

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 checked="" type="radio"/> Miss <input type="radio"/> Ms <input type="radio"/> Theresa Hunt
Organisation	Burness Paull LLP
On behalf of (if relevant)	Mr Ian Suttie
Address	Union Plaza 1 Union Wynd Aberdeen
Postcode	AB10 1DQ
Telephone	[REDACTED]
E-mail	[REDACTED]

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	Policy NE 2 Green Belt and Proposals Map	Paragraph(s)	N/A

What would you like to say about the issue?

Our client, Mr Ian Suttie, owns the house known as Parklea, North Deeside Road, Pitfodells. Parklea is bound by the Lodge House and Bairds Brae to the east; Rocklands Road to the north; Wellwood and other residential properties to the east and North Deeside Road to the south.

In terms of zoning, the Proposed Plan identifies Parklea and all the land to the rear of the house and the land to the east as part of the existing built up area, and as such it has a residential zoning under Policy H1 of the Proposed Plan. However the formal garden ground of Parklea and related land to the east is covered by the Green Belt NE2 Policy in the Proposed Plan. The land sits within the Pitfodells Conservation Area.

McCreadie Design Ltd has carried out a Landscape and Green Belt Appraisal of the garden ground of Parklea. This Appraisal is submitted in support of these representations and forms Document FIR1. Figure 1 of the Appraisal shows the relevant area of garden ground of Parklea outlined in red.

The Appraisal assessed the role which the garden ground plays in the wider Green Belt, taking into account existing and emerging planning policy context, as well as the landscape character and visibility of the area.

As the Appraisal notes, the garden ground at Parklea does not meet any of the principles of the Green Belt policy such as to warrant retention of that designation. The Appraisal demonstrates that the removal of the Green Belt designation from Parklea will:

- (1) not affect the important key characteristics of the landscape setting of Aberdeen;
- (2) create a more defensible road boundary to the Green Belt by using an existing road, Bairds Brae; and
- (3) rationalise the Green Belt in this location to reflect the local characteristics of the area, in accordance with Scottish Planning Policy.

The Appraisal also notes that there are other policies which can protect the amenity of the area, and the existing trees in particular, such as Policy NE5 Trees and Woodlands in the Proposed Plan, a Tree Preservation Order and the Conservation Area status. Accordingly, the use of the Green Belt policy is not required or justified and conflicts with the approach recommended by Scottish Planning Policy (SPP). SPP requires the Council to critically review the Green Belt boundaries as part of the LDP review and it is submitted that a proper review of the boundaries against the aims of the Green Belt must lead to removal of the land and inclusion within the existing settled area, in line with all the surrounding land. Bairds Brae provides a more defensible Green Belt boundary going forward.

Supporting Documents:

SUT 1 McCreadie Design Ltd: Landscape and Green Belt Appraisal for Parklea, Pitfodells

What change would you like to see made?

The findings of the McCreadie Design Landscape and Green Belt Appraisal should be followed and the Green Belt zoning removed from the private garden ground of Parklea.

