

**aberdeen** local development plan

**RESPONSE TO PROPOSED PLAN  
CONSULTATION:  
LOCAL DEVELOPMENT PLAN VISION AND  
STRATEGY**

**ISSUE 1 - 3**

<b>Issue (ref and heading):</b>	<b>VISION AND SPATIAL STRATEGY</b>	<b>1</b>
<b>Development Plan reference:</b>	Pages 5-8	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Mr Colin Morsley (168), Dr Maggie Keegan of Scottish Wildlife Trust (363), Ms Nicola Abrams of Scottish Environmental Protection Agency (408), Ms Fiona McInally of Paths For All (472), Ms Judith Munro of Aberdeen and Grampian Chamber of Commerce (510), Mrs Judy Robinson (576), Ms Naomi Cunningham of The Scottish Property Federation (800), Mr Richard Bush of Richard Bush Chartered Town Planner on behalf of Mrs Nicola Hutcheon (1205), Mr Brian Wallace of Traverse Ltd on behalf of ACCA (1285), Mr Derek Selbie (1473), Mr Ben Freeman of Bancon Developments Ltd (1561).		
<b>Provision of the Development Plan to which the issue relates:</b>	Section sets out the vision and context of the Plan.	
<b>Summary of the representation(s):</b>		
<p>Vision</p> <p>168: Vision Statement (paragraph 1.1): It is simply not possible for Aberdeen City Council to "deal with climate change".</p> <p>363, 408: Pleased to see the emphasis on sustainability within the vision.</p> <p>408: We note the omission of the Scotland River Basin District River Basin Management Plan (the RBMP) and the North East Scotland River Basin Area Management Plan (the AMP) from the list of documents which have been taken account of in the preparation of the Proposed Plan as set out in paragraph 1.13. The Water Framework Directive (2000/60/EC) (WFD) requires that all inland and coastal water within defined river basin districts must reach at least good status by a set deadline. The land use planning system has an important role in delivering this objective in Scotland through its influence on the location, layout and design of new development.</p> <p>472: Broadly supportive of the Vision, main priorities, aims and links with NPF2 and Structure Plan. However, there is no mention of active travel options within the city creating sustainable links between communities.</p> <p>510: We would suggest that the introductory section be extracted to form an Executive Summary and used as a tool for pro-active communication in support of on-going engagement with specific organisations and with the public at large.</p> <p>1285: The Aberdeen Local Development Plan is weak in terms of its strategic vision. Furthermore it has diluted the primary aim for the area which is clearly set out in the National Planning Framework (NPF2). Whilst we recognise that the Aberdeen Local Development Plan is principally concerned with land use, the underlying driver should be economic development. This is not only set out in NPF2 but is also Strategic Objective 1 of the Scottish Government. The statement in Aberdeen Local Development Plan para 2.1 is insufficiently robust and sets the bar for the subsequent policies at too low a level, demonstrating insufficient ambition.</p>		

## Spatial Strategy

363: Section 2.13- it should be recognised that brownfield sites can become reservoirs of biodiversity and some may become home to red data and nationally scarce invertebrates. As such, before being redevelopment and ecological assessment of the site should be undertaken.

576: Work together with Aberdeenshire on development of the area rather than two separate plans and consider what the area really needs.

800: Support for review of greenbelt boundaries to allow for development opportunities.

800: The National Planning Framework 2 states that Aberdeen must be better connected to Edinburgh and Glasgow. Agree with this strategy; however the Proposed Plan does not appear to clearly set out how this will be achieved.

1205: The process by which Directions for Growth allocations are made is inadequate, as are the resultant ALDP Proposed Plan allocations in the spatial strategy. Transport and educational constraints are no greater in the Deeside area than elsewhere in the ALDP. The TA has been carried out on a spurious basis. There is already reliable, proven and established multi-modal transport infrastructure in the Deeside DfG which is superior and under less stress than transport in other parts of the City. Such educational capacity issues can be readily overcome without undue difficulty. There is virtually no risks of the non-provision or failure of the necessary infrastructure in the A93 as it already exists and can cater for new development from day one or can be financed through developer contributions.

1205: The spatial strategy has not been consistently followed through in the development allocations

1561: There is no clear spatial strategy advocated by the Proposed Plan, and there is no reasoned justification for the chosen strategy.

1473: 5,300 homes is an excess for the area Dyce/Bucksburn. There has been no combined masterplan for the area that the community can examine. Questions over the capacity of local infrastructure, roads, water and sewage. Even with the Aberdeen Western Peripheral Route will not help the local traffic generated. Infrastructure must be in place before the housing.

## **Modifications sought by those submitting representations:**

### Vision

168: Change paragraph 1.1 to state "deal with the consequences of climate change".

408: It is requested that reference is made to Scotland River Basin District River Basin Management Plan (the RBMP) and the North East Scotland River Basin Area Management Plan (the AMP) to highlight the important links between the river basin planning and land use planning regimes.

510: We would suggest that the introductory section be extracted to form an Executive Summary and used as a tool for pro-active communication in support of on-going

engagement with specific organisations and with the public at large.

### Spatial Strategy

1205: All developer bids should be reviewed and a much more even distribution of development land allocations should be made.

1561: Bancon suggest that by allocating the larger range of smaller sites, the SP Strategy can be delivered. Bancon further submit that there is nothing to prohibit the Council from allocating, within reasonable bounds, more housing land than identified as required in the Structure Plan. The spatial strategy should be made up of a number of smaller sites across the City area, in order to maximise deliverability.

### Summary of response (including reasons) by planning authority:

#### Vision

1285: This is the vision in the approved Structure Plan, which is supported by the Council and was approved by Scottish Ministers in August 2009. As an area with Strategic Development Plans (Structure Plan) and Local Development Plans it is important that the context of the Local Development Plan follows from the Structure Plan. Reflecting the vision of the Structure Plan at the start of the Local Development Plan makes the link clear. It is the Council's opinion that the vision clearly supports economic development, "We will have acted confidently and taken the courageous decisions necessary to further develop a robust and resilient economy"

168: The vision refers to dealing with climate change, and it is important that the Local Development Plan does respond to climate change and identify mitigation and adaptation measures. It is essential that the Local Development Plan does deal with these issues on a local scale and considers wider impacts.

408: Section 10 of the Town and Country Planning (Development Planning) (Scotland) Regulations 2008 (CD1) sets out what planning authorities are to have regard to in the production of a local development plan. All of these have been considered, but are not all listed in paragraph 1.13. It would be useful to include those that are required under section 10 in the list, and this would include the any river basin management plans relevant to the area. If the reporter was so minded paragraph 1.13 could make reference to Scotland River Basin District River Basin Management Plan (the RBMP) and the North East Scotland River Basin Area Management Plan (the AMP).

472: The vision is a high level statement, and active sustainable transport choices are implicit to the vision and covered within the Structure Plan (CD8) aims at paragraph 1.9 refers to creating sustainable communities, and Policy T2 sets out the detail for managing the transport impact of development.

510: Rather than the introductory section being extracted to form an Executive Summary we would suggest that the Action Programme (CD20) is the most effective document for pro-active communication on the Local Development Plan. This will be used to identify the delivery of the proposals and policies in the Plan and will be continually updated.

### Spatial Strategy

1205, 1561: The main aims of the Structure Plan (CD8) together with meeting the

housing and employment requirements were used to guide the strategy for future development. The amount of greenfield land to be identified within the local authority boundary does not provide significant scope for alternative locations for development. To help guide decisions on the strategy there were a number of considerations that were set out in the Development Options Assessment Report (CD13). These assessments evaluated a range of alternatives against sustainability criteria (which included social, economic and environmental factors), and consideration of the cumulative impact on infrastructure (transport, education, water, waste water, and health) was incorporated into the assessment. Allocations have been split across the city area, but locations have been chosen in relation to their suitability in terms of the assessment and ability to create a sustainable community.

We have strived to provide development opportunities in a range of locations within the city and on sites of different sizes. We have looked to promote a mix of housing and employment development on our larger allocations this issue is dealt with in more detail within Issue 2 Housing and Employment Land Supply and Policy LR1.

576: It is agreed that it is important to consider the cross boundary issues. The Structure Plan set the context and overarching requirements for development but the Council worked closely with Aberdeenshire Council to consider the cumulative impact on infrastructure, and in addition a joint cumulative transport study was commissioned by NESTRANS (CD18).

800: The main ways in which the Local Development Plan, can meet the aim of the National Planning Framework for Scotland 2 (NPF2) (CD2) to make Aberdeen well connected to Edinburgh and Glasgow, its wider regions and the rest of the world, is to support the improvement of the transport network. This includes: rail improvements between Aberdeen and Edinburgh and Glasgow, delivery of the Aberdeen Western Peripheral Route, and provide support for our major transport hubs, including the harbour and the airport. Policy T1 reflects the importance of the transport schemes and allocates land required to deliver improvements. Policy B14 provides support to development associated with the airport and harbour. It is submitted that this meets the requirements of NPF2.

363: It is agreed that brownfield sites can be reservoirs of biodiversity, but it is submitted that the mitigation provided by Policy NE8 - Natural Heritage is sufficient to ensure that account is taken of biodiversity in all developments including brownfield sites.

1473: Response to detailed comments on the housing allowances made is dealt with in Issue 2 Housing and Employment Land Supply and Policy LR1.

#### **Reporter's conclusions:**

#### **Reporter's recommendations:**

<b>Issue (ref and heading):</b>	<b>HOUSING AND EMPLOYMENT LAND SUPPLY AND POLICY LR1</b>	<b>2</b>
<b>Development plan reference:</b>	Pages 13-17 and Policy LR1 Land Release Policy	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
<p>Mrs Charlotte Ryan (43), Mr Alexander G. Shirran of Bucksburn and Newhills Community Council (65), Mrs Anna Kidd of Tillydrone Community Council (228), Mr David Lindsey (271), Mr Jonathan Smith (276), Mr Karl Grieve (381), Mr Guus Glass of Cults, Bieldside and Milltimber Community Council (398), Ms Claire Fowler of Keppie Planning and Development on behalf of Drum Property Group Ltd (479), Ms Judith Munro of Aberdeen and Grampian Chamber of Commerce (510), Mr John Wright of Strutt &amp; Parker LLP on behalf of Macrobert Trust (511), Mrs Wendy Campbell (583), Mr Colin Campbell (584), Ms Rita Stephen of Aberdeen City and Shire Economic Future (760), Ms Naomi Cunningham of The Scottish Property Federation (800), Mr Bob Salter of Geddes Consulting on behalf of Lynch Homes (833), Mrs Shona Mutch (865), Ms Chrstine Burgess of Old Aberdeen Community Council (869), Mr &amp; Mrs Jonathan and Lynn Smith (877), Sir/Madam Tom Straiton (1011), Mr Richard Bush of Richard Bush Chartered Town Planner on behalf of Mrs Nicola Hutcheon (1205), Mr Carlo Crolla (1280), Councillor Marie Boulton (1436), Mrs Nicola Barclay of Homes for Scotland on behalf of Grampian House Builders Committee (1442), Miss Shelley Thomson of Stewart Milne Homes (1464), Mr James Brownhill (1475), Mrs Kathryn Wade (1495), Mr A. W. Findlayson of Cove and Altens Community Council (1537), Councillor James Farquharson (1539), Mrs Catherine Thornhill of Ryden LLP on behalf of Mr Gordon McWilliam (1554), Mr Ben Freeman of Bancon Developments Ltd (1561), Mr John Findlay of Ryden LLP on behalf of Stewart Milne Homes (North Scotland) (1567), Mr David Henderson (1576).</p>		
<b>Provision of the Development Plan to which the issue relates:</b>	Makes provision for three phases of housing and employment land supply to meet the allowances in the Structure Plan.	
<b>Summary of the representation(s):</b>		
<p>Extent of Land Allocations 43, 228, 276, 398, 583, 584, 865, 869, 877, 1011, 1280, 1436, 1475, 1537, 1495: How can the number of homes be justified. The growth assumptions are unrealistic. Does not take into account changed economic environment.</p> <p>479, 510, 800: Support supply of land to ensure that the planning system does not act as a constraint to economic development.</p> <p>1567: Over supply of housing land allocated in Bucksburn and Dyce.</p> <p>833, 1205, 1442, 1567: The proposed Spatial Strategy does not meet the requirements of Scottish Planning Policy and does not provide a 5 year land supply. There should be an allowance for smaller sites included.</p> <p>1464: As a result of the Council over estimating the supply of brownfield sites there is a requirement to include a policy in the Plan that would allow additional greenfield release to make up any deficiencies in the supply of brownfield sites to ensure the 5 year land supply is maintained at all times.</p> <p>Environmental Impact 271, 381, 1495: Greenfield development will have a detrimental</p>		

impact on the City. Will result in the loss of valuable Green Belt.

Strategy 65, 381, 1539: Priority should be given to brownfield development.

510, 800: it may be of benefit to accommodate a more flexible approach of prioritising those proposals that do not form part of the final plan. In the event that anything occurs (and in an uncertain economic climate this is likely) to halt progress on an approved development, an alternative proposal, originally unsuccessful, but with merit, may be revisited to the advantage of the city. Any alternative developments would of course need to meet a threshold level of suitability and quality, but over the life of the LDP it is unlikely that all first choice developments are completed. We believe that designing in this room for manoeuvre would be advantageous and confirm the culture change in planning that we are all seeking.

1576: More than 50% of Structure Plan allowance should be in the City.

Employment Supply 511: Over supply of employment land, especially at Dyce Drive.

760: ACSEF very much welcomes the allocation of more employment land within the timeframe 2007-2023 than required by the Structure Plan.

Policy Wording 1554, 1561: Object to the wording of Policy LR1

#### **Modifications sought by those submitting representations:**

Strategy 43, 271, 865: Leave Greenbelt intact and make use of brownfield land.

398: We believe that proper risk assessments are required on -the timing, location and scale of housing developments -the sequencing of infrastructure projects -an evaluation of the ability of developers to pay for new schools, roads and other facilities

1442: The spatial strategy set out in Proposed Local Development Plan does not provide sufficient land to meet the housing land requirement for a 10 year period from the predicted year of adoption. There is an unrealistic expectation on the programming timescales for delivery of completed units. Consequently, additional sites are required to be allocated to satisfy the requirement of Scottish Planning Policy (para 72).

Allocations 1475, 1495: Reduce housing numbers in light of exceptional circumstances since 2008.

510: allow more flexibility to assist in the delivery of development.

833, 1464: Include a policy to allow the release of greenfield land where there is insufficient supply of brownfield units to meet the Structure Plan Requirements.

The following insert to Policy LR1 is recommended: "Planning permission will be granted for a development proposal including greenfield sites, which is in accord with the principles set out in paragraphs 37, 38, 39 and 80 of Scottish Planning Policy as long as it can be demonstrated that: 1)If the site is greenfield, there is no alternative and available brownfield land in the immediate locality and the site is located at the edge of the existing settlement; 2)the current supply of effective land does not provide a minimum supply of 5 years effective land supply at all times; 3)the approval of the proposal will not materially affect the ongoing implementation and delivery of the

development strategy in the approved development plan; 4)the proposal is in accord with the masterplanning, design and environmental policies set out in the approved development plan; 5)the proposal includes the agreed level of affordable housing (if applicable) required by policy; 6)the proposal is an effective site and evidence of compliance with all technical and other requirements has been provided by the applicant; 7)the proposal is in a location which has spare infrastructure capacity or is self financing in terms of the provision of any upgrade of infrastructure and services by the applicant; 8)the applicant can demonstrate that the proposal is viable in terms of any funding commitments for agreed developer contributions in accord with the provisions of Circular 1/2010.

Any planning application must provide adequate information and analysis to demonstrate compliance with the above requirements to the satisfaction of the planning authority. Planning permission will not be granted for proposals which would undermine the approved development strategy and do not accord with the principles of sustainable development."

1205: Allocate all sites of 100 houses or less within or adjacent to the urban area and within the Aberdeen Western Peripheral Route that were considered and rejected by the MIR, unless they are persuasive and insurmountable reasons not to do so.

1442: In order to provide a clearer and more realistic projection of the potential contribution of brownfield housing land the Local Development Plan should use the 'Small and Large Site Potential' figure of 6,510 provided in Table 3 in Appendix 1 of the Local Development Plan. Furthermore it should be assumed that approximately 20% of this total will not be delivered as sites find alternative uses or fail to be delivered.

1442: Many of the identified 'Regeneration' sites are contained in the 'Brownfield' land supply figures. In order to provide a clearer picture of the contribution of 'Regeneration' housing land these sites should be extracted from the 'Brownfield' land supply. Sections 2.12 to 2.18 of the Spatial Strategy section of the Local Development Plan should also be revised to provide a better overview. Similarly to the 'Brownfield' housing land supply a 20% reduction should be applied to reflect that not all these sites will come forward.

1561: Bancon submit that, whilst the text of policy LR1 might be effective for delivering a Local Development Plan with suitable allocations of land (for housing in particular), but in this instance it relates to wholly unrealistic land allocations, and is subsequently ineffectual. The policy will not ensure the maintenance of a 5 year supply of effective housing land, and Bancon question whether it will even deliver half of the required housing land supply, based on an assumed maximum completion rate on any one site of 300 houses per annum. Bancon therefore submit that the land allocations, in particular those in phase 1, must be revisited to offer a wider range of deliverable sites, with no one site seeking the delivery of more than 900 houses by 2016. This is the only manner in which policy LR1 can be made effective, and the Local Development Plan can succeed in delivering the requirements of the Structure Plan and Scottish Planning Policy.

1567: Allocation of additional/alternative housing sites at Gillahill, Mundurno and Contlaw phased between 2007 and 2030 to ensure a wider spread of housing and maintenance of a 5 year effective supply of housing land (separate representations have been made for various sites pursuant to this representation).



Early Release 1442: Supplementary Guidance should be prepared immediately, in advance of the Local Development Plan, to release housing land which is capable of contributing to the five year effective land supply.

1442: Policy LR1 currently states: 'For housing developments, if the Housing Land Audit highlights that there is less than a 5 year supply of housing land, Supplementary Guidance may be prepared...to release allocations from Phase 2'. Many of the Phase 2 sites are reliant upon delivery of Phase 1 sites. 'Where Phase 2 sites cannot meet any shortfall in the 5 year effective housing land supply, additional sites should be identified'.

Council Owned Land 1442: Aberdeen City Council must commence the immediate marketing of those sites in their control which are programmed to deliver in Phase 1 of the Local Development Plan to ensure the output expectations can be achieved. If the Council does not commence this process immediately the Local Development Plan Phase 1 programme for these sites should be revised downwards to reflect the inevitable delay which will result. Additional sites will require to be identified to contribute towards any consequent shortfall.

Policy Wording 1554: Change policy LR1 We recommend that the policy wording is changed to: Development in close proximity to an allocated site that jeopardises the development of the site; similarly, proposals that do not deliver the full provision of the allocation will be refused unless the proposal is supported by adequate justification.

#### **Summary of response (including reasons) by planning authority:**

##### Housing Requirements

The role of the Structure Plan (CD8) is to "set clear parameters for subsequent Local Development Plans and inform decisions about strategic infrastructure investment." (Circular 1/2009 Paragraph 14 (CD4)). The Structure Plan sets a clear strategy for development in Aberdeen, which includes housing allowances to be delivered through Local Development Plans. The Structure Plan was approved by Scottish Ministers on 14 August 2009.

The housing requirements set in the Structure Plan are based on household forecasts that were developed for Aberdeen City and Shire (Strategic Forecasts 2007) (RD25)). To support the Local Development Plans for Aberdeen and Aberdeenshire a Housing Need and Demand Assessment (CD9) was undertaken that makes an assessment of the future housing requirements, and on 15 June 2010 the Centre for Housing Market Analysis issued its appraisal (CD33), determining the Aberdeen City and Shire Housing Need and Demand Assessment to be 'robust and credible'.

The HNDA estimates that to 2031 there will be a requirement for 59,090 new homes across Aberdeen City and Shire. In addition to meeting the forecast requirement, the Structure Plan is based on an aspiration to see the population of the area grow beyond projections, meet government objectives to increase house building and a need to enable a more responsive housing market. In seeking to achieve this the Structure Plan has made an allowance for 72,000 new homes to 2031 between Aberdeen and Aberdeenshire.

##### Housing Supply

Over the past 25 years development on brownfield land has made a significant

contribution to housing in Aberdeen. Evidence from development during the mid 1990s suggests that high levels of brownfield development can co-exist with high levels of greenfield development (RD26). Whilst the Aberdeen Local Development Plan will only provide brownfield sites for the first phase of the Structure Plan (4,000 homes) the policy approach would support a higher rate of development if the housing market can deliver the sites. Although the Structure Plan recognises the importance of new housing on brownfield sites, it also recognises that greenfield housing is important. Therefore, the Structure Plan strikes an appropriate balance between them. The balance of greenfield and brownfield development has been clearly set out in the Structure Plan. Under Section 16(6) of the Town and Country Planning (Scotland) Act (1997) the Local Development Plan is required to be consistent with the Structure Plan, and there is a requirement for the Local Development Plan to deliver the approved allowances set out in the Structure Plan.

The Proposed Action Programme (CD20) provides a summary of brownfield sites and sites within regeneration areas, section 1. It is made clear that brownfield capacity is calculated by subtracting the regeneration area brownfield sites total (shown in the Proposed Plan Appendix 3) from the Brownfield Urban Capacity Study sub-total (shown in Appendix 1, Table 3) and this presents a range that is consistent with the Structure Plan.

The Proposed Plan makes, both brownfield and greenfield, land available to meet at least a 10 year supply of land to meet the housing allowances in the Structure Plan from the predicted date of approval, which would be up to 2022. This is to comply with Scottish Planning Policy (CD4 paragraph 72).

The Structure Plan housing requirements are set out in Figure 8, and are based on the Aberdeen and Rural Housing Market Areas. The Aberdeen Housing Market Area contains Aberdeen City and part of Aberdeenshire. The Structure Plan Housing Allowances, Schedule 1, which have been allocated in the Proposed Plan, ensure sufficient flexibility in order to deliver the housing requirement.

Policy LR1: Land Release does allow for the release of phase 2 sites if it has been demonstrated that there is less than a 5 year supply, but that this would be through the use of supplementary guidance, and should be prepared in conjunction with the Strategic Development Planning Authority. It may well be the case that a 5 year supply of land has not been demonstrated through the housing land audit, but the solution may not necessarily be to release more land. There may be economic factors that will affect the delivery of housing and no amount of extra land will resolve the issue. Therefore, it is important that phase 2 land, or indeed unallocated sites are not released automatically.

#### Scale of Allocations

There are a number of allocations made that are of a large scale. This is to support a range of facilities and services within the new development, enable the delivery of significant infrastructure improvements, and avoid the problems that disjointed incremental growth has. Through the development option process (CD13) we have sought to identify sites which can make the most efficient use of existing infrastructure. There have been 11 new greenfield sites less than 100 units and 17 sites less than or equal to 500. There is, however, a need, to provide larger scale allocations in order to meet the Structure Plan housing allowances and deliver the services and facilities that will be required. It is our view that the combination of smaller developments will

contribute to the same cumulative impact of larger allocations. We have also identified smaller sites, both brownfield and greenfield, to provide a range of housing sites.

If the development industry is unable to deliver the Structure Plan requirements or the requirements for housing are not as forecast then the preferred strategy would also support a slower rate of growth. If growth is slower than set out in the Structure Plan, developments would be completed over a longer time period. However, if demand is in line with projections or above, there is a need to have a range of sites available to allow the market to respond effectively. The Structure Plan makes it clear in paragraph 4.17 that we cannot expect all the new houses allocated to be built within the relevant plan period.

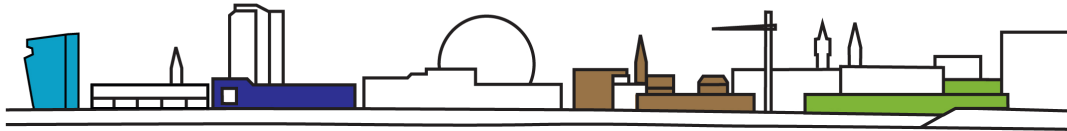
#### Employment Allocation

The employment allocation in the Proposed Plan is consistent with the Structure Plan requirements and paragraph 2.21 of the Proposed Plan provides justification for allocating a total area larger than set out in the Structure Plan. Comments on employment land allocations in the A96 corridor are addressed within Issue 14 Employment Land Allocations: Newhills Expansion and Dyce Drive.

#### **Reporter's conclusions:**

#### **Reporter's recommendations:**

<b>Issue (ref and heading):</b>	<b>REGENERATION AREAS</b>	<b>3</b>
<b>Development Plan reference:</b>	Regeneration Areas Page 11-12.	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Mr David Henderson (1576).		
<b>Provision of the Development Plan to which the issue relates:</b>	Specific allowances for development within regeneration areas.	
<b>Summary of the representation(s):</b>		
<p>1576: Regeneration sites are mentioned, particularly for later parts of Structure Plan allocation phases, and referred here to the next Plan for review, which is taken to mean not yet decided, if not object, as it should be born in mind that has been detailed, considerably resourced (both time (officer, consultant and community) and financially) master plans were produced for Aberdeen's Regeneration areas, which could be considered supplementary planning documents (and were agreed by council) and these were produced with community involvement and buy in which agrees certain guideline policies for house tenure, type and current community cohesion and right to stay, as well as guarantee of detailed community involvement in design briefs which will decide more precise plans, layouts, options for redevelopment/refurbishment and levels of house tenure and type etc.</p>		
<b>Modifications sought by those submitting representations:</b>		
<p>Any Structure or Local Plan proposals for housing allocations should consider the agreed Regeneration Plan and principles contained within them, and next steps (community involved detailed design briefs) as the benchmark for possible housing allocations and opportunities</p>		
<b>Summary of response (including reasons) by planning authority:</b>		
<p>The regeneration allowances identified in the Structure Plan (CD8) and the sites identified in the Local Development Plan reflect the work that has been undertaken in communities. These projects would be lead by the Council and would follow the principles outlined by the respondent.</p> <p>The Masterplans for the regeneration area have not been adopted as supplementary guidance as there is still work required to update these documents to take into consideration changes in national and local planning policy. If this is work is undertaken these could be adopted as supplementary guidance.</p>		
<b>Reporter's conclusions:</b>		
<p></p>		
<b>Reporter's recommendations:</b>		
<p></p>		



**aberdeen** local development plan

**RESPONSE TO PROPOSED PLAN  
CONSULTATION:  
BRIDGE OF DON**

**ISSUE 4 – 12**

<b>Issue (ref and heading):</b>	<b>ALLOCATED SITES: MURCAR OP2, OP3 AND OP4</b>	<b>4</b>
<b>Development Plan reference:</b>	Map: OP2 Murcar, OP3 Berryhill (Murcar), OP4 Findlay Farm Text: Table 5, Appendix 2 Pg 54.	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Ms Nicola Abrams of Scottish Environmental Protection Agency (408), Mr Malcolm Campbell of Knight Frank LLP on behalf of Scottish Enterprise (1182), Mr Joe Davidson (1518), Mr Steve Crawford of Halliday Fraser Munro Planning on behalf of J and AF Davidson (1529).		
<b>Provision of the Development Plan to which the issue relates:</b>	Allocates the sites for employment.	
<b>Summary of the representation(s):</b>		
<p>Potential Constraints</p> <p>408:</p> <p>Text should be added to the OP2 Murcar site description to indicate that there is a potential flood risk constraint at this site.</p> <p>South Mundurno Burn, which has moderate ecological status, runs through the area in question. There is an opportunity to improve the status of this Burn, which has suffered in the past through realignment and pollution, with this development.</p> <p>Phasing</p> <p>1182, 1529:</p> <p>The employment allocation proposed at Murcar (OP2) should be brought forward to the first phase rather than the current phasing of 2024-2030. This would help to support Energetica's ambition of having 100ha of employment land available for business over the next 10-15 years.</p> <p>The site should be promoted and within the first phase of the Local Development Plan rather than the latter phases. It would support the Energetica initiative.</p> <p>The site, when examined as part of the wider North of Don Masterplan can help have an ever greater positive impact of Aberdeen and the wider area.</p> <p>Allocations</p> <p>1518:</p> <p>Supports development at Murcar but recommends that it would be suitable for up to 1000 homes.</p>		
<b>Modifications sought by those submitting representations:</b>		
Potential Constraints		

408:

Insert the following text in the "other factors" section of OP2 Murcar descriptions (appendix 2).

"The site may be at risk of flooding. A flood risk assessment will be required to accompany any future development proposals for this site."

Insert the following text in the "other factors" section of OP descriptions (appendix 2) for the Murcar area (OP2 Murcar, OP3 Berryhill and OP4 Findlay Farm).

