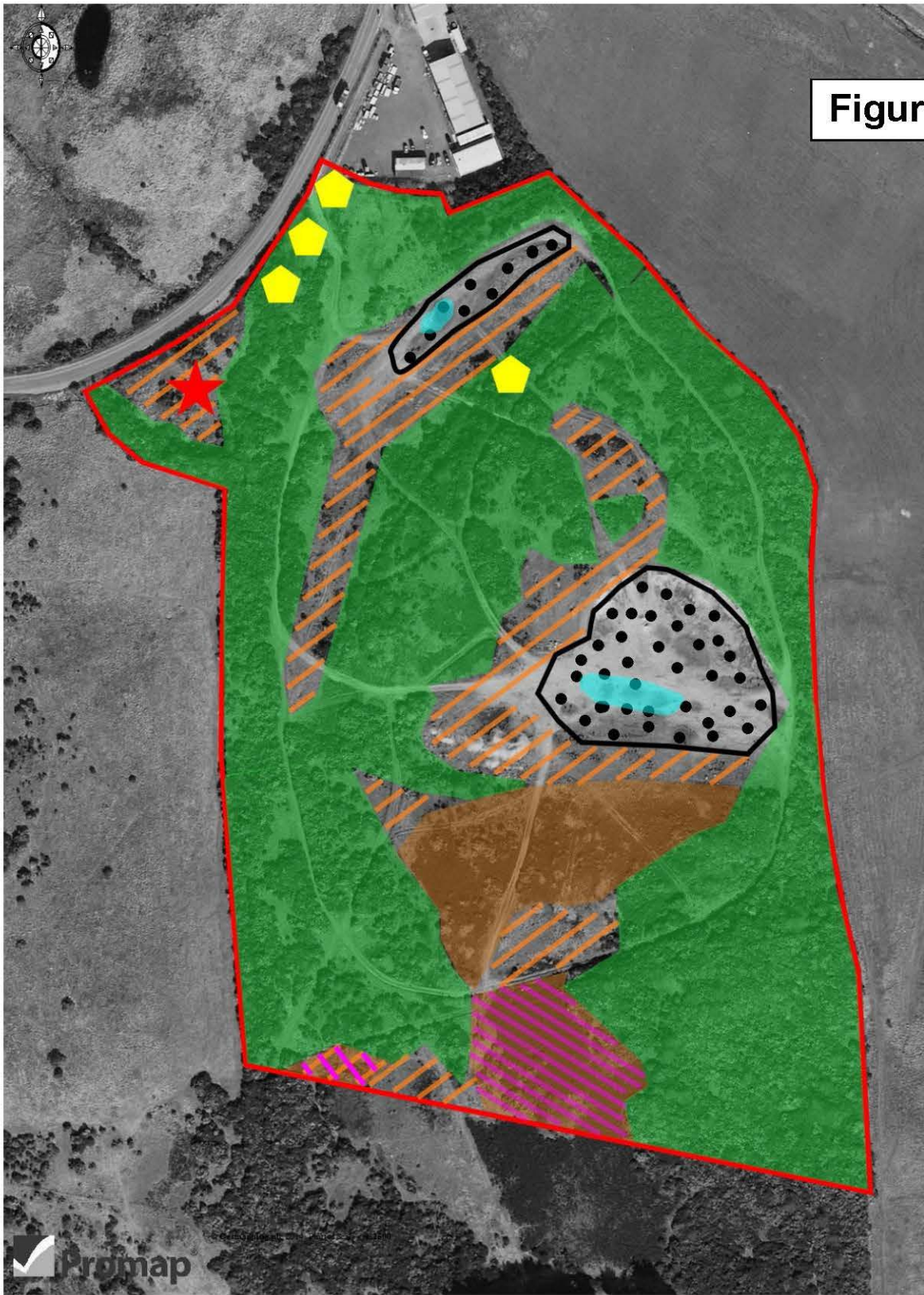











## Figure 2

### Phase 1 Habitat Plan



**Figure 2**



- |  |                          |   |                   |
|--|--------------------------|---|-------------------|
|  | Dense scrub              |  | Standing water    |
|  | Acid grassland           |  | Bare ground       |
|  | Dry dwarf shrub heath    |  | Giant hogweed     |
|  | Wet dwarf shrub heath    |  | Japanese knotweed |
|  | Wet heath/Acid grassland |   |                   |

**Shielhill  
Bridge of Don  
Phase 1 Habitat Plan**

September 2014

**Nigel Rudd Ecology**

15 Bonaly Grove  
Edinburgh  
EH13 0QA  
Tel/fax 0131 441 7955  
Mobile 07976 954 642  
[nigel@nigelruddecology.com](mailto:nigel@nigelruddecology.com)





## **Appendix 1**

### **Species inspections**



## Badgers

**Background** – The badger is the largest member of the Mustelidae in Britain weighing up to 20kg and reaching a length of 1m. Badgers are strong animals, adapted to digging, have good hearing and a well-developed sense of smell.

Badgers live in setts. A sett is a network of underground tunnels, which can have a total length of several hundred metres, although individual tunnels reach only 15m. The tunnels incorporate nesting and sleeping chambers, which are usually lined with dry plant material.

Setts are recognised by the large volume of soil and rock deposited at their entrances and the shape of the opening, usually an oval/arch wider than it is high. Plant debris from the bedding is often found close to the entrances. Setts are only excavated where the soil is deep enough and dry.

The setts vary. Main setts are large and in continuous use and on average have ten to twelve entrances. Often close to a main sett (up to 150m away) there may be an Annexe sett linked to the main sett by established paths. Annexe setts have an average of eight entrances and may not be in continuous use. Subsidiary setts are close to the main sett and are not connected by a clear path and not continuously active the average number of entrances is four. The fourth kind of sett is an Outlying sett. These can be distinguished by having little associated spoil, no approach path and are seldom used. Often they can be occupied by other species such as foxes and rabbits. The average number of holes is two.

