



Proposed Aberdeen Local Development Plan 2015

CONSULTATION RESPONSE – MACTAGGART & MICKEL HOMES
AND MR FABRIZIO NECCHI

JUNE 2015

PREPARED BY COLLIERS
INTERNATIONAL

PREPARED FOR MACTAGGART &
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1 INTRODUCTION

1.1 INTRODUCTION

Colliers International have been instructed by our Client, Mactaggart and Mickel Homes and Mr Fabrizio Necchi, to lodge responses to the proposed Aberdeen Local Development Plan 2015.

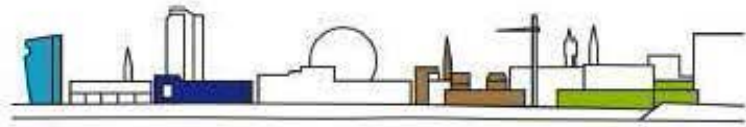
This document sets out those responses in respect of two parcels of land to the west and south-west of Bucksburn Primary School, south of Howes Road, Bucksburn. The subject sites lies adjacent to a site also being promoted by Mactaggart and Mickel Homes and Malcolm Hay Trustees. The site was, within the last pLDP, promoted for residential development of circa 80 units, capable of being developed on a site which can be integrated, well designed, landscaped and deliverable in a short/medium timescale. The Reporter at the last Local Development Plan Examination concluded that there were no overriding reasons to remove the site from the green belt and the green space network. It is argued that the Reporters findings in relation to the site were weak and that in order to allow the settlement to expand to meet local needs, and in the interest of providing a robust green belt edge in line with the provisions of SPP, this area should be removed from the green belt, the green space network, and be allocated in the emerging LDP for residential development. Development across the subject site and the adjacent site to the east is considered to represent a logical and wholly suitable development site in close proximity to the services and facilities of Bucksburn and forming a logical rounding-off of the built form.

This document contains individual representation forms relating to issues of:

- Greenfield Development/Policy LR1 – Land Release Policy
- Masterplan Zones/Directions of Growth
- Policy D1 – Quality Placemaking by Design
- Policy D2 – Landscape
- Policy NE1- Green Space Networks
- Policy NE2 – Green Belt
- Policy H1 – Residential Areas

Full cognisance should be taken of the associated representations for the adjacent Bucksburn site, submitted on behalf of Mactaggart and Mickel Homes and the Malcolm Hay Trustees, along with the appendices contained within this document.

2 REPRESENTATION FORMS



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.

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Organisation	Colliers International
On behalf of (if relevant)	Mactaggart and Mickel Homes and Mr Fabrizio Necchi
Address	1c Exchange Crescent, 1 Conference Sq, Edinburgh
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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	Greenfield Development (page 9)/Policy LR1-Land Release	Paragraph(s)	

What would you like to say about the issue?

Our Clients interests lie to the south-west of the former Bucksburn Primary School, south of Howes Road at Bucksburn. Please refer to the appended information and other consultation responses when considering our comments as set out below.

The plan has placed significant focus on greenfield land release and it is acknowledged that in many areas this is a necessity. The ability of greenfield sites to meet development plan needs is often viewed in the context of large-scale long-term land release. It is held that the ability of small-scale greenfield sites to be released and built-out in a timely manner should also be explicitly acknowledged in the emerging Plan.

The site is currently designated as green belt and part of the green space network in the adopted Local Development Plan. Its status is proposed to remain as such in the emerging Plan.

Paragraph 51 of Scottish Planning Policy (SPP) states that "Local development plans should show the detailed boundary of any green belt, giving consideration to: (inter alia)

- the need for development in smaller settlements within the green belt, where appropriate leaving room for expansion;
- establishing clearly identifiable visual boundary markers based on landscape features such as hedges and field enclosures will rarely provide a sufficiently robust boundary."

In that vein it is considered that the pLDP has not drawn the green belt around Bucksburn correctly, drawing it tight to arbitrary boundaries and leaving no room for expansion. It is considered that the Council should recognise in the plan the entitlement for smaller settlements to expand to meet local requirements, utilising sites which are of a scale, nature and proximity to local services and facilities which are viable and deliverable in the short/medium term. Our Clients land at Bucksburn is such a site which is ripe for development - potentially in tandem with adjacent land which is the subject of representation also - and represents a logical and viable expansion to the urban form in this settlement.

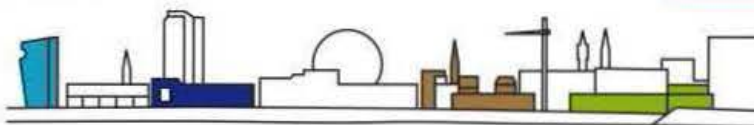
The pLDP further notes that to meet the SDP requirements 17,000 homes have been earmarked on greenfield sites to the period up to 2026. Many of these are mixed use and are carried over from the 2012 Local Development Plan. For the Dyce/Bucksburn/Woodside area, there is a noted existing housing allowance of 3,300 up to 2026. This remains a significant figure of sites to be delivered before 2026. The greenfield allocations will be assessed against the relevant policy, Policy LR1 – Land Release Policy which states that two phases of land release on greenfield sites will take place: Phase 1 2017-2026 and Phase 2 2027-2035.

It is noted however that Phase 1 releases will be 'approved in principle' only. Consequently, it is concluded that there is a real possibility that some of the larger scale sites programmed for delivery in Phase 1 will fail to meet the timescales envisaged as it is probable that significant detailed design and survey work will be required. In recognising that there are existing allocations being carried over from the existing LPD, the Council should ensure where deliverability issues arise, smaller settlements have been provided with the room to expand in a limited, logical fashion to plug any gaps in housing provision which may arise. Furthermore it is considered that complete reliance on large-scale releases may be to the detriment of smaller communities outwith or indeed adjacent to such large releases. Policy LR1 as written allows for smaller-scale proposals on land "in close proximity to an allocation" to be refused; this approach is unsupported.

It is considered that the reliance on existing allocated sites being carried out from the 2012 adopted Local Development Plan is somewhat flawed, in that there are situations where some/part of these historic allocations are large-scale and there remains a significant level of detailed work and consents to be put in place before deliverability on the ground will occur. The Council are reminded that paragraph 123 of SPP states that "A site is only considered where it can be demonstrated that within 5 years it will be free of constraint and can be developed for housing." Comments refer to PAN 2/2010: Affordable Housing and Housing Land Audits and the seven criteria listed. It is confirmed that our Clients site at Bucksburn is considered to be fully effective in terms of both the SPP and PAN, subject to its removal from the green belt and green space network. The policy does not explicitly state support for the necessity of smaller-scale land releases to occur in locations which are capable of 'plugging in' to local services and facilities. These are crucial to the area meeting its housing supply targets and demands, however it has failed to be absorbed into policy within this emerging plan.

What change would you like to see made?

- the text and policy relating to greenfield and land release requires to address and reflect that smaller sites which can be released and delivered, free from constraint and taking cognisance of other plan policies have a role to play in meeting the areas housing land requirements and promoting mixed communities.



Proposed Aberdeen Local Development Plan 2015 Representation Form

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Policy/Site/Issue	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 60%;">Directions for Growth (pages 11-15)/Masterplan Zones (pages 33-34)/City Wide Plan</td> <td style="width: 20%;">Paragraph(s)</td> <td style="width: 20%;"></td> </tr> </table>	Directions for Growth (pages 11-15)/Masterplan Zones (pages 33-34)/City Wide Plan	Paragraph(s)	
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What would you like to say about the issue?

Our Clients interests lie to the south and south-west of the former Bucksburn Primary School, south of Howes Road Bucksburn. The site is currently designated as green belt and green space network. Please refer to all of this appended information along with our response to Policy LR1 - Land Release, NE1-Green Space Networks and NE2-Green Belt when considering out comments set out below.