"Any Masterplan should take account of the existing water features within the site, the pressures which apply to these features and should direct developers to look for opportunities to protect and improve the water environment."

Phasing

1182, 1529:

The employment land at Murcar be brought forward from 2024-2030 phase to the first phase (2007-2016). Table 4 and Table 5 should be amended accordingly.

Allocations

1529:

Allocate further land to the north of OP2 Murcar for business associated with Energetica or mixed-use.

Include the North of Don Masterplan.

The full extent of Murcar should be identified for mixed-use development.

### **Summary of response (including reasons) by planning authority:**

Potential Constraints

408: Scottish Environment Protection Agency's suggested amendments to the site summaries of OP2 within Appendix 2 are acceptable and if the Reporter is so minded, the following text should be added into the 'Other Factors' section of Appendix 2, "This site may be at risk of flooding. A flood risk assessment will be required to accompany any future development proposals for this site."

Scottish Environment Protection Agency's suggestions for the inclusion of text within the Proposed Plan are partially accepted. We feel that as the suggested text relates to the delivery of the site it is best placed in the Action Programme as opposed to Appendix 2. If the Reporter is so minded, the Action Programme will be amended to include reference to site OP2, OP3 and OP4 and to include the following text: "Any Masterplan should take account of the existing water features within the site, the pressures which apply to these features and should direct developers to look for opportunities to protect and improve the water environment". Should the Report be so minded, the Action Programme will need to make reference to OP3 Berryhill and OP4 Findlay Farm and include the suggested text.

## Phasing

1182, 1529: We have allocated more employment land than required by the Structure Plan (CD8) within the time frame 2007-2023. This level of allocation takes account of factors that reduce the overall actual developable area of employment land such as strategic landscaping and land required for transport and ensure that we meet the Structure Plan target of 60 hectares of land to be available to business at all times in a range of places. If the employment land allocation at Murcar was to be brought forward from the Future Growth period to 2007-2023, there would be an uneven spread of employment land allocations throughout the city with a substantial amount of employment land already zoned in this area. Consequently we consider that the employment land at Murcar should remain in the Future Growth period 2024-2030.

## Allocations

1529: The allocation of this site for employment use complements the 75 hectares of employment land in the adjoining area to the south. This is already allocated in the Aberdeen Local Plan 2008 (CD12) and by identifying land for the 2024-2030 period we are maintaining a land supply within the long term to ensure that Energetica's aims and objectives are a lasting legacy for the North East. Housing on this side of the A90 would be remote from the existing housing at Bridge of Don.

The North of Don Masterplan proposal would have an impact on the overall settlement strategy and would require a major reassessment of the proposed sites across the entire city. Reference to Light Rapid Transport without significant assessment looking at the connectivity of Light Rapid Transport to the wider bus network, capital setup costs, future operational costs/risks and clear financial and commercial viability means that it is inadequate to demonstrate at this time that is an alternative allocation to be included. The high level Transport Assessment is not supported by modelling analysis of the proposed transport and appears to be more of a list of what could be done rather than attempting to establish if it will be sufficient and deliverable to support the scale of this allocation as a substantial alternative. Transport impacts would have to be significantly reworked and further consultation carried out. Many of the sites within the masterplan area have been assessed as being 'undesirable' when measured against a range of sustainability criteria. (CD13) Many of the aims of the North of River Don Masterplan are equally achievable by masterplanning the sites which we feel are 'desirable'. It is also likely that the North of Don Masterplan would exacerbate the people of Bridge of Don's concerns that too much development is being planned for the Bridge of Don. Evidence to suggest this comes from the fact that the Bridge of Don masterplan would redistribute more than 60% of the city's greenfield housing allocations to the Bridge of Don. This is compared to approximately a third of the greenfield housing allocations currently proposed. In addition to this, having such a high proportion of allocations in the Bridge of Don area would reduce the choice of sites available elsewhere in the city.

The land to the north of OP2 Murcar is not considered desirable for development as it would impact on the landscape setting of the city and the coastal views. The Aberdeen Green Belt Review 2010 (CD19) states that the site has green belt functions in separating Aberdeen from settlements to the north, such as Blackdog, and in contributing to the city's landscape setting. The site is also part of an orbital corridor of green space from the sea shore to the River Don, thus promoting a third green belt function of providing space for recreation. It also the opinion of Scottish Natural Heritage that sites further north of those already identified in the Aberdeen Local Development



Plan Proposed Plan would have a greater impact on the landscape character of the coastal seaboard and would encroach on the landscape which separates Blackdog and Potterton from Aberdeen (this information is included within the supporting documentation).

**Reporter's conclusions:****Reporter's recommendations:**

<b>Issue (ref and heading):</b>	<b>ALLOCATED SITE: GRANDHOME OP12</b>	<b>5</b>
<b>Development Plan reference:</b>	OP12, Table 5 and Appendix 2.	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Mr Graham Taylor (14), Mrs Shiela Young of Bridge of Don Community Council (256), Ms Nicola Abrams of Scottish Environmental Protection Agency (408), Ms Gemma Robinson (524), Mr Darren Joss (527), Mrs Judy Robinson (576), Mrs Katrina Bird (666), Mrs Anne Coombes (672), Mr Allan Taylor (1197), Mr Martyn Watson (1243), Mr Ian Douglas (1416), Mr Bruce Smith of Paull and Williamsons LLP on behalf of The Grandhome Trust (1568).		
<b>Provision of the Development Plan to which the issue relates:</b>	Site identified for 7000 homes and 5ha of employment land.	
<b>Summary of the representation(s):</b>		
<p>14, 672, 1416 Development should not occur until suitable infrastructure for the additional traffic that will be generated such as the Haudagain Roundabout, Third Don Crossing and Aberdeen Western Peripheral Route has been completed.</p> <p>1243 A third bridge crossing over the River Don would be vital to ensure the smooth flow of traffic within the area. Although a preferred route for a third crossing has been chosen, there are currently disagreements regarding it and there are no specific plans in place for its commencement and completion. Until such time that the third crossing is at the very least approved, with definitive plans in place for its construction, it's very difficult to see how this large development could commence without causing serious issues for the area and surrounding region.</p> <p>256, 666, 1197 Concerned that development is too large and the impact of development on existing infrastructure. There are insufficient facilities within the Bridge of Don area to sustain a community of this size. Infrastructure has historically been delivered long after the houses.</p> <p>1197 Some of the land is prime land for walking (at the back of Middletons, Lee Crescent and Ashwood) will be lost by these plans.</p> <p>672 Unconvinced about how the area will cope with the increased traffic volume that the development will cause. The use of public transport, a new park and ride and transport a hub at Bucksburn, bus lanes on the Parkway, a new bridge over the River Don and the construction of the Western Peripheral Route is mentioned. However, none of these prospects are certain that current residents are already suffering from transport problems, even without the increased developments. Unconvinced that First Bus will consider routing their services to the new developments.</p> <p>Development should be more evenly distributed throughout the city rather than adding yet more housing to Bridge of Don, one of the biggest suburbs in Europe.</p> <p>There are not many remaining 'natural' green spaces in Bridge of Don. There are 'managed' green spaces within housing developments but this isn't sufficient.</p> <p>408 Object to this site unless the issue of flood risk is highlighted in the text as being a potential constraint for the site, as required by Scottish Planning Policy. Danestone Burn</p>		

within site has been realigned and straightened and Woodland Burn also lies within the site. This lies close to the River Don (Dyce to tidal limit) which is at moderate status because of alterations to beds and banks, diffuse pollution and sewage pollution.

1568 The Grandhome Trust supports the allocation of OP12 for development.

The site is in single ownership so the Trust is well placed to ensure the provision of a balanced community through masterplanning, design codes and covenants. The site was selected as one of three national charette locations for the Scottish Sustainable Community Initiative in 2010. Substantial work has been carried out for the site as shown in submitted documentation, and it is proposed to carry out further masterplan development in accordance with the Aberdeen Masterplanning Process with a view to progressing to Supplementary Guidance status.

There are some differences between the boundaries shown in the Masterplan Framework emerging from the Charette process and the boundaries of OP12 as indicated in the Local Development Plan, particularly in the area of Persley Quarries. These mainly affect areas under consideration for later phases, beyond the life of the current plan and early development stages.

The ongoing masterplanning work should, among other matters, consider in detail the precise location and boundary treatment that will be appropriate, including for the potential later phases beyond the current plan period.

OP12 is identified as an opportunity for accommodating some 5 hectares of employment land. The employment uses should be integrated with the neighbourhoods, and not as some segregated mono-cultural area. This should not be viewed as an industrial or logistics location for uses that would be more suitable located elsewhere.

#### **Modifications sought by those submitting representations:**

14, 672, 1416 Reject the proposal until the infrastructure is completed. The council should consider whether there is a commitment to proposed infrastructure development before proceeding with any development in this area.

672 The right to have access to undeveloped green spaces for the many residents of Bridge of Don should be considered.

256 Fewer houses, to be considered only when current problems have been dealt with to the satisfaction of existing residents.

408 Insert the following text in the 'other factors' section of each of the allocation summaries as set out in Appendix 2 - 'This site may be at risk if flooding. A flood risk assessment will be required to accompany any future development proposals for this site. Any Masterplan should take account of the existing water features within the site, the pressures which apply to these features and should direct developers to look for opportunities to protect and improve the water environment.'

1568 1) There should be written into the Local Development Plan a recognition that the detailed boundaries of OP12 will be established through the proposed masterplan work and that there may require to be an early review of the medium terms Local Development Plan boundaries to reflect the boundaries emerging from an approved

masterplan.

2) In any event there should be a recognition that in relation to the establishment of the precise long term boundaries of the site, and the treatment of these boundaries, the adoption of an approved masterplan for the site as supplementary guidance by the Council should have the effect of establishing the detail of the location and treatment of the boundaries of the site.

3) The reference to 5 hectares of employment land, to be clarified such that this is of a type consistent with a residential neighbourhood, and does not include large scale industrial activity or logistics.

**Summary of response (including reasons) by planning authority:**

The Aberdeen City and Shire Structure Plan (CD8) sets the requirements for greenfield housing allowances and authorises a review of green belt boundaries in order to accommodate them. A Development Options Assessment (CD13), Strategic Environmental Assessment (CD21), and consultation on the Main Issues Report (Responses to Representations CD15) were used to assess sites. These were used to identify the most suitable locations to deliver the required growth and in accordance with Scottish Planning Policy paragraph 159 (CD3) which requires green belts to direct growth to the most appropriate locations. This process is described in the Green Belt Review (CD19) which also sets and explains the detailed boundaries of the green belt and land release areas. This site emerged as a desirable option because there are relatively few planning and topographical constraints within the site itself and its scale means that those that do exist (such as woodland and shelter belts and historic features) can be maintained and even enhanced. The scale of development would mean that it could support its own public transport infrastructure as well as services and facilities such as a new town centre, schools and employment land. Its single ownership will assist its deliverability. The work carried out by the site promoter through the Scottish Sustainable Communities Initiative is commended and will help to make this a major and successful contribution to the Structure Plan requirements.

14, 256, 666, 672, 1197, 1243, 1416 (Infrastructure comments) We would agree that a development of 7000 dwellings, employment land and associated services and facilities is going to necessitate a need for significant transport improvements. The existing road network is clearly not suitable to deal with additional traffic from this development.

The provision of services and facilities and employment land within several neighbourhoods as envisaged by the promoter of this site will encourage walking and cycling within the development. It will be important for the development to encourage a modal shift from car use to more sustainable modes (public transport, walking and cycling). However, it is inevitable that there will be external travel demands and consideration of the wider impact of the development on the transport network will be important for the success of this proposal.

Strategic improvements to the road network will be provided by the Aberdeen Western Peripheral Route, Haudagain improvements and Third Don Crossing. The Council and its partner NESTRANS are committed to these schemes and planning permission was granted for the Third Don Crossing in February 2011. The Council has consulted with transport partners and colleagues, including bus operators, to examine the implications of development for the transport network and identify transport infrastructure required to create an efficient, integrated and comprehensive transport network for all travel modes.

Strategic transport modelling has been undertaken to test the efficacy of the current transport network and to help determine the likely need for new infrastructure. As a result, the requirements for new roads, walking and cycling infrastructure and public transport have been identified in the Proposed Plan and attributed to eleven Masterplan Zones across the City, including Grandhome.

The required infrastructure for this area is identified in the Action Programme (CD20) and the Developer Contributions Manual (CD25). This will assist developers in identifying at an early stage the infrastructure that will be required to support this development. The Council will use the Action Programme to assist in the delivery of sites and the required infrastructure. It will be incumbent on the developer to provide mitigation for any net detriment impact on the transport network. All developers will be required to provide the necessary infrastructure or services, or a contribution towards its provision, in order to mitigate the impact of development. A transport appraisal will be required for this site and it will be at this stage the detailed transport improvements will be identified. This will include the need for public transport penetration - which will be made easier through the provision of the Third Don Crossing which will give public transport providers additional route choice. This proposal also incorporated segregated pedestrian and cycle facilities. We are satisfied that a development of this scale will attract public transport. Work on the transport appraisal will feed into the final masterplan for Grandhome.

The need for other non-transport related services and facilities is also recognised in the Action Programme. This includes the need for a new academy, 3 or 4 primary schools, health centre, dental practice and community pharmacy facilities. A number of improvements to the core path network and cycle network are also highlighted, including a new pedestrian bridge across the River Don to Dyce. Further details are contained within the promoter's Transportation and Infrastructure Statement in support of the site.

1197 (Walking Opportunities), 672 (Lack of Open Space) Although this area of countryside is used by walkers, there are few paths through this area when compared to other parts of Aberdeen. The development at Grandhome should encourage walking through providing walkable neighbourhoods and links through areas where none currently exist or are difficult to negotiate. Some of these are detailed in the Action Programme and include the pedestrian bridge over the River Don to Dyce. The Development Options Appraisal notes that maintaining green visual breaks along the Whitestripes ridge, Monument Wood and other areas would help to maintain the visual balance between development and green space apparent when viewed from the south where Balgownie playing fields and Westfield Park are prominent green spaces. These features are recognised in the Illustrative Masterplan for Grandhome (in the Charette Series Report submitted by the promoters) and should provide further outdoor recreation opportunities. Areas of open space containing woodland and wildlife habitats remain to the north of the area at Grandhome Moss and Stoneyhill Wood. We also consider that development should avoid the River Don valley floor which is a distinctive feature contributing to the landscape setting of the city.

672 (Distribution of development) Grandhome emerged as a 'desirable' development option in the Development Options Appraisal and makes a valuable contribution towards the housing requirement set for this Plan by the Structure Plan. Development sites, including some very large ones are distributed all around the city, although it is accepted that because the largest of them in terms of housing numbers - Grandhome - is located in Bridge of Don, then the northern sector has the highest number of houses allocated to it (although the combined housing and employment allocations at Dyce and Bucksburn

are similar in physical size). Reducing the land allocations at Bridge of Don would make it harder to achieve the full range of community facilities and infrastructural improvements which can be achieved by the scale of development currently proposed in the Plan. It would also require us to make compensatory allocations elsewhere in the city on sites considered to be less appropriate, available or sustainable.

408 (Flooding) A Flood Risk Assessment is likely to be required as part of any planning application. In addition a Drainage Impact Assessment will be required to deal with waste and surface water drainage. If the Reporter is so minded, It would be worth mentioning this requirement in the opportunity site reference for OP43 on page 58 of the Proposed Plan. It is also mentioned in the Action Programme on Page 11.

1568 (Supporting the Allocation and Detailed Boundaries) The support for this development is welcomed and the work carried out by the site promoter through the Scottish Sustainable Communities Initiative is commended. The neighbourhood design led approach has incorporated a detailed urban analysis to provide an innovative, illustrative masterplan with a good mix of house types, workplaces, retail and community facilities. The promoters rightly state that their design offers a notable contrast to conventional suburban development which, in line with the rationale behind the SSCI process, could serve as an exemplar on how masterplanning could be carried out.

In respect of the detailed boundary of the site however, there is a divergence of views. Scottish Planning Policy paragraph 161 (CD3) states that local development plans should establish the detailed boundaries of the green belt. Whilst we commend the content of the SSCI submission, we are not convinced that the land around Persley Quarries to the south of the area and beside the River Don opposite Mugiemoos Mill are appropriate for development. The Green Belt Review (CD19) explains that Persley Quarries is a District Wildlife Site. The document District Wildlife Sites (CD29) explains that this is a disused quarry and surrounding area with a diversity of habitats including semi-mature broadleaved woodland, colonising birch woodland, open heathland, tall grassland and gorse scrub. It supports a diversity of woodland birds and mammals. Although the fields to the south are not part of the wildlife site, development here would be isolated from the main body of the settlement should the wildlife site remain undeveloped.

The other area beside the River Don is a frost pocket, much of which is at risk of flooding according to Scottish Environment Protection Agency's flood map (this area was not assessed in the Development Options Appraisal and so flooding is not highlighted as an issue here). The River Don valley is a major and distinctive feature which provides a real sense of place for Aberdeen. This, together with the landscape diversity around the quarries means that these areas help to maintain the landscape setting of the city and an unbroken green link along the River Don which could have recreational value. Accordingly they should remain as green belt and the final masterplan for the area should take cognisance of this.

The comment in respect of the type of employment land envisaged for the area is acknowledged. Although the Proposed Plan does not specify what class of employment land is required, a degree of common sense would suggest that, given the context of a largely residential setting, the use should be one that can be carried out in any residential area without detriment to the amenity of that area. In other words, Class 4 type uses would be acceptable but Class 5 and 6 are unlikely to be.

Although we do not recommend making any prescribed modifications to the Plan, reporters may wish to consider the merits of stating that Class 4 employment uses would be appropriate under 'Other Factors' in the opportunity site reference for OP12 on page 55 of the Proposed Plan and that a Flood Risk Assessment will be required..

**Reporter's conclusions:****Reporter's recommendations:**

<b>Issue (ref and heading):</b>	<b>ALLOCATED SITE: DUBFORD OP25</b>	<b>6</b>
<b>Development Plan reference:</b>	Map OP25, Text: Page 14 (Table 5), Appendix 2 Pg 55.	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Mrs Gail Dinnes (11), Ms Nicola Abrams of Scottish Environmental Protection Agency (408), Mr Justin Lamb of Justin Lamb Associates on behalf of Tor Ecosse Limited (563), Mr Michael Smith (930), Mr Ron Hentges of Dubford Residents' Association (1170), Ms Emelda Maclean of Emac on behalf of Scotia Homes (1189), Mr Eric Anderson (1415).		
<b>Provision of the Development Plan to which the issue relates:</b>	Site allocated for 550 homes.	
<b>Summary of the representation(s):</b>		
<p>11, 930, 1170, 1415: No houses should be built in this area.</p> <p>The infrastructure is not in place to support development.</p> <p>There needs to be a more balanced community and building more houses will not achieve this.</p> <p>408: Object to the allocation of this site unless the issue of flood risk is highlighted as being a potential constraint for the site.</p> <p>563, 1189: Support the identification of the site. The masterplan will be further developed with Scotia Homes in order to deliver the key objectives.</p>		
<b>Modifications sought by those submitting representations:</b>		
<p>408; The respondent suggests inserting the following text in the 'other factors' section of Appendix 2 "This site may be at risk of flooding. A flood risk assessment will be required to accompany any future development proposals for this site"</p> <p>In order to consider opportunities for the protection and improvement of the watercourses in the site the following text should be inserted into 'other factors' section for the site in Appendix 2 "Any Masterplan should take account of the existing water features within the site, the pressures which apply to these features and should direct developers to look for opportunities to protect and improve the water environment."</p> <p>930: OP25 should be designated as Green Space Network (NE1) or Green Belt (NE2).</p> <p>1170, 1415: No approval for development should be granted until the infrastructure/facilities are in place to accommodate development. A better balance of infrastructure and facilities is required in the area.</p>		
<b>Summary of response (including reasons) by planning authority:</b>		
<p>Objections to the site</p> <p>11, 930, 1170, 1415</p> <p>The Aberdeen City and Shire Structure Plan (CD8) sets the requirements for greenfield housing allowances and authorises a review of green belt boundaries in order to</p>		



accommodate them. A Development Options Assessment (CD13), Strategic Environmental Assessment (CD21), and consultation on the Main Issues Report (Responses to Representations CD15) were used to assess sites. These were used to identify the most suitable locations to deliver the required growth and in accordance with Scottish Planning Policy paragraph 159 (CD3) which requires green belts to direct growth to the most appropriate locations. This process is described in the Green Belt Review (CD19) which also sets and explains the detailed boundaries of the green belt and land release areas. This site emerged as a desirable option because the site is well related to the existing settlement area of Denmore and development can be accommodated in terms of landscape and transport. The mix and distribution of uses, density, design, layout and access arrangements will be detailed through the masterplanning process and by developing in accordance with Local Development Plan policies.

In terms of strategic infrastructure provision, the Scottish Government have committed to building the Aberdeen Western Peripheral Route and road improvements at the Haudagain roundabout. In addition to this Aberdeen City Council approved the construction of the Third Don crossing. These are three main transport infrastructure projects which are committed in new Local Development Plan. The required infrastructure for this area is identified in the Action Programme and the Developer Contributions Manual. This will assist developers in identifying at an early stage the infrastructure that will be required to support this development. The Council will use the Action Programme to assist in the delivery of sites and the required infrastructure. It will be incumbent on the developer to provide mitigation for any net detriment impact on the transport network. All developers will be required to provide the necessary infrastructure or services, or a contribution towards its provision, in order to mitigate the impact of development. Capacity exists within existing secondary and primary schools but any specific requirements must be considered alongside other development options in Bridge of Don and in Aberdeenshire. Investment will be needed in water service infrastructure. NHS Grampian will be involved in discussions regarding healthcare requirements.

#### Flooding

408

Scottish Environment Protection Agency's suggestions for the inclusion of text within the Proposed Plan are partially accepted. The text regarding the requirement for a Flood Risk Assessment is acceptable and if the Reporter is so minded, the following text will be added into the 'Other Factors' section of Appendix 2, "This site may be at risk of flooding. A flood risk assessment will be required to accompany any future development proposals for this site." The suggestion for the inclusion of text regarding existing water features is accepted, however, we feel that as the suggested text relates to the delivery of the site that it would be best placed in the Action Programme as opposed to Appendix 2. If the Reporter is so minded, the Action Programme will be amended to include reference to site OP25 and to include the following text: "Any Masterplan should take account of the existing water features within the site, the pressures which apply to these features and should direct developers to look for opportunities to protect and improve the water environment".

#### Support

563, 1189

Support noted and welcomed.

**Reporter's conclusions:**

**Reporter's recommendations:**

<b>Issue (ref and heading):</b>	<b>ALLOCATED SITES: BRIDGE OF DON OP6, OP8, OP9, OP10 AND OP11</b>	<b>7</b>
<b>Development Plan reference:</b>	Map: OP6 Dubford Community Facilities, OP8 Balgownie Primary School, OP9 Aberdeen College Gordon Centre, OP10 East Woodcroft North, OP11 Jesmond Drive Text: Appendix 2 Pg 54	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Mr Ian Rendall (13), Mrs Jennifer Third (15), Mrs Denise Forrest (33), Mrs Pamela Shand (139), Mrs Eileen Olberg (261), Mrs Fiona Reid (262), Mrs Sasha Buchan (263), Mr Stephen Moonie (390), Ms Gemma Robinson (524), Mr Darren Joss (527), Mrs Judy Robinson (576), Mrs Elaine Farquharson-Black of Paull and Williamsons on behalf of Aberdeen College (650), Mrs Mandy McPherson (1172), Ms Lorraine Jones of Sport Scotland (1244), Mrs Alexis Darg (1314), Mr Stephen Booth of Aberdeen City Council - Asset Management (1519).		
<b>Provision of the Development Plan to which the issue relates:</b>	Sites allocated in the Proposed Plan for housing within the Bridge of Don	
<b>Summary of the representation(s):</b>		
<p>OP6</p> <p>261, 262, 1314: The respondents do not think that there is a need for a community facilities site (OP6) in the area and that it will bring with it the disadvantages often associated with such developments. For example noise, litter and a gang culture. It is also thought that the road layout in this area will not be able to cope with such development.</p> <p>Community shops and facilities should be instead built into the proposed housing at Dubford/Shielhill.</p> <p>Sufficient car parking and improved bus service should be provided.</p> <p>1519: Respondent supports the identification of site OP6.</p> <p>OP8</p> <p>13: The respondent believes that the amenity area adjacent to 29 Tarbothill Road should not be included within the site OP8.</p> <p>15: The respondent supports the identification of site OP8 as long as adequate parking is provided. It is thought the site should be used for Council or affordable housing.</p> <p>OP9</p> <p>139: The respondent wants the woodland within the site OP9 to be retained and taken into consideration when it is developed.</p> <p>650: The respondent welcomes the identification of the site (OP9) and feels more of the site could be redeveloped.</p>		

## OP10

33, 1172: Respondents believe that no development is required at OP10. There is a concern where access to the site would come from and what disruption this would cause to the existing residents.

## OP11

33, 390: The respondent is of the opinion that the noise of traffic, loss of wildlife and loss of sunlight due to the potential development of OP11 will directly affect them and that there are not enough facilities in the area to support the new homes

## General Bridge of Don Comments

524, 527, 576: The respondents believe that there are major traffic problems in the Bridge of Don.

The respondents also believe that the public transport services are atrocious and cannot be relied upon.

The respondents believe that the local amenities are not sufficient for the size of the settlement Bridge of Don.

The respondents would like the B & Q Superstore to remain in the Bridge of Don.

576: The respondent thinks that future plans should be bolder, more creative and more forward thinking with planners learning from the current situation.

**Modifications sought by those submitting representations:**

## OP6

261, 1314: OP6 should be converted into a walking area. Through road proposed should be removed.

262: The planned retail development should instead be added into new housing developments in the area.

## OP8

13: Site OP8 should have its boundary redrawn to exclude the amenity area.

## OP9

139: The woodland within OP9 must be retained.

650: Respondent would like to see the entire site identified as OP9.

## OP10 &amp; OP11

33, 390, 1172: OP10 should be used for local amenity only and removed from the Plan.

OP11 should be retained as local amenity.

#### Transport and Infrastructure

524, 527: The respondents would like an improvement made to local amenities, public transport, roads and to make sure that the extra amenities have the budget to be delivered.

576: The respondent would like to see a by-pass, light railway and a tram built. Overall better public transport.

#### General Bridge of Don Comments

263: Respondent would like to see the Plan cancelled.

The respondent would also like less housing in the Bridge of Don and the retention of green areas and open space. The respondent feels that areas of the city should be used for development instead and more facilities and shopping within the Bridge of Don. This should be linked with housing and places where people can work

The respondent queries whether waste disposal for new development has been considered.

#### **Summary of response (including reasons) by planning authority:**

##### OP6

261, 262, 1314: It should be noted from the outset that OP6 Dubford Community Facilities is identified as an opportunity site for community facilities in the 2008 Aberdeen Local Plan (CD12)). In this instance, we should draw your attention to paragraph 78 of Circular 1/09 Development Planning (CD4) which states "Scottish Ministers intend the appointed person to, within the bounds of the issues raised in the representations, primarily examine the appropriateness and sufficiency of the content of the Proposed Plan. . . The appointed person should generally not recommend modifications to parts of the Plan which have been examined in previous examinations or rolled forward from previous Plans, unless circumstances have clearly changed."

We therefore consider that matters on the principle of development on this site have already been addressed through the existing Local Plan. It is therefore appropriate to identify the site as a development opportunity for a neighbourhood shopping centre within a wider residential area zoning.

1519 Support for OP6 Dubford Community Facilities is noted and welcomed.

##### OP8

13 In relation to OP8 Balgownie Primary School, we consider it appropriate to retain amenity space within the site. If the Reporter is so minded, it may be appropriate to mention retaining the amenity open space within the Other Factors section of OP8 in Appendix 2.

15 In relation to parking standards and affordable housing provision should OP8 Balgownie Primary School be redeveloped for housing, the Council has policies within

the Proposed Local Development Plan and Supplementary Guidance which seeks appropriate levels of parking and affordable housing within development. The general support for the redevelopment of OP8 is both welcomed and noted.

#### OP9

139 In relation to OP9 Aberdeen College Gordon Centre, we consider it appropriate to retain as much woodland as possible within the site. If the Reporter is so minded, it may be appropriate to mention retaining the as much woodland as possible within the Other Factors section of OP9 in Appendix 2. This would be in order to create a satisfactory residential amenity.

650 The boundary of site OP9 Aberdeen College Gordon Centre should remain as it is within the Aberdeen Local Development Plan. The OP9 Aberdeen College Gordon Centre site is made up of redundant, unused land and buildings which Aberdeen College would like to see redeveloped in the future. The site is currently covered by residential designation. The remaining area owned by Aberdeen College to the west of the OP9 Aberdeen College Gordon Centre site is currently in use by the College and is also covered by a residential designation (Policy H1). This policy states that new residential development will be approved in principle if it meets certain criteria relating to amenity.