The badger diet is mainly earthworms but also includes fruit, berries, small mammals, birds, carrion, insects and other invertebrates. Usually the badgers find the earthworms in areas of short grass, the most important forage resource used.

Badgers live in extended families or clans with up to 6 adults. They are territorial, often marking the boundary of their territory with latrines. The latrines can be used to establish the size of badger territories in bait marking exercises. The territory can extend to 120 hectares in areas with plenty of improved grassland. Where the forage resource is poorer the territory can be much larger.

Badgers mate at any time of the year and births are most common between December and June.

### Badgers and the Law

Badgers are protected by the Protection of Badgers Act 1992, which is designed to protect the species against cruelty and incidental effects of lawful activity that might harm badgers.

Under the legislation it is an offence to wilfully or recklessly:

kill, injure, take, possess or cruelly ill-treat a badger, or attempt to do so  
Interfere with a sett by damaging or destroying it



Obstruct access to, or any entrance of, a badger sett  
Disturb a badger when it is occupying a sett.

A person is not guilty of an offence if the act was '*the incidental result of a lawful operation and could not have been reasonably avoided*'; what is reasonable often has to be determined by the courts.

A badger sett is defined as '*any structure or place which shows signs of current use by a badger*', including culverts, pipes, holes under sheds, piles of boulders, old mines and quarries.

Current does not mean current occupation but applies to any sett in an area of current badger activity. This applies if the sett is used for only short periods in the year.

The Act makes provision for the issue of licences permitting otherwise illegal operations. Scottish Natural Heritage (SNH) is the licence issuing authority for the purposes of development.

**The Survey** - The inspection was carried out in September 2014 and involved inspection the land for evidence of use by badgers.

In addition to setts, there are a number of signs that indicate badger activity. These include: hair on fences; paths or runs; footprints; latrines; snuffle holes in the ground; day nests and scratch marks on trees.

The site and surrounding accessible land to a radius of 100m was assessed for badger activity. A constant search method was employed in a thorough walkover of the land.

**No evidence was found of badgers using the land.**

**NBN Gateway holds records of the species within 10km of the land but NESBReC hold no record of the species within 1km of the land. It is considered very unlikely the species uses the land.**



## Bats

**Background** - Bats are mammals. They are the only mammals capable of true flight and feed at night, on insects.

During the active seasons of the year, bats require a reliable source of insect food, and therefore habitat rich in insects is good for bats. The preferred feeding habitats are well vegetated, moist, sheltered and warm areas such as mixed woodland, freshwater and hedgerow.

Bats roost during the day in a range of places. In summer females form nursery colonies mainly in buildings, especially houses. Males and non-breeders will use a variety of crevice-type locations, including under slates, gaps in masonry, hollows in trees and bridges, and some species also use these sites for nursery roosts.

Distance travelled to feed varies with species, the pipistrelle is known to travel 3 to 5km radius from the roost, while long-eared bats only travel about 1km as a maximum. Bats use linear features of the landscape: rivers, hedges, woodland edge, to commute from their roost and between feeding areas. These linear features are also feeding routes.

Bats are true hibernators, that is, they are able to survive the winter with little food by lowering their body temperature and surviving on stored fatty deposits built up in the autumn. They use a variety of sites for hibernation: hollow trees, caves, old mines, or more superficial sites (depending on species) like crevices in buildings and bridges, old rubble-filled stone walls, even under roof slates or tiles. Most species require a stable cool temperature for hibernation and generally the deeper and more sheltered the space, the more stable is the temperature. Unlike some other hibernators, bats may be active at any time during the winter, particularly on mild nights. They will slowly arouse from hibernation and become active when disturbed, and so are particularly vulnerable in winter when becoming active will possibly exhaust their stored energy supply.

**Bats and the Law** - The Wildlife and Countryside Act 1981 (WCA) protects bats and their roosts in England, Scotland and Wales. Some parts have been amended by the Nature Conservation (Scotland) Act 2004.

The Conservation (Natural Habitats, &c.) Regulations 1994 (better known as the Habitats Regulations) implement the Council Directive on the Conservation of Natural Habitats and of Wild Fauna and Flora - better known as the Habitats Directive. All bats are listed as 'European protected species of animals'

Under the law it is an offence for any person to:

- Recklessly kill, injure or take a bat. Under the Habitats Regulations it is an offence to deliberately capture or kill a bat.
- Possess or control a live or dead bat, any part of a bat, or anything derived from a bat. This is an offence of strict liability, in other words the onus of proof is on the person in possession of the bat to show, on a balance of



probabilities, that they have it lawfully. An offence is not committed if the bat was not killed, taken, or sold to them or anyone else illegally.