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

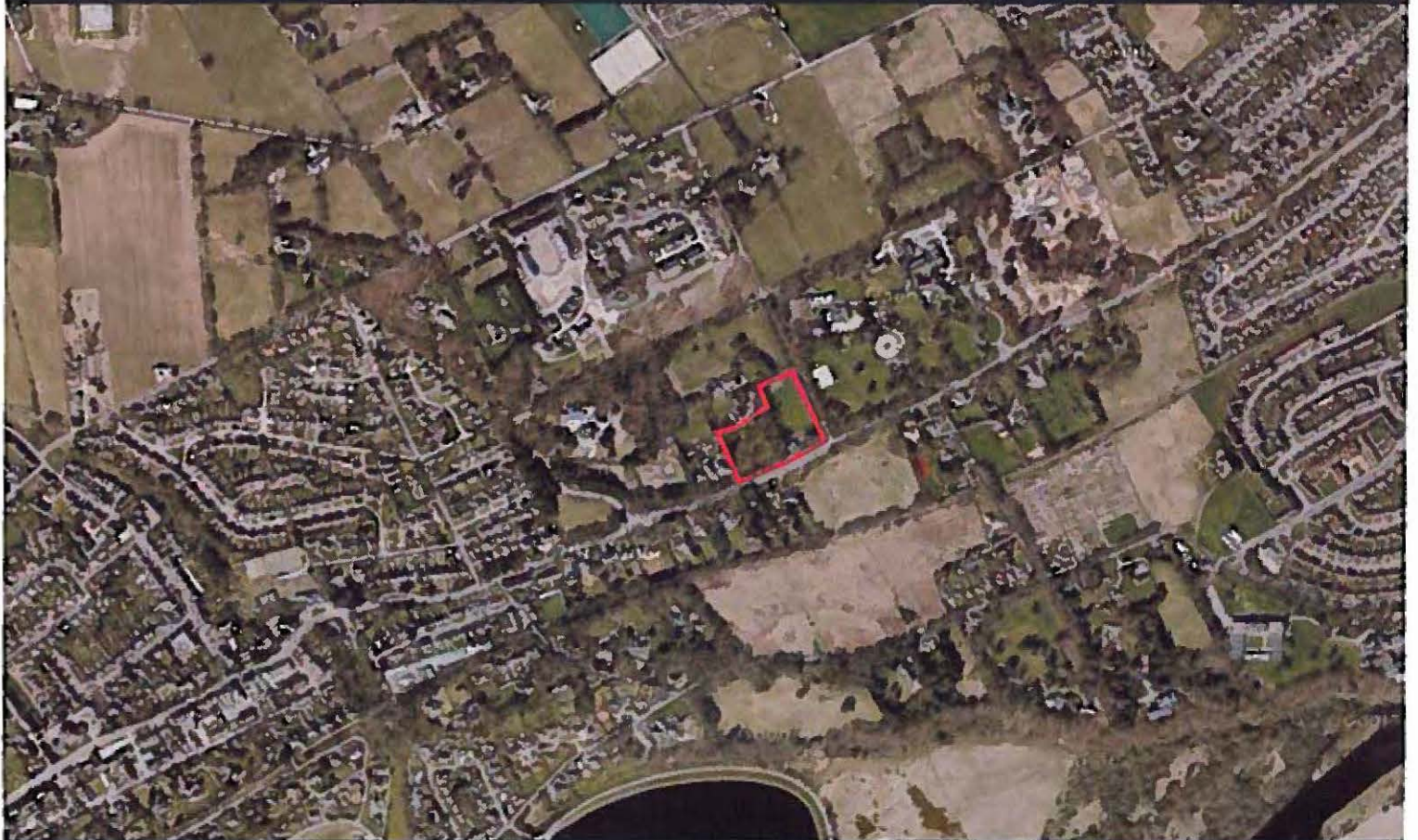
The comments you make on the Proposed Plan will be used to inform the Local Development Plan process and the Examination into the Local Development Plan by the Scottish Ministers' Reporter. You must provide your name and address for your representation to be considered valid, and this information will 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.

SUT1

Landscape & Green Belt Appraisal

Aberdeen City Local Development Plan
Proposed Plan 2015

Parklea, Pitfodels



Mr Ian Suttie

May 2015

Contents

1.0	Introduction	Page 1
2.0	The Green Belt	Page 2
3.0	Landscape Context Appraisal	Page 4
4.0	Conclusions	Page 9

Figures

Figure 1	Landscape Context Plan
Figure 2	Photographic Viewpoints
Figure 3	Current Green Belt & Planning Policy Context
Figure 4	Proposed Green Belt & Planning Policy Context

1.0 Introduction

- 1.1 McCreadie Design Ltd. was commissioned by Mr Ian Suttie to undertake an independent landscape appraisal of the land holding at Parklea, Pitfodels, to: **firstly**, assess the role of the Green Belt in the area, taking into account the existing and emerging planning policy context as well as the landscape character and visibility of the area; and **secondly**, determine the most appropriate long term defensible Green Belt boundary as it relates to the site.
- 1.2 The land holding at Parklea, Pitfodels, is located towards the western edge of Aberdeen City and on the eastern boundary of the community of Cults. The primary road serving the area is the A93, North Deeside Road, which connects a number of small ‘settlements’ with Aberdeen City centre and its orbital road, Anderson Drive, which provides connections to the wider area and region.
- 1.3 The land associated with Parklea forms the majority of the property’s garden and is accessed directly off the North Deeside Road. It is bounded by Bairds Brae to the east, Rocklands Road to the north with a Residential Areas zoning under Policy H1 of both the ALDP 2012 and the Proposed Plan 2015 and the larger landholding referred to as Wellwood to the west, again covered by Policy H1. An existing housing estate on the edge of Cults is located immediately to the west of Wellwood. To the north of Rocklands Road is the Woodlands housing development and development in and around The Ranch.
- 1.4 Immediately adjacent to Parklea to the west are three existing detached houses whose frontages overlook the A93, North Deeside Road, whilst the southern eastern corner of the garden ground at Parklea contains a Lodge House. Along with the formalized entrance gateway to Parklea the four houses along this main road frontage combine to give a more settled, residential character to the immediate setting in contrast to the more open landscape to the east of Bairds Brae (**Figure 1, Landscape Context Plan**) (**See Photographic Viewpoint 4, Figures 1 and 2**)