Should the active part of the Aberdeen College site become surplus to requirements in the future and the College could redevelop the site if the planning application was in accordance with the corresponding policies within the Local Development Plan.

#### OP10

33, 1172 It should be noted from the outset that OP10 East Woodcroft is identified as an opportunity site for sheltered housing in the 2008 Aberdeen Local Plan (CD12). The principle for developing the site for a residential use was established here and we now consider it appropriate to develop the site for mainstream housing in accordance with the Development Options Assessment Report (CD13).

#### OP11

33, 390 Site OP11 Jesmond Drive is also identified in the 2008 Aberdeen Local Plan and now has planning permission granted for 82 dwellings in total. This consists of 74 private and 8 low cost homes. (See Committee Report attached in this folder)

#### General Bridge of Don Comments

263

Aberdeen City Council is required to produce a Local Development Plan which sets out how the strategy for the growth of Aberdeen, as detailed in the Aberdeen City and Shire Structure Plan (CD8).

#### Transport and Infrastructure

261, 262, 524, 527, 576, 1314

Policy I1 Infrastructure Delivery and Developer Contributions states in the Local

Development Plan that development must be accompanied by the infrastructure, services and facilities required to support new or expanded communities and the scale and type of developments proposed. Therefore this will mean that infrastructure, services and facilities will be provided to support new development, of which current communities will also be able to benefit from the increased provision of such infrastructure, services and facilities within their area.

The Cumulative Transport Assessment has identified the strategic transport requirements arising from the Plan. This identified the need for the Aberdeen Western Peripheral Route but did not identify the need for a new light rail or tram system. However the Plan does not preclude the development of such facilities in the future.

#### Scale of Development in Bridge of Don

576

Approximately a third of the total land allocations made in the Aberdeen Local Development Plan Proposed Plan have been made in the Bridge of Don area. The Aberdeen City and Shire Structure Plan sets the requirements for greenfield housing (or employment land) allowances and authorises a review of green belt boundaries in order to accommodate them. A Development Options Assessment (CD13), Strategic Environmental Assessment (CD21), and consultation on the Main Issues Report (Responses to Representations CD15) were used to assess sites. These were used to identify the most suitable locations to deliver the required growth and in accordance with Scottish Planning Policy paragraph 159 (CD3) which requires green belts to direct growth to the most appropriate locations. This process is described in the Green Belt Review (CD19) which also sets and explains the detailed boundaries of the green belt and land release areas. The sites we have identified will help to deliver sustainable communities that are places which offer a high quality of life with a wide range of housing. The Council have also allocated significant land to the area north of the River Don to support the Energetica Corridor concept promoted by Aberdeen and Shire Economic Forum. The Energetica concept seeks to improve the economy and promote the energy industry along the Aberdeen to Peterhead growth corridor. In addition to this, significant allocations were made in the Bridge of Don in order to make sure that there is substantial critical mass to be able to deliver the required infrastructure needed to support development. With the development of more than 7500 dwelling houses and 32 hectares of employment land, a range of facilities and services can be provided, including a range of public transport services. This will reduce the need to travel, and make these more sustainable developments.

The Aberdeen Local Development Plan Proposed Plan sets out policies that seek the retention and promotion of green areas and open space. The Proposed Plan looks to create high quality natural environments with access to good quality open space. Therefore the retention and creation of green areas and open space is an important aspect of the Aberdeen Local Development Plan Proposed Plan.

576

In response to the comment on waste Policy R6 Waste Management Requirements for New Development within the Aberdeen Local Development Plan Proposed Plan sets out how waste disposal should be dealt with for new development.

524, 527, 576 The Council is not able to influence whether the B & Q Superstore remains in the Bridge of Don. Sufficient land allocations have been made for housing and business use which in turn could create the critical mass needed to retain such services in this area.

**Reporter's conclusions:****Reporter's recommendations:**



<b>Issue (ref and heading):</b>	<b>ALTERNATIVE SITE: DENMORE ROAD/ ELLON ROAD</b>	<b>8</b>
<b>Development Plan reference:</b>	Map: OP5 Denmore Road Recycling Centre Text: Appendix 2 Pg 54 New Community Sites and Facilities (CF2)	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Sir/Madam J. V. Carroll of Hall Russell United Football Club (53), Sir/Madam R Morrison of Nicolls AFC (140), Mr Alex M. Fiddes of Hermes Junior Football Club (203), Mr John Findlay of Ryden LLP on behalf of European Development Holdings LTD (629), Ms Jane Adam of Bridge of Don Community Council (1176).		
<b>Provision of the Development Plan to which the issue relates:</b>	Currently playing fields and proposed recycling centre. Alternative use proposed by developer for retail development.	
<b>Summary of the representation(s):</b>		
<p>General</p> <p>140, 203 Support the development of this site proposed by the European Development and Investment Co. Ltd. The proposed development will help remove a potential hotspot for illegal travellers camps. It will also stop dumping on this site. A re-cycling centre could also be allocated on this site.</p> <p>1176 Bridge of Don Community Council supports the bid by European Development Holdings for a substantial superstore plus a recycling centre on the site 2/15 on Denmore Road. The Community Council support the bid subject to the following conditions: -the local residents need to be consulted upon and be in agreement to the site being used for the above proposal, -the amenity/recycling centre must be larger than the current one on Scotstown Road to accommodate the large area of Bridge of Don, -the replacement football pitches must be in the Bridge of Don area. (Possible tie up with the University) - the football teams must be satisfied with the proposed site for their new pitches, -the road structure must be suitable for the traffic that this site would generate.</p> <p>Policy Designation</p> <p>53, 629 Object that this site remains green belt as it should be released for development. The site contributes little to the amenity of the local area as the pitches are not available to the wider public for use. The Urban Green Space and Green Space Network designations are not warranted as a consequence of the existing and proposed uses. Recycling centre proposals has weakened this designation.</p> <p>Food/Retail Services</p> <p>53, 140, 203, 629 There is also a shortfall in food retail services in Bridge of Don, where a better use could be made of the site for the residents by allocation of retail development. The community council is supportive of the proposal providing much needed retail facilities.</p> <p>The development of a food store would satisfy an unmet demand to the east of Bridge of Don and meet the demands of the residential and employment allocations in the extant</p>		

and emerging plans. These facilities can be provided in the short term, whereas similar facilities to the north would be incapable of provision until 2016.

The civic amenity/ recycling centre acquired by the Council can only be provided through the development of the site for retail use. That use would be unacceptable for the football clubs already using the site.

#### Football Clubs/Sports Facilities

53, 140, 203, 629 Development on this site would also secure the long term viability of two Junior Football Clubs and other local clubs. It will provide facilities for the local community and youth of Aberdeen to enjoy as these are lacking in the area. The proposal would help develop a new facility that would remove pressure from other council facilities. The land for the recycling centre is needed for our training facilities and shared car park and it has been made clear that the proposed recycling use is unacceptable to them should they remain on site.

The Community Council support this proposal as it will improve the sports facilities in the area.

The owners of the Balgownie site have confirmed their acceptance of relocating and creating improved facilities at Balgownie in principle.

#### **Modifications sought by those submitting representations:**

53, 629 Remove the urban green space allocation and identify the site for retail development. Remove this OP site reference from the Plan.

140, 203 Allow development to occur on this site.

629, 1176 The site should be allocated in the Plan for Class 1 Retail use comprising food and non food uses. Provision should also be made for a recycling centre on part of this site.

#### **Summary of response (including reasons) by planning authority:**

##### General/Retail Services

53, 140, 203, 629, 1176 The Denmore Road site should remain identified in the Aberdeen Local Development Plan as a site for a recycling centre. There is one recycling centre serving Bridge of Don on Scotstown Road. It is not considered fit for purpose as it is too small to provide the range of facilities required and there is no opportunity to expand it as the surrounding area is a District Wildlife Site (Glashie Howe-see maps of District Wildlife Site's CD29). Furthermore, access to this site is unsatisfactory where there are no filter lanes and cars frequently have to queue on Scotstown Road during busy periods. Such facilities are in demand within the Bridge of Don area and the principle of developing these facilities at this site are supported by the Bridge of Don Community Council. A replacement is therefore required. A need for such facilities was previously highlighted in the Main Issues Report (CD14) where a number of sites were assessed (the scoring matrix used to assess a number of sites in the area is within the Issues Folder). The bulk of the site is used as playing fields and these should be retained. Improved car parking and changing facilities will be provided on site if the recycling centre is built.

Proposals for retail development on sites not identified in the Development Plan will be assessed according to the sequential test promoted by Scottish Planning Policy (CD3) Another site, which has the benefit of unrestricted Class 1 retail use, exists at the B&Q superstore further north on Denmore Road. This site is closer to the new housing proposed at North Denmore and we contend that this site, which has a live planning application, could meet the needs for additional retail development at East Bridge of Don. The convenience shopping requirements of the new communities should be met within the new development areas and will be identified through masterplanning exercises.

#### Policy Designation

53, 629 The playing fields are covered by Policy NE3 Urban Green Space which states that open space should only be used for other purposes if there is no significant loss to the landscape character and amenity of the site and adjoining areas and replacement green space is located close by.

Scottish Planning Policy Paragraph 156 stresses the importance and value of playing fields. It outlines 4 exceptional circumstances under which the redevelopment of playing fields can be considered. We can look at these in turn: 1) The proposal is ancillary to the principal use of the site as a playing field. It is clear in this instance that a supermarket is not an ancillary use. 2) The proposal is a minor part of the playing field which would not affect its potential. In this case the proposed supermarket would result in the loss of the playing fields. 3) The playing field which would be lost, is replaced by a new playing field of comparable or greater benefit in a location convenient for its users or would improve the overall playing capacity in the area. This issue is already addressed in Policy NE3 Urban Green Space. It has been suggested that the playing fields can be relocated to Balgownie playing fields. However these are located around 2km away in another part of Bridge of Don. The impact of the loss of playing fields on North Denmore has not been addressed. 4) That a clear excess of pitches has been demonstrated through a playing field strategy. The playing fields are rated among the best in the city according to the Sports Pitch Strategy (RD38) which although 8 years old is still considered relevant by SportScotland (see highlighted page 10 of SportScotland's submission 1244 included within the Issue Folder).

This shows that the proposal to replace the playing fields with a supermarket meets none of the criteria or circumstances in the Scottish Planning Policy which would justify their development.

The playing fields are also zoned as Green Space Network which has been identified by overlaying a number of datasets and the rationale for this has been explained in Supplementary Guidance on Open Space (RD82). This rationale has sought to ensure that the Green Space Network designation only applies to land that offers significant value to Green Space Network features, (habitat, natural heritage, landscape, active travel and recreation), or land that offers clear opportunities to link these areas, and therefore enhance their value further. It is important to maintain the integrity of the Green Space Network by applying a strong and consistent rationale, and this required a review of the previous Green Space Network designations. The Open Space Audit, which informs the Supplementary Guidance on Open Space (RD82) was presented to the Enterprise, Planning and Infrastructure Committee for approval to publish for public consultation in March 2011, provides more information on the implementation of Policy

NE1.

The Council will look to retain the Urban Green Space and Green Space Network designations allocated at Denmore Road. It is thought that the Policy NE1 Green Space Network and NE3 Urban Green Space zoning is relevant and appropriate. This is due to the fact that the site is in active recreational use. Development of the site would result in significant loss to the landscape character and amenity of the site and adjoining areas and would therefore be contrary to Policy NE3 Urban Green Space. The issue of the ground not being available to public use should not be of any more relevance than that of many other sports pitches around the City. The site is a valuable part of a wildlife corridor and the local townscape which has access value which has the potential to connect the rural areas east of the built settlement (Denmore) with the coast. The site allows for connectivity between habitats and maintains the green linkages that Green Space Network seeks to protect thus justifying designation under policy NE1.

Football Clubs/Sports Facilities

53, 140, 203, 629 The need for the clubs to have improved facilities is not a planning matter and cannot therefore be taken into consideration through the Local Development Plan process.

**Reporter's conclusions:**

**Reporter's recommendations:**

<b>Issue (ref and heading):</b>	<b>ALTERNATIVE SITE: BALGOWNIE HOME FARM, BRIDGE OF DON</b>	<b>9</b>
<b>Development Plan reference:</b>	Land at Balgownie, Bridge of Don shown on Proposals Map.. Policy NE1, Policy NE3, Policy H2	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Mr John Findlay of Ryden LLP on behalf of The University of Aberdeen (619), Mr Bob Salter of Geddes Consulting on behalf of Lynch Homes (833).		
<b>Provision of the Development Plan to which the issue relates:</b>	Urban Green Space containing University of Aberdeen Playing Fields.	
<b>Summary of the representation(s):</b>		
<p>619 - The respondents object to failure of the Proposed Plan to identify land at Balgownie, Bridge of Don for a mixed use development. The site is entirely achievable in the timescale set out by the Proposed Plan, is infill, surplus to Aberdeen University's requirement as sports fields and open space, is sustainable in terms of its proximity to the local transport network, is well located to accommodate further development especially in light of the planned route of the Third Don Crossing, and will provide enhanced recreational facilities to the wider community. The current designation as Urban Greenspace and Green Space Network should be removed and Opportunity site OP40 (for the development of major leisure and recreational facilities identified in 2008 Aberdeen Local Plan) at Balgownie should be reinstated in the adopted Aberdeen Local Development Plan.</p> <p>833 - The respondents say that the site would make a valuable contribution to meeting the Council's housing land requirement in the Phase 1 of the Local Development Plan as defined by Policy LR1. It will also contribute to ensuring that a five year supply of land for housing is maintained at all times, in accord with Scottish Planning Policy.</p>		
<b>Modifications sought by those submitting representations:</b>		
<p>619: Table 5 and Appendix 2 of the Proposed Plan should be amended to include the land at Balgownie as an opportunity site for mixed use development including sports facilities, residential development (about 167 units) and a 3.6 hectare extension to the Aberdeen Science and Technology Park.</p> <p>The proposal map for Area A: Bridge of Don should be amended to reflect this allocation with the appropriate amendments made to the Green Space Network.</p> <p>At the very least it is requested that Opportunity site OP40 (for the development of major leisure and recreational facilities) at Balgownie is reinstated in the adopted Aberdeen Local Development Plan.</p> <p>833: Include Balgownie Home Farm as a preferred option in the first phase of the Local Development Plan for 200 homes.</p>		
<b>Summary of response (including reasons) by planning authority:</b>		
<p>Retain Land Use Zonings.</p> <p>More suitable alternative sites have been identified at Bridge of Don to accommodate the housing and employment land requirements for the area. Part of the site, at the east end</p>		

close to the main vehicle access point, is currently zoned for mixed use purposes and could accommodate a limited amount of development. This has been brought forward into the Proposed Plan.

The Green Space Network and Urban Greenspace designations remain appropriate. The site is central to the Bridge of Don area and is easily accessible to local residents. The population of the area will grow when the Proposed Plan housing allocations are implemented. This will generate an increased need for open space/playing fields. The existing playing fields are rated among the best in the city according to the Sports Pitch Strategy (RD38) which although 8 years old is still considered relevant by SportScotland (see highlighted page 10 of SportScotland's submission 1244 included within the Issue Folder).

It is not appropriate to describe a significant area of open space as an infill opportunity.

There will be no direct vehicle access to the site from the Third Don crossing route.

We acknowledge the improved facilities existing and planned at Aberdeen Sports Village (in which the City Council is a partner). The important regional facilities at the ASV cannot, however, compensate for the loss of local provision at Bridge of Don. The Balgownie pitches are highly rated in the Sports Pitch strategy. While the University may no longer have a requirement for its own use. There is no evidence to suggest there isn't still a wider community requirement for this area of open space to be retained. Scottish Planning Policy (CD3) allows for playing fields to be redeveloped where, among other reasons: a playing field strategy prepared in consultation with SportScotland has demonstrated that there is a clear excess of sports pitches to meet current and anticipated future demand in the area and that the site could be developed without detriment to the overall quality of provision. This has not been demonstrated. Scottish Planning Policy also says that "where a playing field is no longer required for formal sports use, planning authorities should consider whether the site has other recreational, amenity, landscape or biodiversity value which would warrant its retention as open space." (para 157)

The enhanced facilities proposed by the University are promoted as a relocation of pitches from another site in Bridge of Don (Issue 8), so there may not be any net benefit in this being implemented.

The other proposals for housing and science park extension uses are not required as suitable allocations for these uses are promoted by the Proposed Plan on more appropriate sites. The existing Science Park to the south of the site has not been fully developed yet.

The site's proximity to public transport and core paths is recognised. This reinforces its importance within the Green Space Network and the opportunity it presents for recreational use.

Alternative and more appropriate development sites identified in the Proposed Plan are also considered to be deliverable.

The leisure development opportunity (OP4) identified in the extant Aberdeen Local Plan 2008 has been omitted from the Proposed Plan as the Third Don crossing road line goes through this site and vehicle access to it would be extremely difficult, if not impossible, to

achieve. We are not aware of any noted interest to implement this opportunity.

Alternative and more appropriate development sites identified in the Proposed Plan will contribute to meeting the Phase 1 housing land requirement and to ensuring a five year supply of land for housing.

**Reporter's conclusions:****Reporter's recommendations:**

<b>Issue (ref and heading):</b>	<b>ALTERNATIVE SITE: DENMORE ROAD RETAIL UNITS</b>	<b>10</b>
<b>Development Plan reference:</b>	Policy BI1 Business and Industrial Land	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Ms Lorraine Davison of DPP on behalf of Standard Life Investments (395).		
<b>Provision of the Development Plan to which the issue relates:</b>	Site within employment land zoning that has open Class 1 consent.	
<b>Summary of the representation(s):</b>		
<p>395: The respondent feels that a major error has been made with no recognition given to the Bridge of Don Retail Park (Denmore Road retail units) in the Proposed Plan or the Supplementary Guidance. Although the extent of retail does not go as far as the Boulevard Retail Park, it is nonetheless an established retail location which enjoys the benefit of an open Class 1 retail consent. The respondent feels that the Bridge of Don Retail Park is an established retail location that benefits from unrestricted Class 1 use. The park is also subject of a planning application which proposed the redevelopment of the site for new convenience and comparison goods retailing. The respondent feels that the site is well located in terms of public transport and well placed in terms of the Bridge of Don/Grandhome strategic growth area. It is centrally located within Dubford and Murcar Masterplan Zone where significant new housing and employment areas are proposed.</p>		
<b>Modifications sought by those submitting representations:</b>		
<p>395: The respondent would like the Bridge of Don Retail Park to be identified as Policy RT3: Town, District and Neighbourhood Centres on the Proposals Map.</p> <p>The respondent would like the Bridge of Don Retail Park to be listed under "District Centres" in Figure1 of the Supplementary Guidance.</p>		
<b>Summary of response (including reasons) by planning authority:</b>		
<p>The Council is still of the same opinion that the retail units on Denmore Road will remain designated as Business and Industrial Land (BI1). As indicated by the respondent, the retail units are covered by an unrestricted open Class 1 Retail Use and therefore it is not thought necessary to change the land use policy. The site is also currently subject to a planning application for the redevelopment of the existing retail units to form a single Class 1 retail unit (Application Reference: 101203) Reference (RD98). In addition to this the retail units at Denmore Road do not currently fit the definition of a 'District Centre' in the Local Development Plan as there is no food supermarket or superstore and non-retail services. Therefore the Bridge of Don Retail Park does not reflect a mix of uses expected in a District Centre.</p>		
<b>Reporter's conclusions:</b>		
<p></p>		
<b>Reporter's recommendations:</b>		
<p></p>		



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<b>Issue (ref and heading):</b>	<b>OTHER ALTERNATIVE SITES: BRIDGE OF DON</b>	<b>11</b>
<b>Development Plan reference:</b>	Sites not identified in the Proposed Plan.	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Mr Gary Purves of Knight Frank LLP on behalf of Bett Homes Ltd (552), Miss Christine Dalziel of Halliday Fraser Munro Planning on behalf of Mr Ali Bedawi (1526), Mr Bob Reid of Halliday Fraser Munro Planning on behalf of Mr J McIntosh of Goval Farm (1528), Mr Bob Reid of Halliday Fraser Munro Planning on behalf of Mr M Hickey (1530), Mr Steve Crawford of Halliday Fraser Munro Planning on behalf of Robertson Property Ltd. (1533), Mr John Findlay of Ryden LLP on behalf of Stewart Milne Homes (North Scotland) (1567).		
<b>Provision of the Development Plan to which the issue relates:</b>	Alternative proposals in the Greenbelt NE2.	
<b>Summary of the representation(s):</b>		
<p>Mill of Mundurno</p> <p>552: The respondent would like to object to the failure to identify the land at Mill of Mundurno (2/14) for development. The respondent feels that the land at the Mill of Mundurno would be a natural extension to the proposed OP25 Dubford. It is thought that the extension of OP25 to incorporate the land at Mill of Mundurno would create robust, well defined and defensible boundary to the site. The sites close proximity to the urban edge of Aberdeen, A90 and nearby employment areas mean that the site should be allocated for development within the overall preferred option at Dubford considered suitable for a number of uses. The respondent believes that this would help to maximise the potential of the area, deliver the requirements of Structure Plan and help to deliver the Energetica Strategy.</p> <p>Land Adjacent to Ellon Road</p> <p>1526: The respondent feels that the Green Belt designation of the site (known as 2/06 Land adjacent to Old Ellon Road, Murcar, Bridge of Don in the Main Issues Report) serves no purpose as in terms of the Green Belt functions set out in Scottish Planning Policy. The respondent feels that the site is a logical, modest extension to the existing allocation. It is also queried whether the Green Belt Review undertaken can provide a comprehensive review of the existing Green Belt zoning around the city as it extended only to the assessment of proposed development sites. Subsequently it is thought that the Green Belt has not been reviewed in its entirety.</p> <p>The respondent feels that the Green Space Network designation does not appear to reflect any distinction between wildlife/recreational land sites with limited or no importance. The respondent acknowledges that the Murcar Burn requires protection, however the respondent believes that this could be done via a buffer strip. The respondent believes that a large part of this site is open scrubland and does not contribute to the objectives of the Green Space Network and should instead be allocated as employment land.</p> <p>North Don Masterplan (Perwinnes)</p> <p>1528: The respondent thinks that The Bridge of Don area should play a much more</p>		

significant role in the settlement strategy. Development of the available land, including Perwinnes, should address many of the present deficiencies in the area. The respondent believes that the land is readily developable and has geographic advantages in terms of sustainability.

Not only is readily developable land available to the North of the Don, but it also has clear geographic advantages in terms of sustainability. Its proximity to a Windfarm test facility offers significant opportunities to help power the infrastructure such development will require.

The opportunities in the Bridge of Don area to take forward Energetica are clear. In terms of economic development and diversification there are more and better opportunities in the north of the city.

A major masterplanning exercise should be carried out which should go beyond simply ensuring the quality of individual neighbourhoods.

#### Robertson's Yard

1533: The respondent states that they do not think that the Green Belt zoning of the site (2/03) reflects the aims of Green Belt; it is restrictive in terms of the existing use rights on these sites; discourages positive future planning for the existing uses; and increases uncertainty and therefore discourages investment in the future of these sites. It is thought that the area in general is potentially very important to the future of the Energetica Strategy as a site to support the delivery of renewable energy technology and infrastructure.

#### Mundurno

1567: Development Option 2/02 Mundurno. The respondent objects to the exclusion of the site at Mundurno Development option 2/02 from the Proposed Plan as an allocated site.

The respondent feels that the site would be developed as an integral part of the Denmore area. This area is a key component between the city and the A90 corridor to Peterhead and two of the strategic growth areas identified within the Structure Plan. This is reinforced by the Energetica Initiative.

The employment land provision is currently at odds with the residential provision and as such further housing land is required to improve the integration of housing and employment uses and encourage sustainable travel. The site at Mundurno along with the Dubford site would address this shortfall. A development framework could be completed for both these sites. The phased development of both sites would also reach the critical mass to deliver the necessary neighbourhood facilities.

It is acknowledged that the key infrastructure have to be delivered prior to development and that the site at Dubford should logically be developed first prior to the development of the land at Mundurno.

A draft development framework had been completed showing how the site would create a sustainable neighbourhood. Also a landscape and visual assessment shows there are no landscape or visual constraints.

**Modifications sought by those submitting representations:**

552: The respondent requests that site OP25 Dubford is extended eastwards to incorporate the land at Mill of Mundurno as shown in the respondents submission (Figure 1). The site is located to the immediate east of the B999 and is approximately 1.9 hectares.

1526: The respondent requests that the land adjacent to Old Ellon Road and Murcar, north of OP2, should be removed from Green Belt and Green Space Network and be redesignated as Employment Land in the second phase (2017-2034) of the Local Development Plan.

1528: The respondents would like due consideration to be given to their submissions. The submission includes the Proposed North Of Don Masterplan.

1533: The respondent would like the area around Mundurno (previously known as 2/03 within the Main Issues Report) rezoned to mixed use with potential future development opportunity for employment use.

1567: The respondent would like the site at Mundurno (previously known as 2/02 within the Main Issues Report) identified as an opportunity site for the development of around 750 houses, associated employments, local shopping provision and community facilities within the period 2017-2023 and be subject to a joint development framework with Dubford (OP25) site to the south.

**Summary of response (including reasons) by planning authority:**

The Aberdeen City and Shire Structure Plan (CD8) sets the requirements for greenfield housing allowances and authorises a review of green belt boundaries in order to accommodate them. A Development Options Assessment (CD13), Strategic Environmental Assessment (CD21), and consultation on the Main Issues Report (Responses to Representations CD15) were used to assess sites. These were used to identify the most suitable locations to deliver the required growth and in accordance with Scottish Planning Policy paragraph 159 (CD3) which requires green belts to direct growth to the most appropriate locations. This process is described in the Green Belt Review (CD19) which also sets and explains the detailed boundaries of the green belt and land release areas. The following sites were all considered to be undesirable for reasons set out in the Development Options Assessment Report 2009 (CD13).

**Mill of Mundurno**

552: An extension to OP25 Dubford to include land at Mill of Mundurno (known as site 2/14 within the Main Issues Report) would not be appropriate. The development would be remote and unrelated to the existing settlement. The B999, although having the appearance of a minor carriageway, is a busy road carrying a considerable amount of traffic. Consequently the road further splits this site from the existing residential development at North Denmore and OP25 Dubford and would cause concern for pedestrians or cyclists aiming to avoid the use of the car. This could increase car dependency which is counter to national, regional and local policy. The site is highly visible from the A90 and contributes to green belt functions by separating Aberdeen from settlements to the north and in contributing to the city's landscape setting. The site is also part of an orbital corridor of green space from the sea shore to the River Don, thus adding a third green belt function of providing space for recreation. This site has

previously been dismissed as being undesirable for development at the Public Local Inquiry for the Aberdeen Local Development Plan in 2006 (a copy of the Report is attached within the Issue folder, CD11). The Reporter concluded that the land around the mill lade, the mill pond and the Burn of Mundurno have a Green Space Network function as a wildlife corridor. A small housing estate at the site, in current conditions, would have rather poor access to public transport and neighbourhood facilities, where there are effectively no opportunities for walking to destinations other than the adjacent hotel and workplaces and retail offers in the adjacent industrial and commercial area of North Denmore. The distance from bus stops and the relative infrequency of services would not encourage the use of buses by residents of the site. Alternative sites in more appropriate and sustainable locations throughout the city have been identified. These allocations meet the requirements set out in the Structure Plan. It is the opinion of Scottish Natural Heritage that sites further north of those already identified in the Aberdeen Local Development Plan Proposed Plan would have a greater impact on the landscape character of the coastal seaboard and would encroach on the landscape which separates Blackdog and Potterton from Aberdeen (Scottish Natural Heritage comments are attached within the Issues Folder). Scottish Environment Protection Agency flood risk maps also indicate that the majority of the site is an area 'at risk of flooding from rivers' which results from the Mundurno Burn (a copy of the Scottish Environment Protection Agency flood map, RD17, is included within the issue folder).