- Intentionally or recklessly damage, destroy or obstruct access to any place that a bat uses for shelter or protection. This is taken to mean all bat roosts whether bats are present or not. There is a defence that this is not illegal in a dwelling house, but the defence can only be relied on (other than in the living area of a dwelling house) if the Statutory Nature Conservation Organisation (SNCO), i.e. Scottish Natural Heritage was notified about the proposed action and allowed reasonable time to advise as to whether it should be carried out, and if so, how. Under the Habitats Regulations it is an offence to damage or destroy a breeding site or resting place of any bat. This is an absolute offence - in other words, recklessness does not have to be proved.
- Recklessly disturb a bat while it is occupying a structure or place that it uses for shelter or protection. There is a defence that this is not illegal in a dwelling house, but the defence can only be relied on (other than in the living area of a dwelling house) if the relevant SNCO was notified about the proposed action and allowed reasonable time to advise as to whether it should be carried out, and if so, how. Under the Habitats Regulations it is an offence to deliberately disturb a bat (this applies anywhere, not just at its roost).
- Sell, offer or expose for sale, or possess or transport for the purpose of sale, any live or dead bat, any part of a bat, or anything derived from a bat. It is also an offence to publish, or cause to be published, any advertisement likely to be understood as conveying that they buy or sell, or intend to buy or sell, any live or dead bat, part of a bat or anything derived from a bat. Sale includes hire, barter and exchange.
- Set and use articles capable of catching, injuring or killing a bat (for example a trap or poison), or knowingly cause or permit such an action. This includes sticky traps intended for animals other than bats.
- Make a false statement in order to obtain a licence for bat work.
- Possess articles for the purpose of them being used to commit an offence, or to attempt to commit an offence. These are punishable in a like manner as for the actual offence.

**There was no roost opportunity on the land.**

**The semi-natural habitats on the land have potential to support insect prey for bats and it is likely the species forage over the land. NESBReC holds records of species flying over the land.**



## **Appendix 2**

Plant Species list.



## Shielhill Bridge of Don

### Plant Species

|                      |                                 |
|----------------------|---------------------------------|
| Alder                | <i>Alnus glutinosa</i>          |
| Bell heather         | <i>Erica cinerea</i>            |
| Bent grass           | <i>Agrostis tenuis</i>          |
| Birch                | <i>Betula sp.</i>               |
| Bramble              | <i>Rubus fruticosus</i>         |
| Cats ear             | <i>Hypochoeris radicata</i>     |
| Cock's foot          | <i>Dactylis glomerata</i>       |
| Cottongrass          | <i>Eriophorum angustifolium</i> |
| Cross-leaved heath   | <i>Erica tetralix</i>           |
| Devil's bit scabious | <i>Succisa pratensis</i>        |
| Docken               | <i>Rumex obtusifolius</i>       |
| Elder                | <i>Sambucus nigra</i>           |
| Fescue               | <i>Festuca sp.</i>              |
| Foxglove             | <i>Digitalis purpurea</i>       |
| Giant hogweed        | <i>Heracleum mantegazzianum</i> |
| Gorse                | <i>Ulex europeus</i>            |
| Grass of Parnassus   | <i>Parnassia palustris</i>      |
| Hawthorn             | <i>Crataegus monogyna</i>       |
| Heath rush           | <i>Juncus squarrosus</i>        |
| Heather              | <i>Calluna vulgaris</i>         |
| Japanese knotweed    | <i>Fallopia japonica</i>        |
| Jointed rush         | <i>Juncus articulatus</i>       |
| Nettle               | <i>Urtica dioica</i>            |
| Raspberry            | <i>Rubus idaeus</i>             |
| Ragwort              | <i>Senecio jacobea</i>          |
| Rowan                | <i>Sorbus aucuparia</i>         |
| Soft rush            | <i>Juncus effusus</i>           |
| Sorrel               | <i>Rumex acetosella</i>         |
| Sphagnum moss        | <i>Sphagnum sp.</i>             |
| Strawberry           | <i>Fragaria vesca</i>           |
| Thistle              | <i>Cirsium arvense</i>          |
| Tormentil            | <i>Potentilla erecta</i>        |
| Wavy hair-grass      | <i>Deschampsia flexuosa</i>     |
| Willow               | <i>Salix sp.</i>                |
| Willowherb           | <i>Epilobium spp.</i>           |
| Yorkshire fog        | <i>Holcus lanatus</i>           |





## **Appendix 3**

### **Designated Sites**

## CITATION

**SCOTSTOWN MOOR  
SITE OF SPECIAL SCIENTIFIC INTEREST  
Aberdeen**

Site code: 1412

NATIONAL GRID REFERENCE: NJ935116

OS 1: 50 000 SHEET NO: Landranger Series 38  
1: 25 000 SHEET NO: Explorer Series 406

AREA: 12.7 hectares

## NOTIFIED NATURAL FEATURES

Biological : Fens : Springs (including flushes)

## DESCRIPTION

Scotstown Moor is located about 3 km to the north-east of the mouth of the River Don, in north Aberdeen. The mixture of wetland includes fen-meadow, wet heath and springs and flushes. The mineral-rich springs and flushes provide habitats for a number of plant species now rare in the north-eastern lowlands, including black bog-rush *Schoenus nigricans*, lesser butterfly orchid *Platanthera bifolia*, greater sundew *Drosera anglica* and lesser tussock sedge *Carex diandra*.

## NOTIFICATION HISTORY

Notified under the 1949 Act: 1971.  
Re-notified under the 1981 Act: 10 January 1984.  
Notification reviewed under the 2004 Act: 26 May 2011.

## REMARKS

Measured area of site corrected (from 12.89 ha).



**Scottish Natural Heritage**  
All of nature for all of Scotland

**SCOTSTOWN MOOR**  
**Site of Special Scientific Interest**

**SITE MANAGEMENT STATEMENT**

**Site code: 1412**

**Address:** Inverdee House, Baxter Street, Torry, Aberdeen AB11 9QA

**Tel:** 01224 266500

**email:** Grampian@snh.gov.uk

**Purpose**



This is a public statement prepared by SNH for owners and occupiers of the SSSI. It outlines the reasons it is designated as an SSSI and provides guidance on how its special natural features should be conserved or enhanced. This statement does not affect or form part of the statutory notification and does not remove the need to apply for consent for operations requiring consent.

We welcome your views on this statement.

