

Applicant's Response to Submissions from Culter Community Council

1. This Statement has been prepared on behalf of the applicant, Matnic Ltd. Full details of the applicant's case are set out in the Statement of Further Written Submissions ("FWS") and we would refer the LRB to that document for matters of detail.
2. The latest statement from Culter Community Council ("CCC") confirms the main issues for their objection, and the CCC has narrowed its concerns down to four key points. These are considered in turn below.

(1) Type of Housing

3. The CCC accepts the proposed reuse of this brownfield site for residential use, but would prefer "modest houses", as they believe that there is no need for more flats in Culter.
4. With respect, it is not for the Community Council to dictate what type of housing should be delivered in its area. The key matter here is the fact that there is an accepted need for a range of new housing in the Culter area, and that this brownfield site is accepted as being appropriate for residential use.
5. The CCC's suggestion of building "modest houses" on the site would not allow the inclusion of a new ground floor retail unit as part of the proposed regeneration of the site. The street frontage design and height adopted in the final proposals for the site emerged to match the request of the CCC in pre-application discussions. The CCC's suggested modest houses approach is not therefore appropriate for this site which is located within an identified retail centre. No weight can therefore be given to this suggestion.
6. Furthermore, and what is a significant material consideration in support of this application, is the fact that this application will deliver much need new housing in a highly accessible, brownfield site within a local centre.
7. The LRB will be aware that the Proposed Aberdeen Local Development Plan is currently the subject of an Examination; and a Hearing was held this week (25th May) to specifically discuss the City's housing land shortfall. This Hearing has raised the very real possibility that the Council will have to consider the release of further unallocated, greenfield sites to address this housing land shortfall.
8. The alternative approach – and one that is fully supported by the Council's current and emerging Local Development Plans, the approved Strategic Development Plan, and the Scottish Planning Policy – is to support the reuse of brownfield sites for more housing. This is what the applicant is proposing.
9. The choice to be made is therefore either supporting more housing on accessible brownfield sites such as the application site; or releasing more unallocated greenfield sites in the Green Belt. The preference must be to support brownfield redevelopment over greenfield release. This is a further significant material consideration in support of this application.

(2) Scale and design of proposal

10. CCC repeats its concerns that the proposals for the site are "*out of scale with the adjoining buildings, and the design presented not being remotely in sympathy with the existing buildings, neither in form nor in style*".
11. As we have set out in some detail in the applicant's FWS, this position is not accepted and is based on the CCC (and indeed the Planning Officer) choosing to ignore the context established by the 4 storey flatted development immediately to the east of the application site – the former Gordon Arms Hotel development – and the 3-4 storey mixed use development to the south east of the site – the Co-op development.
12. The Co-op development is directly comparable to the application proposals, and the Gordon Arms Hotel development is taller than the proposed development.
13. Whether the CCC (or the Planning Officer) like these developments or not, is not relevant. These buildings exist and are an established part of the street scene. They are important buildings in terms of both the application site and the local context of the area. They cannot be ignored.

14. The selective use of some scale, density and height comparisons by the CCC is not therefore appropriate, and does not provide an accurate picture of the proposed development and how it has been designed to reflect and respect the scale, height and massing of adjacent properties.
15. These adjoining buildings have established a clear precedent for this scale and type of building in this location and set the context for assessing the proposed development of the application site. The development has therefore been designed with due and proper consideration for its context and complies with the principles of Policy D1 of the adopted LDP.
16. It has been designed to be 3 storeys at the street frontage, stepping up to 4 storeys at the rear, similar to the approach adopted at the Co-op development. It will, however, have a greater level of amenity space than the Co-op development and will be lower than the adjacent flatted development at the Gordon Arms Hotel site.
17. In this context, which is the correct one, overdevelopment is not a valid reason for refusing this application.

(3) Loss of parking available to the public

18. CCC repeats its concerns that the applicant's proposals for the car parking arrangements for the redevelopment of the site "*would be worse than at present*". This is also not correct.
19. At present, there are three private car parking spaces available on the site. These are currently available for the public and shoppers to use, but this is entirely at the discretion of the applicant. These are not public spaces. In contrast, the proposed redevelopment of the site will make provision for a total of 18 new car parking spaces which will all be available on a communal basis to the public, shoppers and residents. This will result in an increase in 15 spaces over the current situation. This is clearly a significant enhancement.
20. Furthermore, and as confirmed in its updated consultation response, the Council's Roads Development Management Team has raised no issues with the proposed levels of car parking and has confirmed that it has no objections. This is a further significant material consideration in support of this planning application.