The pLDP promotes the Strategic Development Plans vision for four growth areas as the focus for development over the period up to 2035 noting however: "Development on brownfield sites is strongly encouraged. Significant allowances are also made for development on greenfield sites." (Paragraph 1.9) The pLDP states that "substantial land allocations have been made in the Dyce/Bucksburn A96 corridor close to Aberdeen Airport, which is one of the gateways to the Energetica corridor" (Paragraph 2.21). While the direction of growth is not in itself disputed, it is considered that an overreliance on these larger-scale sites to deliver may result in a lack of housing being readily available to meeting demand in shorter time periods. There is a real danger that the plan focus on masterplan zones may be to the detriment of smaller communities lying outwith or adjacent to these zones. This is noted further in our response to LR1.

The emphasis missing from this plan as currently written is deliverability and appropriate, realistic development timeframes. Large-scale allocations have a role to play in the plan area and such allocations which have been made throughout the Council area do have a place in the long-term delivery of homes and employment land, however it must be acknowledged that the funding, supporting infrastructure and overall lead-in timescales for such sites differs greatly to smaller sites. Smaller sites are more readily capable of plugging-in and integrating with existing services and facilities and should be an important element in the overall delivery of housing numbers over a plan period.

The pLDP acknowledges that "The proximity of housing and employment land allocations provides the opportunity for people to live close to places of work." (Paragraph 2.21) The Council have here acknowledged the importance of co-location of employment and residential land uses, whether that be deliver in tandem or in response to a defined need. It is considered that while larger masterplan zones are capable of delivering both uses, the plan currently does not go far enough to support small-scale residential land releases which are responding to local needs.

The Council must recognise, and this must be carried through in policy, that smaller sites have a role to play meeting housing needs and providing homes for a working population in existing settlements. This is in line with SPP which calls for "a generous supply of land for each housing market area" and "a range of attractive, well-designed, energy efficient, good quality housing." (Paragraph 110)

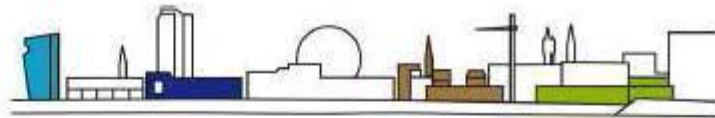
In that vein and turning our attention to our Clients site at Bucksburn, it is noted that the subject site has been omitted from both the Newhills Expansion and Dyce Drive (zone 3) and Greenferns masterplan (zone 4) areas (as set out in Figure 1: Masterplan Zones). Indeed it lies nestled between the two masterplan sites. While the site is currently designated green belt and part of the green space network (discussed separately) it is not considered to play an important or justified role in either of these designations. The ability of this site to form a logical extension to the adjacent residential areas of Bucksburn which links between the two masterplan Zones should be recognised and its status reviewed without delay. The masterplan areas as currently shown cannot be taken forward in isolation from the smaller settlements they border. As such and in the interest of creating a more logical and robust greenbelt boundary in this area of Aberdeen, cognisance should be given at this stage regarding the knock-on effects the masterplan development Zones will have in areas outwith or which they border, and how their development will impact on the greater Aberdeen area and countryside. In the context of the Bucksburn site, this would mean the creation of a logical green belt boundary around and through both masterplan Zone 3 and 4, thus pulling the green belt boundary south of Bucksburn and allowing smaller in-fill residential development to take place in a logical fashion, which properly rounds-off the settlement. This approach would allow our Clients site available as a viable development opportunity in close proximity to services, facilities and capable of being absorbed into the town boundary. The resultant green belt boundary would be stronger than that currently in place and through linking the boundary with the green space network beyond and within Zones 3 and 4, would meet other policy aspirations. The existing minor road to the south between the site and Auchmill Golf Course, together with enhancement of existing tree planting, could provide such a boundary.

It is noted from the accompanying Action Programme that there remains, in some respects, significant work to be carried out in respect of the delivery of some of the masterplan zones. Timescales for the commencement of on-site build begin in 2017 and the Council are urged to realistically consider how achievable these aspirations may be and what procedures and sites are in place should a shortfall in housing numbers occur.

It is requested that the Council review the ability of the masterplan Zones to create strong landscapes within which smaller developments in local communities can take place, such as is argued to be the case in Bucksburn. The pLDP does not provide a level of information to set out how these zones are to integrate with adjacent existing settlements and what their development mean for the context and setting of smaller sites.

What change would you like to see made?

- review of how the masterplan zones (particular zones 3 and 4) affect the area of Bucksburn highlighted and a review of the green belt and green space network to assist in linking these zones without detrimentally affecting the small area of Bucksburn which has been omitted from either zone.
- formation of a robust, defined green belt boundary linking masterplan zones 3 and 4, which allow for small-scale development/infill to take place on our Clients site at Bucksburn
- inclusion of reference to how shortfalls from the masterplan zone developments are to be dealt with as the plan progresses



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	Strategic Environmental Assessment Environmental Report	<input type="checkbox"/>	
Policy/Site/Issue	Policy D1-Quality Placemaking by Design	Paragraph(s)	

What would you like to say about the issue?

Our Clients interests lie to the west and south-west of the former Bucksburn Primary School, south of Howes Road. Please refer to all of this appended information along with our responses to Policy NE1-Green Space Networks and NE2-Green Belt, when considering our comments set out below.

Policy D1 is largely supported however it is held that there are significant overlaps between this and other key policies in the successful creation of quality places and spaces. As such we would welcome acknowledgment of such policies – such as Policy D2-Landscape –in the preceding policy text.

Policy D1 sets out the criteria against which any proposals will be assessed, including the six key qualities of successful places, which echoes national policy and is therefore supported. Any development which may come forward on the above site would carefully address each of these criteria. In specific relation to our Clients interests, it is held that development to the west and south-west of the former school could readily create a contained and integrated development with clear relationships to the adjacent built form. Access and connectivity could be promoted via Howes Road and the A96; and via pedestrian/cycle links to the south - both east and west. Additionally, landscape works would assist in creating a robust green belt boundary and a setting for a logical residential development which is:

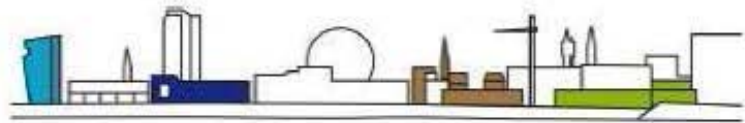
- distinctive;
- welcoming;
- safe and pleasant;
- easy to move around in;
- adaptable; and
- resource efficient.

Similar arguments were made during the 2007 Local Plan inquiry in respect of land to the west of the school. While at that stage the sites inclusion for residential development of circa 40 units was not supported, it is maintained that there are now greater opportunities for development in this location which should be explored as a response to fulfilling local housing demand. Furthermore, the issues for non-inclusion primarily related to issues of landscape which we believe and as noted in respect of response to Policy D1 and D2, can be incorporated into any design going forward.

Paragraph 3.4 of the Plan as written encourages "an engaging, design-led approach to secure quality placemaking through the appropriate use of pre-application discussion" and this is welcomed. The same paragraph also makes reference to the Aberdeen City and Shire Design Review Panel and while it is acknowledged that this can be a useful tool in striving for design and placemaking quality, we would welcome further information as to how sites are selected for this process and what weighting the Panel's findings have at the application determination stage.

What change would you like to see made?

- acknowledgment of the overlap with other related policies
- further information within the associated policy text or associated supplementary guidance regarding the design review panel



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Policy/Site/Issue	Policy D2 - Landscape/Site formally known as OP27 at Bucksburn	Paragraph(s)

What would you like to say about the issue?

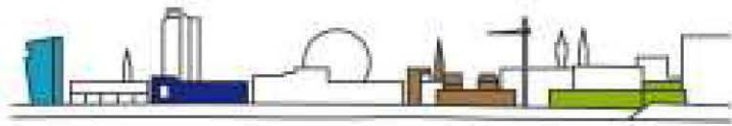
Our Clients interests lie to the south of the former Bucksburn Primary School, south of the Inverurie Road (A96) at Bucksburn. The site was a proposed allocation in the previous proposed Local Development Plan (pLDP), included as OP27. It was promoted at this time for residential development of circa 80 units. A concept plan for the site is included in the appended information. Please refer to all of this appended information along with our responses to Policy D1-Quality Placemaking by Design, Policy NE1-Green Space Networks and NE2-Green Belt, when considering our comments set out below.