**Description of the site**

Scotstown Moor SSSI is located within Scotstown Moor Local Nature Reserve (LNR). It is notified as an SSSI for its wetland habitats, in particular its mineral-rich springs and flushes. These habitats have many plant species now rare in the north eastern lowlands, including black bog-rush, lesser butterfly orchid, greater sundew and lesser tussock sedge.

| <b>Natural Features of Scotstown Moor SSSI</b> | <b>Feature Condition (date monitored)</b> |
|--|---|
| Springs including flushes                      | Unfavourable, declining (July 2005)       |

Site condition monitoring was last carried out in 2005 for cycle 2 of SNH's programme. This assessed the wetland as being in unfavourable condition due to the encroachment of gorse onto one of the main flushes

**Past and present management**

The SSSI is the last unreclaimed fragment of what was once a more extensive area of wetland and heathland. It is thought there were two wetlands, Perwinnes Moss to the north and the smaller but botanically richer Scotstown Moor to the south, linked together by an area of dry heath rising to a height of 86m above sea level at Corse Hill. It is believed that the wetland and heathland together comprised the former common of Perwinnes, owned by the Bishopric of Aberdeen and feuars had grazing and some peat-cutting rights on the common. It is thought that the site was grazed until the 1970's but exact details of this grazing including its timing and intensity are unknown.

Perwinnes Moss was lost when it was reclaimed for agriculture in the 1970's. Scotstown Moor SSSI has been adversely affected by new housing, road and pipeline construction and casual tipping. In the 1980's Dubford road was constructed across the Moor and houses built. This resulted in loss of some of the wettest and most botanically species-rich areas and altered the drainage of the site.

Since 1830 the site has been regularly visited by botanists from Aberdeen University who have recorded over 250 species of flowering plant.

Scotstown Moor Local Nature Reserve (LNR) (51.8ha) was designated by Aberdeen City Council (ACC) in 1994. The LNR is an important area for the local people and as an environmental resource for schools, colleges and universities. There are interpretative panels on site, a LNR leaflet and an educational pack for schools, which all include information about the SSSI. A path system is present on the LNR, which extends around the perimeter of the SSSI.

As well as a spread of gorse scrub on the SSSI, it is thought that there has been an increase in dominance of sharp-flowered rush. These two changes may be the result of the removal of grazing from the site and the area drying out as a result of the road and housing developments around it. Gorse forms dense scrub which smothers other vegetation. It also affects the soil by enriching it, thus making it less suitable for wetland plants. The sharp-flowered rush causes an accumulation of plant litter, which may exclude some of the plant species of importance. SNH has funded gorse control around the main flush areas and ACC has organised volunteer days for a number of years to help remove gorse and other invasive species.

In recent years bracken has encroached onto the SSSI, which is an invasive species spreading rapidly by means of strong underground stems or rhizomes. The hydrology of the site has been significantly influenced by development taking place around the LNR, and ACC monitors the water table each month. If the water level continues to drop significantly over a period of time then mitigation measures may need to be considered to prevent further lowering.

Scotstown Moor LNR has a Management Advisory Committee, to advise the council on the management of the site, which includes the SSSI. This group comprises of local residents and representatives of local groups and organisations. A management plan was written for the LNR in 1994 and revised in 2001.

#### **Objective for Management (and key factors influencing the condition of natural features)**

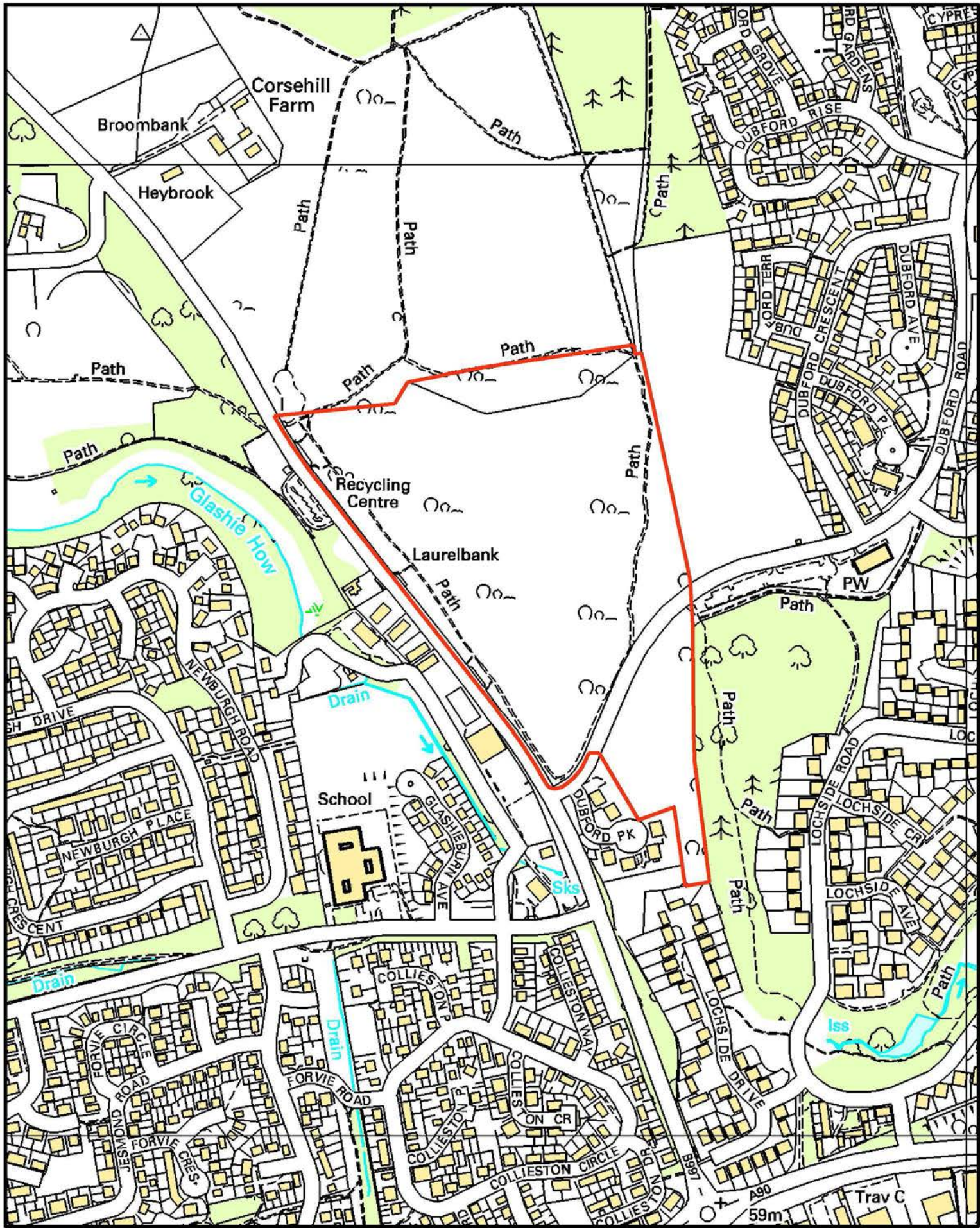
We wish to work with the **owner** to protect the site and to maintain and where necessary enhance its features of special interest. SNH aims to carry out site survey, monitoring and research as appropriate, to increase our knowledge and understanding of the site and its natural features.

