

Proposed Aberdeen Local Development Plan 2015 Representation Form

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

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

Name	Mr <input type="radio"/> Mrs <input type="radio"/> Miss <input checked="" type="radio"/> Ms <input type="radio"/>	Lucy Sumner
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On behalf of (if relevant)	Shivas Trust/ D Gray & Others	
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Please tick if you would like to receive all future correspondence by e-mail

What document are you commenting on?	Proposed Plan	<input checked="" type="checkbox"/>
	Proposed Supplementary Guidance	<input type="checkbox"/>
	Proposed Action Programme	<input type="checkbox"/>
	Strategic Environmental Assessment Environmental Report	<input type="checkbox"/>
Policy/Site/Issue	The Spatial Strategy: Directions for Growth (Deeside)	Paragraph(s) 2.25 / page 15
	Policy NE2: Greenbelt	3.99 / page 53

What would you like to say about the issue?

Please see attached document for detailed response

What change would you like to see made?

Please see attached document for detailed response

Please return the completed form by:

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

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

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

Data Protection Statement

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

HALLIDAY FRASER MUNRO
PLANNING

P1910.001/LS

1 June 2015

Local Development Plan Team

Aberdeen City Council
Business Hub 4
Ground Floor North
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Dear Sir/Madam,

**ABERDEEN LOCAL DEVELOPMENT PLAN 2016 – RESPONSE TO
PROPOSED PLAN**

**‘THE SPATIAL STRATEGY: DIRECTIONS FOR GROWTH (DEESIDE)’,
‘POLICY NE2: GREENBELT’,**

LAND AT COBBLESTOCK, PETERCULTER [MIR Ref: B0930]

On behalf of Shivas Trust / D Gray & Others

I write with reference to the above consultation on the Proposed Aberdeen Local Development Plan (PLDP). This letter responds to ‘The Spatial Strategy’ chapter, and ‘Policy NE2: Greenbelt’.

The response is made in support of a previously submitted development bid site on land at Cobblestock, Peterculter.

This letter will provide an introduction to the site and the representation history to date, and will discuss each of the above aspects of the PLDP in turn.

OVERVIEW: LAND AT COBBLESTOCK, PETERCULTER

The site is situated between Station Road South and Barrhill House at the south-west end of Peterculter. The Main Issues Report Site Reference is B0930. (See Fig 1).

A previous bid was submitted during the preparation of the current 2012 Aberdeen Local Development Plan (LDP). In the Reporters conclusions they stated that **“the site sits well in the landscape and is in close proximity to the centre of Peterculter”**.

In 2013, the site was subject of a new, reduced bid for 3.2 hectares, proposed for 15 units.

We believe there is scope in the PLDP to allow further small scale development in Peterculter, which will complement the surrounding character and setting of the adjacent properties on Station Road South and Station Road East.

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The close proximity of the site to the A93 North Deeside Road provides strong links to the local services and facilities and a bus stop is located approximately 600 metres, which links Peterculter with the centre of Aberdeen.

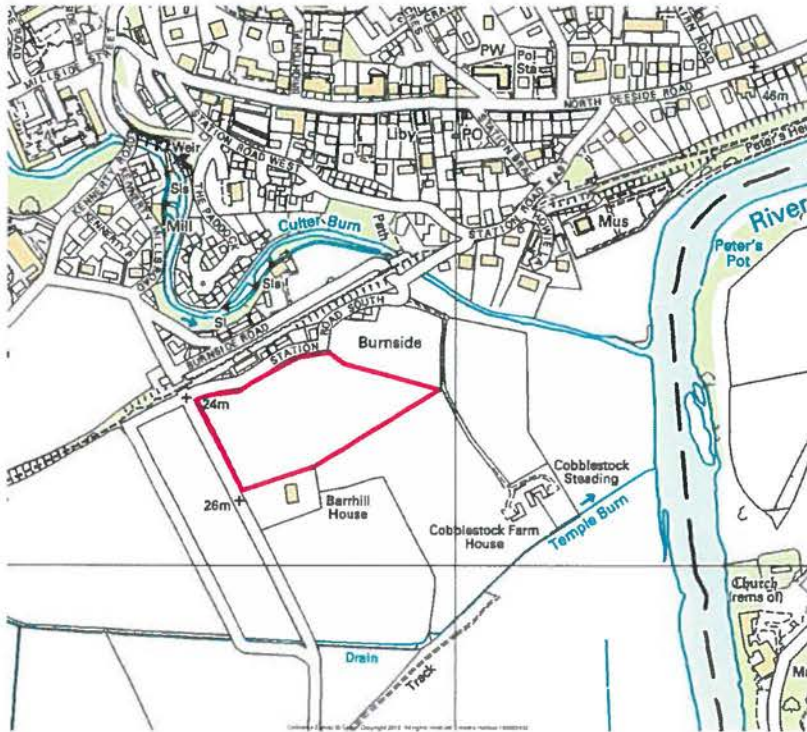


Fig 1: Location of Cobblestock, adjacent to Station Road South

'THE SPATIAL STRATEGY: DIRECTIONS FOR GROWTH (DEESIDE)'

As stated in Para 2.25 of the PLDP, there is 'limited' development planned for the Deeside corridor, as with Para 2.28 of the 2012 LDP. We question why the status of the Deeside corridor remains 'limited'; Deeside is a highly desirable location to live. Peterculter has good links to the City Centre and west into Aberdeenshire. A low rate of housing delivery in the area has forced house prices to rise, and compounding the unaffordable housing shortage along this corridor.

New sites listed in the PLDP for Peterculter are Malcolm Road (71 homes), Mid Anguston (8 homes), and Woodend (19 homes).