Following on from our response to Policy D1 in meeting and delivering through sensitive layout and design the six key qualities of a successful place, Policy D2 – Landscape is a key consideration in the successful delivery of any site, providing a setting for development, a sense of welcome and important delineations between public and private spaces. In specific relation to our Clients land interests at Bucksburn, where the site is currently allocated (and continued to be proposed as) both green belt and green space networks, a strong landscape framework to integrate and provide a fitting context for development in this location could be employed. The positive impacts of a robust landscape framework are numerous, including the provision of a stronger more robust green belt boundary, and the ability to enhance green networks and their features thus assisting the creation of successful welcoming places.

Indeed it is strongly considered the case that the employment of a robust, sensitive and strong landscape framework can overcome a substantial level of any concerns which the local authority or statutory consultee may have in the allocation of this site for residential development. Indeed Policy D2 calls for development to "create new landscapes where none exist and where there are few existing features." We welcome this inclusion in the Policy however conclude that it requires to be further emphasised in the Policy as a means by which other aspirations and policy provisions of the wider plan can be met, for example in relation to green space networks

What change would you like to see made?

- request that the policy text is expanded/amended to provide greater emphasis on the ability of a robust landscape framework to address policy considerations and significantly assist in meeting the provisions of Policy D1.



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	Strategic Environmental Assessment Environmental Report	<input type="checkbox"/>
Policy/Site/Issue	Policy NE1 Green Space Network/City Wide Plan	Paragraph(s)

What would you like to say about the issue?

Our Clients interests lie to the west and south-west of the former Bucksburn Primary School, south of Howes Road, Bucksburn. The site remains designated part of the green belt and green space network. Please refer to all of the appended information along with our response to Policy NE2-Green Belt when considering comments set out below.

The function of a green space network is to connect natural green spaces, habitats and communities. Under Policy NE1 – Green Space Network the Council aim to “protect, promote and enhance the wildlife, access, recreation, ecosystem services and landscape value of the Green Space Network” and “Proposals for development that are likely to destroy or erode the character and/or function of the Green Space Network will not be permitted.” It is held that development of the Bucksburn site would not destroy or erode the character and function of the Network. Strong links can be provided within a development area thereby creating and enhancing wildlife corridors and extending the overall network. In addition, ensuring a residential population exists to utilise the network via connected paths and routes is held to be a key consideration in meeting the aims of Policy NE1.

It is held that the Reporters findings at the 2007 Inquiry that the site should remain designated as green belt and part of the green space network were flawed. This site is wholly capable of delivering a robust greenbelt boundary more in line with SPP whilst also providing through-links and access to the wider green space network in and around the plan area. As such the green space network designation on this site should be removed and the site designated under Policy H1-Residential Areas. In addition, taking into consideration the fact that the adjacent land to the south-east of the former primary school is also being promoted for residential, it is considered that this is the correct opportunity for the Council to consider the full merits of development taking place in this location being fully capable of creating and emphasising a strong green belt boundary which links with the wider area.

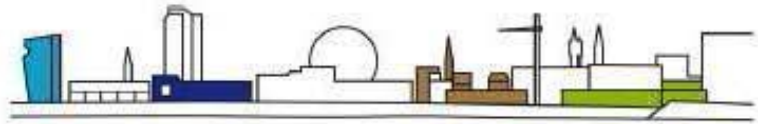
The Reporters previously failed to take account of the ability for a sensitively designed development in this location to strengthen the wider landscape framework for the area. Given the location of the site and its ability to form a logical extension to the urban form in the wider area, it is held that the site does not constitute such a strong component in the wider, extensive, green space network which warrants a ban on any development taking place. It is concluded that development of this site would constitute viable development which can be successfully and sensitively designed to strengthen the character and function of the wider green space network. Taken in tandem with comments relating to the identified masterplan zones (part of a separate response) it is held that the site can be successfully developed for residential purposes while meeting the terms of Policy NE1. Indeed, the policy allows for mitigation to offset any potentially negative impacts which development might have on the network.

Ultimately it is considered that this policy does not prohibit development of this site at Bucksburn, but promotes mitigation, design excellence and integration with other aspects of the network in any plans/layouts coming forward.

It is held that the Council have failed to provide real scope within this policy to allow for development to take place in tandem with enhancements to the green space network. There is an acknowledgement that a key aim is to enhance the network, however a further sentence requires to be added to this policy to acknowledge that development opportunities may present themselves in or adjacent to designated green space network areas whereby network enhancements can be provided and in such instances the Council may - taking cognisance of all other determining issues – be minded to support such an application. The policy and use of the designation has to date implied the designation as a constraint on development taking place however this stance should not be taken forward in the emerging plan policy. It is held that wording to the following effect should also be added to the policy: “development proposals coming forward on designated green space network sites may be appropriate where such development can be shown to enhance the network and connections therein.”

What change would you like to see made?

- It is held that wording to the following effect should also be added to the policy: "development proposals coming forward on designated green space network sites may be appropriate where such development can be shown to enhance the network and connections therein."
- removal of the green space network designation at our Clients site at Bucksburn, to allow for a sensitive residential development to take place and green networks to be created and enhanced via a well-designed and appropriate landscape framework



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Policy/Site/Issue	Policy NE2 - Green Belt/Green Belt/City Wide Map	Paragraph(s)	

What would you like to say about the issue?

Our Clients interests lie to the west and south-west of the former Bucksburn Primary School, south of Howes Road at Bucksburn. The site was - in part - previously promoted for residential development and while unsuccessful at that stage (2007), it is considered that these two fields, and the availability of the adjacent field to the east, would form a logical, deliverable development opportunity of a size and scale appropriate to the settlement of Bucksburn. The site currently remains designated as green belt and part of the green space network. Please refer to all of the appended information along with our response to Policy NE1-Green Space Networks when considering our comments set out below.

The pLDP states that "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. The green belt directs planned growth to the most appropriate locations and supports regeneration" (Paragraph 3.99). The Council are reminded that Scottish Planning Policy (SPP) states "For most settlements, a green belt is not necessary as other policies can provide an appropriate basis for directing development to the right locations." (Paragraph 49) It also states that "The spatial form of the green belt should be appropriate to the location... Local development plans should show the detailed boundary of any green belt, giving consideration to: (inter alia) the need for development in smaller settlements with the green belt, where appropriate leaving room for expansion; establishing clearly identifiable visual boundary markers based on landscape features such as rivers, tree belts, railways or main roads."(Paragraph 51)

The draft green belt policy, Policy NE2, advises against any development in the green belt outwith the scope of those narrow uses listed therein. It is considered that while the Policy partially reflects SPP, the current wording of Policy NE2 does not reflect other aspects of SPP including the requirement for the planning system to be "flexible enough to accommodate changing circumstances and allow the realisation of new opportunities."(Paragraph 93) It is considered that the green belt policy of the pLDP does not contain sufficient flexibility to respond to changing circumstances and as currently set out this stringent wording is acting as a barrier to development in local plan areas where green belt designations are no longer appropriate and are failing to be flexible when a review of those boundaries in the context of development pressure takes place.

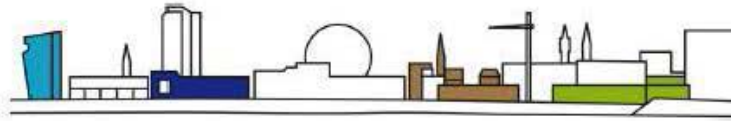
In relation to our Clients site at Bucksburn the designation of green belt in this precise location is not found to be in accordance with the overall thrust of SPP in relation to appropriateness, expansion of the settlement or indeed boundary markers. It should therefore be redrawn to reflect a clearly identifiable visual boundary marker based on the existing southern boundary of the site, the minor road which currently separates the site from adjacent the golf course. Indeed, development in this location in tandem with a strong landscape framework would provide a robust defensible boundary to the built development thereby also delineating a physical green belt boundary line for the wider area.