1.5 Within the adopted **Aberdeen Local Development Plan 2012** the site is covered by Policy NE2, Green Belt. In addition, the site forms a part of the Pitfodells Conservation Area (10), and is covered by Tree Preservation Order (TPO) 21. The TPO covers a larger area than just the site.

2.0 The Green Belt

Policy Context

2.1 Scottish Planning Policy (SPP) (June 2014) states 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”** (emphasis added). The SPP goes on to say **“However, where the planning authority considers it appropriate, the development plan may designate a green belt around a city or town to support the spatial strategy by:**

- **Directing development to the most appropriate locations and supporting regeneration;**
- **Protecting and enhancing the character, landscape setting and identity of the settlement; and**
- **Protecting and providing access to open space”** (Paragraph 49)

2.2 Paragraph 51 makes it clear that **“Local development plans should show the detailed boundary of any green belt”** and the LDP needs (amongst others) to establish **“clearly identifiable visual boundary markers based on landscape features such as rivers, tree belts, railways or main roads. Hedges and field enclosures will rarely provide a sufficiently robust boundary”**.

2.3 At a local level the adopted **Aberdeen Local Development Plan (ALDP) 2012**, acknowledges that the aim of the Green Belt is to **“maintain the identity of Aberdeen and the communities within and around the city by defining their physical boundaries clearly, avoiding coalescence and**

urban sprawl, maintaining the landscape setting and providing access to green space.” (Page 204)

- 2.4 Finally, in relation to Protecting and Enhancing the Natural Environment, **Policy NE5, Trees and Woodlands**, of the ALDP, sets out to **“protect and enhance Aberdeen’s trees and woodlands with the aim of doubling the existing tree cover of the city.” (Page. 207)** Supplementary Guidance has also been published by the City Council on protecting trees and woodlands.
- 2.5 The **Aberdeen City and Shire Strategic Development Plan (SDP)**, which sets the policy context to the Local Development Plan, states in Paragraph 4.31 that the Green Belt coverage **“will need to change to meet the growth this plan seeks to achieve”**.
- 2.6 In turn the **Proposed Aberdeen Local Development Plan 2015** acknowledges the existing planning policy context provided by SPP, SDP and the ALDP 2012 in that it proposes to continue to **“protect, promote and enhance the wildlife, access, recreation, ecosystem services and landscape value of the Green Space Network”. (Policy NE1, Page 52)** Through **Policy NE5, Trees and Woodlands**, the Proposed Plan 2015 also seeks to protect the city’s tree resource advising that **“appropriate measures should be taken for the protection and long term management of existing trees and new planting”**. With regard to the Green Belt the Proposed Plan 2015 through **Policy NE2** aims to **“maintain the distinct identity of Aberdeen and the communities within and around the city, by defining their physical boundaries clearly”**. (Page 53) In light of the policy context set out above it is considered that, to fully comply with the requirements of SPP and the Development Plan, the garden ground at Parklea identified in this representation should be removed from the Green Belt. This would provide for a longer term defensible Green Belt Boundary to be maintained in this area and accord with the Scottish Government’s Policy which states 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”**. (SPP

Paragraph 49) It is therefore against this updated policy and emerging policy context that the land at Parklea, Pitfodels has been assessed.

3.0 Landscape Context Appraisal

3.1 As noted above, the site is located immediately to the north of the A93, North Deeside Road, within a settled landscape dominated by the River Dee corridor. The northern bank of the River Dee is located approximately 600 metres to the south of the site entrance to Parklea with the general land form benefiting from a south facing aspect with views extending across the Dee Valley to the south.