#### Land Adjacent to Ellon Road

1526: It is the opinion of the Council that redesignating the land adjacent to Old Ellon Road and Murcar, which is north of the site identified as OP2 Murcar and known as site 2/06 within the Main Issues Report, from Green Belt and Green Space Network to Employment Land in the second phase would not be appropriate. The purpose of green belt designation, as set out in Scottish Planning Policy, for an area is to: - direct planned growth to the most appropriate locations and support regeneration, - protect and enhance the quality, character, landscape setting and identity of towns and cities, and - protect and give access to open space within and around towns and cities. It is thought that development of the site known as 2/06 would not be in an appropriate location or would support regeneration. The development would be highly visible from the A90 and would restrict access to the remaining open space to the north of Aberdeen. The Local Development Plan settlement strategy directs growth to areas felt to be the most appropriate locations and natural extensions to the urban fringe. Scottish Planning Policy (CD3) states that Green Belt boundaries should be clearly identifiable on the ground, using strong visual or physical landscape features such as rivers, tree belts, railways or main roads. In terms of this site the Mundurno Burn on the northern edge has been identified as the clear boundary of the Green Belt. Sufficient land to meet Structure Plan requirements has also been identified in more appropriate locations closer to the existing settlement. Scottish Natural Heritage agree that sites further north of those already identified within the Aberdeen Local Development Plan Proposed Plan would have a greater impact on the landscape character of the coastal seaboard and would encroach on the landscape which separates Blackdog and Potterton from Aberdeen. Scottish Environment Protection Agency flood risk maps also indicate that part of the site is an area 'at risk of flooding from rivers' which is results from the Mundurno Burn (a copy of the Scottish Natural Heritage comments and Scottish Environment Protection Agency Flood Map, RD17, are attached within the Issue Folder). Consequently it is thought that the Green Belt designation on this site does serve a purpose.

In terms of the Green Space Network designation, the site has access value which

connects the rural areas north of the built settlement (Denmore) with the coast. The site allows for connectivity between habitats and maintains the green linkages that Green Space Network seeks to protect. The fact that the respondent feels that the site is open scrubland with no real value should not influence its policy designation in the Local Plan. With regards to the respondents comment that the Green Space Network designation not appearing to reflect any distinction between wildlife/recreational land and site with limited or no importance. This is addressed and explained within the Supplementary Guidance on Open Space (RD82) which has been presented to the Enterprise, Planning and Infrastructure Committee for approval to publish for public consultation in March 2011. This has been developed in parallel with the Open Space Strategy (RD39), a draft of which also went before that Committee.

#### North Don Masterplan/Perwinnes

1528 The North of Don masterplan proposal would have an impact on the overall settlement strategy and would require a major reassessment of the proposed sites across the entire city. Reference to Light Rapid Transport without significant assessment looking at the connectivity of Light Rapid Transport to the wider bus network, capital setup costs, future operational costs/risks and clear financial and commercial viability means that it is inadequate to demonstrate at this time that is an alternative allocation to be included. The high level Transport Assessment is not supported by modelling analysis of the proposed transport and appears to be more of a list of what could be done rather than attempting to establish if it will be sufficient and deliverable to support the scale of this allocation as a substantial alternative. Transport impacts would have to be significantly reworked and further consultation carried out. Many of the sites within the masterplan area have been assessed as being 'undesirable' when measured against a range of sustainability criteria. Many of the aims of the North of River Don Masterplan are equally achievable by masterplanning the sites which are allocated in the Aberdeen Local Development Plan Proposed Plan. It is also likely that the North of Don Masterplan would exacerbate the people of Bridge of Don's concerns that too much development is being planned for the Bridge of Don. Evidence to suggest this comes from the fact that the Bridge of Don masterplan would redistribute more than 60% of the city's greenfield housing allocations to the Bridge of Don. This is compared to approximately a third of the greenfield housing allocations currently proposed. In addition to this, having such a high proportion of allocations in the Bridge of Don area would reduce the choice of sites available elsewhere in the city and may prove more difficult to deliver the required development within the timescales envisaged, requiring a large number of landowners and developers to work together. Land at Perwinnes is deemed undesirable as it is open farmland and is highly visible exposed hill. The hill is a landmark that provides a backdrop to development at Bridge of Don and helps to contain it. Other than the Mundurno Burn and former sand and gravel pit at Leuchlands which forms a distinctive mound to the east, there are no other significant features in the area which could be used to form a strong green belt boundary. The site is poor in access terms, although it may be large enough to support its own services and facilities (including new schools) and public transport. However, development breaking out over the lower ground to the south before climbing up Perwinnes Hill would add to a sense of urban sprawl and isolation unconnected to the existing urban area.

It is thought that sufficient allocations have already been made in the Bridge of Don area to support the Energetica project. In addition to the 75 hectares already zoned at Berryhill and Findlay Farm for employment use in the 2008 Aberdeen Local Plan, but which remains undeveloped, there has been 32 hectares of employment land zoned in

the Proposed Plan. Sites capable of accommodating over 7500 homes have also been allocated to the area which is believed to be a significant allocation to support the Energetica project. Major masterplanning exercises have already been undertaken to plan future developments at Grandhome and Dubford.

#### Robertson's Yard

1533: The site known as 2/03 within the Main Issues Report is currently zoned as Green Belt. The Council recommend that this site remains allocated for Green Belt use. It is acknowledged by the Council that the site currently has existing use rights for general industrial and storage and these use rights are not affected by the site being zoned as green belt. It has also been identified as an extension for the landfill site at OP1 Hill of Tramaud. This was established at the Local Public Inquiry for the current Local Plan (Issue 33, CD11). The site, along with neighbouring sites, is remote from the existing urban area and therefore less suitable for development. Further development could result in urban sprawl that would harm the landscape setting of the area. The gap between Bridge of Don and Potterton has important green belt functions in providing a landscape setting for Aberdeen and preventing coalescence. These functions would be damaged by out-of-scale and incongruous development of urban character. It would thus be wrong to formalise an isolated and non-conforming use by designating it for employment uses. In addition it is thought that sufficient allocations to meet the Structure Plan requirements up to 2030 and to support the Energetica initiative can be met without this site or neighbouring land to the south. The site also has access problems where it is a necessity to make a dangerous right turn across the busy A90 dual carriageway in order to drive to Aberdeen. If industrial/mixed use development was developed on this site then it is highly likely that any access would have to include rationalisation of the junctions and consideration of a ban on right turns to the A90. The site would be dependent on access for workers by car, because of its isolated location and its position off a trunk road. Such work-related travel would add to congestion problems in the local network, and to the traffic load on the unsuitable junction between the B997 Scotstown Road and the western end of Shielhill Road. It is also possible that the Council could be reliant on landfill for longer than expected. An extension to the site would meet this possible need whilst meeting the requirements of the proximity principle.

#### Mundurno

1567: The site known as 2/02 within the Main Issues Report is currently zoned as Green Belt and Green Space Network. We recommend that this site remains allocated for Green Belt and Green Space Network use. This site performs green belt functions by contributing to the identity and landscape setting of the city, and of preventing coalescence between Bridge of Don and Potterton. It is isolated from the existing settlement of Denmore by the B999 and topographical changes. Local primary schools could not cater for the demand generated by a development of this size. It is unlikely this scale of development could support the necessary neighbourhood facilities and services to significantly reduce residents' need to travel. Non-motorised linkages to other areas outwith the site would require substantial improvements to provide a realistic, safe and attractive alternative to cars. The site to the south at Dubford is a preferred option which is considered more sustainable as it is adjacent to the existing urban area. There is no requirement for the 2/02 site in addition to the Dubford site and other Bridge of Don sites. Scottish Natural Heritage agree that sites further north of those already identified in the Aberdeen Local Development Plan Proposed Plan would have a greater impact on the landscape character of the coastal seaboard and would encroach on the landscape

which separates Blackdog and Potterton from Aberdeen (a copy of the Scottish Natural Heritage comments are attached within the Issue Folder). Finally it is thought that there is a positive balance between residential and employment land provision with more than 7500 homes having been allocated for the Bridge of Don area and in addition to 75 hectares of employment land brought forward from the Aberdeen Local Plan 2008 and yet to be developed, a further 32 hectares has also been allocated in the Proposed Plan. Consequently sufficient allocations to meet the Structure Plan requirements up to 2030 and to support the Energetica initiative can be met without this site.

**Reporter's conclusions:****Reporter's recommendations:**



<b>Issue (ref and heading):</b>	<b>ENERGETICA - THE GLOBAL ENERGY HUB</b>	<b>12</b>
<b>Development Plan reference:</b>	Local Development Plan (paragraphs 1.7, 2.24, 2.25 and within the Glossary)	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Mr Gary Purves of Knight Frank LLP on behalf of Bett Homes Ltd (552), Ms Rita Stephen of Aberdeen City and Shire Economic Future (760), Ms Naomi Cunningham of The Scottish Property Federation (800), Mr Malcolm Campbell of Knight Frank LLP on behalf of Scottish Enterprise (1182), Miss Christine Dalziel of Halliday Fraser Munro Planning on behalf of Mr Ali Bedawi (1526), Mr Bob Reid of Halliday Fraser Munro Planning on behalf of Mr J McIntosh of Goval Farm (1528), Mr Steve Crawford of Halliday Fraser Munro Planning on behalf of J and AF Davidson (1529), Mr Bob Reid of Halliday Fraser Munro Planning on behalf of Mr M Hickey (1530), Mr Steve Crawford of Halliday Fraser Munro Planning on behalf of Robertson Property Ltd. (1533), Mr John Findlay of Ryden LLP on behalf of Stewart Milne Homes (North Scotland) (1567).		
<b>Provision of the Development Plan to which the issue relates:</b>	Land allocations and economic development.	
<b>Summary of the representation(s):</b>		
<p>760, 800, 1182: The respondents welcome the significant land allocations and infrastructure identified for the area north of the River Don which will support the Energetica Coastal development. The Energetica project is central to Aberdeen City and Shire's aspiration to position the region as a global energy hub focussing on all energy technologies. At the heart of the project is a coastal development extending from Aberdeen to Peterhead which will link together key energy assets such as the Aberdeen Science Parks, Airport, Oceanlab and the port of Peterhead providing opportunities for new investment in infrastructure, leisure and housing. It is also thought that land allocations made in Dyce/Bucksburn A96 corridor will improve access to and from this transformational project. The objective of Energetica is to create a low carbon environment, capable of competing with the best locations globally to attract retrain talent over 15 years.</p> <p>It is suggested that the Local Development Plan make reference to the forthcoming Energetica Design Guidance and adopt this as supplementary guidance.</p> <p>552, 1526, 1528, 1529, 1530, 1533, 1567</p> <p>The respondents feel that the inclusion of their sites within the Plan would help to achieve the objectives of Energetica.</p>		
<b>Modifications sought by those submitting representations:</b>		
1182: The respondent would like greater recognition to be given to Energetica in the Local Development Plan. A section within Chapter 2 The Spatial Strategy inserted after the City Centre section would be welcomed. The section should make reference to the longer term capacity of the Bridge of Don area to accommodate additional growth to assist the future development of Energetica, including new local access routes from the Dyce area to the A90(T) north of Bridge of Don, which incorporate sustainable transport linkages to encourage working and living in Energetica. The Plan should also include a reference in the Table on page 20 of the Plan, to Masterplan Zones 1, 2, 3 and 4 as lying within the Energetica Area. We would also ask that Appendix 6 of the Local		

Development Plan be updated to include the Energetica Design Guide as Supplementary Guidance once it has been adopted.

1528, 1529, 1530 The respondent would like the identification of their sites within the Plan. This would help to support the Energetica Initiative.

**Summary of response (including reasons) by planning authority:**

760, 800, 1182

The support given is welcomed.

1182

Significant recognition has been given to Energetica in the Local Development Plan (paragraphs 1.7, 2.24, 2.25 and within the Glossary). Paragraph 2.24 and Table 5 already make reference to the longer term capacity of the Bridge of Don area to accommodate additional growth to assist the future development of Energetica. Paragraph 2.24 also makes reference to proposed transportation schemes that will provide benefits to the Bridge of Don/Energetica area. These include the Aberdeen Western Peripheral Route, the Third Don Crossing and the Haudagain roundabout improvements. It is therefore not necessary to add a specific section to the Plan regarding Energetica.

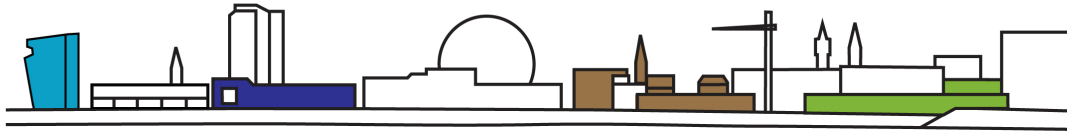
If the Reporter is so minded, text could be added to the Bridge of Don/Grandhome section of the Aberdeen Local Development Plan which will recognise that an Energetica Design Guide will be adopted as Supplementary Guidance in the future. The text could state "A specific Energetica Design Guide will be brought forward and adopted as Supplementary Guidance alongside the Plan in due course". Appendix 6 could then be updated to recognise the future adoption of the Energetica Design Guide and additional information guide that will accompany the Supplementary Guidance.

552, 1526, 1528, 1529, 1530, 1533, 1567

Please see Issue 4, Issue 11 and Issue 84 regarding the issue of sites to support the Energetica Initiative.

**Reporter's conclusions:**

**Reporter's recommendations:**



**aberdeen** local development plan

**RESPONSE TO PROPOSED PLAN  
CONSULTATION:  
DYCE AND BUCKSBURN**

**ISSUE 13 - 22**

<b>Issue (ref and heading):</b>	<b>ALLOCATED SITES: STONEYWOOD OP23 AND OP24</b>	<b>13</b>
<b>Development Plan reference:</b>	LR1 Land Release Policy, OP23 Stoneywood Terrace and OP24 Stoneywood	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Mr Alexander G. Shirran of Bucksburn and Newhills Community Council (65), Ms Nicola Abrams of Scottish Environmental Protection Agency (408), Mrs Rhonda Reekie of Scottish Green Party (611), Mr Malcolm Campbell of Knight Frank LLP on behalf of Dandara Limited (700), Mr Derek Selbie (1473), Mr Ben Freeman of Bancon Developments Ltd (1561).		
<b>Provision of the Development Plan to which the issue relates:</b>	Allocation of 43.41ha for residential development	
<b>Summary of the representation(s):</b>		
<p>Supports OP23</p> <p>65: Supports development of site OP23 Stoneywood Terrace.</p> <p>Queries Green Space Network within OP23</p> <p>1561: Green Space Network designation upon Bancon-owned part of site OP23 Stoneywood Terrace is not appropriate.</p> <p>Seeks protection for woodland within OP24</p> <p>1473: Woodland within site OP24 Stoneywood should be protected for its cultural heritage value.</p> <p>Flood risk within OP24 should be highlighted</p> <p>408: Object to development of OP24 Stoneywood unless the issue of flood risk is highlighted in the text as being a potential constraint. The Green Burn runs through southern part of site OP24 Stoneywood.</p> <p>Allotments within OP24</p> <p>611: Development of site OP24 Stoneywood should include provision of land for community allotments.</p> <p>Seeks immediate release of OP24 and queries requirement for new primary school</p> <p>700: Support identification of OP24 Stoneywood for development and support inclusion of site within first phase (2007-2016). Support identification of Stoneywood within Masterplan Zone 3 - masterplan for site now submitted. Note infrastructure requirements identified within appendices 2 &amp; 4. Masterplan process has demonstrated that there is not a sufficient area of developable land that is capable of accommodating a replacement primary school with additional capacity. The location of a school on the site would result in a much reduced housing capacity. Urgent demand for housing warrants this site being made available for development immediately, contrary to statement</p>		

contained in the Action Programme.

**Modifications sought by those submitting representations:**

Queries Green Space Network within OP23

1561: Recommend that the Green Space Network designation is removed from the Bancon-owned part of site OP23, illustrated in the accompanying appendix 3.

Flood risk within OP24 should be highlighted

408 'Other Factors' section of site description for OP24 in Appendix 2 of Proposed Plan should be amended to include the following statements; "This site may be at risk of flooding. A flood risk assessment will be required to accompany any future development proposals for this site." & "Any Masterplan should take account of the existing water features within the site, the pressures which apply to these features and should direct developers to look for opportunities to protect and improve the water environment."

Allotments within OP24

611: Allotments should be included as a requirement in any planning permissions given.

Seeks immediate release of OP24 and queries requirement for new primary school

700: Seek removal from appendices 2 & 4 of requirement for replacement primary school with additional capacity within the Stoneywood Masterplan Zone. Suggest that the text be amended to state that a replacement primary school with additional capacity should be provided in the Stoneywood/Bucksburn area. Encourage Council to consider alternative options, including rezoning of catchments in the Dyce/Stoneywood/Bucksburn/Newhills area to address future capacity issues or secondly the potential for a new school at the site of the former Bankhead Academy. A further option would be to extend the existing primary school at Stoneywood. Ask that a similar change is made to the Action Programme.

**Summary of response (including reasons) by planning authority:**

Supports OP23

65: Supporting comments for the development of OP23 Stoneywood Terrace are welcomed.

Queries Green Space Network within OP23

1561: It has been confirmed with respondent no 1561 (Bancon Developments Ltd) that their comments in relation to these sites contain an error, with land in their control being referred to as being within site OP23 Stoneywood Terrace, when in fact that land is within site OP24 Stoneywood. The remainder of the response is correct and applicable. The designated Green Space Network is a strategic network of woodland and other habitats, active travel and recreation routes, greenspace links, watercourses and waterways. The network includes designated Natural Heritage Sites, as set out in policy NE8, links between habitats and open spaces identified in Aberdeen's Open Space Audit 2010 (CD23), as well as opportunities for future use for physical activity and access to the outdoors. The designation of the site as Green Space Network does not preclude all development, but requires any development proposal to be assessed on the basis of its

impact on the character or function of the network. Proposals that are likely to destroy or erode the character or function of an area of Green Space Network will not be permitted. The area in question, as shown in appendix 3 to the representation, was not deemed to be suitable for development through the development options appraisal (CD13), nor following consultation on the Main Issues Report (CD14). The loss of the woodland on the site was not considered justifiable for the sake of 3 homes, and so was deemed undesirable for development. The Green Space designation should ensure that the woodland on the site is afforded appropriate protection, and is consistent with the wider aim of the Green Space Network in this area to maintain effective links with the River Don.

Seeks protection for woodland within OP24

1473: Existing woodland within site OP24 Stoneywood will benefit from the protection afforded by policies NE5: Trees and Woodlands and NE1: Green Space Network (in places). These policies are intended to protect trees, woodlands and other areas of natural heritage value from development which would result in the loss of, or damage to, existing trees or which would destroy or erode the character or function of the Green Space Network.

Flood risk within OP24 should be highlighted

408: Scottish Environment Protection Agency's suggestions for the inclusion of text within the Proposed Plan are partially accepted. The text regarding the requirement for a Flood Risk Assessment is acceptable and if the Reporter is so minded, the following text will be added into the 'Other Factors' section of Appendix 2 for both sites, "This site may be at risk of flooding. A flood risk assessment will be required to accompany any future development proposals for this site." The suggestion for the inclusion of text regarding existing water features is accepted, however, we feel that as the suggested text relates to the delivery of the site that it would be best placed in the Action Programme (CD20) as opposed to Appendix 2. If the Reporter is so minded, the Action Programme will be amended to include reference to site OP23 Stoneywood Terrace and to include the following text for both sites: "Any Masterplan should take account of the existing water features within the site, the pressures which apply to these features and should direct developers to look for opportunities to protect and improve the water environment".

Allotments within OP24

611: Site OP24 Stoneywood, as contained in the proposed plan, offers an opportunity for the development of 500 homes, with associated facilities & infrastructure. We would agree that allotments need to be considered as part of the open space requirements. This issue will be dealt with in the Open Space Supplementary Guidance (RD82). This states that developments that are likely to cause a demand for small-scale, local food production, such as high density housing or flats will require to include the provision of allotments as part of their open space provision. Figure 5 of the Guidance outlines the quantitative and accessibility standards for allotments expected.

Seeks immediate release of OP24 and queries requirement for new primary school

700: Supporting comments for the development of OP24 Stoneywood are welcomed. The requirement for delivery of a primary school within site OP24 Stoneywood was set following detailed consultation and collaborative study with colleagues in the Council's

Education, Culture & Sport directorate. The developer of this site has intimated that, in their opinion, the site is not large enough for the level of housing allocated as well as a new primary school. A study of current school rolls, capacity and potential changes to catchment boundaries has been actioned to investigate this issue. The outcome of this work will determine how best the education provision arising from this development can be met and the Action Programme (CD20) can be amended at that time. The Action Programme is intended to be a dynamic document which can be updated. Until such time as this work has been carried out it would not be appropriate to change the Action Programme. The developer has provisionally agreed to finance the necessary work, for an independent third party to be commissioned by the Council. While the developer wishes the site to be made available for development immediately, this would not be consistent with the zoning of the site in the current Aberdeen Local Plan. Until such time as the Proposed Plan has been adopted, any planning application will be assessed primarily in accordance with the extant Local Plan, with the degree of materiality attached to the Proposed Plan increasing as it progresses towards adoption. An application made in advance of the adoption of the Proposed Plan would be at the developer's risk, and the Council cannot offer any guarantees on the likely success of such an application.

**Reporter's conclusions:****Reporter's recommendations:**

<b>Issue (ref and heading):</b>	<b>EMPLOYMENT LAND ALLOCATIONS: NEWHILLS EXPANSION AND DYCE DRIVE OP26 AND OP28</b>	<b>14</b>
<b>Development Plan reference:</b>	LR1 Land Release Policy, OP26 Craibstone North and Walton Farm and OP28 Rowett North	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Mr Alexander G. Shirran of Bucksburn and Newhills Community Council (65), Mr Colin Graham of Miller Developments (209), Mr Graeme Stewart (214), Dr Robin Kay (233), Ms Nicola Abrams of Scottish Environmental Protection Agency (408), Mr Gordon MacCallum of Keppie Design on behalf of CALA Homes (East) Ltd and SAC Craibstone (465), Mr John Wright of Strutt & Parker LLP on behalf of Macrobert Trust (511), Mr John Findlay of Ryden LLP on behalf of The University of Aberdeen (619), Ms Lorraine Jones of Sport Scotland (1244), Mr Derek Selbie (1473).		
<b>Provision of the Development Plan to which the issue relates:</b>	Employment land allocations of 54.5ha	
<b>Summary of the representation(s):</b>		
<p>Seek change in zoning of OP26 to allow relocation of Scottish Agricultural College</p> <p>465: Wish site OP26 to be changed from an employment land allocation to that of a higher education and research institute in order to facilitate the relocation of the existing Scottish Agricultural College, better reflect the existing use of the land, and to enable planned future intensification of that use by SAC.</p> <p>Wish Walton Farm element of OP26 to be disassociated from the Craibstone North part</p> <p>511: Wish Walton Farm Buildings (part of OP26) to be allocated as employment land, either through an extension to OP32 or as a standalone site with allocation for class 4 uses, with ancillary class 5 &amp; 6 development. This is sought to compensate for the reduced area of employment land allocated as a result of the extended park and ride site (OP33).</p> <p>Perceived incompatibility of zoning of OP28 with Rowett Development Framework</p> <p>511: Object to the identification of OP28 for employment land purposes. Appendix 5 of the Proposed Plan indicated that the Rowett Development Framework will be carried forward. That development framework envisages a science and research park, with very limited elements of business and industrial use. The zoning of the site for business and industrial uses is not consistent with the carrying forward of the development framework.</p> <p>214: Queries whether the Rowett Development Framework is still a valid document given that the Rowett Institute is relocating to Forresterhill.</p> <p>Support for OP28</p> <p>619: Welcome allocation of Rowett north (OP28) for use as employment land, and express commitment to work collaboratively on joint development framework with site OP26 Craibstone North.</p>		



### Concern over loss of existing sports pitches within OP28

1244: OP28 Rowett North when seen from aerial imagery contains a number of pitches. It is not clear if there is associated changing accommodation. National policy in the Scottish Planning Policy outlines (specifically paragraph 156) the circumstances which need to be met in order for the redevelopment of pitches to be acceptable in national policy terms. If the site contains a pitch then the allocation of this for redevelopment needs to be considered against this national policy position. The Council's Pitch Strategy (2003) although now out of date still contains conclusions of relevance. At the time, it identified an oversupply of full sized pitches and an undersupply of small sided pitches and cricket pitches. However, it was also recognised that a surplus of pitches was necessary due to many of the pitches being of poor quality. The supply and demand analysis would need to be reconsidered in order to understand what the current position is. The Strategy outlines a number of Options for dealing with surpluses which should be considered. The Strategy also recommends that any funds obtained through the sale of pitches are subject to re-investment back into pitches.

Seeks retention of green wedges and granite buildings within OP28.

1473: Disappointed that entire OP28 site has been allocated for development, with no green wedges retained. The MIR had shown a wedge to the south of the airport footprint. Additionally, several iconic buildings within the site, including the Rowett main block, Reid library and Strathcona House, should be retained as part of any new development.

214: Questions whether Greenburn Farm will be retained due to it being a granite building when OP28 Rowett North is developed.

214: Strathcona House and the Reid Library should be preserved on OP28 Rowett North. Supports OP26 & OP28, but seeks retention of green areas & walkways

65: Supportive of development on sites OP26 Craibstone North and Walton Farm and OP28 Rowett North, but states that consideration should be given to the retention of green areas and walkways through the site.

Flood risk within OP26 & OP28 should be highlighted and masterplanning of OP28 should consider water features

408: Object to the sites OP26 & OP28 unless the issue of flood risk is highlighted in the text as being a potential constraint for the site, as required by Scottish Planning Policy. Suggests addition to 'other factors' section of appendix 2 to reflect need for masterplanning of site OP28 to protect and improve existing watercourses.

Employment allocations excessive

209, 214, 511: Objection to excessive allocation of employment land. The scale of the proposed employment land allocations, particularly sites OP26 and OP28 around the Dyce Drive area, will have an adverse effect on land values and rents for existing employment land in this area. Given the existing employment land allocated and available in the area, the designation of further such areas is considered to risk the viability of those existing allocations not yet developed. Previous employment land in the Dyce & Westhill areas vacant.

214: As the site will become vacant when the Rowett Institute relocate, could OP28 Rowett North be designated as Greenbelt and Greenspace Network.

#### Concerns over title deeds

214: Concerns that title deeds for Greenburn Cottage will have to be changed due to the development of OP28 Rowett North. Questions whether this will be under Rowett Institute scope and if costs will be covered by the Institute. Requests that Greenburn Cottage residents are involved in any changes from an early stage.

#### Access issues relating to OP28

214: Public access to and through particular areas of the city are very important to local amenity. All paths should be clearly marked on survey drawings. Residents of Greenburn Cottage require that the gate be stopped up at Market Street to the north of OP28 Rowett North, with control over access.

#### Query over phasing of OP28

214: Clarification is required regarding the phasing of OP28 Rowett North. The Proposed Plan states that the site is under local development plan period '2007-2016' and '2017-2023', as does the Strategic Environmental Assessment Report. Whereas the Main Issues Report has the site under 'Strategic Reserve Employment Land 2024-30'.

#### Policy 45 of Aberdeen Local Plan in relation to site OP28

214: Queries whether current Policy 45: Existing Community Sites and Facilities can be applied to OP28 Rowett North.

#### Issues relating to Greenburn Cottage, within OP28

214: Questions whether Greenburn Cottage (OP28 Rowett North) can be upgraded to mains drainage/sewerage.

214: Greenburn Cottage is not marked as private property on the proposals map.

214: Requests that Greenburn Cottage are included in all aspects of the planning process relating to site OP28 Rowett North.

#### Density and quality of OP28

214: Queries whether low building density and high quality environment envisaged in the Dyce Drive Planning Brief will also be required for OP28 Rowett North.

#### Upkeep & maintenance of OP28 before development

214: Questions who will be responsible for the upkeep and maintenance of OP28 Rowett North when the Rowett Institute vacate the site.

#### Impact on wildlife and protected species within OP28

214: There is a lot of wildlife and rare species on and around OP28 Rowett North, the

impact that development will have on these species must be considered.

**Modifications sought by those submitting representations:**

Seek change in zoning of OP26 to allow relocation of Scottish Agricultural College

209, 465: Re-zone entire OP26 (Craibstone North & Walton Farm) as a higher education campus/higher education and research institute.

Wish Walton Farm element of OP26 to be disassociated from the Craibstone North part

511 : Wishes the Craibstone North part of OP26 to be allocated for educational/institutional use, with the Walton Farm section of the site (see attached plan, shown hatched) to remain as an employment land allocation, either as a standalone site or as an annexe to Site OP32 to the north and west.

Perceived incompatibility of zoning of OP28 with Rowett Development Framework

511: Requests that the status of the Rowett Development Framework (2008) is clarified, through either inclusion of its content on the proposals map or through its omission from the Local Development Plan.

Concern over loss of existing sports pitches within OP28

1244: Retention of OP28 Rowett North for pitch(es) use; or As part of the Local Development Plan process, consideration of the loss of the pitch(es) against the criteria outlined in para 156 of the Scottish Planning Policy to assess whether the national policy is satisfied; or If none of the criteria outlined in para 156 of the Scottish Planning Policy has been met and the site is still to be allocated for redevelopment, acknowledgement in the text referring to the site that there is a pitch(es) and reference to the need for the requirements of the Scottish Planning Policy and revised Policy NE3 to be met, and that the process outlined in the Council's Pitch Strategy will be followed.