It is our view that the green belt boundary in this location can and should be adjusted, and that this can be carried out within the provisions of SPP. It is strongly refuted that the findings of the 2007 Local Plan inquiry into the site or the 2012 Reporters findings into the adjacent land in relation to issues of green belt and the green space network – although binding – were in fact correct.

There exists a clear necessity for a more resilient green belt boundary to be located in this area than is currently the case. In its current form, the urban form is disjointed and the green belt as set out tightly drawn to arbitrary boundaries allows for no 'rounding-off' of development to take place. There is a design response which can be brought about to physically provide for a robust greenbelt boundary to the south, thus allowing the clearly suitable and viable development location to be utilised for local housing provision. The redrawing of the boundary around the subject site would provide important linkages to key facilities in the settlement, namely residential to recreation and the wider green network. A logical redraw of the green belt boundary and green space network along the minor road which runs to the south of the subject site and that of the adjacent site (also being promoted during this consultation) would provide shelter, enhance biodiversity in the wider area and release local land for local housing in a short-medium term.

What change would you like to see made?

- more flexibility in the policy to better-reflect the thrust of SPP.
- the greenbelt boundary as depicted on the proposed City Wide Map reviewed to exclude our Clients site at Bucksburn and create a stronger boundary between the built form and the green belt beyond.



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 type="radio"/> Ms <input type="radio"/>
Organisation	Colliers International
On behalf of (if relevant)	Mactaggart and Mickel Homes and Mr Fabrizio Necchi
Address	1c Exchange Crescent, 1 Conference Square, Edinburgh
Postcode	EH3 8UL
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 H1-Residential Areas/	Paragraph(s)

What would you like to say about the issue?

Our Clients interests lie to the west and south-west of the former Bucksburn Primary School at Howes Road, Bucksburn. Please refer to all of the appended information along with our response to Policy D1-Quality Placemaking, NE1-Green Space Networks and NE2-Green Belt when considering out comments set out below.

Whilst the policy as currently set out is largely acceptable, the Council should set out clarifications regarding the character area descriptions – if any exist – and what specific radius applies to 'surrounding areas'. This would assist in meeting related design excellence standards and creating successful places in line with national policy.

It is considered that should the Council be minded to include our Clients land at Bucksburn as land suited to residential development, any development in this locations would be in full accordance with the provisions of Policy H1 in that development:

- Would not constitute over development
- Would not have an unacceptable impact on the character and amenity of the surrounding areas
- Would not result in the loss of valuable open space
- Would comply with SG

It is known that the site was previously promoted for residential development as has the site directly adjacent to the east. Taken together, it is strongly maintained that these fields can form a logical yet contained development area, linked to the existing urban areas yet with the ability to include a strong landscape framework which overall enhances this area and provides a physical, visible green belt boundary whilst also allowing for connectivity of green space networks to occur. This, is is held, merits the sites removal from its current designation as part of the green belt and green space network.

What change would you like to see made?

- the Council should set out clarifications regarding the character area descriptions – if any exist – and what specific radius applies to 'surrounding areas'.
- the inclusion of our Clients land at Bucksburn as identified in the supporting information

APPENDICES

To be read in conjunction with each representation

1 SITE PLAN

2 LOCAL PLAN INQUIRY 2007

3 LOCAL DEVELOPMENT PLAN 2012

4 PROPOSED LOCAL DEVELOPMENT PLAN 2015



Proposed Aberdeen Local Development Plan 2015

CONSULTATION RESPONSE – MACTAGGART & MICKEL HOMES
AND MR FABRIZIO NECCHI

JUNE 2015

PREPARED BY COLLIERS
INTERNATIONAL

PREPARED FOR MACTAGGART &
MICKEL HOMES AND MR FABRIZIO
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1 INTRODUCTION

1.1 INTRODUCTION

Colliers International have been instructed by our Client, Mactaggart and Mickel Homes and Mr Fabrizio Necchi, to lodge responses to the proposed Aberdeen Local Development Plan 2015.

This document sets out those responses in respect of two parcels of land to the west and south-west of Bucksburn Primary School, south of Howes Road, Bucksburn. The subject sites lies adjacent to a site also being promoted by Mactaggart and Mickel Homes and Malcolm Hay Trustees. The site was, within the last pLDP, promoted for residential development of circa 80 units, capable of being developed on a site which can be integrated, well designed, landscaped and deliverable in a short/medium timescale. The Reporter at the last Local Development Plan Examination concluded that there were no overriding reasons to remove the site from the green belt and the green space network. It is argued that the Reporters findings in relation to the site were weak and that in order to allow the settlement to expand to meet local needs, and in the interest of providing a robust green belt edge in line with the provisions of SPP, this area should be removed from the green belt, the green space network, and be allocated in the emerging LDP for residential development. Development across the subject site and the adjacent site to the east is considered to represent a logical and wholly suitable development site in close proximity to the services and facilities of Bucksburn and forming a logical rounding-off of the built form.

This document contains individual representation forms relating to issues of:

- Greenfield Development/Policy LR1 – Land Release Policy
- Masterplan Zones/Directions of Growth
- Policy D1 – Quality Placemaking by Design
- Policy D2 – Landscape
- Policy NE1- Green Space Networks
- Policy NE2 – Green Belt
- Policy H1 – Residential Areas

Full cognisance should be taken of the associated representations for the adjacent Bucksburn site, submitted on behalf of Mactaggart and Mickel Homes and the Malcolm Hay Trustees, along with the appendices contained within this document.

APPENDICES

To be read in conjunction with each representation

1 SITE PLAN



K. B. Caspary & P. C. Patton S.J. 11/2011

2 LOCAL PLAN INQUIRY 2007

Recommendation

11. The green belt and Green Space Network designations that apply to the north-eastern part of the objection site should be deleted and replaced by the Mixed Use (M37) designation. The south-western part of the objection site (the part on which young trees are growing) should continue to be designated green belt and Green Space Network.

Subject:	Issue 40 – Land at Newton Croft, Howes Road, Bucksburn
Objector:	European Development Company (formerly Country Life Estates Limited) GSNP576/1
Procedure:	Hearing

Background

1. From Auchmill Road (A96) at Bucksburn, Howes Road runs generally southwards in the small wooded valley of the Bucks Burn, then south-eastwards to Northfield. About half way along the road there is a barrier to motor vehicles. The road thus provides a relatively traffic-free route for pedestrians and cyclists. The objection site has a 100 m frontage to the south-east side of Howes Road some 50 m from its junction with Auchmill Road. Its extent is 2.25 ha and it has two components. The first is a field, rising from 50 m AOD at the frontage to about 65 m AOD at Newton Croft, a substantial house beside the south-east boundary of the site. The second adjoins the south-west side of the field and extends farther to the south. It is well-wooded, contains the driveway to Newton Croft and, in its southernmost part, also contains a small disused quarry with trees all around. In the old quarry there is a cattery and a residential caravan.

2. To the south-west of the site, also in a wooded setting, is a garage building occupied by a motor engineer. The southernmost part of the site adjoins Auchmill Golf Course. To the south-east of the site, as well as Newton Croft, there are two agricultural fields, on the far side of which is a public footpath then another part of the golf course. To the north-east of the site is Bucksburn Primary School. On the opposite side of Howes Road from the site is a police headquarters building, beyond which is residential development. From inspections of the locality on several occasions it appears that cars are regularly parked on the west side of Howes Road in the vicinity of the objection site and that this parking may be associated with the police headquarters.

3. There are significant views of the objection site from: Howes Road; Bucksburn roundabout; and Auchmill Road over a length of some 250 m south from the roundabout. The paddock is open to view from Howes Road, the frontage being marked by a post and rail fence. Further west along the road, the paddock is screened by the woodland on the west part of the site.

4. The A96 from Howes Road to the Bucksburn roundabout has a rising gradient, so that the roundabout has an altitude similar to that of the higher part of the paddock. The view from the roundabout includes the fields and golf course above and beyond the objection site. Substantial areas of woodland associated with the golf course form a strong feature on the skyline. Other planting nearer at hand, close to the road, screens the residential area to the west.