3.2 This is a settled landscape as a range of settlements have established across the rising land form taking advantage of the south facing aspect and all linked by the A93, North Deeside Road, with Aberdeen City. However, a key characteristic of this landscape is the presence of a mature treescape which has established across these settlements to form a soft green context for the various communities. Tree belts, woodlands as well as individual and groups of specimen trees have matured to form a series of layers across the communities which, when seen from the south (**Photo 3, Figure 2**) visually connect to set the context to a range of built forms. This soft context is a key characteristic of the landscape and one that should be protected and actively maintained for the future.

3.3 Across the more densely developed part of the valley the tree cover is more limited as the tree belts and woodland areas are restricted to parks and river valleys. A significant proportion of the tree cover has matured within private gardens, with a range of tree species thriving within this context. This adds to the layering effect when seen at both a local, street level (**Photo 1, Figure 2, View of the A93, North Deeside Road corridor**) and in the wider context (**Photo 3, Figure 2, View looking north from Banchory-Devenick**).

3.4 Whilst the settlement pattern is continuous across the landscape extending out from Aberdeen towards Cults and beyond, it is acknowledged that the density

of the settlement pattern also varies. In this respect, within close proximity to the land at Parklea, the proportion of residential development to tree cover and private open space is reduced in comparison to the established communities at Cults to the west and Airyhall to the east. As a result, the scale and form of the tree cover is more significant, with larger specimen trees established across the site. This reflects the historic development of the area and the predominance of private gardens occupied by a variety of larger mansion houses and villas. However, when viewed from the south, the tree cover, whilst more extensive, blends in with the tree cover established across Cults and Airyhall, setting the context to a range of high quality, predominantly residential areas. The site is not distinguishable from the general tree cover in the area. (See **Photo 3, Figure 2**)

- 3.5 To the east of the site is a range of non-residential land uses, including: the Marcliffe Hotel, the International School and a leisure club at Woodbank which all retain many of the characteristics of the area: mature specimen tree cover, managed open spaces and formal leisure/recreation facilities. Development has continued to be realised within the area, however, as new facilities have been added, including the housing developments along Craigton Road, the importance of the tree cover is widely acknowledged and in this respect, forms an integral reason for the establishment of Pitfodels Conservation Area as Aberdeen City Council recognised that, in addition to the quality of the buildings in the area, **“a dominant theme throughout the Conservation Area is that of structural tree planting...”** which **“forms part of the overall distinctive character.”** (Aberdeen City Conservation Area Character Appraisal and Management Plan: Pitfodels January 2015) The Conservation Area designation extends from the edge of Airyhall/Garthdee to Cults, as well as between Craigton Road to the north and the River Dee to the south. (**Figure 3, Current Green Belt and Planning Policy Context**) Importantly, the designation of the Conservation Area provides protection to the treescape in this area.
- 3.6 The Conservation Area also applies to the land associated with Wellwood and in turn Parklea, where the former has seen new-build high quality housing and

sensitive conversions over recent years adding to the population of the area, but importantly these have been set within the existing landscape framework. The important components of the established tree structure have been retained as new residential development has been built into under-utilized and/or surplus open space and glades. The result is a vibrant landscape where change is and can be accommodated, but importantly without affecting or undermining the quality of the landscape setting. The dense ornamental tree cover lining the North Deeside Road frontage has been retained and indeed, enhanced, as the new developments have come on stream. Despite the changes brought about by recent development, the setting has remained unaffected at a local level, when viewed from the North Deeside Road (**Photo 1, Figure 2**) or from the wider perspective to the south. (**Photo 3, Figure 2**)

- 3.7 Consistent with the wider context, the mature tree cover continues to visually contain both the more established and newer development forms which often only become visible as the viewer travels through the area on either the main North Deeside Road or the local roads and lanes. This approach to delivering development in the area is fully consistent with the aims and objectives of the Pitfodels Conservation Area designation that allows for sensitively planned new development to come forward. In turn, whilst it is acknowledged that the landscape between Airyhall/Garthdee and Cults is a settled landscape of a different character and residential density than the two adjoining communities, importantly, there is still a clear visual separation between them. This is illustrated in views from outside the area and specifically from the south (**Photo 3, Figure 2**) where the mature tree cover, forming a key characteristic of the Pitfodels Conservation Area, essentially dominates the built form in the area and in turn, maintains this area's distinct **sense of place**.