#### **To maintain the wetland areas in particular the springs and flushes with black bog-rush**

Flushes and springs are vulnerable to lowering of the water table which can be caused by changes in land use directly on them or in the surrounding area. These changes cause them to dry out, modifying their hydrology and the rare plant communities that grow on them.


To prevent the loss of flushes to scrub invasion it is important that the programme of containment and control of gorse onto wetland habitats is continued. Monitoring of the water table should continue and mitigation such as ditch blocking investigated if required.

Date last reviewed: 26 May 2011.



# Scotstown Moor

Site of Special Scientific Interest  
 Site Code: 1412

 Site boundary

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This is an updated representation of the notified site  
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Scale 1:5,000



## CITATION

**CORBY, LILY & BISHOPS' LOCHS**  
**SITE OF SPECIAL SCIENTIFIC INTEREST**  
Aberdeenshire, Aberdeen

Site code: 401

NATIONAL GRID REFERENCE: NJ922145 & NJ912143

OS 1: 50 000 SHEET NO: Landranger Series 38  
1: 25 000 SHEET NO: Explorer Series 421

AREA: 35.1 hectares

## NOTIFIED NATURAL FEATURES

|            |   |                     |   |                               |
|------------|---|---------------------|---|-------------------------------|
| Biological | : | Freshwater habitats | : | Mesotrophic loch              |
|            |   |                     | : | Eutrophic loch                |
|            | : | Fens                | : | Hydromorphological mire range |
|            |   |                     | : | Open water transition fen     |

## DESCRIPTION:

Corby, Lily and Bishops' Lochs are located 4km north-east of Aberdeen. These three lochs together with their fringing reedbeds and bogs provide one of the best and least disturbed wetland sites in the north-eastern lowlands. Corby and Lily lochs also show an excellent hydroseral progression from open water to woodland.

The lochs' nutrient status range from mesotrophic (Bishops' Loch) to eutrophic (Corby Loch). Corby and Lily lochs' aquatic vegetation includes at least five species of pondweed *Potamogeton*. The fringing reedbeds are dominated by common club-rush *Schoenoplectus lacustris*, bottle sedge *Carex rostrata* and common reed *Phragmites australis*.