Seeks retention of green wedges and granite buildings within OP28.

1473: Reinstatement of a green wedge within site OP28, to the south of the Airport.

Flood risk within OP26 & OP28 should be highlighted and masterplanning of OP28 should consider water features

408: Insert the following text to the 'other factors' section of the site summary in Appendix 2 for both OP26 & OP28 - "This site may be at risk of flooding. A flood risk assessment may be required to accompany any future development proposals for this site." For site OP28 (Rowett North) also insert the following text to the site summary: "any masterplan should take account of the existing water features within the site, the pressures which apply to these features and should direct developers to look for opportunities to protect and improve the water environment".

Employment allocations excessive

209: Want site OP28 (Rowett North) to be deleted altogether, but if council is not minded to remove the site from the Plan entirely, then wording of policy LR1 should be amended to restrict development of the employment land sites (OP26 & OP28) until the Dyce Drive

Planning Brief area has been completed, on the basis that development prior to this time would jeopardise development of existing employment land sites, such as Dyce Drive. The only exception would be in an instance that there was insufficient land within Dyce Drive (site OP32) to accommodate a specific requirement.

214: Seeks removal of site OP28 (Rowett North) and re-zoning of site as part of Green Space Network and Green Belt.

Query over phasing of OP28

214: Show the correct phasing for OP28 Rowett North in the Proposed Plan.

Policy 45 of Aberdeen Local Plan in relation to site OP28

214: Clarify the application of existing policy 45: Existing Community Sites and Facilities against opportunity sites.

Issues relating to Greenburn Cottage, within OP28

214: Show Greenburn Cottage property boundary as private land within proposals map.

Density and quality of OP28

214: Considers that the fields west and east of Market Street may be suitable for a lower-impact use (not industrial).

#### **Summary of response (including reasons) by planning authority:**

Seek change in zoning of OP26 to allow relocation of Scottish Agricultural College

209, 465: Site OP26 Craibstone North and Walton Farm has been identified as being appropriate for an employment land designation. The Development Options Assessment Report (CD13) noted that, taking into account existing allocations of land nearby for employment at OP32 Dyce Drive, the A96 Park & Ride site and the other development option site at OP28 Rowett North, there is likely to be significant change to the open character of this part of the A96 gateway into Aberdeen. In that context, the development of OP26 Craibstone North would be less intrusive than it otherwise might be, and would be consistent with other land uses in the surrounding area. While the site is not specifically zoned for use as an educational campus, the prospective relocation of the Scottish Agricultural College from their existing campus to a part of their campus within this area would not be fundamentally inconsistent with the zoning of the site for business and industrial use, though any specific proposal must be subject of a planning application. A change in the zoning of the site to that of a higher education campus is considered to be unnecessary at this stage as to do so would, while allowing development for educational use, restrict the development of the site for any alternative employment use which would be no less appropriate. Issues relating to the requirement for collaborative masterplanning of OP26 with OP28 are addressed in Issue 22 'Masterplanning of Newhills Expansion and Dyce Drive'.

Wish Walton Farm element of OP26 to be disassociated from the Craibstone North part

511: The Walton Farm element of OP26 Craibstone North and Walton Farm does not merit its own stand alone opportunity site designation, nor inclusion in another adjacent

site, as its zoning for employment purposes contributes towards the Structure Plan targets and is entirely consistent with business and industrial uses. The increase in land allocated for OP33 A96 Park & Ride and the corresponding reduction of employment land available for development within OP32 Dyce Drive in the Proposed Plan is compensated by new employment land allocations sufficient to meet the Structure Plan targets.

#### Perceived incompatibility of zoning of OP28 with Rowett Development Framework

214, 511: The Rowett Development Framework (2008) (RD80) was prepared on the basis of the 2008 Aberdeen Local Plan, which zoned the site as 'Existing Community Sites and Facilities'. As the zoning of the site OP28 Rowett North has been changed to now facilitate 34.5ha of employment land in the proposed Local Development Plan, it is no longer appropriate for this supplementary guidance to be carried forward with the Proposed Plan. If the Reporter is so minded reference to the Rowett Development Framework (2008) can be removed from appendix 5 and the notes to table 6, page 15 amended accordingly.

#### Support for OP28

619: The Council welcomes the supporting comment for OP28 Rowett North.

#### Concern over loss of existing sports pitches within OP28

1244: It is understood that the pitches referred to are those at Waterton Road, immediately to the east of OP28 Rowett North and those to the west of Greenburn Drive towards the south east corner of OP28 Rowett North. Both of these areas lie outwith the boundary of OP28 Rowett North and are not proposed for development. As no sport pitches are proposed for development in this case, Scottish Planning Policy paragraph 156 is not of relevance.

#### Seeks retention of green wedges and granite buildings within OP28.

214, 1473: Page 15 of the Main Issues Report (CD14) shows a blue wedge to the south of the airport and north of OP28 Rowett North as being undesirable for development. This area of land was subsequently zoned under policy NE3 Urban Green Space in the Proposed Plan, which provides protection for areas with recreational value. As the site lies outwith OP28 Rowett North it is not proposed for development. Records indicate that there are no listed buildings within OP28 Rowett North. Through Policy D4 Aberdeen's Granite Heritage, the City Council will encourage the retention of granite buildings throughout the city, even if not listed or in a conservation area. Conversion and adaptation of redundant granite buildings will be favoured.

#### Supports OP26 & OP28, but seeks retention of green areas & walkways

65: The Council welcomes supporting comments for OP26 Craibstone North and Walton Farm and OP28 Rowett North. While opportunity sites identified are considered to be generally suitable for development, further consideration of issues such as layout, provision of green space and pedestrian walkways will be considered through preparation of a combined masterplan for sites OP26: Craibstone North & Walton Farm and OP28: Rowett North. Detailed aspects of any development proposal will be assessed upon submission of a planning application and assessment against the

relevant policies contained in the development plan.

Flood risk within OP26 & OP28 should be highlighted and masterplanning of OP28 should consider water features

408: Scottish Environment Protection Agency's suggestions for the inclusion of text within the Proposed Plan are partially accepted. The text regarding the requirement for a Flood Risk Assessment is acceptable and if the Reporter is so minded, the following text will be added into the 'Other Factors' section of Appendix 2 for OP26 and OP28, "This site may be at risk of flooding. A flood risk assessment will be required to accompany any future development proposals for this site." The suggestion for the inclusion of text regarding existing water features is accepted, however, we feel that as the suggested text relates to the delivery of the site that it would be best placed in the Action Programme (CD20) as opposed to Appendix 2. If the Reporter is so minded, the Action Programme will be amended for OP28 to include the following text: "Any Masterplan should take account of the existing water features within the site, the pressures which apply to these features and should direct developers to look for opportunities to protect and improve the water environment".

Employment allocations excessive

209, 214, 511: Sites OP26 Craibstone North and Walton Farm & OP28 Rowett North have been allocated to contribute towards ensuring a sufficient supply of employment land for the plan period, in line with the Structure Plan. These sites were chosen following a rigorous assessment of all proposed development options (CD13), following which they emerged as being appropriate for development. The Aberdeen City and Shire Structure Plan (CD8) sets the requirements for employment land allowances and authorises a review of green belt boundaries in order to accommodate them. A Development Options Assessment (CD13), Strategic Environmental Assessment (CD21), and consultation on the Main Issues Report (Responses to Representations CD15) were used to assess sites. These were used to identify the most suitable locations to deliver the required growth and in accordance with Scottish Planning Policy paragraph 159 (CD3) which requires green belts to direct growth to the most appropriate locations. This process is described in the Green Belt Review (CD19) which also sets and explains the detailed boundaries of the green belt and land release areas. These sites emerged as desirable options because they were found to be ideally located for employment development particularly due to the existing allocations for employment land and Park & Ride in the immediate area. The fact that two sites may be in competition is of no relevance to their allocation within the Proposed Plan, and does not constitute valid grounds for altering the phasing of development or removing a site.

Concerns over title deeds

214: The issue of title deeds related to Greenburn Cottage is not a matter for the Development Plan process and is a private affair between the parties concerned.

Access issues relating to OP28

214: It is agreed that public access to and through the city are very important. Policy NE9 Access and Informal Recreation states that new development should not compromise the integrity of existing or potential recreational opportunities including access rights, core paths, other paths and rights of way. Existing core paths and aspirational core paths

are mapped on the additional city wide proposals map which accompanies the Plan. Through a combined masterplan for OP28 and OP26, existing topographical features such as paths and rights of way will be a consideration.

#### Query over phasing of OP28

214: The statement regarding alteration to the phasing of OP28 Rowett North from Strategic Reserve Employment Land 2024-2030 in the Main Issues Report (CD14) to Local Development Plan Period 2007-2023 in the Proposed Plan is correct. The phasing of this site has been brought forward due to its imminent availability. The Local Development Proposed Plan represents the Council's intended position.

#### Policy 45 of Aberdeen Local Plan in relation to site OP28

214: The Proposed Plan rezones the OP28 Rowett North site from Existing Community Sites and Facilities (Local Plan 2008 Policy 45) to Land Release as an opportunity for the development of 34.5ha of employment land (Proposed Plan Policy LR1). Policy 45 of the Aberdeen Local Plan is therefore not relevant to the development of OP28 Rowett North.

#### Issues relating to Greenburn Cottage, within OP28

214: The issue of upgrading existing properties to mains drainage/sewerage is not a matter for the Development Plan process. It is not the purpose of the Local Development Plan Proposals Map to make a distinction between private and public property. The map is intended to show land use zonings and allocations for new development sites. Members of the local community seeking to maintain involvement in the development process may wish to engage with future consultation undertaken in support of the development framework, masterplan and planning application processes.

#### Density and quality of OP28

214: OP28 Rowett North has previously been subject to a Development Framework (Rowett Development Framework). The Rowett Development Framework (2008) (RD80) was prepared on the basis of the 2008 Aberdeen Local Plan (CD12), which zoned the site as 'Existing Community Sites and Facilities'. As the zoning of the site OP28 Rowett North has been changed to now facilitate 34.5ha of employment land in the proposed Local Development Plan, it is considered that it is no longer appropriate for this supplementary guidance to be carried forward with the Proposed Plan. As stated above, if the Reporter is so minded reference to the Rowett Development Framework (2008) can be removed from appendix 5 and the notes to table 6, page 15 amended accordingly. It is intended that a collaborative development framework covering OP28 Rowett North, OP26 Craibstone North and Walton Farm, OP29 Craibstone South, OP30 Rowett South and OP31 Greenferns Landward will set out the broad principles for development of the wider area. A subsequent masterplan will be prepared for OP26 Craibstone North and Walton Farm and OP28 Rowett North providing detailed guidance on design matters. The density of development and environment to be created will become apparent through the masterplanning process.

#### Upkeep & maintenance of OP28 before development

214: Responsibility of upkeep and maintenance of land lies with the landowner and is not

a matter for the Development Plan process.

Impact on wildlife and protected species within OP28

214: Policy NE8: Natural Heritage seeks to protect wildlife by requiring ecological assessments where there is evidence to suggest that habitat or species of importance exist within any given site which is the subject of a planning application. In assessing any planning application for this site this policy will be a material consideration.

**Reporter's conclusions:**

**Reporter's recommendations:**



<b>Issue (ref and heading):</b>	<b>HOUSING LAND ALLOCATIONS: NEWHILLS EXPANSION AND DYCE DRIVE ALLOCATIONS OP29, OP30 AND OP31</b>	<b>15</b>
<b>Development Plan reference:</b>	LR1 Land Release Policy, OP29 Craibstone South, OP30 Rowett South and OP31 Greenferns Landward.	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
<p>Mr Eric Jensen (54), Ms Aileen Jensen (55), Mr James Fish (56), Ms Tiffany Sims (57), Ms Joyce Milne (62), Ms Gayle Morrice (63), Ms Gillian Ewen (64), Mr Alexander G. Shirran of Bucksburn and Newhills Community Council (65), Mr Brian Morgan (68), Mr Peter Wilson (69), Ms Catriona McWilliam (70), Mr Frederick Milne (71), Mr Philip Morrice (72), Mr Keir Willox (73), Mr George Hood (82), Ms Fyfe Hepburn (83), Mr Kenneth Sandison (84), Ms Lorraine Sandison (86), Mr Ali Hassanirad (89), Ms Angela Cameron (90), Mr Scott Cameron (91), Mrs June V. Shirriffs (92), Sir/Madam H. Brown (93), Dr George G. Shirriffs (94), Ms Elizabeth Binnie (95), Mr George J. Lowe (96), Sir/Madam N. Sands (102), Mr Dennis Scott Dalgarno (103), Mrs E. Cheyne (104), Mr Alexander Davidson (105), Ms Ann Perrott (106), Mr James Chalmers (108), Mrs Margaret Chalmers (109), Mr Alan Walker (110), Ms Joyce Forrest (111), Mr David W. Metcalfe (112), Ms Oonagh Grassie (113), Mrs Gillian Millar (114), Ms Shari Ross (116), Sir/Madam M. Sands (117), Sir/Madam W. Middleton (118), Sir/Madam I. Middleton (119), Ms Morag Dalgarno (120), Ms Claudine Park (121), Ms Sandra Roach (122), Mr Peter Roach (123), Mr Ian Park (124), Sir/Madam Sam D. Sinclair (125), Mr Colin McKay (126), Dr Steven Yule (127), Mrs Susan Yule (128), Mr Graham MacPherson (142), Ms Kimberley Murison (146), Mr Simon Merrilees (147), Ms Olive Hunter (148), Mr David Merson (149), Mr Norman Hunter (150), Ms Lorna Dey (165), Mr Derek Watt (180), Ms Elizabeth Merson (181), Ms Helen Wood Barron (183), Mr Michael Alexander Barron (185), Mr Kevin A. Cowie (187), Mr E. G. Roberts (188), Mr John Chung (191), Mrs Azadeh Safarvarkiani (192), Ms Susan Cameron (194), Mr Craig Cameron (195), Ms Angela M. Gibb (196), Ms Jane Troup (198), Mr John Bedford (199), Ms Heidi Aylmer (200), Mr Gary M. Aylmer (201), Ms Carol Milne (205), Mr Keith Milne (206), Ms Louise Wood (207), Mr Graeme Stewart (214), Mr Charles Hall (217), Mr Charles Thorn (218), Mr Alistair Blues (219), Ms Dorothy Hall (220), Ms Betty Johnston (221), Ms Valerie Sinclair (222), Mr &amp; Mrs G. B. Peddie (224), Mr Eric K. Johnstone (236), Mr Allan Davidson (238), Mr R. Hainey (239), Mrs R. Hainey (240), Ms Barbara Steffensen (241), Mr John Cameron (242), Mr Stuart Tait (243), Mrs Susan Tait (244), Ms Karen Hughes (245), Mr David S. M. Campbell (246), Ms Arlene Wilson (247), Dr J. Kenneth McAlpine (248), Ms Judith Farquhar (249), Mr Raymond Farquhar (250), Mrs Gilean Frew (270), Mr Glenn Taylor Buchan (292), Ms Ellen Buchan (293), Mr Rod Buchan (294), Mr Malcolm McDonald (295), Ms Michelle McDonald (296), Mrs Barrie Buchan (299), Mr Stephen Jack (300), Ms Pamela Anne Jack (301), Mr Matthew Dunning (313), Mr P.E. Johnston (314), Mrs F.A. Pastuszko (315), Mr A.S.G. Pastuszko (316), Ms Shauna Gowans (354), Ms June McDonald (355), Mr William McDonald (356), Ms Pamela Gatt (357), Mr Neil Taylor (358), Mr Colin McKenna (399), Mrs Lindsay A Simpson (400), Mr Robert G Simpson (401), Mr W Guy Bentinck (403), Mrs June Bentinck of 34 Kingswood Avenue (404), Ms Nicola Abrams of Scottish Environmental Protection Agency (408), Mr Roy Bremner (432), Mr Steve Delaney of Mastrick, Sheddocksley and Summerhill Community Council (543), Mrs Wendy Campbell (583), Mr Colin Campbell (584), Mr John Findlay of Ryden LLP on behalf of The University of Aberdeen (619), Mr Alexander Kilgour (935), Mr William Simpson (936), Mrs Eziz Robertson (939), Mrs Florence Pirie (942), Mrs H.B Oakes (944), Mr Terence Oakes (945), Mrs Elizabeth Coutts (946), Mrs Margaret Park (947), Mr Charles Coutts (948), Sir/Madam V Hutcheon (949), Ms Hilary Davern (950), Mrs Vera Mutch (951), Mr N Craig (952), Sir/Madam M Hutcheon (953), Mrs Alison Murison</p>		

(954), Mr Alexander Murison (956), Mr Douglas Park (957), Ms Eliana Figueroa (958), Mr Derek W Martin (959), Mr Edgar Castillo (960), Ms Lydia A W Martin (962), Mr Donald Vass (964), Ms Joan Vass (965), Ms Valerie Weir (966), Mr Gerard David Cairns (967), Mr James Grant (968), Mr William P Weir (969), Ms Siobhan G Anthony (970), Mr Stephen King (974), Mr L Watson (975), Mr William Miller (976), Mrs Jackie Cairns (977), Mr George A Wallace (978), Ms Margaret Miller (979), Thilini Wallace (980), Ms Heather Burns (981), Ms Sheila Irvine (983), Mr B J Carey (984), Mr William Irvine (985), Sir/Madam A Carey (987), Sir/Madam R Holden (988), Mr David Coull (990), Sir/Madam Elm Holden (991), Mrs Dorothy Gray (992), Mrs Isobel M Patterson (993), Ms Catherine May (994), Mr Gordon Patterson (995), Ms Cath Grant (996), Mr Alexander May (997), Sir/Madam R W Wilkie (998), Ms Margaret McEwan (999), Ms Fiona Wilkie (1000), Ms Silvia Gaspar-Pereira (1002), Mrs GB Anthony (1003), Mr Stan McEwan (1004), Mr Stuart Lamond (1005), Mr William Smith (1006), Ms Helen Davidson (1007), Ms Rosemary Walker (1008), Mrs Gwendoline Jones (1009), Mr Iain Laidlaw (1010), Sir/Madam Tom Straiton (1011), Ms Florence Gunn-Folmer (1012), Ms Kaye Smith (1013), Mr Alexander Gunn (1014), Sir/Madam George Ian Gibson (1015), Ms Elaine Grosvenor (1016), Mr Stephen Anthony (1017), Mr Brian Yeats (1018), Ms Jennifer Miller (1019), Ms Julie McLulich (1021), Ms Suzanne Walker (1022), Mr Hamish McLulich (1023), Mrs Gillian Joss (1024), Mrs Fiona McRuvie (1025), Mr Brain Folan (1026), Mr William Skidmore (1027), Ms Linda Cameron (1028), Mr Lewis Joss (1029), Mrs Wendy Skidmore (1030), Mr Alexander Crawford Hair (1031), Sir/Madam A Innes (1032), Mr George Lowe (1033), Mrs Margaret Lowe (1035), Mr James Wilson (1037), Mr Derek Walker (1038), Ms Ruth Tulloch (1040), Ms Christina M Wilson (1042), Mr Samuel Stafrace (1044), Mr Zane Hair (1045), Ms Amanda Stafrace (1046), Mrs Valerie Henderson (1047), Ms Rachel Watson (1048), Dr C Hauptfleisch (1049), Mr Iain Watson (1051), Sir/Madam Arnajorn Joensen (1053), Ms Sheena Lamond (1054), Ms Marion Cumming (1055), Mr Gordon Cumming (1056), Sir/Madam N Sutherland (1057), Dr Iain Greig (1058), Ms Catherine McBain (1059), Mr Mahmoud Kamel (1060), Mr William Beattie (1061), Mr Noelle Straton (1062), Sir/Madam Bernese Kamel (1063), Ms Susan Beattie (1064), Ms Helen Ireland (1065), Miss Jean M Park (1066), Ms Katharine Hume (1067), Miss Vera M Anderson (1068), Mr Angus Morrison (1069), Mr Cameron Millar (1070), Mr Mike Hume (1071), Ms Catriona Morrison (1072), Sir/Madam E Young (1073), Ms Amanda-Jane Mackay (1074), Sir/Madam R Birse (1075), Mr Martin Mackay (1076), Mr David Cornet (1077), Mr Ian Sim (1078), Mr Lawrence Dean (1079), Ms Irene McKay (1080), Ms Dorothy Higgins (1081), Ms Patricia Sim (1082), Mr Munawar H Usman (1083), Mr & Mrs J & K Massie (1084), Ms Sadia A Usman (1085), Mrs Grace M Hepburn (1086), Mrs V Taylor (1087), Mrs Ewa Gainska (1088), Sir/Madam EA Taylor (1089), Mr Miroslaw Gainski (1090), Mrs Pat Duncan (1091), Mr David Bruce (1092), Mr Robert Overy (1093), Ms Jennifer Bruce (1094), Ms Gillian Graham (1095), Mr Mark Graham (1096), Ms Marilyn Rose (1097), Mr William Robertson (1098), Mr Kenneth Rose (1099), Mrs Margaret Kilgour (1100), Mr Alan Stott (1101), Mr Walter Jardine (1102), Ms Muriel Wyness (1103), Mr W R Hepburn (1105), Ms Caroline Taylor (1106), Mrs J MacLean (1107), Mr Colin Taylor (1108), Ms Barbara Bruce (1109), Mr James Henderson (1110), Ms Joan Keyes (1111), Mrs Pamela Stuart (1112), Mr Tom Keyes (1113), Mr Raphael C Stuart (1114), Mr Stuart Higgins (1115), Mr Barclay J Massie (1116), Ms Carol Buchan (1118), Sir/Madam E Cooper (1119), Sir/Madam Selina Jardine (1122), Mr Malcolm Cameron (1123), Sir/Madam M Maclean (1124), Ms Lorraine Jones of Sport Scotland (1244), Mr Toby Johns (1386), Mr Graeme Law (1390), Mr Richard Johnson (1414), Mr Derek Selbie (1473), Mrs Charlotte Goodbody (1484), Professor Ivan Goodbody (1486), Mr Stephen Booth of Aberdeen City Council - Asset Management (1519), Mr John Findlay of Ryden LLP on behalf of Stewart Milne Homes (North Scotland) (1567), Mr Ian Cox of Kingswells Community Council (1579), Ms Helen Gibson (1585).

<b>Provision of the Development Plan to which the issue relates:</b>	Allocations for a combined 3440 homes across three sites, with joint masterplan required.
<b>Summary of the representation(s):</b>	
<p>Retention of trees &amp; walkways, and provision of appropriate facilities within OP29</p> <p>65: Development of OP29 Craibstone South must retain existing trees and walkways and provide suitable facilities for the community, such as a village centre.</p> <p>Object to OP29</p> <p>165: Object to development of OP29 Craibstone South because of Green Belt status, recreational value &amp; traffic problems as a result of development. The proposal is dependant on the Aberdeen Western Peripheral Route, has flooding issues, and is inconsistent with Aberdeen City Council 's open space aspirations for the city.</p> <p>OP29 should protect woodland and incorporate employment land</p> <p>1473: Development of OP29 Craibstone South should protect woodland and should incorporate employment land.</p> <p>Support OP29 subject to conditions</p> <p>1579: Support development of OP29 Craibstone South subject to conditions. Agree with exclusion of site that was 1/05 in Main Issues Report from the Proposed Plan. Woodlands and wildlife on the site will require careful conservation measures to protect biodiversity.</p> <p>Concern over development on sports pitches within OP30</p> <p>1244: According to page 72 of the Plan OP30 Rowett South contains playing fields. From aerial imagery it does not appear that it does but our response assumes there is given the information contained in the Plan. National policy in the Scottish Planning Policy outlines (specifically paragraph 156) the circumstances which need to be met in order for the redevelopment of pitches to be acceptable in national policy terms. If the site contains a pitch then the allocation of this for redevelopment needs to be considered against this national policy position. The Council's Pitch Strategy (2003) although now out of date still contains conclusions of relevance. At the time, it identified an oversupply of full sized pitches and an undersupply of small sided pitches and cricket pitches. However, it was also recognised that a surplus of pitches was necessary due to many of the pitches being of poor quality. The supply and demand analysis would need to be reconsidered in order to understand what the current position is. The Strategy outlines a number of Options for dealing with surpluses which should be considered. The Strategy also recommends that any funds obtained through the sale of pitches is subject to re-investment back into pitches.</p> <p>Object to OP30</p> <p>1414: Object to development of OP30 Rowett South on basis of past dismissal of this land by reporters, conflict with Green Belt policy, loss of amenity and excessive airport</p>	

noise.

Supports OP30 subject to conditions

1579: Support development of OP30 Rowett South subject to conditions. Part of this site is exposed to wider view. Development must carefully consider impact on skyline.

432: Any development at OP30 Rowett South should be of a similar character to Christie Grange. Existing trees should be preserved. Tree Sparrows and other wildlife should be protected.

Gypsy Travellers

214: Concern over gypsy travellers in site OP30 Rowett South.

Seeks boundary changes to OP31

54, 55, 56, 57, 62, 63, 64, 68, 69, 70, 71, 72, 73, 82, 83, 84, 86, 89, 90, 91, 92, 93, 94, 95, 96, 102, 103, 104, 105, 106, 108, 109, 110, 111, 112, 113, 114, 116, 117, 118, 119, 120, 121, 122, 123, 124, 125, 126, 127, 128, 142, 146, 147, 148, 149, 150, 180, 181, 183, 185, 187, 188, 191, 192, 194, 195, 196, 198, 199, 200, 201, 205, 206, 207, 217, 218, 219, 220, 221, 222, 224, 236, 238, 239, 240, 241, 242, 243, 244, 245, 246, 247, 248, 249, 250, 292, 293, 294, 295, 296, 299, 300, 301, 313, 314, 315, 316, 354, 355, 356, 357, 358, 399, 400, 401, 403, 404, 583, 584, 935, 936, 939, 942, 944, 945, 946, 947, 948, 949, 950, 951, 952, 953, 954, 956, 957, 958, 959, 960, 962, 964, 965, 966, 967, 968, 969, 970, 974, 975, 976, 977, 978, 979, 980, 981, 983, 984, 985, 987, 988, 990, 991, 992, 993, 994, 995, 996, 997, 998, 999, 1000, 1002, 1003, 1004, 1005, 1006, 1007, 1008, 1009, 1010, 1011, 1012, 1013, 1014, 1015, 1016, 1017, 1018, 1019, 1021, 1022, 1024, 1025, 1026, 1027, 1028, 1029, 1030, 1031, 1032, 1033, 1035, 1037, 1038, 1040, 1042, 1044, 1045, 1046, 1047, 1048, 1049, 1051, 1053, 1054, 1055, 1056, 1057, 1058, 1059, 1060, 1061, 1062, 1063, 1064, 1065, 1066, 1067, 1068, 1069, 1070, 1071, 1072, 1073, 1074, 1075, 1076, 1077, 1078, 1079, 1080, 1081, 1082, 1083, 1084, 1085, 1086, 1087, 1088, 1089, 1090, 1091, 1092, 1093, 1094, 1095, 1096, 1097, 1098, 1099, 1100, 1101, 1102, 1103, 1105, 1106, 1107, 1108, 1109, 1110, 1111, 1112, 1113, 1114, 1115, 1116, 1118, 1119, 1122, 1123, 1124, 1484, 1486, 1585, 1586: OP31 Greenferns Landward is too large and too close to Derbeth. The location of the site threatens the Burnbrae District Wildlife Site.

Housing mix and appropriate infrastructure within OP31

65, 619: A mixture of housing is necessary on site OP31 Greenferns Landward, along with new primary school, incorporating safe pedestrian/cycle routes.

Object to OP31

270: Object to development of OP31 Greenferns Landward development will spoil outlook and rural character of area.

Boundary changes to OP31

543: Welcome changes to boundary of site OP31 Greenferns Landward which would avoid potential coalescence between site OP31 Greenferns Landward and existing

settlement at Northfield.

Seeks enhancement of trees and woodlands within OP31

1473: OP31 Greenferns Landward provides an opportunity to enhance trees and woodlands.

OP31 cannot meet phasing targets

1567: OP31: Greenferns Landward cannot contribute any housing until completion of OP30 Rowett South and therefore cannot meet phasing targets.