Local Context

- 3.8 As stated above, the site is set in the context of a mature landscape structure which extends across the Pitfodels Conservation Area and beyond, into the communities of Cults to the west and Airyhall to the east. (**Photo 3, Figure 2**) The Pitfodels area is covered by a distinct set of planning policies, ranging

from **Policy H1, Residential Areas**, through to **Policy NE2, Green Belt** in both the Adopted ALDP 2012 and the same named policies in the Proposed Plan 2015. Parklea House itself sits within a residential zone which extends along Rocklands Road/Airyhall Road to the east.

- 3.9 There is also a pocket of established residential development along the North Deeside Road. The Green Belt then runs from the east of these houses along both sides of the North Deeside Road and down to the south across the River Dee Corridor landscape.
- 3.10 Established pockets of housing and more recent developments are excluded from the Green Belt with the result that the remaining part of the land holding at Parklea, included in the Green Belt, appears isolated from the remainder of the Green Belt. Its boundaries to the north and west are defined by the established residential areas zoning in both the Adopted ALDP 2012 and in the Proposed Plan 2015 rather than **“clearly identifiable visual boundary markers”**, as required by SPP. **(Paragraph 51)**
- 3.11 It is submitted that the site does not serve any function within the Green Belt policy. It is considered that there is an opportunity to rationalise the Green Belt boundary at Parklea, by removing the garden ground associated with the existing mansion house to establish what would be seen as a longer term more defensible and robust Green Belt boundary to this area, in the form of Bairds Brae to the east, consistent with the established Green Belt boundary to the north at Woodlands and North Deeside Road to the south. This approach would be consistent with Government policy on the designation of Green Belts as **Scottish Planning Policy** which advises that there is a need to establish **“clearly identifiable visual boundary markers based on landscape features such as.....main roads. Hedges and field enclosures will rarely provide a sufficiently robust boundary”**. **(Paragraph 51)**
- 3.12 The important features across the Parklea land holding are already protected by planning policy through the adopted **Aberdeen Local Development Plan 2012, Policy NE1: Green Space Network** and the **Proposed Aberdeen**

Local Development Plan 2015 as well as the **Pitfodels Conservation Area** designation. The Conservation Area designation covers the extended setting to the site and importantly makes specific reference to the mature “**structured tree planting**” which helps make the character of the overall area so “**distinctive.**” In addition, the existing Tree Preservation Order that covers part of the Parklea site also reinforces the importance of the tree cover in the area and importantly, as highlighted above, combines with other mature tree cover in the area to, not only provide a distinct sense of place but also, visually separate the two communities of Cults and Airyhall when viewed from the south. **(Photo 3, Figure 2)**

- 3.13 Releasing the site from the Green Belt will not impact upon the identity of the communities, nor will it lead to urban sprawl as it is a small pocket of land within a residential area. The site does not provide access to the green space network for public recreational purposes as it is private ground. It is considered that the only purpose of the current Green Belt designation across the site is to protect the landscape setting of the area and that this can be achieved through other planning policies and designations.
- 3.14 The Green Belt boundary should be redrawn at this location to follow the A93, North Deeside Road, removing the site from this designation. **(Figure 4, Proposed Green Belt and Planning Policy Context)** This approach takes into account the fact that there are established residential areas already on either side of this parcel of land and the key landscape features, namely the mature tree cover, are protected and in turn, will be retained to help “**maintain the distinct identity of Aberdeen and the communities within and around the city, by defining their physical boundaries clearly.**” **(Proposed ALDP 2015, Page 53)**
- 3.15 **Figure 4** illustrates how the Green Belt boundary in this area should be redrawn to help establish a clear, well defined long term defensible Green Belt which can be readily understood on the ground without undermining the overall policy context. It is proposed that the land removed from the Green Belt should be re-designated under **Policy H1, Residential Areas** in the

Proposed ALDP 2015 to be consistent with adjoining land uses and again, reflect a more consistent approach to policy designations.