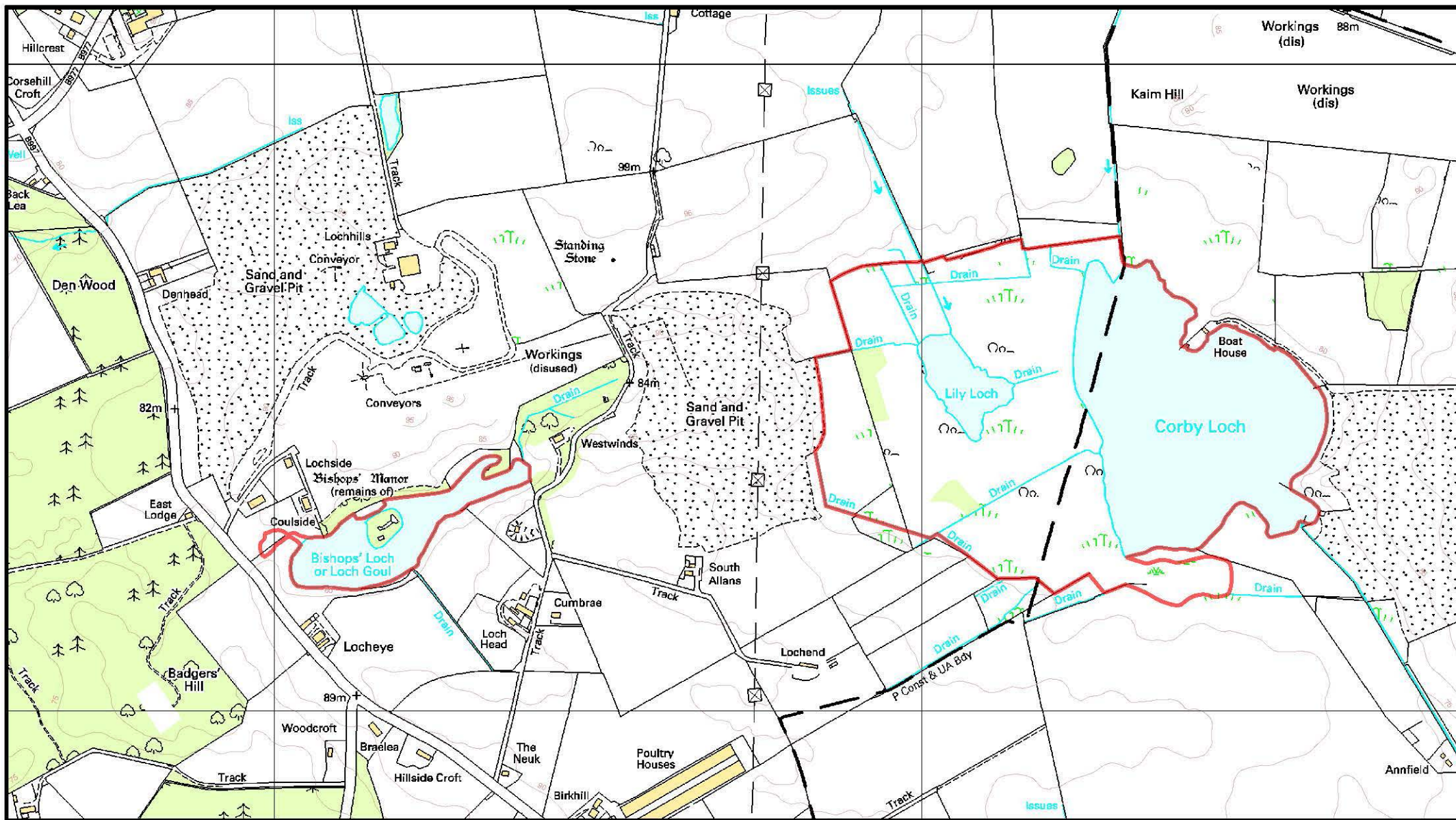
The basin occupied by Corby and Lily lochs (once a single water body), contains examples of northern 'poor-fen', tussocky heather-cottongrass bog and birch-willow scrub of recent origin.

## NOTIFICATION HISTORY

First notified, under the 1981 Act: 26 October 1983.  
Notification reviewed under the 2004 Act: 26 May 2011.

## REMARKS

Measured area of site corrected (from 33.2 ha).



## Corby, Lily and Bishops' Lochs

Site of Special Scientific Interest

Site Code: 401

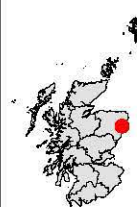
 Site boundary

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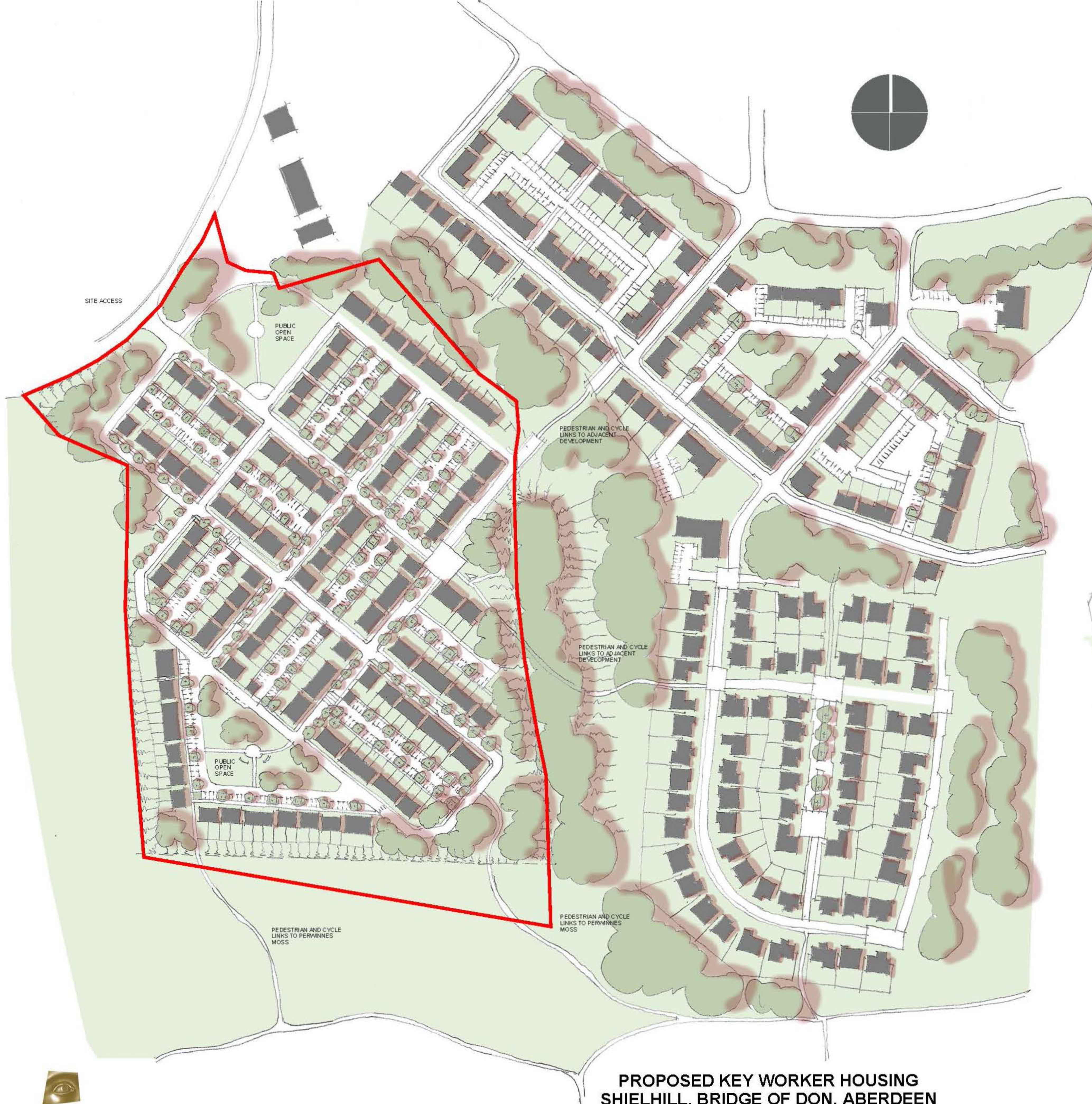