5. Travelling south from the roundabout, the police headquarters building appears straight ahead as it is on the outside of a left-hand curve. It is also in the dip of the Bucks Burn valley and Newton Croft is visible above its roofline as is the upper part of the paddock. The higher

ground and wooded skyline beyond remain in view. Going further south, the police headquarters building looms larger and conceals almost the whole of the site. As Malcolm Road (a road on the left, nearly opposite Howes Road) is approached and the police building is passed the paddock comes into view on the right, closer at hand. The higher ground beyond is lost to view but the skyline remains strongly defined by woodland.

6. In the current local plan (core document 6.11) the objection site is designated as green belt. In the finalised local plan, the site is retained in the green belt and is also designated Green Space Network. Policy 40 of the finalised local plan says that residential development will not be permitted where noise associated with Aberdeen Airport exceeds 60Leq.

Summary of objection

7. The objection site should not be designated as green belt and Green Space Network. Instead, it should be designated Residential (R36) and as an Opportunity Site for residential development. It is capable of accommodating residential development in the period 2006 to 2010.

8. Retention of the site in the green belt is not justified. The site is extremely well-contained in landscape terms, due to topography and existing woodland features. It is isolated by development to the north and Auchmill Golf Course to the south. Although the larger component of the site, the paddock, was once used for grazing, it is now redundant. It is detached from any larger agricultural unit and is not a viable unit on its own. Development here should thus be preferred to new large-scale extensions to the built-up area. It would round off and not extend beyond the limits of the built-up area. It would not result in coalescence but would better define the built-up area and thereby secure the integrity of the green belt.

9. The adjoining primary school and police headquarters are within the residential area. To the south and south-east lie a brownfield site and residential property, and there is a commercial garage to the west. Development on the objection site would thus be infill and a natural expansion of the existing settlement.

10. Development on the objection site would have minimal impact on the landscape setting of the city because it would not be visually intrusive. Views into the site would be limited to those from the immediately adjoining areas. Loss of land for recreational purposes would be negligible given the extent of public open space nearby. The site is not in public ownership and there is no right of access to the paddock.

11. Residential development on the objection site would meet criteria in policy 11 of the structure plan. It would respect the character and density of existing development in the area and increase choice of residential environments and house types. An indicative layout demonstrates that the site is capable of accommodating 26 detached houses and, on the brownfield part of the site, 20 flats. Development would be contained by existing woodland to the south and west and by rising ground towards the golf course to the south-east. Infrastructure (drainage, roads and schools) is available.

12. The Green Belt Review (core document 6.21) considered only large tracts of land. Contrary to what the Review found in relation to the tract within which the objection site lies, development on the latter would not result in coalescence. Development on the objection site would satisfy the guiding principles listed on pages 7 and 8 of the Review in that it would be east of the Western Peripheral Route, adjacent to the urban area, not harm recreation, wildlife or historic designations and would protect the landscape setting of the city.

13. The objection site is adjacent to a major transport corridor to the city. It can be satisfactorily accessed and is within walking distance of primary and secondary schools, both of which have capacity to accommodate the scale of development proposed. Community facilities and retail provision are also within walking distance of the site.

14. The finalised local plan allocates insufficient land for residential development. Residential development on the objection site would meet this shortfall and allow a relatively small-scale housing development in a sustainable location. The site is in the hands of a developer who provides houses to customers' individual specifications. This would meet a demand not otherwise being met, especially because land that is allocated for residential development at Greenferns is not likely to be available for development soon enough to meet structure plan requirements. The local plan residential allocations are also deficient in relation to providing for a variety and choice of sites. Allocation of the objection site would help overcome this deficiency.

15. In response to the Council's case, the green belt has been adjusted elsewhere to accommodate development. Contentions that the site is highly visible to traffic entering Aberdeen on the A96 and that development would "infringe the horizon" are entirely refuted. Views of the site are transient and glimpsed. The site has a backdrop of woodland and rising ground. There is no prospect of coalescence of Bucksburn and Northfield. They are separated by the golf course and Northfield is more than 0.5 km to the south. The objection site does not impinge on the Bucksburn Valley district wildlife site. Its development would not affect cycle use of Howes Road.

16. It is accepted that development on the objection site should be preceded by a transportation assessment and that the junction of Howes Road and A96 will require improvement. This could be addressed by preventing right turns by traffic exiting Howes Road. All vehicles would have to turn left, and those wishing to travel eastwards could make use of Bucksburn roundabout, which is a short distance to the west. Any problem with on-street parking on Howes Road could be addressed by imposition of parking restrictions.

17. It is accepted that, because of the presence of the airport to the north-west, any planning application would have to be supported by a noise impact assessment. The assessment would identify any necessary mitigation measures. There is already a substantial number of residential properties between the site and the airport. Aircraft are becoming quieter and a proposed runway extension may mean that aircraft need to use less power on take-off. The airport approach used by helicopters is different from that used by fixed-wing aircraft and the impact of helicopter noise on the objection site is likely to be negligible.

18. Additional points made at the hearing include the following. The objection site excludes Newton Croft. This house, the objection site and the field to the south-east are in the same ownership. Development on the site would cause no loss of community identity. Land to the south of the objection site could possibly be made over to public use, depending on negotiations at the time of submission of an application for planning permission. The paddock has not been used for grazing for 2 or 3 years. Development would give scope for management of the woodland on the site.

Council's response to the objection

19. According to policy 27 of the structure plan, the review of green belt boundaries should aim to "protect and enhance the prime ecological, landscape and recreational assets of the Green Belt, meet the aims of sustainable transport and identify land for the long term development needs of Aberdeen and surrounding settlements." This reflects Scottish Planning Policy 21: *Green Belts* (SPP21) (core document 2.12).

20. The objection site comprises three landscape components: a former quarry to the west, an open field to the north-east (the paddock), and substantial areas of broadleaved woodland bordering the former quarry and entrance driveway. The elevated nature of the site has implications for its visibility. The A96 is the principal route for traffic entering Aberdeen from the north and the objection site is highly visible to this traffic. The convex form of the slope in the objection site and its open character mean that any development will infringe on the horizon.

21. The objection site is part of the green space separating Northfield and Bucksburn. This space maintains the separate identities of these settlements, helps to define their boundaries and prevents their coalescence. The green belt boundary at this point follows the Bucks Burn valley, which is a district wildlife site. This helps to safeguard the landscape element of the Bucksburn gorge, trees and associated wildlife habitats, which together help to provide a local sense of place and identity. This approach to drawing green belt boundaries is supported by SPP21, which says that “Green belt boundaries must be clearly identifiable on the ground, using strong visual or physical features. These may include rivers, tree belts, railways or main roads and landscape features that form the horizon.....” (paragraph 21).

22. The green space is a significant recreational resource as it includes Auchmill Golf Course and the gorge itself. Howes Road goes through the gorge and is a popular walking place for local people. It is in recognition of the landscape, wildlife and recreational importance of the general area that it has been designated as Green Space Network.

23. Howes Road forms part of the city’s cycle network. At its Northfield end cyclists have the option of taking a route through open fields to Sheddocksley to the east-west Westhill to Union Street route and to the southerly route to Cults.

24. The grounds of objection say that there is no public access to the paddock. This fails to take account of the value of open space apart from its public accessibility.

25. Development here would be contrary to policy 27 of the structure plan in that it would harm the landscape setting of the city, its diversity, and sense of place.

26. The finalised local plan does make adequate provision of land for new housing. Greenferns is considered as a separate issue.

27. In relation to access matters, a pelican crossing is provided on the A96 some 260 m from the site. Howes Road is identified as a shared on-road local cycle route. This route continues northbound to Dyce and southbound towards the city centre. Bus stops are provided on the A96, approximately 100 m from the site. Public transport services available on the A96 are fairly wide-ranging, and make the objection site well-connected in terms of accessibility compared to other city locations. In terms of cross-town journeys and possible commuting, a change of bus would probably be required when travelling to Bridge of Don or Altens-Tullos but some of these destinations may still be within a 45 minutes door-to-door journey time.