4.0 Conclusions

4.1 In conclusion:









- **Firstly**, it is acknowledged that the key characteristics of the land at Parklea, with its mature tree cover and understorey planting forms an important role in the landscape setting to the west of Aberdeen City and the **communities** set out along the A93, North Deeside Road;
- **Secondly**, where a Green Belt is proven to be required there is scope within **Scottish Planning Policy** for Green Belt boundaries to be reviewed and adjusted to reflect 'local' circumstances and to help establish **“clearly identifiable visual boundary markers based on landscape features such as rivers, tree belts, railways or main roads. Hedges and field boundaries will rarely provide a sufficiently robust boundary”**. (SPP Paragraph 51);
- **Thirdly**, the current Green Belt zoning of the site, which is garden ground associated with an established residential area, is, when assessed against current Scottish Planning Policy inadequately defined and does not meet the test that it should now be based upon **“clearly identifiable visual boundary markers...such as [amongst others] main roads”**. There is now an opportunity through the current review of the Development Plan to rationalise the Green Belt at this location to reflect the local characteristics of the area and to help form a robust and long term defensible boundary to the Green Belt;
- **Fourthly**, the site and its key characteristics are protected by the **Conservation Area** designation and **TPO 21** as well as **Policy NE5, Trees and Woodlands**, of both the ALDP 2012 and the Proposed Plan 2015 which can be used to adequately control and protect the tree coverage on the site. Scottish Planning Policy advocates against using the Green Belt

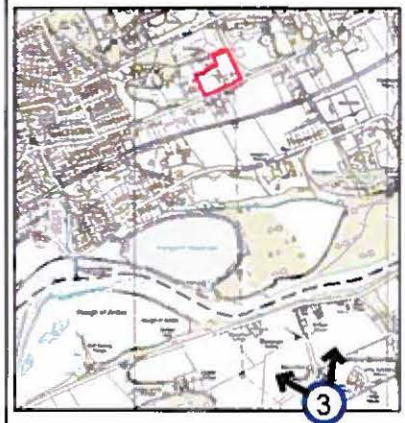
when other policies and designations provide an appropriate context for decision making;

- **Fifthly**, in light of Scottish Planning Policy and the need for clearly identifiable Green Belt boundaries, “**using strong visual or physical landscape features such as (inter alia)...main roads**” it is recommended that the Green Belt boundary at Parklea should be redrawn to exclude the established garden ground associated with the house and that the new Green Belt boundary should follow the A93, North Deeside Road to the south and Bairds Brae to the east, consistent with the defined Green Belt to the north at Woodlands, as illustrated in **Figure 4, Proposed Green Belt and Planning Policy Context** ; and,
- **Finally**, it is considered that through this approach the Green Belt policy in the area will have a more consistent, robust, and long term defensible boundary at Pitfodells, Aberdeen.



LEGEND

-  SITE BOUNDARY
-  EXISTING BUILDINGS
-  EXISTING DEVELOPMENT / PLOTS
-  EXISTING ROAD NETWORK
-  EXISTING TREES / WOODLAND
-  EXISTING OPEN / GREEN SPACE
-  AGRICULTURAL LAND
-  PHOTOGRAPHIC VIEWPOINT LOCATIONS



Mr Ian Suttie **mccreadiedesign**

LAND AT PARKLEA, PITFODELS

LANDSCAPE & GREEN BELT APPRAISAL

FIGURE 1

LANDSCAPE CONTEXT PLAN

Scale: 1:5,000 (A3) Date: May 2015
Job No. M1324



Viewpoint 1: View looking along the tree lined North Deeside Road (A93) corridor



Viewpoint 2: View looking south from North Deeside Road (A93)



Viewpoint 3: Distant view looking north towards the site from the minor road which extends southwards from Banchory-Devenick



Viewpoint 4: View looking North from the North Deeside Road at the southern boundary of the land at Parklea