Scale 1:8,000









GROSS SITE AREA 23 ACRES  
 AREAS MEASURED FROM ENGINEERS LEVEL SURVEY

HOUSING MIX, AFFORDABLE:  
 3 BED SEMI / TERRACED HOUSES:  
 2 BED SEMI / TERRACED HOUSES:  
 1 BED FLATS:  
 2 BED FLATS:  
 3 BED DISABLED BUNGALOWS

**TOTAL: 260 UNITS.**

ALSO INCLUDED ON SITE 30 SQ.M. WORKSHOPS 10 NO.

CAR PARKING PROVIDED AT 200%



DEVELOPMENT CONCEPT: SHOWING REAR PARKING COURTS AND VISITORS LAYBY PARKING ON STREET

**PROPOSED KEY WORKER HOUSING  
 SHIELHILL, BRIDGE OF DON, ABERDEEN  
 scale: 1 :1250 @ A1**

HALLIDAY FRASER MUNRO  
PLANNING

P1899/SL/lc

24 March 2014

Local Development Plan Team  
Planning and Sustainable Development  
Aberdeen City Council  
Business Hub 4  
Ground Floor North  
Marischal College  
Broad Street  
Aberdeen  
AB10 1AB

Dear Sir / Madam

**FUTURE MINERAL EXTRACTION / RESIDENTIAL / EMPLOYMENT SITE  
SHIELHILL, BRIDGE OF DON, ABERDEEN (B0206)  
Response to Local Development Plan Main Issues Report  
Mr J Langler**

We refer to the current consultation on the Aberdeen City Local Development Plan Main Issues Report (MIR).

A 'development bid' was submitted as part of the pre-MIR consultation proposing the allocation of 9.3 ha of land at Shielhill, Bridge of Don, Aberdeen for mineral extraction (sand and gravel aggregate extraction).

Detailed site and laboratory testing has shown that the site supports a high quality gravel aggregate and sand resource capable of being extracted. This resource should be considered in the context of major future development taking place to the north of Aberdeen, such as the AWPR, major housing at Dubford, major commercial development at Murcar and various developments in the Energetica Corridor. The location of this resource at Shielhill presents a highly sustainable solution to serve these future developments with the necessary gravel aggregate and sand for construction.

**MIR - Main Issue 1 – Greenfield Housing and Employment Allocations**

In terms of the Settlement Strategy and allocation of new greenfield development allocations, the general approach taken by the MIR is that if the existing allocations are carried over, there is no requirement to allocate additional greenfield sites. The exception to this approach however, is the proposed allocation of 'a number of additional small sites (amounting to 98 houses) around Peterculter to increase housing choice there and to support the primary school'. This suggests there is some flexibility in the allocation of appropriate greenfield development sites.

CARDEN CHURCH  
6 CARDEN PLACE  
ABERDEEN  
AB10 1UR

TELEPHONE  
(01224) 388700

FACSIMILE  
(01224) 388777

E-MAIL  
PLANNING@hfm.co.uk



OFFICES IN BELFAST,  
DUNDEE, EDINBURGH  
AND GLASGOW

CHARTERED  
ARCHITECTS

CHARTERED PLANNING  
CONSULTANTS

LAND USE  
CONSULTANTS

URBAN DESIGNERS

SPACE PLANNERS

PARTNERS

JOHN HALLIDAY  
DIP ARCH (ABDN)  
ARIBA ARIAS

IAN G FRASER  
B ARCH (HONS)  
RIBA FRIAS

DAVID HALLIDAY  
BSC (HONS)  
PG DIP ARCH (ABDN)

DIRECTOR OF PLANNING  
BOB G REID  
BA(HONS) MCD  
MRTPI FRICS

REGIONAL DIRECTOR  
STEVE CRAWFORD  
BSC (HONS) MRTPI



Issue 1 set out in the MIR asks whether the Council need to add to the greenfield housing and/or employment land supply by allocating more sites. We suggest that the alternative 'Option 2' should be pursued and additional greenfield land should be allocated for housing and employment uses, in order to provide a range of large, medium and small sites, which in turn will increase the deliverability of new development in the City. We believe that there is an over-reliance on large scale sites and there is a requirement for smaller allocations such as that which could be accommodated at Shielhill. The justification for the allocation of land at Shielhill is however based on the location of an existing resource.



### **Mineral Extraction / Phased Development Strategy**

The land at Shielhill presents an opportunity for mineral extraction in the first instance, on a temporary basis, then the potential for residential or commercial development following restoration. This strategy removes potential for any conflicts with adjacent residential or commercial uses.

In terms of mineral extraction operations, these would not involve the entire site and would be undertaken through scraping processes rather than blasting. Existing bunds would be used to limit any impacts within the site. In terms of the adjacent residential development, there is already a substantial landscaped area proposed along the western boundary of the Dubford development (see planning application ref P131614). The western boundary of this site also sits at a higher level relative to the Shielhill site, and the Shielhill site level will lower through scraping operations. This will ensure an adequate buffer between any housing built and occupied and any mineral extraction operations.