(4) Other policies

21. CCC also repeats its desire for the development to comply with affordable housing and low and zero-carbon buildings policies. As we have confirmed in the FWS, the proposed development will make provision for affordable housing in full accordance with LDP Policy H5; and details of energy saving measures can be suitably controlled by way of a condition in accordance with LDP Policy R7. These matters can be conditioned and are not valid reasons for refusing the application.

Summary and Range of Benefits

22. Like the planning officer, the CCC has focussed on the perceived impacts of the proposal, rather than take a balanced assessment of the application and the range of benefits that it can provide.
23. Planning policy establishes a presumption in favour of this type of development, not a presumption against it.
24. In our opinion, both the CCC and the Planning Officer have failed to give appropriate consideration and weight to the significant benefits of the proposed redevelopment of this underused and semi derelict site. These range of benefits are significant material considerations that confirm that planning permission should be granted for this planning application. We have summarised these benefits below:

- Redevelopment and reuse of an underused, semi-derelict and vacant, brownfield site for a mix of uses; which is located in a highly accessible location within the Peterculter local centre, adjacent to shops, services, bus stops (6 buses per hour), core paths and cycle ways.
- Delivery of a new, modern retail unit which will provide an active street frontage along North Deeside Road which will support, enhance and add to the vitality of the local centre.
- Estimated £2M build cost, which will provide a range of local construction jobs and new local employment opportunities once the new retail unit has opened.
- Delivery of 16 new residential units on a brownfield site which have been specifically designed to meet local housing needs, and will take pressure off releasing more unallocated, greenfield sites for housing.

- Significant contribution towards the delivery of affordable housing in the local area, in full accordance with the Council's affordable housing policy.
- An estimated £0.25M per annum increase to local retail expenditure as a result of the 16 new households. This represents significant investment in the local area, and will further support the vitality and viability of the Peterculter Neighbourhood Centre.
- Support from adjacent shops and businesses which recognise that the proposals will *"result in redevelopment of a run-down eyesore and the provision of new retail and residential accommodation would be a positive addition to the village"*.
- Delivery of 18 new car parking spaces which will be available to residents, shoppers and the public which represents a significant enhancement over the current provision of 3 private spaces.
- Inclusion of new electric vehicle charging spaces and 18 cycle spaces as part of new development which represents a significant enhancement over the current provision (none exist at present).
- Support from the Council's Roads Officers for the proposed access and car parking arrangements which is considered to be safe and convenient; and accords with the Council's standards.
- Scale, design, height and massing of development which matches and is directly comparable to the developments adjacent and opposite the site (the Gordon Arms Hotel and Co-op developments).
- Provision of new private amenity space for the new residents which exceeds the level of amenity space provided at the Co-op development opposite.
- Agreed contribution towards off-site open space improvements, which will further enhance green spaces in the local area, benefiting the new residents and enhancing existing residential amenity in the area.
- No trees are being lost (there are none on site); and the proposed new tree planting will improve and enhance the tree cover in this location, bringing further green space benefits.
- No impact on bats or any other ecological interest (there are no bats or ecology present on the site); and the inclusion of new landscaping which will add to and enhance the bio-diversity of the local area.
- Agreed contribution towards core path improvements in the local area, which will further enhance the accessibility and amenity of the area.
- Agreed contribution towards local health care provision, which will further support services and facilities in the local area.
- Improvements to the existing, historical drainage situation and the delivery of a new SUDs approach for the site which offers betterment over the current arrangements and has been designed in agreement with Scottish Water.
- No objections from any technical consultees.
- All detailed design and operational matters can be appropriately controlled by conditions.

25. For all these reasons we therefore consider that this is the right development in the right place.

26. We would therefore urge the LRB to take a balanced view of these redevelopment proposals; give due and proper weight to these range of significant benefits; and grant planning permission for this proposed development, subject to appropriate conditions.

27. These conditions would deal with access and parking arrangements; landscaping; open space; materials; noise mitigation measures; waste and recycling provision; affordable housing provision; developer contributions towards the core path network, healthcare facilities and open space; and details of the water and drainage arrangements. These are all standard conditions which can be imposed to control these aspects of the development. The applicant is happy to accept such conditions and would welcome the opportunity to agree these with the LRB.