Accept suitability of site OP31 for development, but express a number of concerns

1579: Broadly support development of OP31 Greenferns Landward but strongly object to positioning of south west boundary. Concerns regarding requirement for Kingswells North junction to be a full junction. Query why area to south west of OP31 Greenferns Landward is designated as Green Belt rather than Green Space Network. Strongly object to the fact that the site has been moved further west from that proposed in the Main Issues Report. Planning of site should seek to avoid impact on landscape and skyline on higher part of site to the west. Land between OP31 Greenferns Landward and Kingswells should be designated to avoid future coalescence. Concern over impact on District Wildlife Site.

Opportunity to enhance character of Bucksburn

65: The existing community of Bucksburn has lost its natural heart as a result of increased traffic on the A96, which splits the community in two. There is an opportunity to establish something to replace that. Also need to establish green areas for children to play freely, not necessarily just playparks.

Infrastructure requirements and general impact of development of OP30

1386, 1390: The proposed development by Aberdeen University in the Bucksburn area is dependant on the delivery of the Aberdeen Western Peripheral Route. Development should retain landscape character and maintain green space between existing settlement and proposed new development. Major and guaranteed development in public infrastructure will be required if development is to be sustainable.

Welcome collaborative masterplanning approach

1519: Welcome the requirement for collaborative masterplanning, for sites OP29 Craibstone South, OP30 Rowett South & OP31 Greenferns Landward. Site OP31 Greenferns Landward is supported as an opportunity for 1500 homes.

Ecological Status of watercourses & potential impact on Buck's Burn

408: Sites OP29 Craibstone South, OP30 Rowett South and OP31 Greenferns Landward include the Gough Burn and other minor watercourses. It is requested that the need to consider opportunities for the protection and improvement of the watercourses within these sites are clearly highlighted. Development at OP31 Greenferns Landward may have potential to impact upon the Buck's Burn.

**Modifications sought by those submitting representations:**

## Object to OP29

165: Site OP29 Craibstone South, should be left as a small business centre opportunity. If housing is to be permitted, it should be severely limited.

## Concern over development on sports pitches within OP30

1244: Clarification as to whether OP30 Rowett South contains playing fields. If it does: Retention of OP28 Rowett North for pitch(es) use; or As part of the Local Development Plan process, consideration of the loss of the pitch(es) against the criteria outlined in para 156 of the Scottish Planning Policy to assess whether the national policy is satisfied; or If none of the criteria outlined in para 156 of the Scottish Planning Policy has been met and the site is still to be allocated for redevelopment, acknowledgement in the text referring to the site that there is a pitch(es) and reference to the need for the requirements of the Scottish Planning Policy and revised Policy NE3 to be met, and that the process outlined in the Council's Pitch Strategy will be followed.

## Object to OP30

1414: Development of OP30 Rowett South should not take place.

## Seeks boundary changes to OP31

56, 57, 62, 63, 64, 68, 69, 70, 71, 72, 73, 82, 83, 84, 86, 89, 90, 91, 92, 93, 94, 95, 96, 102, 103, 104, 105, 106, 108, 109, 110, 111, 112, 113, 114, 116, 117, 118, 119, 120, 121, 122, 123, 124, 125, 126, 127, 128, 142, 146, 147, 148, 149, 150, 180, 181, 183, 185, 187, 188, 191, 192, 194, 195, 196, 198, 199, 200, 205, 206, 207, 217, 218, 219, 220, 221, 222, 224, 236, 238, 239, 240, 241, 242, 243, 244, 245, 246, 247, 248, 249, 250, 292, 293, 294, 295, 296, 299, 300, 301, 313, 314, 315, 316, 354, 355, 356, 357, 358, 399, 400, 401, 403, 404, 583, 584, 935, 936, 939, 942, 944, 945, 946, 947, 948, 949, 950, 951, 952, 953, 954, 956, 957, 958, 959, 960, 962, 964, 965, 966, 967, 969, 970, 974, 975, 976, 977, 978, 979, 980, 981, 983, 984, 985, 987, 988, 990, 991, 992, 993, 994, 995, 996, 997, 998, 999, 1000, 1002, 1003, 1004, 1005, 1006, 1007, 1008, 1009, 1010, 1011, 1012, 1013, 1014, 1015, 1016, 1017, 1018, 1019, 1021, 1022, 1024, 1025, 1026, 1027, 1028, 1029, 1030, 1031, 1032, 1033, 1035, 1037, 1038, 1040, 1042, 1044, 1045, 1046, 1047, 1048, 1049, 1051, 1053, 1054, 1055, 1056, 1057, 1058, 1059, 1060, 1061, 1062, 1063, 1064, 1065, 1066, 1067, 1068, 1069, 1070, 1071, 1072, 1073, 1074, 1075, 1076, 1077, 1078, 1079, 1080, 1081, 1082, 1083, 1084, 1085, 1086, 1087, 1088, 1089, 1090, 1091, 1092, 1093, 1094, 1095, 1096, 1097, 1098, 1099, 1100, 1101, 1102, 1103, 1105, 1106, 1108, 1109, 1110, 1111, 1112, 1113, 1114, 1115, 1116, 1118, 1119, 1122, 1123, 1124, 1484, 1486, 1585, 1586: The southern and western boundaries of site OP31 Greenferns Landward should be returned to that shown in the Main Issues Report.

## Object to OP31

270: Use old Bankhead Academy site (OP15) for housing. Greenferns (OP31) should not be developed for housing.

### Boundary changes to OP31

543: Amend boundaries of site OP31 Greenferns Landward to avoid Burnbrae Moss District Wildlife Site.

OP31 cannot meet phasing targets

1567: Allocations within OP31 Greenferns Landward, should be pushed back into a later phase, in order to reflect the constraints upon them.

Accept suitability of site OP31 for development, but express a number of concerns

1579: Reduce the extent of the South and South-west boundaries of site OP31 Greenferns Landward.

Ecological Status of watercourses & potential impact on Buck's Burn

408 'Other Factors' section of site description for sites OP29 Craibstone South, OP30 Rowett South & OP31 Greenferns Landward in appendix 2 of Proposed Plan should be amended to include the following statement: "Any Masterplan should take account of the existing water features within the site, the pressures which apply to these features and should direct developers to look for opportunities to protect and improve the water environment."

### **Summary of response (including reasons) by planning authority:**

Retention of trees & walkways, and provision of appropriate facilities within OP29

65: For all opportunity sites within Masterplan Zone 4, matters including retention of existing trees and retention/provision of pedestrian/cycle routes, open space, local shops and facilities will be addressed through the masterplanning process, and influenced by designation of Green Space Network and policies seeking to preserve and enhance wildlife & key elements of the natural environment and facilitate sustainable and active travel. Major infrastructure improvements such as public transport and roads to support new development, schools and healthcare facilities are set out in Appendix 4 to the Proposed Plan and in the Action Programme (CD20). The character of existing settlements and the topography of a site should be taken into account when preparing masterplans and planning applications for these sites. The designation of a site for development does not mean that the entirety of that site will be built upon, as provision of open space will be necessary through the masterplanning process and is a requirement under policy NE4: Open Space Provision in New Development.

Object to OP29

165: The Aberdeen City and Shire Structure Plan (CD8) sets the requirements for greenfield housing allowances and authorises a review of green belt boundaries in order to accommodate them. A Development Options Assessment (CD13), Strategic Environmental Assessment (CD21), and consultation on the Main Issues Report (Responses to Representations CD15) were used to assess sites. These were used to identify the most suitable locations to deliver the required growth and in accordance with Scottish Planning Policy paragraph 159 (CD3) which requires green belts to direct growth to the most appropriate locations. This process is described in the Green Belt Review (CD19) which also sets and explains the detailed boundaries of the green belt

and land release areas. This site emerged as a desirable option because it is in well wooded grounds and is not visible from the A96, so development here is likely to be relatively unobtrusive. This could provide an attractive and well sheltered living environment provided the steeper slopes and potential flooding areas are avoided. The proximity of the site to employment land opportunities in the area will help to place less reliance on the car. The Development Options Assessment Report (CD13) acknowledges that flooding issues affecting the site must be addressed before development can go ahead. All development sites must demonstrate that sufficient measures have been taken to minimise the traffic generated as a result of that development. Development must be accompanied by transport infrastructure improvements of a level commensurate with the scale and impact of development and sufficient to support new or expanded communities. Aberdeen City Council, Aberdeenshire Council, the North East Scotland Transport Partnership and the Scottish Government are all committed to the delivery of the Aberdeen Western Peripheral Route. Should the Aberdeen Western Peripheral Route not be delivered, it is likely that the development plan, comprising the proposed Local Development Plan and Structure Plan/Strategic Development Plan (SDP) as appropriate, would require to be reviewed. It is acknowledged that the site presently may offer opportunities for recreation. Nonetheless the site has been identified as being capable of accommodating growth to the north-west of the city, contributing towards the Structure Plan housing targets. Policy NE9 Access and Informal Recreation states that new development should not compromise the integrity of existing or potential recreational opportunities, including access rights, core paths, other paths and rights of way. Furthermore, provision of open space will be necessary through the masterplanning process and is a requirement under policy NE4: Open Space Provision in New Development and the related Open Space Supplementary Guidance (RD82). The land shown as site OP29 Craibstone South is not zoned in the Aberdeen Local Plan (2008) as a small business opportunity, as seems to be suggested by respondent 165. This site was submitted at the Development Options stage as a site for residential development, has been assessed on that basis and was found to be a suitable site to accommodate such growth, contributing towards the housing targets set out in the Structure Plan.

OP29 should protect woodland and incorporate employment land

1473: For all opportunity sites within Masterplan Zone 4, matters including retention of existing trees and retention/provision of pedestrian/cycle routes, open space, local shops and facilities will be addressed through the masterplanning process, and influenced by designation of Green Space Network and policies seeking to preserve and enhance wildlife & key elements of the natural environment and facilitate sustainable and active travel. Section 3.72 of the proposed Local Development Plan states that where trees are considered to be at risk from development or construction, we may require information and safeguarding measures in accordance with standards as set out in supplementary guidance on protecting trees and woodlands (RD95). In addition, policy NE5: Trees and Woodlands sets out that that proposals resulting in the loss of, or damage to, established trees and woodlands that have natural or cultural heritage value or contribute to the character, biodiversity or amenity of an area will be resisted. The Development Options Assessment Report set out that OP29 Craibstone South represents an ideal opportunity to create a high quality residential environment. The proximity of existing and proposed employment land allocations was also acknowledged, with such local opportunities helping to reduce reliance on travel by car.



### Support OP29 subject to conditions

1579: Welcome support for OP29 Craibstone South. Section 3.72 of the proposed Local Development Plan states that where trees are considered to be at risk from development or construction, we may require information and safeguarding measures in accordance with standards as set out in supplementary guidance on protecting trees and woodlands (RD95). In addition, policy NE5: Trees and Woodlands sets out that that proposals resulting in the loss of, or damage to, established trees and woodlands that have natural or cultural heritage value or contribute to the character, biodiversity or amenity of an area will be resisted. Policy NE8: Natural Heritage seeks to protect wildlife by requiring ecological assessments where there is evidence to suggest that habitat or species of importance exist within any given site which is the subject of a planning application.

### Concern over development on sports pitches within OP30

1244: There is an existing sports pitch within site OP30, adjacent to the north-eastern boundary of the site, between the A96 and Forrit Brae. The entire area of the pitch has been designated as part of the Green Space Network. Given the obvious recreational value of the site, the Green Space Network designation and corresponding policy NE1 will provide protection from any development which would destroy or erode that recreational value.

### Object to OP30

1414: The Aberdeen City and Shire Structure Plan (CD8) sets the requirements for greenfield housing allowances and authorises a review of green belt boundaries in order to accommodate them. A Development Options Assessment (CD13), Strategic Environmental Assessment (CD21), and consultation on the Main Issues Report (Responses to Representations CD15) were used to assess sites. These were used to identify the most suitable locations to deliver the required growth and in accordance with Scottish Planning Policy paragraph 159 (CD3) which requires green belts to direct growth to the most appropriate locations. This process is described in the Green Belt Review (CD19) which also sets and explains the detailed boundaries of the green belt and land release areas. This site emerged as a desirable option because it is well related to existing development at Bucksburn and could help to create a natural urban extension. The previous dismissal of any site by reporters does not preclude that site from consideration in the preparation of a new Local Development Plan because the new Structure Plan requires the planning authority to allocate land for development, and so a new process of site assessment is begun afresh, with the target of meeting the further growth envisaged in the Structure Plan. Policy H8: Housing and Aberdeen Airport of the Proposed Plan sets out that applications for residential development under or in the vicinity of aircraft flight paths will not be permitted where night time noise levels exceed specified levels. Where noise is likely to be an issue in determining a planning application, submission of a noise assessment may be necessary. The amenity of existing residents will be a material consideration in the assessment of any planning application for the site, and will be an important consideration in preparation of the masterplan for this site, to be produced collaboratively with the developers of OP29 Craibstone South and OP31 Greenferns Landward.

### Supports OP30 subject to conditions

1579: Support for site OP30 Rowett South is welcomed. The exposure and aspect of the

site are important considerations in the masterplanning of the site, which is to be produced collaboratively with the developers of OP29 Craibstone South and OP31 Greenferns Landward. In addition, the impact of a development proposal upon skyline and landscape setting of an area will be considered via policies D1 Architecture and Placemaking and D6 Landscape, which seek to ensure that development is designed to respect skyline, topography and landscape setting. 432: The character of existing settlements and the topography of a site should be taken into account when preparing masterplans and planning applications for these sites. Policy D1 Architecture and Placemaking states that, to ensure high standards of design, new development must be designed with due consideration for its context and make a positive contribution to its setting. This policy provides a link to the relevant supplementary guidance, the Aberdeen Masterplanning Process (RD63), which sets out the requirements for such documents, including details of the relationship of a development to its surroundings. Section 3.72 of the proposed Local Development Plan states that where trees are considered to be at risk from development or construction, we may require information and safeguarding measures in accordance with standards as set out in supplementary guidance on protecting trees and woodlands (RD95). In addition, policy NE5: Trees and Woodlands sets out that that proposals resulting in the loss of, or damage to, established trees and woodlands that have natural or cultural heritage value or contribute to the character, biodiversity or amenity of an area will be resisted. Policy NE8: Natural Heritage seeks to protect wildlife by requiring ecological assessments where there is evidence to suggest that habitat or species of importance exist within any given site which is the subject of a planning application.

#### Gypsy Travellers

214: The nature and location of Gypsy and Traveller sites will be determined in accordance with policy H6: Gypsy and Traveller Caravan Sites and the relevant supplementary guidance relating to this topic (RD69). See Issue 111 Policy H6 and H7: Gypsy Traveller Sites Proposals.

#### Seeks boundary changes to OP31

54, 55, 56, 57, 62, 63, 64, 68, 69, 70, 71, 72, 73, 82, 83, 84, 86, 89, 90, 91, 92, 93, 94, 95, 96, 102, 103, 104, 105, 106, 108, 109, 110, 111, 112, 113, 114, 116, 117, 118, 119, 120, 121, 122, 123, 124, 125, 126, 127, 128, 142, 146, 147, 148, 149, 150, 180, 181, 183, 185, 187, 188, 191, 192, 194, 195, 196, 198, 199, 200, 201, 205, 206, 207, 217, 218, 219, 220, 221, 222, 224, 236, 238, 239, 240, 241, 242, 243, 244, 245, 246, 247, 248, 249, 250, 292, 293, 294, 295, 296, 299, 300, 301, 313, 314, 315, 316, 354, 355, 356, 357, 358, 399, 400, 401, 403, 404, 583, 584, 935, 936, 939, 942, 944, 945, 946, 947, 948, 949, 950, 951, 952, 953, 954, 956, 957, 958, 959, 960, 962, 964, 965, 966, 967, 968, 969, 970, 974, 975, 976, 977, 978, 979, 980, 981, 983, 984, 985, 987, 988, 990, 991, 992, 993, 994, 995, 996, 997, 998, 999, 1000, 1002, 1003, 1004, 1005, 1006, 1007, 1008, 1009, 1010, 1011, 1012, 1013, 1014, 1015, 1016, 1017, 1018, 1019, 1021, 1022, 1024, 1025, 1026, 1027, 1028, 1029, 1030, 1031, 1032, 1033, 1035, 1037, 1038, 1040, 1042, 1044, 1045, 1046, 1047, 1048, 1049, 1051, 1053, 1054, 1055, 1056, 1057, 1058, 1059, 1060, 1061, 1062, 1063, 1064, 1065, 1066, 1067, 1068, 1069, 1070, 1071, 1072, 1073, 1074, 1075, 1076, 1077, 1078, 1079, 1080, 1081, 1082, 1083, 1084, 1085, 1086, 1087, 1088, 1089, 1090, 1091, 1092, 1093, 1094, 1095, 1096, 1097, 1098, 1099, 1100, 1101, 1102, 1103, 1105, 1106, 1107, 1108, 1109, 1110, 1111, 1112, 1113, 1114, 1115, 1116, 1118, 1119, 1122, 1123, 1124, 1484, 1486, 1585, 1586: The Aberdeen City and Shire Structure Plan (CD8) sets the requirements for greenfield housing allowances

and authorises a review of green belt boundaries in order to accommodate them. A Development Options Assessment (CD13), Strategic Environmental Assessment (CD21), and consultation on the Main Issues Report (Responses to Representations CD15) were used to assess sites. These were used to identify the most suitable locations to deliver the required growth and in accordance with Scottish Planning Policy paragraph 159 (CD3) which requires green belts to direct growth to the most appropriate locations. This process is described in the Green Belt Review (CD19) which also sets and explains the detailed boundaries of the green belt and land release areas. This site emerged as a desirable option because it was considered to provide scope for the north-west city expansion, and could be considered alongside options at Rowett South and Craibstone. Greenferns Landward as originally submitted was significantly larger, and has been subsequently reduced in both size and southern extent in order to avoid encroachment on the Burnbrae Moss District Wildlife Site and Bucksburn Gorge District Wildlife Site, and to prevent potential coalescence with adjacent settlements. The Council's response to representations (CD15) received following publication of the Main Issues Report indicated that site boundaries were likely to be amended to those now presented as site OP31 Greenferns Landward in the Proposed Plan, moving northwards to avoid the District Wildlife Sites and westward to maintain a strong natural boundary. The adjacent District Wildlife Sites will be taken into consideration through both the Masterplanning and planning application processes.

#### Housing mix and appropriate infrastructure within OP31

65, 619: An appropriate mix of housing on sites exceeding 50 units will be required through policy H4: Housing Mix. Major infrastructure improvements such as public transport and roads to support new development, schools and healthcare facilities are set out in Appendix 4 to the Proposed Plan and in the Action Programme (CD20). Three new primary schools are required within masterplan zone 4, which comprises sites OP29 Craibstone South, OP30 Rowett South and OP31 Greenferns Landward. Infrastructure requirements will need to be reflected in any Masterplan or planning application for development. The precise level of infrastructure requirements and developer contributions will need to be agreed with the Council through the Masterplan process and any subsequent planning application in accordance with the Infrastructure and Developer Contributions Manual (CD25). Development must also be accompanied by a package of transport infrastructure measures including road network improvements of a level commensurate with the scale of development and sufficient to support new or expanded communities. Policy D3 of the Proposed Plan ('Sustainable and Active Travel') requires new development to be designed in order to minimise travel by private car, improve access to services and promote healthy lifestyles.

#### Object to OP31

270: The Aberdeen City and Shire Structure Plan (CD8) sets the requirements for greenfield housing allowances and authorises a review of green belt boundaries in order to accommodate them. A Development Options Assessment (CD13), Strategic Environmental Assessment (CD21), and consultation on the Main Issues Report (Responses to Representations CD15) were used to assess sites. These were used to identify the most suitable locations to deliver the required growth and in accordance with Scottish Planning Policy paragraph 159 (CD3) which requires green belts to direct growth to the most appropriate locations. This process is described in the Green Belt Review (CD19) which also sets and explains the detailed boundaries of the green belt and land release areas. This site emerged as a desirable option because it was

considered to provide scope for the north-west city expansion, and could be considered alongside options at Rowett South and Craibstone. The character of existing settlements and the topography of a site should be taken into account when preparing masterplans and planning applications for these sites. Policy D1 Architecture and Placemaking states that, to ensure high standards of design, new development must be designed with due consideration for its context and make a positive contribution to its setting. This policy provides a link to the relevant supplementary guidance, the Aberdeen Masterplanning Process (RD63) which sets out the requirements for such documents, including details of the relationship of a development to its surroundings. The site of the former Bankhead Academy (OP15) has, as suggested, been allocated for housing development. Further land required to meet the Structure Plan greenfield housing allocations is also required and these have been identified through the Development Options appraisal (CD13).

#### Boundary changes to OP31

543: Supporting comments in relation to boundary changes welcomed. The designated Green Space Network is a strategic network of woodland and other habitats, active travel and recreation routes, greenspace links, watercourses and waterways. The network includes designated Natural Heritage Sites, as set out in policy NE8, links between habitats and open spaces identified in Aberdeen's Open Space Audit 2010, as well as opportunities for future use for physical activity and access to the outdoors. The area covered by the Burnbrae Moss District Wildlife Site (DWS) benefits from an additional designation as part of the Green Space Network. As such, development proposals must be assessed against policies NE1 Green Space Network and NE8 Natural Heritage. Policy NE1 states that proposals for development which would be likely to destroy or erode the character or function of the Green Space Network will not be permitted. It is further stated that masterplanning of new developments should determine the location and extent of the Green Space Network within these areas. Policy NE8: Natural Heritage states that development resulting in an adverse impact on designated areas (which includes District Wildlife Sites), having taken into account any proposed mitigation measures, will only be permitted where it can address the criteria set out in Scottish Planning Policy. The presence of the DWS and Green Space Network should be taken into account through the masterplanning of the site, and any impact should be subject to appropriate mitigation. Taking these factors into above, and given that the development site does not in fact encroach directly upon the DWS, it is not proposed to make any further changes to the boundary of site OP31.

#### Seeks enhancement of trees and woodlands within OP31

1473: For all opportunity sites within Masterplan Zone 4, matters including retention of existing trees and retention/provision of pedestrian/cycle routes, open space, local shops and facilities will be addressed through the masterplanning process, and influenced by designation of Green Space Network and policies seeking to preserve and enhance wildlife & key elements of the natural environment and facilitate sustainable and active travel. Section 3.72 of the proposed Local Development Plan states that where trees are considered to be at risk from development or construction, we may require information and safeguarding measures in accordance with standards as set out in supplementary guidance on protecting trees and woodlands (RD95). In addition, policy NE5: Trees and Woodlands sets out that that proposals resulting in the loss of, or damage to, established trees and woodlands that have natural or cultural heritage value or contribute to the character, biodiversity or amenity of an area will be resisted.

### OP31 cannot meet phasing targets

1567: The phasing programme set out in the Proposed Plan is intended to set the maximum pace at which development shall proceed. The Local Development Plan cannot ensure the delivery of development sites in a particular phase, but rather to ensure that site selection results in a supply of land which is readily capable of being developed. The pace of development will be determined by many factors, not least of which is the level of demand. This issue is recognised in Structure Plan paragraph 4.17, which states that "this plan provides a generous supply of land for new housing, although we cannot expect all the new homes to be built within the relevant plan period."

### Accept suitability of site OP31 for development, but express a number of concerns

1579: The Aberdeen City and Shire Structure Plan (CD8) sets the requirements for greenfield housing allowances and authorises a review of green belt boundaries in order to accommodate them. A Development Options Assessment (CD13), Strategic Environmental Assessment (CD21), and consultation on the Main Issues Report (Responses to Representations CD15) were used to assess sites. These were used to identify the most suitable locations to deliver the required growth and in accordance with Scottish Planning Policy paragraph 159 (CD3) which requires green belts to direct growth to the most appropriate locations. This process is described in the Green Belt Review (CD19) which also sets and explains the detailed boundaries of the green belt and land release areas. For what is now the Greenferns Landward site, the southern boundary was seen to follow field boundaries along a valley bottom. Rising ground to a low ridge to the south provides a green outlook for, and backdrop to, development at Greenferns Landward. The Green Belt Review acknowledges the presence of the District Wildlife Site at Burnbrae Moss, stating that the difference in vegetation between the gorse heath and the improved grassland to the north-east helps to reinforce a strong boundary. Its recreational value and merit in preventing coalescence is noted. According to the Development Options Assessment Report, Site OP31 emerged as a desirable option because it was considered to provide scope for the north-west city expansion, and could be considered alongside options at Rowett South and Craibstone. Greenferns Landward as originally submitted was significantly larger, and has been subsequently reduced in both size and southern extent in order to avoid encroachment on the Burnbrae Moss District Wildlife Site and Bucksburn Gorge District Wildlife Site, and to prevent potential coalescence with adjacent settlements. The Council's response to representations (CD15) received following publication of the Main Issues Report indicated that site boundaries were likely to be amended to those now presented as site OP31 Greenferns Landward in the Proposed Plan, moving northwards to avoid the District Wildlife Sites and westward to maintain a strong natural boundary. The adjacent District Wildlife Sites will be taken into consideration through both the Masterplanning and planning application processes. The exposure, aspect and landscape setting of the site are important considerations in the preparation of a masterplan, which is to be produced collaboratively with the developers of OP29 Craibstone South and OP30 Rowett South. In addition, the impact of a development proposal upon skyline and landscape setting of an area will be considered via policies D1 Architecture and Placemaking and D6 Landscape, which seek to ensure that development is designed to respect skyline, topography and landscape setting.

The cumulative impact assessment identified requirements to improve the Kingswells North junction, and an option has been identified for the purposes of that appraisal. Further analysis will be required to fully establish the detail of this improvement, and this

will be undertaken in due course as the detail emerges from the masterplanning of the 11 masterplan zones.

The designated Green Space Network is a strategic network of woodland and other habitats, active travel and recreation routes, greenspace links, watercourses and waterways. The network includes designated Natural Heritage Sites, as set out in policy NE8, links between habitats and open spaces identified in Aberdeen's Open Space Audit 2010 (CD23), as well as opportunities for future use for physical activity and access to the outdoors. The site to the south-west of site OP31 Greenferns Landward has not been identified as part of this network as it fails to make a significant contribution to the network in one of these specified areas. The Green Belt value of the site lies in its location between site OP31 Greenferns Landward and the existing Kingswells settlement, with a buffer between these two areas required to prevent coalescence. As stated in Scottish Planning Policy (CD3), Green belt designation is not intended to be used to protect natural heritage, and there is a clear distinction between the purpose of Green Belt and Green Space Network designations respectively. Designation of land between these two settlements as Green Belt will provide a restriction on inappropriate forms of development and should allow for retention of an effective buffer, allowing the two settlements to retain their individual identities.

Opportunity to enhance character of Bucksburn

65: It is agreed that the significant level of development planned in the area over the plan period offers opportunities to enhance the character of the existing Bucksburn settlement and to deliver open space to meet the needs of the wider community. The character of existing settlements and the topography of a site will be taken into account when preparing masterplans and planning applications for sites within masterplan zone 4. The designation of a site for development does not mean that the entirety of that site will be built upon, as provision of open space will be necessary through the masterplanning process and is a requirement under policy NE4: Open Space Provision in New Development. The nature of new open space provision required under this policy will be determined through the Council's Open Space Supplementary Guidance (RD82).

Infrastructure requirements and general impact of development of OP30

1386, 1390: All development sites must demonstrate that sufficient measures have been taken to minimise the traffic generated as a result of that development. Development must be accompanied by transport infrastructure improvements of a level commensurate with the scale and impact of development and sufficient to support new or expanded communities. Aberdeen City Council, Aberdeenshire Council, the North East Scotland Transport Partnership and the Scottish Government are all committed to the delivery of the Aberdeen Western Peripheral Route. Should the Aberdeen Western Peripheral Route not be delivered, it is likely that the Development Plan, comprising the proposed Local Development Plan and Structure Plan/Strategic Development Plan (SDP) as appropriate, would require to be reviewed. The character of existing settlements and the topography of a site will be taken into account when preparing masterplans and planning applications for sites within masterplan zone 4.

Welcome collaborative masterplanning approach

1519: Support for the collaborative masterplanning approach taken in the plan is

welcomed.

#### Ecological Status of watercourses & potential impact on Buck's Burn

408: Scottish Environment Protection Agency's suggestions for the inclusion of text within the Proposed Plan are partially accepted. We feel that as the suggested text relates to the delivery of the sites it is best placed in the Action Programme (CD20) as opposed to Appendix 2. If the Reporter is so minded, the Action Programme will be amended to include the following text in relation to OP29 Craibstone South, OP30 Rowett South and OP31 Greenferns Landward: "Any Masterplan should take account of the existing water features within the site, the pressures which apply to these features and should direct developers to look for opportunities to protect and improve the water environment".