### **Future Residential / Commercial Use**

The boundaries of the land at Sheilhill are contiguous with the Dubford residential allocation of 550 houses to the east, and to existing business and quarrying developments to the north. Following completion of mineral extraction operations, the site presents an ideal opportunity for the next phase of housing or commercial development in the area.

Although there are large scale employment land allocations in the area being built out at present, there is an absence of small-scale start up business units in the area which are affordable and accessible to new enterprises. The land at Shielhill would be ideal for this use, given its location adjacent to the existing buildings occupied by Walker Technical Resources. The site is also close to a large existing and proposed population, presenting a sustainable employment location.

### **Brownfield Sites**

It is noted that the MIR allocates a number of brownfield sites as preferred future options for residential or commercial development at Craiginches, Grove Nursery, Raiths Farm and Woodend. The land at Shielhill is also a brownfield site. It is understood to have extant planning permission for quarrying and has been used for quarrying operations in the past. The site has also been used as a MOD driver training centre. The site is degraded from previous usage. This is evidenced through the majority of the site's present condition as worn down scrub land covered in gravel vehicle tracks.

### **Sustainability Checklist**

We have reviewed the 'Sustainability Checklist' of the Shielhill site. It scores 40 out of 100. The Sustainability Checklist confirms that there are no concerns regarding built and cultural heritage, flooding, drainage, contamination, landscape impact, relationship to existing settlement, creation of employment opportunities, contamination or infrastructure capacity. The development bid is however classed as 'undesirable', with 'Land use conflict with neighbouring residential and nature conservation' identified as constraints.



The proposal to allocate the site for mineral extraction is based on the existing mineral resources that are present within the site. This makes much of the site assessment criteria academic, as its location and characteristics are based on the natural occurrence of the minerals. It represents a phased sustainable resource in high demand that can be used to provide natural materials necessary for the range of development projects taking place in the area. The exhaustion of this resource then leaves a brownfield site adjacent to an established centre of population.

We comment on the perceived constraints as follows:

### **Harmonisation of Neighbouring Uses**

The proposed mineral extraction operations will only be temporary. Any land use conflicts will be appropriately mitigated in the short term through boundary treatments on both sites. There will not be any long-term conflicts. We therefore do not believe that 'land use conflict' presents a constraint to the development of the site. The Sustainability Checklist states that 'The use of this site as a quarry will conflict with the adjacent residential development at Dubford which is now under construction by causing noise and air pollution that is unlikely to be sufficiently mitigated through a buffer or tree screening.' In summary however:

- Mineral extraction through site scraping is proposed. This does not involve the same level of impact as quarrying through blasting operations;
- Mineral extraction operations would be subject to a detailed planning permission. Such a permission would be supported by appropriate detailed reports on noise and air quality impacts. This would highlight appropriate mitigation measures that would be identified if necessary, that in turn would be controlled through appropriate planning conditions or licensing;
- Detailed designs for the proposed residential development adjacent to the site indicate a large landscaped buffer area. This, added to a 10m wide mineral extraction buffer proposed around the perimeter of the scraped area would result in a distance of at least 60m between plots and mineral extraction areas. Landscape buffers would also be provided within this area;
- The site benefits from existing use rights for mineral extraction.

Having regard to the above, we do not believe that perceived 'land use conflict' represents a reason not to allocate the site for development.

### **Nature Conservation**

The site is presently within a District Wildlife Site. It does however benefit from extant planning permission for mineral workings and is largely of a degraded nature. This leads us to question the continued allocation of the site as a DWS.

In the current Local Development Plan 2012, the wider Scotstown / Perwinnes Moss area includes a number of natural heritage designations. The most valuable of these is the Site of Special Scientific interest (SSSI) designated in the southern area at Scotstown Moor. The second most valuable is the Local Nature Reserve (LNR) north of the SSSI, but outwith the Shielhill bid site. The District Wildlife Site represents the less valuable area, and the Shielhill bid site is only a small part of this. We understand the justification for the allocation of the SSSI, the LNR and part of the DWS. The continued zoning of the Shielhill site as a District Wildlife Site / Local Nature Conservation Site does however make little sense, given the site's current degraded condition and minimal nature value.



The Council's website states that:

'District Wildlife Sites are sites identified by the former District Council with assistance from Scottish Natural Heritage as sites of city-wide importance for nature conservation. DWS's are considered to represent the best examples of habitat types in the city and cover a wide range of habitats including semi-natural woodland, heathland, wetland, river systems and large stretches of Aberdeen's coastline.'

We understand that DWSs are now referred to as Local Nature Conservation Sites. The physical condition of the Shielhill site is however not sufficient to warrant the continued designation of the site as part of a DWS / LNCS. This designation should not be seen as a constraint to development due to the current condition of the land.

### **Conclusion**

In conclusion, we do believe that there are compelling arguments to allocate the land at Shielhill in the Proposed Local Development Plan as a phased development to permit mineral extraction operations, then site restoration and future residential or commercial development. This would result in the delivery of future sustainable development adjacent to an established and growing centre of population in the north of Aberdeen.

The housing and employment land strategy set out in the MIR is not to allocate any further greenfield land. We believe that further sites should be allocated to provide a range of deliverable development opportunities.

Having regard to the foregoing, we would respectfully request that 9.3 ha of land at Shielhill, Bridge of Don is allocated in the forthcoming Aberdeen City Proposed Local Development Plan for mineral extraction.

Should you have any queries regarding any aspect of the above please do not hesitate to contact me.

Yours faithfully



**Scott Leitch**  
**Associate Planning Consultant**  
**Halliday Fraser Munro Planning**