28. For vehicular traffic, Howes Road would require upgrading should development on the site be permitted. A large development on the objection site would be likely to attract an undesirable increase in right-turning movements at the junction with the A96. This would present a significant road safety risk, especially as cars tend to park along the northern side of Howes Road. Detailed investigation into the access arrangements from the trunk road would be required, as the police station would also be affected by any proposals. On road safety grounds movement at the Howes Road-Auchmill Road junction should be restricted to left-in and left-out only. The A96 is a major arterial route into Aberdeen carrying large volumes of traffic. Detailed assessment of any proposals which may affect this corridor would be required, as would

mitigation of any effects. Additional delay and congestion resulting from significant new development on the A96 corridor would be unacceptable.

29. Local amenities and distances to them are: Bucksburn Primary School 230 m; Bankhead Academy 1 km; post office (Sclattie Park) 1.2 km; library (Bucksburn) 440 m; and shops 300 m.

30. Aberdeen Airport Public Safety Zone tapers at the southern end to a point 208 m to the west of the site. Planned expansion of the airport will bring the zone closer to the site, but is unlikely to impinge on it. Frequent aircraft noise from helicopters and aeroplanes taking off from the airport is very apparent at the site. Planning Advice Note 56: *Planning and Noise* (PAN56) states that planning authorities should consider both the current level of noise exposure and any increase that may be expected in future. Over the past two decades the introduction of quieter aircraft has reduced noise, but airport hours of operation and numbers of flights are set to increase in future. There is an intention to extend the runway to the north by 300 m and to extend the terminal building. Peak runway movements by fixed-wing aircraft look set to grow from 20 movements an hour now to around 24 an hour in the period 2005-2015. Housing is a noise-sensitive land use. Development plan policies should guide residential development away from existing sources of significant noise. Where this is not possible or practicable, the layout and design of buildings may offer scope to reduce noise impact. Noise-sensitive development should not be permitted where it might conflict with the operation of established businesses or other land uses which generate significant levels of noise.

31. In PAN56, Annex 1 sets out four Noise Exposure Categories. These identify the need for development proposals to address noise issues in the case of air traffic noise (expressed in Leq). In category A (daytime: <57; night-time: <48), noise need not be considered as a determining factor in granting planning permission, although it may not be desirable at the high end. In category B (daytime: 57 to 66; night-time: 48 to 57), noise should be taken into account and, where appropriate, conditions imposed to ensure an adequate level of protection against noise. A Noise Impact Assessment would be needed for development at the high end of this category, identifying appropriate noise mitigation measures. In 1990, the 60Leq contour enveloped the whole of the objection site. By 1996 it had shrunk to cover 90% of the site. In 2000 it passed just to the west of Newton Croft, and by 2003 it crossed only the very north-western corner of the site.

32. Aberdeen Airport is Europe's busiest commercial heliport. PAN56 advises that helicopter noise has characteristics different from those of fixed-wing aircraft and is often regarded as more intrusive and annoying by the public, especially when helicopters spend time hovering overhead. The flight paths of helicopters are not as consistent or regulated as those of fixed-wing aircraft. There is thus some uncertainty surrounding the current and future noise impact of helicopters in the locality.

33. Additional points made at the hearing include the following. Development on the objection site would lead to pressure for development on the fields to the south-east of the site and the primary school: the objector's indicative layout for the site makes provision for access to these fields. The golf course alone would form an extremely narrow wedge of open ground. The site is highly visible to southbound travellers on the A96: they face the site when exiting from Bucksburn roundabout. The contribution made by the objection site to the natural heritage value of the Bucks Burn valley is negligible, but the potential for enhancement is greater if residential development does not take place. The cattery and the commercial garage to the west are virtually invisible from Howes Road, and for this reason the objection site is not a gap site. Traffic generated by 46 dwellings on the site (and bearing in mind the proposed prohibition of right turns at the Howes Road-A96 junction) would not be a concern in relation to the operation of Bucksburn roundabout.

Conclusions

34. At present, the objection site is part of the green belt. Structure plan policy 27 expects there to be a review of the green belt. Local plans are to set the boundaries so that, among other things:

- the landscape setting and identity of urban areas are protected;
- coalescence is prevented; and
- development required by structure plan policies is accommodated.

35. The objector contends that the Green Belt Review of 2002 (core document 6.21) gives consideration only to large tracts of land, rather than to areas on the scale of the objection site. We note that, insofar as the objection site has been considered in the review, it is as part of a much larger area called Sheddocksley A, which extends from Bucksburn to Northfield and includes Auchmill Golf Course. Our conclusions under issue 5 in this report indicate that the 2002 Review has significant limitations and cannot be taken as fulfilling the policy 27 requirement. Thus little weight can be attached to the “Initial Findings” of the Review in which it is stated that Sheddocksley A and part of an adjoining area to the south should remain as green belt “in order to protect their recreational use and to prevent coalescence between Sheddocksley and Bucksburn” (page 11).

36. The first of the policy 27 criteria is protection of landscape setting. The paddock is visible from a limited stretch of Howes Road to which it gives a pleasantly rural character. The rise in ground level means that buildings on the paddock are very likely to be seen against the sky when viewed from Howes Road. This effect would be confined to that part of Howes Road immediately adjacent to the paddock because of the screening immediately to the west. On the opposite side of the road the site of the police headquarters with housing beyond imparts a more urban character, although not too harshly thanks to areas of landscaping.

37. From the vicinity of Bucksburn roundabout on the A96, development on the objection site would be seen as a quite small enclave low down in the broad sweep of countryside centred on Auchmill golf course. Travelling south from the roundabout, development on the site would be largely hidden by the police headquarters building, with parts of the development seen above and beyond the headquarters building but below the wooded skyline. From the vicinity of the Malcolm Road junction the paddock fills the view to the right with woodland as a strong skyline feature and development on the paddock would probably be seen from here as forming tiers on the rising ground but below the skyline formed by the trees.

38. From the foregoing, we conclude that the paddock and the trees within the south-west part of the site do make a positive contribution to the setting of this part of the city. They are part of an important landscape unit on the south-east side of the Bucks Burn valley. Although only glimpsed fleetingly by south-bound travellers on the A96, development on the site would have a strong effect on the view to the right in the vicinity of the Malcolm Road junction.

39. We have made no reference to development on the south-west, wooded part of the objection site in this context because the existing development here is well-screened from view and new residential development on this part of the site, if of low density, would be unlikely to have significant visual impact on the surroundings. In the indicative layout plan a flatted development on this part of the site is suggested. We have not attempted to assess the impact likely to arise from this suggestion.

40. Regarding the second and third criteria, development on the objection site would be close to other built development to the north-west and north-east and well-separated from development in other directions. Northfield is 400 m or more to the south-east. It is completely

out of sight thanks to the rising ground on this side of the Bucks Burn, and this topographical effect is reinforced by the areas of intervening woodland. For these reasons, development would have no adverse effect on the identity of urban areas and would not cause coalescence.

41. Regarding the need to accommodate development required by structure plan policies, policies 8 and 9 of the plan require identification and safeguarding of new greenfield sites where planning permission for housing development may be granted in the period from 2000 to 2010. If, following consideration of all the various proposed greenfield housing sites, it is concluded that the objection site is an appropriate location for some of the required housing, its removal from the green belt would accord with policy 27.

42. A further criterion arises from paragraph 4.33 of the structure plan, which, in the context of the green belt, refers to providing countryside for recreational purposes. The only recreational use suggested in connection with the objection site is provision of a public footpath. Such a path could form part of a direct route between Bucksburn and Northfield, but other routes exist along Howes Road and along the far side of the fields to the south-east of the objection site. Evidence does not demonstrate the necessity for a route through the objection site, although such a route might be a useful addition to the existing network.

43. It is contended that development on the objection site would be “infill”. The definition of infill in the structure plan is not relevant as it refers to land within a settlement boundary as defined in a local plan. The definition in the finalised local plan refers to development situated between existing development. Development on the objection site would be beside existing development to the north-west and north-east but not between it. The commercial garage to the south-west may be discounted because it adjoins only a relatively short part of the south-west boundary of the objection site, is separated from the site by woodland and is very unobtrusive thanks to woodland that surrounds it on three sides.