#### **Reporter's conclusions:**

#### **Reporter's recommendations:**

<b>Issue (ref and heading):</b>	<b>ALLOCATED SITE: DYCE DRIVE OP32</b>	<b>16</b>
<b>Development Plan reference:</b>	OP32 Appendix 2, Page 57	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Mr Colin Graham of Miller Developments (209), Mr Graeme Stewart (214), Ms Nicola Abrams of Scottish Environmental Protection Agency (408), Mr John Wright of Strutt & Parker LLP on behalf of Macrobert Trust (511), Mr Roger Laird of Archial on behalf of BP North Sea Infrastructure (764), Mr Malcolm Campbell of Knight Frank LLP on behalf of Scottish Enterprise (1182).		
<b>Provision of the Development Plan to which the issue relates:</b>	108ha comprising Specialist Employment Land and Green Space Network.	
<b>Summary of the representation(s):</b>		
<p>Boundary of OP32 does not reflect Aberdeen Western Peripheral Route alignment</p> <p>209: The western boundary of OP32 Dyce Drive does not fully reflect the alignment of the proposed Aberdeen Western Peripheral Route. Given that there is now a detailed plan for the Aberdeen Western Peripheral Route available, it would seem sensible to replace the indicative line of the plan with a more detailed route and tidy up such cartographical inconsistencies.</p> <p>Queries which OP site the field enclosed by Wellheads Drive to the north, Dyce Drive to the west, Market Street to the east and Walton Farm to the south, lies within</p> <p>214: Queries which opportunity site the field enclosed by Wellheads Drive to the north, Dyce Drive to the west, Market Street to the east and Walton Farm to the south lies within.</p> <p>Concerns over noise within/arising from OP32</p> <p>214: Raises concerns over the potential noise from busy roads and new industrial uses adjacent to Greenburn Cottage.</p> <p>Ecological Status of watercourses &amp; flooding within OP32</p> <p>408: Object to development of OP32 Dyce Drive unless the issue of flood risk is highlighted in the text as being a potential constraint. As the Green Burn runs through site OP32 Dyce Drive, development may impact upon River Don. It is requested that the need to consider opportunities for the protection and improvement of the watercourses within site OP32 Dyce Drive are clearly highlighted.</p> <p>Zoning of OP32 is not consistent with Dyce Drive Planning Brief</p> <p>511: Object to inclusion of Walton Farm within site OP26 Craibstone North and Walton Farm, as landowners have differing aspirations. Zoning of site OP32 Dyce Drive as 'specialist employment area' (class 4) is not consistent with the Dyce Drive Planning Brief, which suggests class 4 use with ancillary class 5 &amp; 6 uses would be appropriate.</p>		



OP32 is within Forties Pipeline consultation zone

764: The Northwest corner of OP32 Dyce Drive is within 50m of the Forties Pipeline. Part of the site is within consultation zones under PADHI guidelines.

Supports OP32 subject to conditions 1182: Supports development of OP32 Dyce Drive subject to delivery of Aberdeen Western Peripheral Route, including Airport Link Road and Park and Ride. Understand the Council's position that the Dyce Drive Infrastructure Masterplan cannot be referenced in the Local Development Plan as it does not have the status of adopted supplementary guidance.

### **Modifications sought by those submitting representations:**

Boundary of OP32 does not reflect Aberdeen Western Peripheral Route alignment

209: Tidy up western boundary of site OP32 Dyce Drive. Remove site OP32: Dyce Drive from the list of 'Specialist Employment Areas'.

Queries which OP site field enclosed by Wellheads Drive to the north, Dyce Drive to the west, Market Street to the east and Walton Farm to the south lies within

214: Development within the field, enclosed by Wellheads Drive to the north, Dyce Drive to the west, Market Street to the east and Walton Farm to the south should be low density, similar to that proposed for OP28 Rowett North in the Rowett Development Framework.

Concerns over noise within/arising from OP32

214: Residents of Greenburn Cottage should be involved in the design process from the earliest stages.

Ecological Status of watercourses & flooding within OP32

408: 'Other Factors' section of site description for OP32 Dyce Drive in appendix 2 of Proposed Plan should be amended to include the following statements; "This site may be at risk of flooding. A flood risk assessment will be required to accompany any future development proposals for this site." & "Any Masterplan should take account of the existing water features within the site, the pressures which apply to these features and should direct developers to look for opportunities to protect and improve the water environment."

Zoning of OP32 is not consistent with Dyce Drive Planning Brief

511: Remove Walton Farm from site OP26 Craibstone North and Walton Farm and designate as a standalone site, or alternatively include as part of an amended OP32 Dyce Drive site, which would allow for class 4 with ancillary class 5 & 6 uses. Remove site OP28 Rowett North.

OP32 is within Forties Pipeline consultation zone

764: Site OP32 Dyce Drive - Insert reference to presence of Forties Pipeline in the 'other factors' section of Appendix 2.

**Summary of response (including reasons) by planning authority:**

Boundary of OP32 does not reflect Aberdeen Western Peripheral Route alignment

209 Site OP33 A96 Park and Ride, to the south of site OP32 Dyce drive, is designated as 'Land for Transport' (Policy T1), and is intended to deliver a park-and-ride facility. It is appropriate for such a facility to be located in close proximity to the Aberdeen Western Peripheral Route to facilitate easy access. Site OP32 Dyce Drive itself is designated as a mix of Specialist Employment Land (BI2) and Business & Industrial (BI1). Both of these sites were carried forward from the extant Aberdeen Local Plan 2008 (CD12), which was adopted following the scrutiny of reporters at a public local inquiry, and are considered to be suitable for development as previously accepted. Dyce Drive was considered under Issue 49 (CD11) of the Reporters' Report into the Public Local Inquiry for the current Local Plan. The Aberdeen Western Peripheral Route shown on the proposals map represents the preferred route, but is not intended to inform detailed assessment of the relationship between the Aberdeen Western Peripheral Route and any given site.

Queries which OP site field enclosed by Wellheads Drive to the north, Dyce Drive to the west, Market Street to the east and Walton Farm to the south lies within

214 The field in question which is enclosed by Wellheads Drive to the north, Dyce Drive to the west, Market Street to the east and Walton Farm to the south lies within OP32 Dyce Drive. Concerns over noise within/arising from OP32

214 The amenity of existing residents and the impact on adjacent uses, including through noise generation, will be material considerations in the assessment of any planning application for the site of OP28 Rowett North (where Greenburn Cottage lies) and OP32 Dyce Drive. Within the proposed Local Development Plan, Policy BI1 Business and Industrial Land states that, where business and industrial areas are to be located beside residential areas, permissions will be restricted to class 4 business uses. Furthermore, buffer zones will be required to separate these uses and safeguard residential amenity. Conditions relating to noise, hours of operation and external storage may be appropriate in some instances. Members of the local community seeking to maintain involvement in the development process may wish to engage with future consultation undertaken in support of the planning application processes. All development proposals must demonstrate that sufficient measures have been taken to minimise the traffic generated as a result of that development. Development must be accompanied by a package of transport infrastructure measures including road network improvements of a level commensurate with the scale of development and sufficient to support new or expanded communities. Policy D3 of the Proposed Plan ('Sustainable and Active Travel') requires new development to be designed in order to minimise travel by private car, improve access to services and promote healthy lifestyles.

Ecological Status of watercourses & flooding within OP32

408 Scottish Environment Protection Agency's suggestions for the inclusion of text within the Proposed Plan are partially accepted. The text regarding the requirement for a Flood Risk Assessment is acceptable and if the Reporter is so minded, the following text will be added into the 'Other Factors' section of Appendix 2, "This site may be at risk of flooding. A flood risk assessment will be required to accompany any future development proposals for this site." The suggestion for the inclusion of text regarding existing water features is accepted, however, we feel that as the suggested text relates to the delivery

of the site that it would be best placed in the Action Programme (CD 20) as opposed to Appendix 2. If the Reporter is so minded, the Action Programme will be amended to include reference to site OP32 Dyce Drive and to include the following text: "Any Masterplan should take account of the existing water features within the site, the pressures which apply to these features and should direct developers to look for opportunities to protect and improve the water environment".

Zoning of OP32 is not consistent with Dyce Drive Planning Brief

511 The view of the planning authority is that the Dyce Drive Planning Brief of 2004 (RD76) is broadly consistent with the zoning of OP32 Dyce Drive as a 'specialist employment area'. The Development Brief, which is to be carried forward with the Proposed Plan, indicates that development will generally be restricted to those falling within class 4 of the use classes order, but that other uses (such as classes 5 and 6, for example) would be permitted where 'they are necessary and maintain the required high quality environment'. The 'specialist employment' designation expresses a similar sentiment, albeit in different terms, with an emphasis on class 4 uses, but an acknowledgement that ancillary facilities may be permitted where it can be demonstrated that they would enhance the attraction and sustainability of the area for business investment. The 'specialist employment area' within OP32 Dyce Drive has been subject to the scrutiny of Reporters through the public inquiry process, and has been carried forward from the extant Plan. It should be noted from the outset that OP32 Dyce Drive is identified as an employment land allocation in the 2008 Aberdeen Local Plan (CD12). In this instance, we should draw your attention to paragraph 78 of Circular 1/09 Development Planning (CD4) which states "Scottish Ministers intend the appointed person to, within the bounds of the issues raised in the representations, primarily examine the appropriateness and sufficiency of the content of the Proposed Plan. . . . The appointed person should generally not recommend modifications to parts of the Plan which have been examined in previous examinations or rolled forward from previous Plans, unless circumstances have clearly changed." We therefore consider that matters on the principle of development on this site has already been addressed through the existing Local Plan. Issues with respect to OP26 Craibstone North and Walton Farm are dealt with under Issue 14 Employment Land Allocations: Newhills Expansion and Dyce Drive OP26 and OP28.

OP32 is within Forties Pipeline consultation zone

764 As site OP32 Dyce Drive encroaches upon the Health and Safety Executive's (HSE) notification zones for the Forties Oil Pipeline. As consultation with HSE will be required for development proposals within the notification zone, and the types of development may be restricted under HSE's 'PADHI' (Planning Advice for Developments near Hazardous Installations) guidelines (RD19), if the Reporters' are so minded it is agreed that the 'other factors' section of Appendix 2 to the Proposed Plan could reflect this.

Supports OP32 subject to conditions

1182 Welcome supporting comment for OP32 Dyce Drive.

Understand the Council's position that the Dyce Drive Infrastructure Masterplan cannot be referenced in the Local Development Plan as it does not have the status of adopted supplementary guidance.

The Council has identified an integrated package of measures in the Local Transport Strategy, also reflected in the Regional Transport Strategy, for improving the transport network and the Aberdeen Western Peripheral Route is an important part of this package. Aberdeen City Council, Aberdeenshire Council, the North East Scotland Transport Partnership and the Scottish Government are all committed to the delivery of the Aberdeen Western Peripheral Route. This scheme is currently subject to legal challenge so a delivery timescale is difficult to establish at this point in time. Aberdeen City Council support the delivery of the Aberdeen Western Peripheral Route as soon as possible. Any development implemented before or after the Aberdeen Western Peripheral Route would need to provide appropriate mitigation measures including any additional infrastructure required. The Council confirms that the Dyce Drive Infrastructure Masterplan was not referenced in the Proposed Plan as it is not an adopted Supplementary Guidance document.

**Reporter's conclusions:****Reporter's recommendations:**

<b>Issue (ref and heading):</b>	<b>ALLOCATED SITE: WOODSIDE OP135</b>	<b>17</b>
<b>Development Plan reference:</b>	LR1 Land Release Policy , Table 6 Page 15 and Appendix 2 Page 57.	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Mr Alexander G. Shirran of Bucksburn and Newhills Community Council (65), Ms Nicola Abrams of Scottish Environmental Protection Agency (408), Ms Lorraine Jones of Sport Scotland (1244), Mr David Scott of Ledingham Chalmers LLP on behalf of ANM Group Limited (1457), Mr Stephen Booth of Aberdeen City Council - Asset Management (1519), Mr Scott Leitch of Halliday Fraser Munro Planning (1527), Mr John Findlay of Ryden LLP on behalf of Stewart Milne Homes (North Scotland) (1567).		
<b>Provision of the Development Plan to which the issue relates:</b>	Allocated site for 300 homes	
<b>Summary of the representation(s):</b>		
<p>Support for site</p> <p>1457, 1519, 1527: Support the allocation of this site and the provision of 50% affordable housing and delivery of the Woodside Sports Village.</p> <p>Flooding</p> <p>408: Scottish Environment Protection Agency objects to the allocation of this site because the majority of the site lies within the 1:200 year flood envelope of the Indicative River and Coastal Flood Map and considers that the site does not comply with Scottish Planning Policy.</p> <p>Access and transport</p> <p>65, 1567: Concerned with the access of this site onto a single carriageway road very close to the Haudagain roundabout. Delivery is dependent on improvements being made on the Haudagain roundabout.</p> <p>Phasing of development</p> <p>1567: This allocation should be placed in a later phase of the Plan due to deliverability constraints. Impact on sport pitches</p> <p>1244: This contains a number of pitches which are described as good quality in the Council's 2003 Pitch Strategy (see pages 28-29). There is no information provided in terms of any replacement provision.</p>		
<b>Modifications sought by those submitting representations:</b>		
<p>Flooding</p> <p>408: Would remove objection either if these allocations are removed from the Plan, or if a FRA is carried out prior to Plan adoption and this demonstrates that: -The site itself is not at risk of flooding (this may require the allocation outline to be redrawn to remove the area at significant risk of flooding); -The flood storage and conveyancing capacity of the function floodplain is safeguarded; -Development of these allocations will not increase</p>		

the risk of flooding elsewhere and subsequently the flood risk constraint is highlighted in the Final Plan.

#### Phasing of development

1567: Allocation should be pushed back into a later phase. The shortfall can be addressed through the allocation of land at Gillahill (650 units), Mundurno (550 units) and Contlaw (650 units).

#### Impact on sport pitches

1244:- Retention of the site for pitch(es) use; or As part of the Local Development Plan process, consideration of the loss of the pitch(es) against the criteria outlined in para 156 of the Scottish Planning Policy to assess whether the national policy is satisfied; or If none of the criteria outlined in para 156 of the Scottish Planning Policy has been met and the site is still to be allocated for redevelopment, acknowledgement in the text referring to the site that there is a pitch(es) and reference to the need for the requirements of the Scottish Planning Policy and revised Policy NE3 to be met, and that the process outlined in the Council's Pitch Strategy will be followed.

### **Summary of response (including reasons) by planning authority:**

#### Support for site

In light of objections 1527, the Council now considers that the greenbelt and Green space network zoning should be changed and that the site should now be zoned for mixed use for up to 300 homes, of which 50% would be affordable housing

The site is included in an area of Aberdeen where there is already a high proportion of housing provided by registered landlords, such as the Council, and the facilities to support such socio-economic groups. Any housing on this site, especially any affordable houses, would benefit from the facilities being provided elsewhere in Woodside/Tillydrone. There are small scale employment opportunities within 1.6 kilometres, with larger industrial areas slightly further afield.

The site is largely owned by the Lads Club. The Council itself and Aberdeen & Northern Marts also own land, and both endorse the objection 1527. If the Lads Club is able to realise development potential on this site, they say that they intend to use this money for upgrading and refurbishment of the existing playing fields, which lie closer to the river. The playing fields are well used but suffer from poor drainage (due to defective land drains) and do not meet the modern standard of playing fields and changing facilities which the Lads Club aspire to. The Lads Club provide facilities for the wider area of Woodside and Tillydrone and these facilities were provided, and are intended to provide, facilities for young men to provide sporting opportunities as an alternative to less socially desirable activities. These purposes are considered by the Council to be of great value and to be encouraged.

The original allocation was as part of the green space network but the Council considers that this can still be maintained with appropriate design of any development as it is not intended that the whole site should be built development.

#### Flooding

One of the major constraints on development is the potential for flooding. There is an objection by Scottish Environment Protection Agency that the site should not be developed because of this potential. The wording is that "the majority of the site" is medium to high risk of flooding. However, Scottish Environment Protection Agency go on to say (at paragraph 5.2.9) that they would be happy to remove this objection if a flooding risk assessment is carried out prior to Plan adoption and this demonstrates that the site itself is not at risk of flooding (which may be done by the allocation outline being redrawn to remove the area at significant risk of flooding). The intention in the zoning proposal is that only part of the site would be developed for housing - the remainder would remain as football pitches, which could accommodate any overspill from the river. As will be seen on site, the site slopes and the intention, as the Council understands it, is that the housing development would take place next to the road, at the higher end of the site. The objection put forward by Halliday Fraser Munro refers to a detailed flood risk assessment which was undertaken for a previous development proposal and asserts that the area assigned for housing is located on areas free from any risk of flooding. This assessment has now been sent to Scottish Environment Protection Agency for comment and it is submitted that development can be approved subject to a Condition that a satisfactory flood risk assessment is produced to demonstrate that built development will not take place on areas subject to substantial risk of flooding.

#### Access and transport

The site is well served by local bus routes and the Logie Place Neighbourhood Centre is situated approximately 800 metres walk from the western edge of the site. Although there are no clear routes and pedestrians would need to cross the A96 at the Haudagain roundabout, there is a pedestrian phase to the lights. The local community council express concern about the proposed development only that there would need to be consideration for road safety of residents, and this concern can be adequately addressed by conditions with regard to provision of crossing points, to the satisfaction of the Roads Authority.

Provision of the Aberdeen Western Peripheral Route would assist in dealing with traffic congestion in the North of the City, but is not essential to the development of this site for up to 300 homes, of which 50% would be affordable housing. As such there are no deliverability constraints for this site. Additional zoning for housing will help to address housing supply issues.

The Council has taken a proactive approach to infrastructure requirements to support new developments by clearly identifying these in the Proposed Plan. As with all developments allocated in the Local Development Plan, through the masterplan and planning application process the developer will need to submit a Transport Assessment detailing the traffic movements likely to be generated by the development along with any measures required to mitigate the transport impact of development. This will need to be agreed with the Council and Transport Scotland. Masterplans will also need to show how and when supporting infrastructure will be delivered in order to ensure that there is no detrimental impact on the surrounding transport network.

#### Phasing of development

The sites which are suggested to be developed - Gillahill, Contlaw and Mundurno - instead of the site at Woodside are not considered to be suitable alternatives for development. The sites are not identified as Preferred Options in the Proposed Plan and

further information is set out under Issue 35 Alternative Sites: Kingswells, Issue 11 other Alternative Sites: Bridge of Don and Issue 53 Alternative Sites in Cults, Bieldside and Milltimber.

#### Impact on sport pitches

Objection 1244 is on the basis that there is no information on any replacement provision, but it should be noted that the proposed zoning is for partly housing and the balance to remain as playing fields. There will be no loss of playing fields. The intention of the Lads Club is to reinvest funds in sports provision, which would benefit the provision of good quality pitches, and can thus be said to satisfy Objection 1244.

For these reasons, the Council considers that the objection on behalf of Aberdeen Lads Club/GSS Developments Ltd (1527) should be preferred and that the zoning of site OP135 should be changed from greenbelt and green space network to Land Release 1, for the time horizon 2007 - 2016, to allow mixed use, to include residential development for up to 300 homes, of which 50% would be affordable housing, and the pitches to remain for recreational use

#### **Reporter's conclusions:**

#### **Reporter's recommendations:**



<b>Issue (ref and heading):</b>	<b>OTHER ALLOCATED SITES: DYCE AND BUCKSBURN OP15, OP16, OP17, OP20, OP22, OP27</b>	<b>18</b>
<b>Development Plan reference:</b>	OP15 Bankhead Academy, OP16 BP, Dyce (part) Centre, OP17 Former Garden School, OP20 Hopecroft, OP 22 Mugiemoos Mill, Mugiemoos Road, Bucksburn and OP27 Land near Bucksburn School	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Mr Alexander G. Shirran of Bucksburn and Newhills Community Council (65), Ms Jessie Baxter (257), Ms Nicola Abrams of Scottish Environmental Protection Agency (408), Mrs Betty Smith (587), Mrs Rhonda Reekie of Scottish Green Party (611), Mrs Elizabeth Manson (616), Mr James Welsh of Halliday Fraser Munro Planning on behalf of Mr. Malcolm Hay (766), Mrs Catherine Thornhill of Ryden LLP on behalf of Goodmand Real Estate Adviser (UK) LTD on behalf of ABPP Developments LTD (916), Mr Eddie Sim (1192), Mr Richard Johnson (1414), Mr Stephen Booth of Aberdeen City Council - Asset Management (1519).		
<b>Provision of the Development Plan to which the issue relates:</b>	Other smaller sites for residential and mixed use development	
<b>Summary of the representation(s):</b>		
<p>Aircraft flight path issues &amp; retention of granite building within OP15</p> <p>65: Concerns regarding safety and noise due to site OP15 Bankhead Academy being located in a flight path. The original granite fronted building should be retained in site OP15.</p> <p>Road traffic issues</p> <p>65, 611: Consideration should be given to the traffic generated by new development in the area, including the construction of the new waste paper disposal site in Sclattie Quarry and significant housing proposals. Council expects Aberdeen Western Peripheral Route and Haudigan improvements to solve traffic problems alone.</p> <p>Revisions to boundary of OP16</p> <p>916: Whilst the continued designation of OP16 BP Dyce (part) Centre as Mixed Use is welcomed, the changes to the relevant opportunity site boundary between the approved Local Plan and the Proposed Plan are questioned. The BP site, as OP103 in the Aberdeen Local Plan, has now been revised as OP16 BP Dyce (part) Centre, which strangely includes only that part of the site which has already obtained planning permission and is soon to be developed, omitting the portion of the former OP103 which has not been granted permission for redevelopment.</p> <p>Relationship between OP17 and existing properties</p> <p>616: Object to any development on OP17 that would be higher than the existing property heights, or which would impact on privacy of existing property at 15 Glen Gardens.</p>		

### Support for OP17

1519: Support development of OP17 Former Carden School for residential purposes.

### Object to site OP20

587: Object to development of OP20 Hopecroft, other sites are more suitable. There are traffic issues in this area and building more houses will only make these problems worse. The mature trees on Forrit Brae/Hopetoun Grange must be protected. Houses should be built beside available schools. Bats, badgers and red squirrels have all been seen in this area. The population of Aberdeen is falling. The pedestrian link and right of way adjacent to this site must remain. The site is in the airport flight path and development here contradicts current Aberdeen Local Plan policy 40: Housing & Aberdeen Airport.

1192: Object to development on OP20 Hopecroft. This site is greenbelt and any increase in traffic from the new development would cause further disruption to the unsuitable road layout.

1414: Objects to the development of site OP20 Hopecroft. Noise at the site will be excessive, with the Council's assessment of aircraft noise inadequate and misleading. Concerns expressed about design and materials of future housing, given that previous approval on site was unsympathetic to local styles & materials. Concern over potential for loss of protected trees. Affordable housing will be insufficient and potentially located in areas most affected by excessive airport noise.

### Support OP22, but raises concerns over traffic and routes to school

65: Support development for OP22 Mugiemoos Mill, however there will be a problem of increased traffic on Mugiemoos Road which is already congested. Walkways and cycle paths should be incorporated into the site to allow children to travel to Stoneywood School.

### Object to OP22

257: Object to development of OP22 Mugiemoos Mill. Development of this scale requires supporting infrastructure (such as Aberdeen Western Peripheral Route, third don and additional Dee Crossing), and otherwise will simply lead to further congestion, particularly at existing river crossings. Associated environmental impact of traffic congestion.

### Ecological status of Buck's Burn & impact on River Don

408: OP22 Bucks Burn is at moderate ecological status because of changes to beds and banks and diffuse pollution. Also lies close to the River Don which is at moderate status because of alterations to beds and banks, diffuse pollution and sewage pollution.

### Provision of allotments

611: Any planning application for OP22 Mugiemoos Mill should provide land for community allotments.

#### Access to OP27 & impact of development

65: Site OP27 Land Near Bucksburn School - concerns over the existing access to the school. It would not be suitable for the increased traffic generated by the development. The houses proposed for OP27 would need to be single storey or one and a half storey maximum due to the topography and visibility of the site.

Support OP27, but query Green Belt zoning of adjacent land

766: Support development on OP27 Land Near Bucksburn School, but questions the Green Belt zoning of land immediately to the south-west. The Green Belt boundary indicated in the review is not reflected in the Proposed Plan, with this land to the south-west of the site failing to fulfil any of the functions of Green Belt land as set out in Scottish Planning Policy.

#### **Modifications sought by those submitting representations:**

##### Revisions to boundary of OP16

916: The entire area of OP16 should be identified as mixed use. The proposed Green Space Network designation that runs along the western fringe of the site OP103 in the extant Aberdeen Local Plan (2008) and overlays plot C should be removed and the approved development brief for the former BP Headquarters Complex (April 2008) is to be added to the list of Supplementary Guidance to the Aberdeen Local Development Plan.

##### Object to site OP20

1192, 1414: Leave OP20 as greenbelt.

##### Ecological status of Buck's Burn & impact on River Don

408: Opportunities to protect and improve the watercourses within OP22 must be considered. An appropriate way forward would be to insert the following text into the 'other factors' section of each of the allocation summaries as set out in Appendix 2 for the following sites: "Any Masterplan should take account of the existing water features within the site, the pressures which apply to these features and should direct developers to look for opportunities to protect and improve the water environment."

##### Provision of allotments

611: Allotments should be a requirement within any planning permission given for OP22.

Support OP27, but query Green Belt zoning of adjacent land

766: The Green Belt designation to the south of site OP27 should be re-drawn to better reflect the findings of the Green Belt review, which did not indicate the land immediately to the south-west of the site being included within the Green Belt.

#### **Summary of response (including reasons) by planning authority:**

##### Aircraft flight path issues & retention of granite building within OP15

65: While opportunity sites identified are considered to be generally suitable for

development, detailed assessment of any proposal will be required through submission of a planning application and assessment against the relevant policies contained in the development plan. Within the Proposed Plan, policy D4: Aberdeen's Granite Heritage, encourages the retention of existing granite buildings throughout the city, even if not listed or in a Conservation Area. Conversion and adaptation of redundant granite buildings will be favoured. Where a large or locally significant granite building that is not listed or in a Conservation Area is demolished, the City Council will expect the original granite to be used on the principal elevations of the replacement building. The impact of airport noise upon development will be a material consideration in the assessment of planning applications within the immediate surrounds of the airport and particularly under the aircraft flight path. Applications for such development, including for site OP15 Bankhead Academy, will be expected to submit supporting information, generally in the form of a noise assessment, to demonstrate that noise will be within tolerable levels and that a suitable level of amenity can be attained. Policy H8 of the Proposed Plan states that development within areas where noise would exceed stated levels will not be permitted. Statutory consultation arrangements exist for the safeguarding of aerodromes through the provisions of Town and Country Planning (Safeguarded Aerodromes, Technical Sites and Military Explosives Storage Areas) (Scotland) Direction 2003 and the accompanying circular 2/2003 (RD7).

#### Road traffic issues

65, 611: The combination of transport modelling and gathering the views of partners and stakeholders has helped the Council to identify requirements for new walking and cycling infrastructure, including Core Paths, as well as public transport and roads. Infrastructure requirements will need to be reflected in any Masterplan or planning application for development. The precise level of infrastructure requirements and developer contributions will need to be agreed with the Council through the Masterplan process and any subsequent planning application in accordance with the Infrastructure and Developer Contributions Manual (CD25). All development proposals must demonstrate that sufficient measures have been taken to minimise the traffic generated as a result of that development. Development must be accompanied by a package of transport infrastructure measures including road network improvements of a level commensurate with the scale of development and sufficient to support new or expanded communities. Policy D3 of the Proposed Plan ('Sustainable and Active Travel') requires new development to be designed in order to minimise travel by private car, improve access to services and promote healthy lifestyles. These measures demonstrate a clear link between the development taking place and the level of transport infrastructure improvements required.