These new sites, together with Oldfold and the other existing sites from the current LDP, provide a total figure of 248 homes to be delivered in the first phase of the LDP (2017-2026). There are no homes planned for delivery in Deeside in Phase 2 (2027-2035) of the PLDP (PLDP Table 8).

Housing Delivery in Peterculter 2012-2016

We question why new housing allocations have remained 'limited' in this area over two LDP periods, whilst housing development delivery targets have continued to fall short. In order to achieve desired 'growth', due consideration must be given to the **realistic delivery** of development in the corridor.

The only major housing development allocation for Peterculter in the PLDP, Oldfold, is an existing site. This site has been allocated for 550 homes since 2012 with no completions to date (source: Draft Housing Land Audit 2015). First completions are expected in 2016 due to the understandable time it takes to bring forward a site of this size.

Focusing on the small to medium-scale sites in Peterculter, the Table below lists the current position of housing delivery.



2012 LDP Site Name	Allocated Units	Units Delivered (2015)	Expected / Further Completions
Peterculter East	31	0	2015 (15 units)
Culter House Road	5	3	2016 (2 units)
Edgehill House	5	0	2015 (5 units)
Craigton Road	20	Completed	-
North Garthdee Farm	60	Completed	-
Peterculter Burn	19	0	Post 2023 (19 units)
TOTALS	140	83	

The Table concludes that around 60% of the allocated small to medium sites have been delivered in the current LDP period.

In addition to Oldfold, an expected 554 homes were to be delivered in the period 2007-2016. A range of small and medium scale sites, which can be **delivered** early in the plan period need to be identified in order that the required housing targets are met, and homes continue to be available.

Main Issues Report: Sustainability Checklist

Cobblestock scored 42 out of 100 on the Sustainability Checklist (2013). It is classed as 'undesirable' with 'Green Belt' highlighted as its constraint. It should, however, be noted that this score is higher than Mid Anguston (39), only one less than Woodend Site 1 (43) and two less than Malcolm Road East (44), sites which have been identified for development.

There is also reference made to potential impacts on the surrounding landscape and access, and states that the site is only 'partially related to Peterculter'. This is not consistent with the view of the Reporter during the Examination of the PLDP in 2012, which stated "**the site sits well in the landscape and is in close proximity to the centre of Peterculter**". The site is located 0.3 miles from North Deeside Road and the centre of Peterculter, accessed by a road already serving a number of residential properties. We therefore question why Cobblestock is considered to be less acceptable than the Mid Anguston site which is located at a far greater distance of 2 miles from the settlement centre and is accessed from numerous roads. Cobblestock is the more sustainable option.

The constraints highlighted in the assessment can be overcome. The sustainability checklist itself states that these issues of potential impact on landscape and relationship with the settlement would only be apparent 'without mitigation', however, mitigation will be provided and the proposal includes the provision of landscape planting and connectivity with the surrounding properties. The undulating nature of the site will further assist the integration of the development within the landscape.



The access from North Deeside Road is used by a large number of existing residential properties, and recent planning permissions have been granted for further housing developments, using the same road network. The road network has the capacity to accommodate the minimal scale of development proposed.

The issue of the site being zoned as 'Green Belt' would be overcome should the site be allocated for residential use. Furthermore, the issue of school capacity at Cults Academy is the same issue facing the preferred allocations. This is a constraint which is equally applicable to the selected sites.

'POLICY NE2: GREENBELT'

"The aim of the Green Belt is to maintain the distinct identity of Aberdeen and the communities within and around the city, by defining their physical boundaries clearly." (PLDP Para 3.99)

We agree with the principles of the Aberdeen Green Belt and respect the necessity of this in the context of development control.

A constraint of Cobblestock is that the site is within the Greenbelt zoning. Its strong integration into the existing settlement of Peterculter would support a clear, defined physical boundary to the settlement.

"Safeguarding the Green Belt helps to avoid coalescence of settlements and sprawling development on the edge of the city, maintaining Aberdeen's landscape setting and providing access to open space." (PLDP Para 3.99)

We are of the view that the site is a logical extension to Peterculter, and its strong boundaries to the north, south and west allow for a clear, defined boundary to Peterculter.

This, in turn with the small-scale nature of the proposed development would not contribute to undesirable coalescence or sprawl.

"The Green Belt directs planned growth to the most appropriate locations and supports regeneration." (Para 3.99)

For the reasons listed throughout this response to the LDP, we believe that this is an appropriate location for planned development in Peterculter.

As per the Aberdeen Green Belt Review, "Green belt designation should be used to direct development to suitable locations, not to prevent development from happening"(pg 1).

CONCLUSION

In conclusion, the position of the Main Issues Report Housing Land Strategy (2013) was not to allocate any further Greenfield land. However, the preferred options - and subsequently allocated sites - for the forthcoming LDP are four sites around Peterculter for residential development in addition to the existing sites carried forward. We support the allocation of additional land in this area, but suggest that the land at Cobblestock is a suitable option, with better links to Peterculter than some of the preferred options. There are no technical constraints to the development of this site.



The failure to deliver a large number of the allocated units of the current LDP and its impacts on the property market, especially along Deeside, is further justification as to why more deliverable small and medium scale sites should be allocated in the forthcoming LDP.

It is our request therefore, that the land at Cobblestock, Peterculter [MIR Ref: B0930], be zoned as an opportunity site for residential development to allow a suitable, sustainable site to be delivered in the forthcoming LDP period.

Yours faithfully,



Lucy Sumner
Planning Consultant
For Halliday Fraser Munro