44. A further contention is that development on the objection site would better define the built-up area. The woodland on the south-west part of the site would provide a clear boundary feature. The south-east boundary of the site is largely defined by Newton Croft, but its mellowed appearance, the fact that it is a single building and the adjoining vegetation all combine to make it an unobtrusive feature in views from the north-west. In visual terms it would be swamped by development on the objection site.

45. In terms of accessibility, the site is within walking distance of schools and other, limited local amenities. Howes Road is a cycle route which connects to other parts of the city. Bus services on Auchmill Road are frequent and have a variety of destinations. Vehicle traffic generated by development on the site could be accommodated on the local road network if right turns at the junction of Howes Road and Auchmill Road can be prohibited.

46. The objection site is affected by aircraft noise. Nearly all of the site is outwith the 60Leq area defined on the Aberdeen Airport Noise Contour Map (core document ACC90). Policy 40 of the finalised local plan indicates that residential development should not be permitted where airport noise exceeds 60Leq. This policy is the subject of other objections, which are considered under issue 222. Arising from these we recommend that policy 40 be amended to include reference to a night-time noise level of 57dB L_{eq}. This is a response to the introduction of night flights. There is no evidence to show whether this level is exceeded or is likely to be exceeded at the objection site. Over the past two decades aircraft noise has diminished. It is expected that night-time and total numbers of flights to and from the airport will increase.

47. The extent to which the finalised local plan provides for an adequate supply of land for new housing is considered in chapter 1 of this report, in particular issue 2, and our

recommendations in respect of all proposed housing sites will take account of this. The need for a variety and choice of locations will also be taken into account.

Recommendation

48. A recommendation regarding this site is contained in chapter 11.

Subject:	Issue 41 – Land at Beacon Sports Centre, Bucksburn
Objector:	NHS Grampian GSNP1910/15
Procedure:	Written Submissions

Background

1. In Bucksburn, the east end of Kepplehills Road, part of Inverurie Road, Cloverfield Gardens and development on the east side of Slattie Park encircle a predominantly open area that is about ten or eleven hectares in extent. This area has various uses. There are grass pitches, a bowling green, a children's play area, disused tennis courts and a war memorial, along with the Beacon Community Centre, Bucksburn swimming pool, Bucksburn Clinic, a public library and Marlpool Special School. Except for the school, the whole area is designated in the finalised local plan as urban green space (GS34) and green space network (GSN28).

Summary of objection

2. In the Bucksburn area there is urgent need for an additional health centre. This need arises from increasing population in the area and resultant pressure on existing facilities. NHS Grampian's preferred site for a new centre is to the south-west of the Beacon Sports Centre. This site is well-placed to serve the wider community and is in public ownership. It should not be designated as urban green space but should be identified as an opportunity site for provision of a new health centre facility.

Council's response to the objection

3. The bulk of the urban green space area of which the objection site forms part, along with the site occupied by Marlpool Special School, is proposed as the site of a new secondary school with community facilities to replace Bankhead Academy, the special school and the public library. As part of the proposal, the Beacon Community Centre will be refurbished. Two new outdoor grass pitches and a floodlit all-weather pitch will be provided. Outline planning permission was granted early in 2005. The swimming pool and clinic will remain, as they are not part of the development. Detailed proposals from three development companies are now being evaluated. The school project team has indicated that there is not sufficient land to accommodate a health centre in the development proposals. Land at Beacon Sports Centre should be identified as an opportunity site to reflect the new school project.

4. It is understood that NHS Grampian intends to relocate the Bucksburn and Gilbert Road medical practices in due course but that this is not included in the authority's ten-year plan for the period from 2004 to 2014. The Council is willing to work with the health authority in seeking a site for a health centre in the Bucksburn area.

- (d) The capacity of the new Friarsfield site should be stated as 280 dwellings.
- (e) In Figure 9 of the local plan, in the Friarsfield OP5 entry, the masterplan for Friarsfield should not include Craighton and the references to 20 dwellings on the higher ground and to a new academy at Friarsfield should be deleted.
- (f) Development at Friarsfield must be accompanied by improvements to the local road network, including (i) a new road from that part of Kirk Brae which adjoins the south-west side of the site to Craighton Road east of its junction with Friarsfield Road and (ii) widening of Craighton Road eastwards from the end of the new road to the edge of the built-up area at Airyhall. These improvements must make possible provision of a bus service to the site.
- (g) Green Space Network designation should be applied to a strip of land adjoining the whole of Friarsfield's Kirk Brae boundary.
- (h) The Waldorf School playing field should be retained or, if affected by development, should be replaced by an improved facility.

Stationfields, Cove OP8 (Issue 121)

49. Significant conclusions include the following:

- The railway would be a very firm green belt boundary.
- The site has no function in preventing coalescence, and it has a very limited function in regard to the landscape setting of Cove or Aberdeen as a whole.
- The site has rather good access to bus services between Cove and the city centre and further destinations.
- The site is within fairly easy walking distance of local shops and a primary school.

50. In proposed change B7, the site would be given the Future New Communities designation. We find that the site is well-suited for housing development at the present time.

51. **Recommendation:** The site should be retained in Figure 9 of the local plan and should be allocated for development in terms of structure plan policy 8. The need to reserve land for a railway halt with car parking for passengers (if this is the outcome of consideration of Crossrail options) and to ensure that National Cycle Route 1 is not adversely affected should be included in the Figure 9 entry.

Greenfield sites identified in objections

Jesmond Drive (Issue 35)

52. This site is greenfield and residential development on it would contribute to the policy 8 and policy 9 requirements of the structure plan. Under issue 35, for the reasons given there, we recommend that the Jesmond Drive objection site be designated for mixed use, with a capacity for 40 dwellings on the residential part. As this site appears to be suitable for immediate development, it is appropriate for inclusion as an allocation in terms of NEST policy 8.

Newton Croft (Issue 40)

53. Significant conclusions include the following:

- The paddock and the trees within the south-west part of the site make a positive contribution to the setting of this part of the city, they are part of an important landscape unit on the south-east side of the Bucks Burn valley and although only glimpsed fleetingly by south-bound travellers on the A96, development on the site would have a strong effect on the view to the right in the vicinity of the Malcolm Road junction.

- A small part of the site is within the 60Leq area defined on the Aberdeen Airport Noise Contour Map (core document ACC90). Policy 40 of the finalised local plan indicates that residential development should not be permitted where airport noise exceeds 60Leq and, under issue 222, we recommend that this policy be amended to include reference to a night-time noise level of 57dB L_{eq} .

54. The landscape and aircraft noise considerations indicate that this is not a suitable site for residential development.

55. **Recommendation:** The site should be designated green belt and Green Space Network as shown in the finalised local plan.

Malcolm Road East (Issue 78)

56. Significant conclusions include the following:

- The existing green belt boundary is clearly defined by strong features.
- Woodland on the objection site helps to provide clear definition to the northern extent of the existing built-up area.
- Development would make less clear the boundary between what is built-up and what is countryside and would not contribute to a compact urban form.
- National and local plan policies seek to protect and enhance woodland.
- Malcolm Road is substandard.

These lead us to conclude that the finalised local plan should not be changed.

57. **Recommendation:** The site should be designated green belt and Green Space Network as shown in the finalised local plan.

Contlaw Road (Issue 83)

58. Significant conclusions for this site include the following:

- There is a clearly-defined boundary to the existing built-up area along Contlaw Road.
- It may be difficult to create a satisfactory relationship between development on the site and the existing houses on the other side of the road. There is doubt as to whether the landscape setting of this part of Milltimber could be satisfactorily maintained.
- Milltimber has a primary school, church and community centre but no other facilities. The nearest bus stops are some 500 m from the site. Development would not encourage an increase in the proportion of trips made on foot or by public transport.

We conclude that this site is not suitable for residential development.