Mr Ian Suttie **mccreadiedesign**

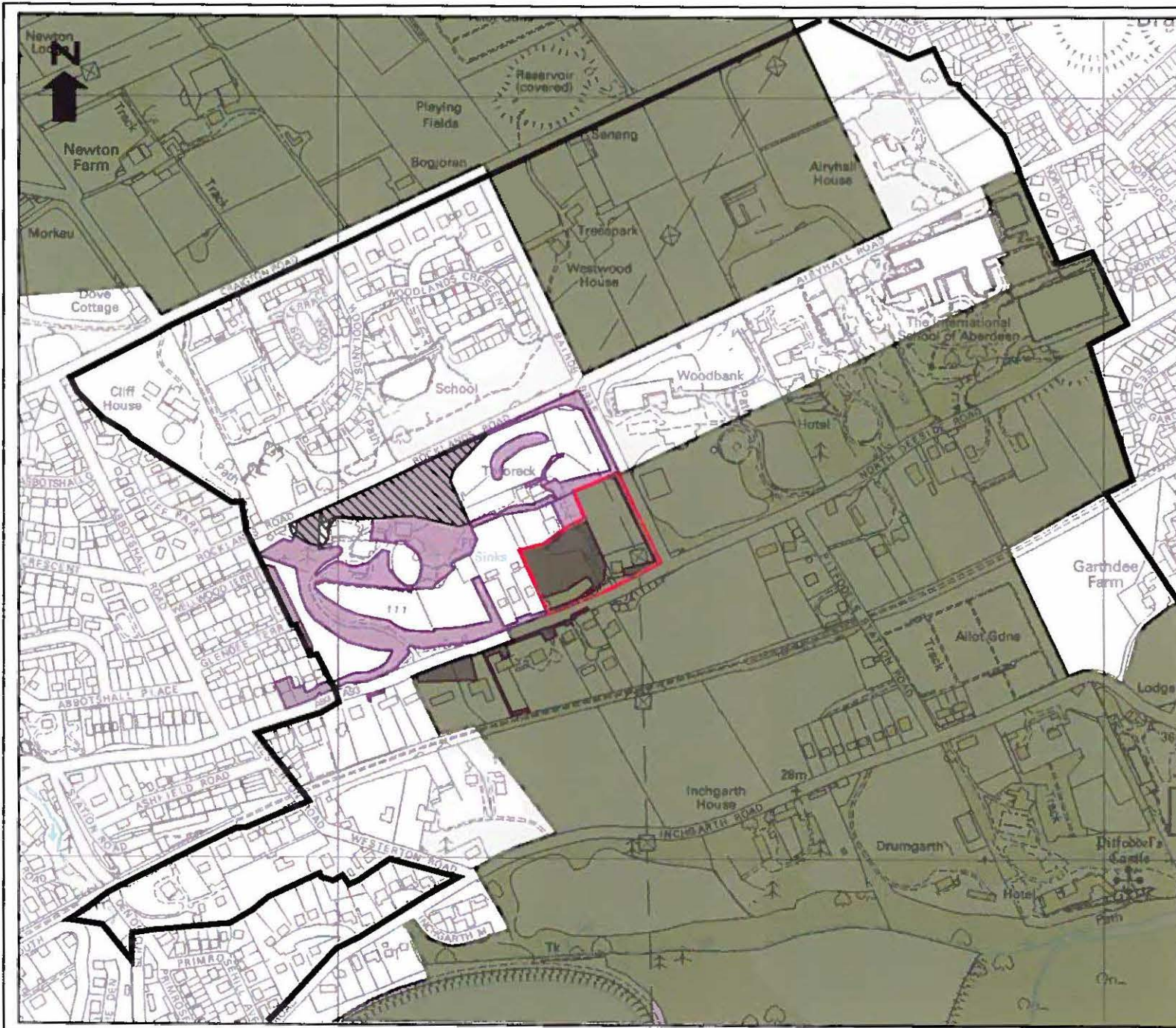
LAND AT PARKLEA, PITFODELS

LANDSCAPE & GREEN BELT APPRAISAL






FIGURE 2

PHOTOGRAPHIC VIEWPOINTS

Scale: N/A Date: May 2015
Job No. M1324



LEGEND

-  SITE BOUNDARY
-  GREEN BELT (POLICY NE2)
-  GREEN SPACE NETWORK (POLICY NE1)
RELATED TO THE SITE AT WELLWOOD
-  CONSERVATION AREA BOUNDARY
-  EXTENT OF TREE PRESERVATION
ORDER (TPO)

Mr Ian Suttie **mccreadiedesign**

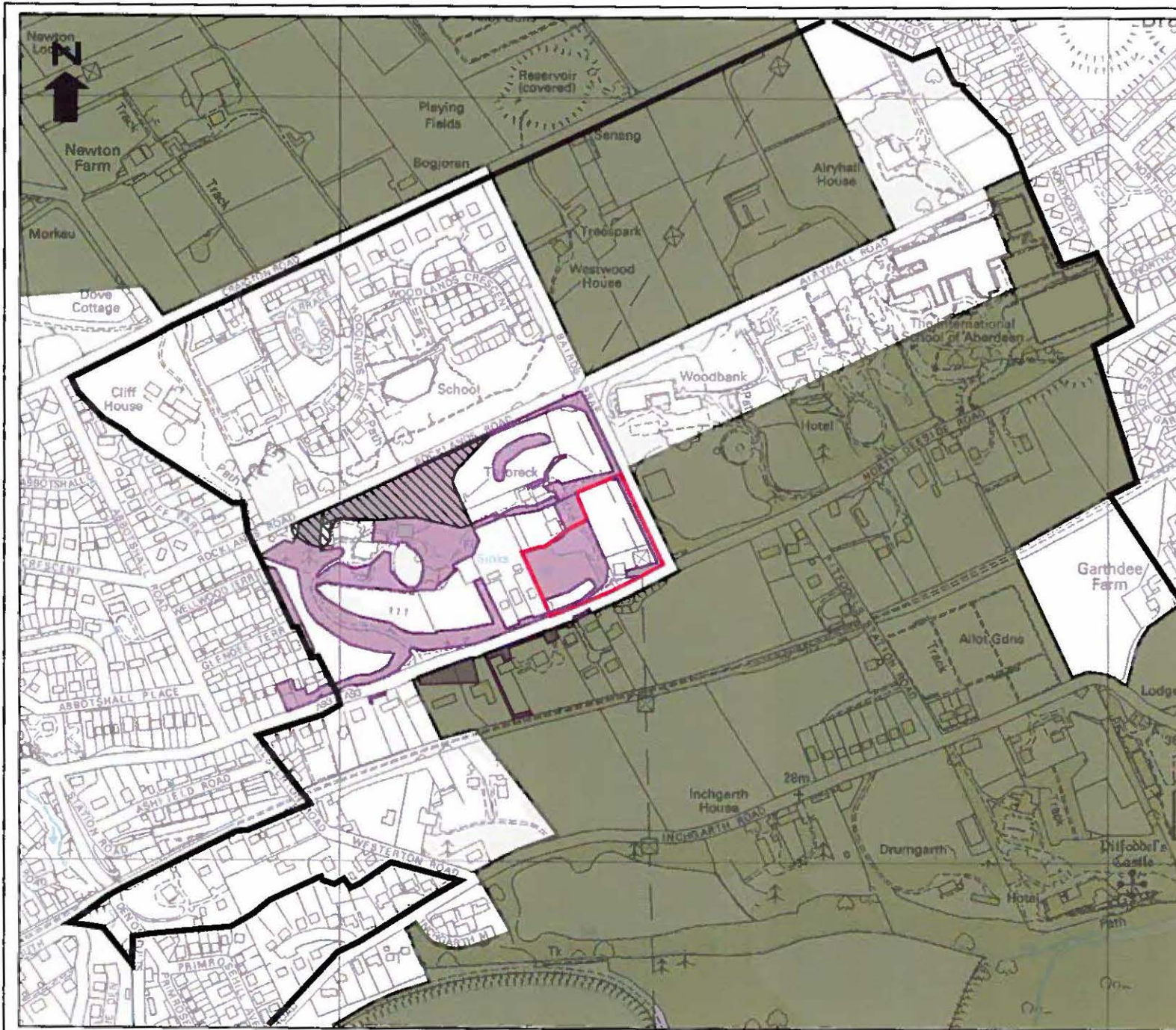
LAND AT PARKLEA, PITFODELS

LANDSCAPE & GREEN BELT APPRAISAL






FIGURE 3

**CURRENT GREEN BELT & PLANNING
POLICY CONTEXT**

Scale 1:5,000 (A3) Date May 2015
Job No. M1324



LEGEND

-  SITE BOUNDARY
-  GREEN BELT (POLICY NE2)
-  GREEN SPACE NETWORK (POLICY NE1) RELATED TO THE SITE AT WELLWOOD
-  CONSERVATION AREA BOUNDARY
-  EXTENT OF TREE PRESERVATION ORDER (TPO)

Mr Ian Suttie **mccreadiedesign**

LAND AT PARKLEA, PITFODELS

LANDSCAPE & GREEN BELT APPRAISAL

FIGURE 4

PROPOSED GREEN BELT & PLANNING POLICY CONTEXT

Scale 1:5 000 (A3) Date May 2015
Job No. M1324