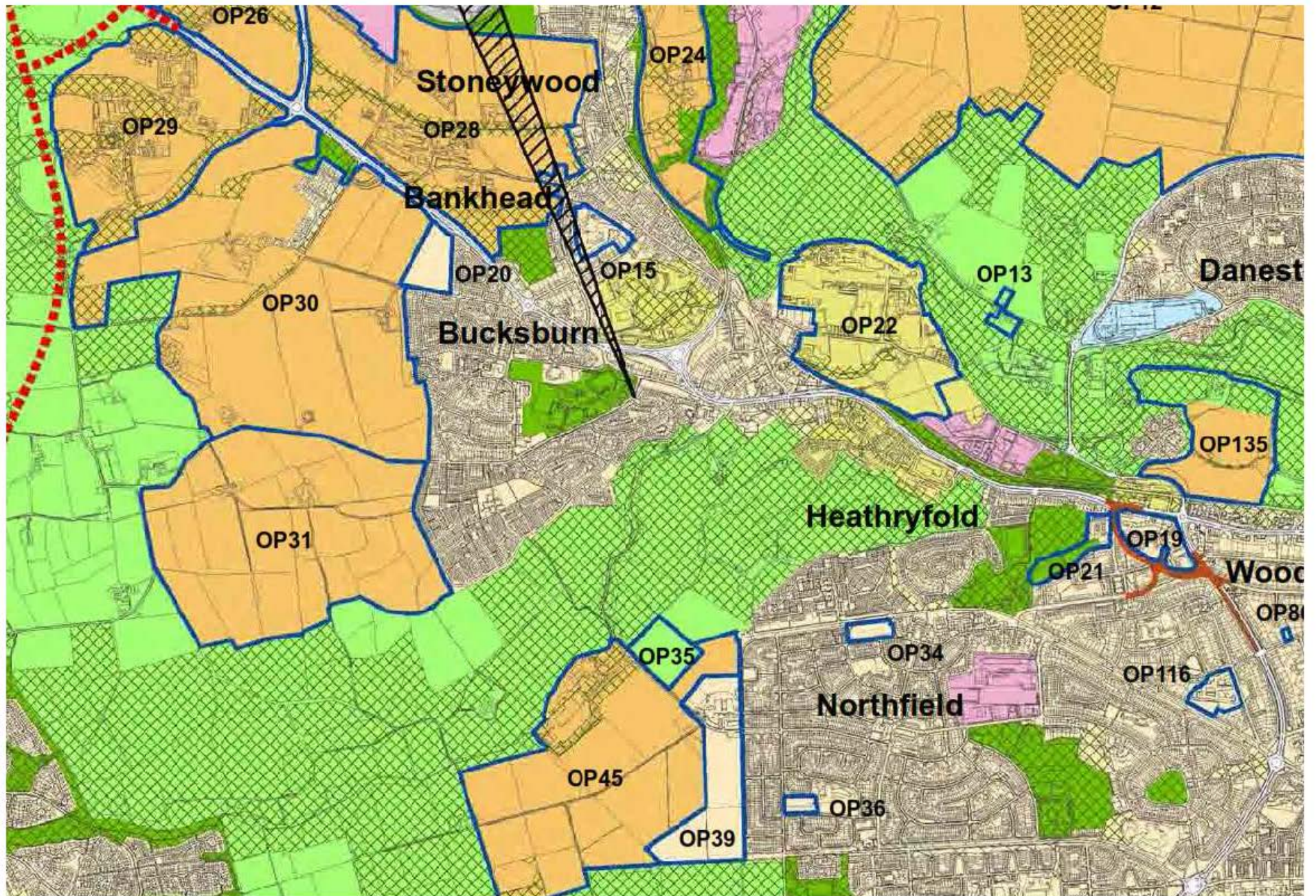
59. **Recommendation:** The finalised local plan should not be changed.

Bett Homes (1) Milltimber (Issue 85)

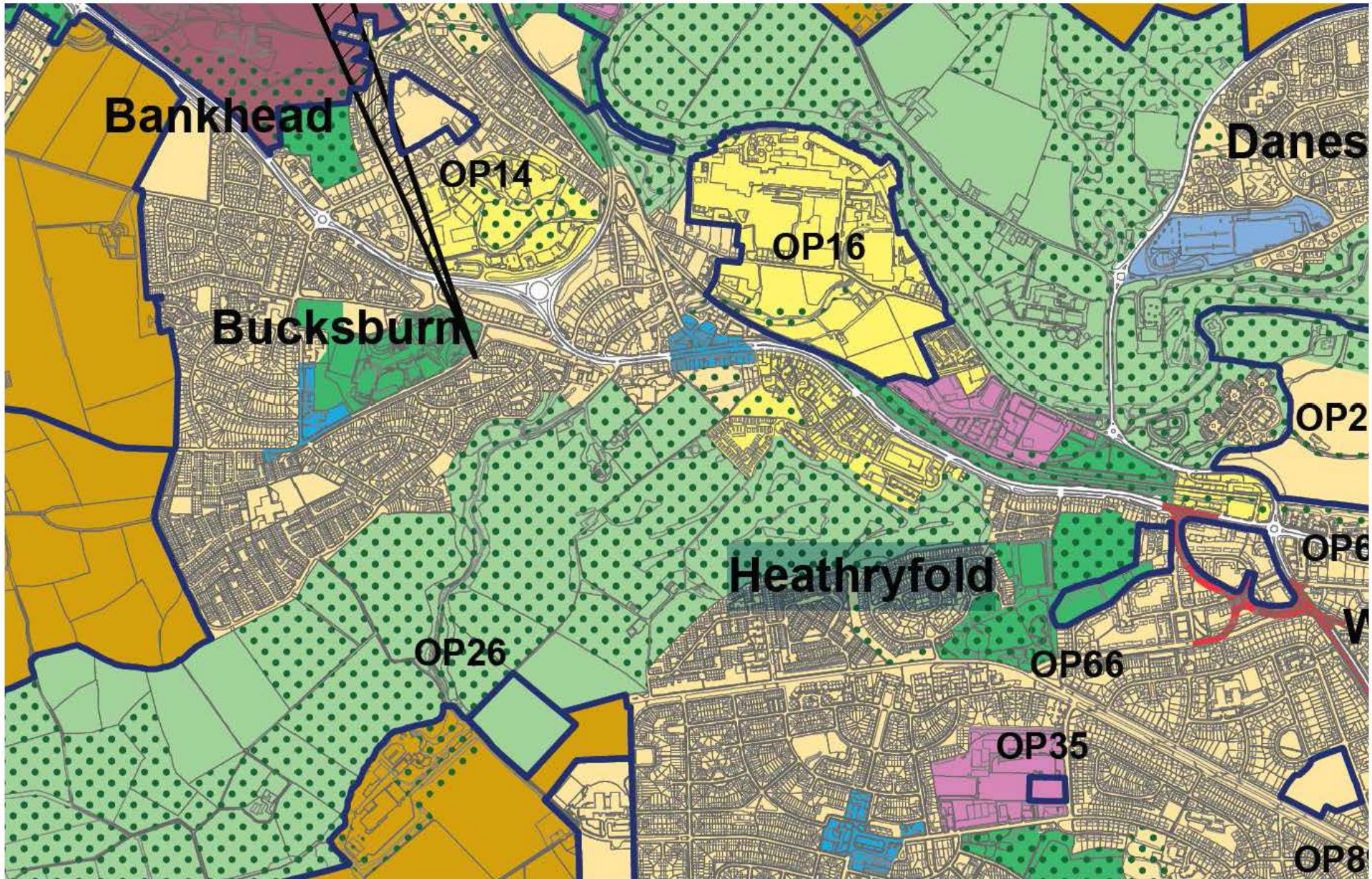
60. Significant conclusions for this site include the following:

- The site makes a positive contribution to the setting of Milltimber and the wider setting of the city.
- The existing green belt boundary is clearly identifiable.
- It would be difficult to integrate development with the urban form of the main part of Milltimber.
- North Deeside Road separates the site from the local primary school.

3 LOCAL DEVELOPMENT PLAN 2012



4 PROPOSED LOCAL DEVELOPMENT PLAN 2015



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