#### Revisions to boundary of OP16

916: Site OP16 BP Dyce (part) Centre was carried forward from the extant Aberdeen Local Plan (CD12) and was included in the extant Plan following scrutiny by Reporters through the Public Local Inquiry process. In the Reporter's Report (CD11) BP Dyce (part) was considered under Issue 44. It should be noted from the outset that this site was identified as a development opportunity in the 2008 Aberdeen Local Plan (CD12). In this instance, we should draw your attention to paragraph 78 of Circular 1/09 Development Planning (CD4) which states "Scottish Ministers intend the appointed person to, within the bounds of the issues raised in the representations, primarily examine the appropriateness and sufficiency of the content of the Proposed Plan. (. . . . .) The appointed person should generally not recommend modifications to parts of the Plan

which have been examined in previous examinations or rolled forward from previous Plans, unless circumstances have clearly changed." We therefore consider that matters on the principle of development on this site has already been addressed through the existing Local Plan. The former BP Headquarters site in Dyce (Site OP16 in Proposed Plan, Site OP103 in extant Aberdeen Local Plan) has retained its zoning as a mixed use area, though the opportunity site boundary shown in the Proposed Plan now covers a smaller area, reflecting only that part of the site which has had planning permission granted for redevelopment. The alteration to the boundary is of limited significance, as any proposal for the redevelopment of the remaining parts of the former BP site will be assessed against the continued zoning of the site as a mixed use area, the relevant policies contained in the Local Development Plan, as adopted, and the approved Planning Brief for the site. If the Reporters are so minded the approved Planning Brief can be included in the list of supplementary guidance to be brought forward with the Proposed Plan. The designated Green Space Network is a strategic network of woodland and other habitats, active travel and recreation routes, greenspace links, watercourses and waterways. The network includes designated Natural Heritage Sites, as set out in policy NE8, links between habitats and open spaces identified in Aberdeen's Open Space Audit 2010 (CD23), as well as opportunities for future use for physical activity and access to the outdoors. Designation of an area of land to the west of site OP16 BP, Dyce, within site OP103 BP Dyce from the extant Aberdeen Local Plan, does not preclude development on the site, but requires particular attention to be paid to the impact of any development proposal on the character or function of the Green Space Network. As the contribution made by this site towards the Green Space Network has been established through the Open Space Audit, it is not considered appropriate to remove the designation.

#### Relationship between OP17 and existing properties

616: While opportunity sites identified are considered to be generally suitable for development, detailed assessment of any proposal will be required through submission of a planning application and assessment against the relevant policies contained in the Development Plan. Interested parties will have the opportunity to make representations on more detailed aspects of a proposal, such as height of buildings, design etc, on submission of an application for planning permission. Impact on privacy as a result of all new development and design issues, including the relationship of new development with its surroundings, both built and n natural, will be material considerations in assessment of an application for planning permission.

#### Support for OP17

1519: Welcome supporting comment for OP17 Former Carden School.

#### Object to site OP20

587, 1192, 1414: Site OP20 Hopcroft was carried forward from the extant Aberdeen Local Plan (CD12) and was included in the extant Plan following scrutiny by Reporters through the Public Local Inquiry process. In the Reporter's Report (CD11) Hopcroft was Issue 52. It should be noted from the outset that this site was identified as a development opportunity in the 2008 Aberdeen Local Plan. In this instance, we should draw your attention to paragraph 78 of Circular 1/09 Development Planning (CD4) which states "Scottish Ministers intend the appointed person to, within the bounds of the issues raised in the representations, primarily examine the appropriateness and sufficiency of the

content of the Proposed Plan. . . The appointed person should generally not recommend modifications to parts of the Plan which have been examined in previous examinations or rolled forward from previous Plans, unless circumstances have clearly changed." We therefore consider that matters on the principle of development on this site have already been addressed through the existing Local Plan. Reallocating site OP20 Hopecroft back to green belt land is not considered to be appropriate as its suitability for residential development has been established through the inquiry process for the existing Aberdeen Local Plan (2008) and it will contribute towards the housing land supply. During the inquiry process, reporters recommended that the land currently designated as OP20 Hopecroft be allocated for residential development, with a capacity for 30 dwellings, with the benefits of employment opportunities nearby and the site's robust boundaries mentioned specifically. It was concluded by the reporter that these advantages would outweigh noise issues if residential development were to be restricted to the southern, less noisy part of the field and if such noise mitigation as is possible was to be provided. It is therefore considered that the principle of development of 30 homes on this site has been established by the reporters' findings at the Public Local Inquiry, which took into account representations based on noise issues at that time.

All development proposals must demonstrate that sufficient measures have been taken to minimise the traffic generated as a result of that development. Development must be accompanied by a package of transport infrastructure measures including road network improvements of a level commensurate with the scale of development and sufficient to support new or expanded communities. This is reflected in Policy T2 Managing the Transport Impact of Development, while Policy D3 of the Proposed Plan ('Sustainable and Active Travel') requires new development to be designed in order to minimise travel by private car, improve access to services and promote healthy lifestyles. In terms of any existing right of way, this policy states that existing access rights will be protected and enhanced. Where development proposals impact on the access network, the principle of the access must be maintained through the provision of suitable alternative routes. The requirement for new educational infrastructure as a result of development will be taken into account through policy I1: Infrastructure Delivery and Developer Contributions. Development must be accompanied by the infrastructure (including schools infrastructure), services and facilities required to support new or expanded communities and the scale and type of development proposed. Section 3.72 of the proposed Local Development Plan states that where trees are considered to be at risk from development or construction, we may require information and safeguarding measures in accordance with standards as set out in supplementary guidance on protecting trees and woodlands (RD36). In addition, policy NE5: Trees and Woodlands sets out that that proposals resulting in the loss of, or damage to, established trees and woodlands that have natural or cultural heritage value or contribute to the character, biodiversity or amenity of an area will be resisted. Policy NE8: Natural Heritage seeks to protect wildlife by requiring ecological assessments where there is evidence to suggest that habitat or species of importance exist within any given site which is the subject of a planning application. Affordable housing for the site should be set in accordance with policy H5 Affordable Housing, which states that developments of five or more units should contribute no less than 25% of the total number of units as affordable housing. This figure was set having had consideration for Planning Advice Note 74 Affordable Housing (RD29), which sets a benchmark of 25% affordable housing. Further details on provision of affordable housing is contained in the Council's Affordable Housing Supplementary Guidance (RD68).

Support OP22, but raises concerns over traffic and routes to school

65: Welcome supporting comment for OP22 Mugiemoos Mill. Site OP22 Mugiemoos Mill, as contained in the Proposed Plan, offers an opportunity for the redevelopment of the vacant paper mill site and adjoining industrial land. The combination of transport modelling and gathering the views of partners and stakeholders has helped the Council to identify requirements for new walking and cycling infrastructure, including Core Paths, as well as public transport and roads. Infrastructure requirements will need to be reflected in any Masterplan or planning application for development. The precise level of infrastructure requirements and developer contributions will need to be agreed with the Council through the Masterplan process and any subsequent planning application in accordance with the Infrastructure and Developer Contributions Manual (CD25). All development proposals must demonstrate that sufficient measures have been taken to minimise the traffic generated as a result of that development. Development must be accompanied by a package of transport infrastructure measures including road network improvements of a level commensurate with the scale of development and sufficient to support new or expanded communities. Policy D3 of the Proposed Plan ('Sustainable and Active Travel') requires new development to be designed in order to minimise travel by private car, improve access to services and promote healthy lifestyles. These measures demonstrate a clear link between the development taking place and the level of transport infrastructure improvements required.

Object to OP22

257: Site OP22 Mugiemoos Mill was carried forward from the extant Aberdeen Local Plan (CD12) and was included in the extant Plan following scrutiny by Reporters through the Public Local Inquiry process. In the Reporter's Report (CD11) Mugiemoos Mills was Issue 38. It should be noted from the outset that this site is identified as a development opportunity in the 2008 Aberdeen Local Plan (CD12). In this instance, we should draw your attention to paragraph 78 of Circular 1/09 Development Planning (CD4) which states "Scottish Ministers intend the appointed person to, within the bounds of the issues raised in the representations, primarily examine the appropriateness and sufficiency of the content of the Proposed Plan. (. . . . .) The appointed person should generally not recommend modifications to parts of the Plan which have been examined in previous examinations or rolled forward from previous Plans, unless circumstances have clearly changed." We therefore consider that matters on the principle of development on this site have already been addressed through the existing Local Plan.

Site OP22 Mugiemoos Mill, as contained in the Proposed Plan, offers an opportunity for the redevelopment of the vacant paper mill site and adjoining industrial land. The Council has identified an integrated package of measures in the Local Transport Strategy (RD34), also reflected in the Regional Transport Strategy (RD30), for improving the transport network and the Aberdeen Western Peripheral Route and Third Don Crossing are important parts of this package. Aberdeen City Council, Aberdeenshire Council, the North East Scotland Transport Partnership and the Scottish Government are all committed to the delivery of the Aberdeen Western Peripheral Route. This scheme is currently subject to legal challenge so a delivery timescale is difficult to establish at this point in time. Aberdeen City Council support the delivery of the Aberdeen Western Peripheral Route as soon as possible. Any development implemented before or after the Aberdeen Western Peripheral Route would need to provide appropriate mitigation measures including any additional infrastructure required. The planning application for the Third Don Crossing proposal was approved subject to conditions on 23rd February 2011 (RD50). In addition the Local Development Plan Cumulative Impact Assessment

has identified the need for further capacity improvements across Persley Bridge.

#### Ecological status of Buck's Burn & impact on River Don

408: The suggestion for the inclusion of text regarding existing water features is accepted, however, we feel that as the suggested text relates to the delivery of the site that it would be best placed in the Action Programme (CD 20) as opposed to Appendix 2. If the Reporter is so minded, the Action Programme will be amended to include reference to site OP22 Mugiemoos Mills and to include the following text: "Any Masterplan should take account of the existing water features within the site, the pressures which apply to these features and should direct developers to look for opportunities to protect and improve the water environment".

#### Provision of allotments

611: Site OP22 Mugiemoos Mill, as contained in the Proposed Plan, offers an opportunity for the redevelopment of the vacant paper mill site and adjoining industrial land. We would agree that allotments need to be considered as part of the open space requirements. This issue will be dealt with in the Open Space Supplementary Guidance (RD82). This states that developments that are likely to cause a demand for small-scale, local food production, such as high density housing or flats will require to include the provision of allotments as part of their open space provision. Figure 5 of the Guidance outlines the quantitative and accessibility standards for allotments expected.

#### Access to OP27 & impact of development

65: As this site is to be developed for more than 50 homes, the developer will be required to prepare a masterplan prior to applying for planning permission. This will set out the key principles of the design approach taken, including preferred layout, access to and from the site, relationship with existing buildings and topographical features and delivery of infrastructure such as roads and educational/health facilities where necessary. All development proposals must demonstrate that sufficient measures have been taken to minimise the traffic generated as a result of that development. Development must be accompanied by a package of transport infrastructure measures including road network improvements of a level commensurate with the scale of development and sufficient to support new or expanded communities. Policy D3 of the Proposed Plan ('Sustainable and Active Travel'). Masterplanning of this site should take into account Policy D3: Sustainable and Active Travel, which requires new development to be designed in order to minimise travel by private car, improve access to services and promote healthy lifestyles. Access to nearby schools will be an important consideration.

#### Support OP27, but query Green Belt zoning of adjacent land

766: Site OP27 Land Near Bucksburn School, in common with all other development options validly submitted, was subject to scoring against the Council's sustainability checklist, and found to be a promising site for development. The proposal to develop further land in this area has come very late in the process and was not brought up at either the Development Options or Main Issues stages. There has been no opportunity for the public or anyone else to comment on this. The Proposed Plan identifies sufficient greenfield housing land for the first two Structure Plan phases and most of the third phase. The green belt boundary shown in the Green Belt Review (CD19) is to reflect the original development option for the site. Land to the south remains as greenbelt in order



to protect the recreational value and setting of the golf course. Following selection of appropriate sites for development to meet Structure Plan requirements, the designation of land as green belt can enable the planning authority to direct planned growth to the most appropriate locations, a specific function of green belt designation in Scottish Planning Policy (CD3).

**Reporter's conclusions:****Reporter's recommendations:**

<b>Issue (ref and heading):</b>	<b>ALLOCATED SITES: GREENFERNS OP39 AND OP45</b>	<b>19</b>
<b>Development Plan reference:</b>	OP39 Greenferns and OP45 Greenferns Appendix 2, Page 57 and 58.	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Miss Lynne Cheetham (8), Ms Nicola Abrams of Scottish Environmental Protection Agency (408), Mr Steve Delaney of Mastrick, Sheddocksley and Summerhill Community Council (543), Mrs Elaine Farquharson-Black of Paull and Williamsons LLP on behalf of Enermech Group Limited (648), Mr Stephen Booth of Aberdeen City Council - Asset Management (1519), Mr John Findlay of Ryden LLP on behalf of Stewart Milne Homes (North Scotland) (1567), Mr Ian Cox of Kingswells Community Council (1579).		
<b>Provision of the Development Plan to which the issue relates:</b>	Combined allocations for 1470 homes and 10ha of employment land	
<b>Summary of the representation(s):</b>		
<p>Impact of development of OP39 on existing residential properties</p> <p>8: Concern raised over the impact of development at OP39 on existing homes on Davidson Drive, Northfield. Particular reference made to privacy, views and outlook, traffic, noise, safety and natural light.</p> <p>Concerns over impact on playing fields and traffic generated through development</p> <p>543: Concerns raised over the future of the existing Sheddocksley playing fields. Respondent does not wish to see this community resource incorporated into the development. Concerns over traffic generated by development, though supportive of Masterplan's suggestion of a spine road linking up with Provost Fraser Drive and Provost Rust Drive.</p> <p>Support for OP45 subject to conditions</p> <p>1519: Aberdeen City Council support inclusion of site OP45, which is entirely within their ownership. Development Framework for site has been approved by Aberdeen City Council.</p> <p>1579: Support inclusion of site OP45, subject to certain conditions and safeguards.</p> <p>Concerns over ability to deliver OP45</p> <p>1567: States that Aberdeen City Council are yet to market site OP45, and raises concerns over the Council's ability to ensure that site is delivered within phasing targets and suggests knock-on effect on allocations in the next phase.</p> <p>Green Space Network zoning on OP45</p> <p>648: Enermech, operating from Bucksburn House site (OP45), are concerned that part of their site is designated as Green Space Network, which they feel fails to reflect that the site is designated for wildlife purposes only. It is suggested that the Green Space Network designation may be misunderstood as inferring that the land in question has</p>		

recreational, landscape and/or access value. Object to any suggestion that the land is of benefit to public for recreational, landscape or access purposes.

#### Ecological Status of watercourses & flooding within OP45

408: Objection to site OP45 by Scottish Environment Protection Agency. This objection will be removed if wording of site summary in Appendix 2 is changed to reflect potential flood risk. It is also requested that the summary includes reference to the need to consider opportunities for the protection and improvement of watercourses through the masterplanning process.

#### **Modifications sought by those submitting representations:**

##### Impact of development of OP39 on existing residential properties

8: Wishes development to be distanced from Davidson Drive. Either not built at all, or moved back 2-3 fields towards Westhill.

##### Concerns over impact on playing fields and traffic generated through development

543: Respondent wants Aberdeen City Council to commit to the protection of Sheddocksley Playing Fields. Also wants development to be conditional upon delivery of spine road running through development linking in to Provost Rust Drive and Provost Fraser Drive.

##### Support for OP45 subject to conditions

1579: An additional buffer zone should be included within site OP45 in order to help protect the District Wildlife Site.

##### Concerns over ability to deliver OP45

1567: Allocations for site OP45 should be pushed back to a later phase. Any shortfall as a result can be met through the allocation of additional sites at Gillahill (650), Mundurno (550) and Contlaw (650).

##### Green Space Network zoning on OP45

648: Green Space Network designation should be removed from site OP45. Failing removal, respondent seeks confirmation within either the proposed plan or supplementary guidance that the Green Space Network zoning on this site reflects only the district Wildlife Site and is not available for recreational or access uses.

#### Ecological Status of watercourses & flooding within OP45

408: 'Other Factors' section of site description for OP45 in appendix 2 of proposed plan should be amended to include the following statements; "This site may be at risk of flooding. A flood risk assessment will be required to accompany any future development proposals for this site." & "Any Masterplan should take account of the existing water features within the site, the pressures which apply to these features and should direct developers to look for opportunities to protect and improve the water environment."

#### **Summary of response (including reasons) by planning authority:**

### Impact of development of OP39 on existing residential properties

8: These sites were carried forward from the extant Aberdeen local Plan (2008). OP45 Greenferns is identified in the 2008 Aberdeen Local Plan (CD12) for Strategic Housing Land Reserve (Section 2.5 page 22). OP39 Greenferns was identified as a Housing Allocation for 120 houses. Given that the principle for developing this area was established here (albeit subject to review) all such areas have been carried forward into the Proposed Plan. They were also assessed as being suitable for development in the Development Options Assessment Report 2010 (CD13 ).The Council remain of the opinion that these sites are suitable for residential development as proposed. These sites were subject to the scrutiny of reporters in the Public Local Inquiry, and are addressed under Issue 56 of the subsequent report (CD11). Detailed aspects of a development proposal, such as potential noise, loss of light, loss of privacy etc will be material considerations in the assessment of future planning applications, both in terms of the environment created through development and the impact of that development upon existing dwellings.

### Concerns over impact on playing fields and traffic generated through development

543: The existing sports pitches/playing fields at Sheddocksley have been designated as both Green Space Network and Green Belt within the proposed plan. Green Belt designation restricts the types of development permitted in such areas, while the purpose of the Green Space Network is to maintain a strategic network of woodland and other habitats, active travel and recreation routes, greenspace links, watercourses and waterways, providing an enhanced setting for development and other land uses and improved opportunities for outdoor recreation, nature conservation and landscape enhancement. The approved Greenferns Development Framework (RD78) sets out the design principles which will inform preparation of a masterplan and development of detailed proposals for the site. The retention of the existing Sheddocksley sports pitches emerged as a key theme from consultation with the local community, and the framework suggests that as a result of this local provision, open space within the Greenferns site will be of other types, in order to provide variety.

All development sites must demonstrate that sufficient measures have been taken to minimise the traffic generated as a result of that development. Development must be accompanied by a package of transport infrastructure of a level commensurate with the scale of development and sufficient to support new or expanded communities. Appendix 4 to the proposed plan sets out the key infrastructure requirements for then various masterplan zones. Among the requirements for Masterplan zone 5 (Greenferns) is road access from Greenferns to Provost Rust Drive and Provost Fraser Drive.

### Support for OP45 subject to conditions

1519, 1579: The Council welcomes supporting comments for OP45 Greenferns. In preparing masterplans for any site, developers will be encouraged to take into account the character of neighbouring land, including existing topography and relevant designations, such as District Wildlife Sites. Detailed assessment of a development proposal, upon submission of an application for planning permission, would determine what impact a scheme may have upon such a designation. The Bucksburn Gorge District Wildlife (CD29) site forms part of the designated Green Space Network, the purpose of which is to maintain a strategic network of woodland and other habitats, active travel and recreation routes, greenspace links, watercourses and waterways, providing an

enhanced setting for development and other land uses and improved opportunities for outdoor recreation, nature conservation and landscape enhancement. Proposals for development that are likely to destroy or erode the character or function of the Green Space Network will not be permitted. It is considered that this network provides the same function as the buffer sought.

#### Concerns over ability to deliver OP45

1567: The phasing programme set out in the proposed plan is intended to set the maximum pace at which development shall proceed. The Local Development Plan cannot ensure the delivery of development sites in a particular phase, but rather to ensure that site selection results in a supply of land which is readily capable of being developed. The pace of development will be determined by many factors, not least of which is the level of demand. This issue is recognised in Structure Plan paragraph 4.17 (CD8), which states that "this plan provides a generous supply of land for new housing, although we cannot expect all the new homes to be built within the relevant plan period." The Council has demonstrated its commitment to take this site forward through the preparation of the Greenferns Masterplan (RD74).

#### Green Space Network zoning on OP45

648: The purpose of the Green Space Network is to maintain a strategic network of woodland and other habitats, active travel and recreation routes, greenspace links, watercourses and waterways, providing an enhanced setting for development and other land uses and improved opportunities for outdoor recreation, nature conservation and landscape enhancement. Inclusion of land within the Green Space Network may be as a result of any one of these reasons. The plan does not provide a breakdown of the justification for inclusion of any given site. In this particular instance, the Green Space Network covers the Bucksburn Gorge District Wildlife Site (CD29). This is considered to be sufficient justification for Green Space Network designation.

#### Ecological Status of watercourses & flooding within OP45

408: Scottish Environment Protection Agency's suggestions for the inclusion of text within the Proposed Plan are partially accepted. The text regarding the requirement for a Flood Risk Assessment is acceptable and if the Reporter is so minded, the following text will be added into the 'Other Factors' section of Appendix 2, "This site may be at risk of flooding. A flood risk assessment will be required to accompany any future development proposals for this site." The suggestion for the inclusion of text regarding existing water features is accepted, however, we feel that as the suggested text relates to the delivery of the site that it would be best placed in the Action Programme (CD 20) as opposed to Appendix 2. If the Reporter is so minded, the Action Programme will be amended to include reference to site OP39 Greenferns and to include the following text for OP39 Greenferns and OP45 Greenferns: "Any Masterplan should take account of the existing water features within the site, the pressures which apply to these features and should direct developers to look for opportunities to protect and improve the water environment".

#### **Reporter's conclusions:**

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**Reporter's recommendations:**

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<b>Issue (ref and heading):</b>	<b>ALTERNATIVE SITE: DYCE PLAYING FIELDS</b>	<b>20</b>
<b>Development Plan reference:</b>	Site not allocated in Proposed Plan.	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Mr Robin Holder of Holder Planning on behalf of MacDonald Estates (853).		
<b>Provision of the Development Plan to which the issue relates:</b>	Alternative proposal for retail and recreation development.	
<b>Summary of the representation(s):</b>		
853: The Pitmedden Road playing fields, Dyce, have been earmarked by McDonald Estates and the Dyce Sports and Leisure Development Trust as a potential site for a sporting and recreational hub, with funding and delivery secured via the development of a new supermarket on part of the site. The Council's Open Space Audit of 2010 identified a good supply of open space in the Dyce ward, though the Pitmedden site was adjudged to be well below average in terms of its open space quality.		
<b>Modifications sought by those submitting representations:</b>		
853: Seek the zoning of the area shown on the accompanying plan as an opportunity site for development, with a number of options suggested for the relevant policy to be applied to the site. The site may be zoned entirely as a mixed use area, supporting a combination of retail, sports and open space. Supplementary planning guidance could be prepared for the site, containing details of the type and location of the various land uses. Alternatively, the Local Development Plan could set out the distribution of land uses through separate policies for the component parts of the site.		
<b>Summary of response (including reasons) by planning authority:</b>		
853: The Dyce playing fields have been zoned as both Urban Green Space (NE3) and Green Space Network (NE1) on the basis of their value as a recreational and sports facility. The policies which correspond with those zonings are intended to restrict development where it would result in significant loss or damage to the value of that resource.		
<p>Any proposal for development which would involve the loss of an existing open space resource, such as sports pitches/playing fields, must be accompanied by justification for the loss of that resource. No compelling justification has been provided other than a statement that the Council's Open Space Audit (CD23) indicates that these pitches are well below average in terms of open space quality. Furthermore, the acknowledgement of the Open Space Audit 2010 that this area is of a below average standard does not demonstrate the suitability of a supermarket on part of the site. The Open Space Audit aims to provide an accurate reflection of the quantity, distribution and quality of open space across the city, to inform the preparation of policies in the proposed plan for the protection and enhancement of open spaces and to inform the preparation of the Council's Draft Open Space Strategy (RD39). That strategy is intended to set out how such spaces can be effectively managed and enhanced where possible.</p>		
<p>It is also noted that both the current Aberdeen Local Plan and the proposed Local Development Plan would not allow development upon sites designated as Urban Green Space for any use other than recreation or sport unless a provision was made for an equivalent and equally convenient alternative area of open space. No such provision has</p>		

been mentioned. It is not considered that the submissions made are sufficient to warrant any change to the zoning of this site or the preparation of additional supplementary guidance at this stage.

**Reporter's conclusions:****Reporter's recommendations:**



<b>Issue (ref and heading):</b>	<b>ALTERNATIVE SITE: NEWTON FARM DYCE</b>	<b>21</b>
<b>Development Plan reference:</b>	Site not allocated in the Proposed Plan.	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Ms Natasha Douglas of Ryden LLP on behalf of Marshall Farms (635).		
<b>Provision of the Development Plan to which the issue relates:</b>	Alternative Proposal - Development Option 1/15	
<b>Summary of the representation(s):</b>		
<p>635: Object to failure to include site at Newton Farm, Dyce, for Business and Industrial use within proposed plan. Site submitted at Development Options stage, ref 1/15. Zoned as Green Belt in proposed Local Development Plan.</p> <p>State that HSE/PADHI regulations would not rule out development on site.</p> <p>Highlights site's attractive location in relation to A96 and 'Energetica Corridor'.</p> <p>Question the ability of sites OP39 &amp; OP45 at Greenferns to deliver 10ha of employment land within the plan period. State that OP45 is reliant on delivery of OP39 first. Cite Aberdeen City and Aberdeenshire housing Land Audit, which lists site OP39 as being 'constrained' as a result of its ownership. State that site 1/15 is not constrained and can be delivered.</p> <p>Site is ideally located to provide an extension to Kirkhill Industrial Estate. State that the existing agricultural use of the site will be damaged by the Aberdeen Western Peripheral Route, which will sever the site.</p> <p>Support the Aberdeen Western Peripheral Route as a boundary for development of site 1/15 for employment purposes. Junction to the north-west of the site will provide access.</p> <p>Contend that site 1/15 does not meet any of the purposes of Green Belt designation. Suggest Aberdeen Western Peripheral Route could act as outer boundary, providing protection against coalescence, and thereby allowing development of 1/15.</p>		
<b>Modifications sought by those submitting representations:</b>		
635: Request that city-wide proposals map and table 6 of proposed plan are amended to include land at Newton Farm, Dyce, for employment use.		
<b>Summary of response (including reasons) by planning authority:</b>		
<p>635: As stated in the Development Options Assessment Report (CD13), a major gas pipeline passes through the site. Under HSE's PADHI regulations (RD19), only level 1 developments would be permitted on the inner zone. In terms of employment development this would include workplaces employing less than 100 people and car parking. In addition, the Aberdeen Western Peripheral Route is a major constraint upon the site, with the proposed route skirting the south western edge of the site and the embankment for the road encroaching upon the site. While it is acknowledged that PADHI regulations do not preclude development upon this site, the restrictions placed upon development, when combined with the Aberdeen Western Peripheral Route's route encroachment upon the site, would severely restrict the level of development which</p>		

could be accommodated.

The Development Options Assessment Report also identified the significant existing and proposed allocations in the Dyce area. Given the scale of those allocations, and the desire to ensure delivery of Dyce Drive (OP32), it is considered that additional allocations would not be necessary. Structure Plan employment land requirements are met on more suitable sites elsewhere.

Site OP39 was carried forward from the extant Aberdeen Local Plan (CD12), while site OP45 is a new allocation for 10ha of employment land and 1350 homes. A Development Framework, covering both sites, and a detailed Masterplan, applying to site OP39 only, were approved by Aberdeen City Council in January 2010 (RD74). While the site is technically constrained under the terms of PAN 2/2010 (section 2) (RD9), which requires all publicly owned land not forming part of a programme of land disposal to be listed as constrained due to its ownership, the Council has made clear its position that all sites in its ownership, that have been identified within the proposed plan, shall be made available for delivery as set out in the plan. The existence of the development framework and masterplan, allied with the single ownership of the site, ensure that once included within a programme of land disposal the site could be swiftly delivered before 2023, which is the end of the first Structure Plan phase for employment land.

It is not for the Local Development Plan to allocate land for development as compensation for the impact of the Aberdeen Western Peripheral Route on existing uses. The Compulsory Purchase process should ensure that landowners affected by the Aberdeen Western Peripheral Route are compensated adequately.

The Green Belt status proposed for this land does not require the site to fulfil all of the criteria of Green Belt designations, but one or more. In this instance, the designation directs planned growth to more appropriate locations within the City area.

The planning authority contends that no compelling case has been made for the modification of the plan to include an employment land designation as site 1/15, as identified through the Development Options process.

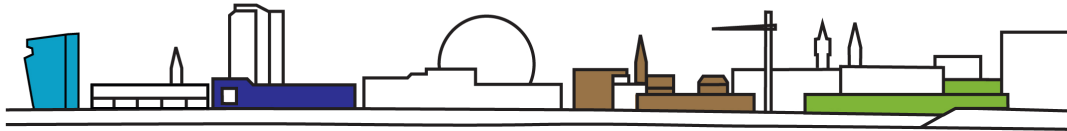
**Reporter's conclusions:****Reporter's recommendations:**

<b>Issue (ref and heading):</b>	<b>MASTERPLANNING OF NEWHILLS EXPANSION AND DYCE DRIVE</b>	<b>22</b>
<b>Development Plan reference:</b>	Proposed Plan sites OP26, OP28, OP29, OP30 & OP31	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Mr Gordon MacCallum of Keppie Design on behalf of CALA Homes (East) Ltd and SAC Craibstone (465).		
<b>Provision of the Development Plan to which the issue relates:</b>	Collaborative masterplanning for sites OP26 & OP28, and sites OP29, OP30 & OP31 respectively	
<b>Summary of the representation(s):</b>		
<p>465: It has been agreed that a Strategic Development Framework document will be prepared for sites OP26 Craibstone North and Walton Farm, OP28 Rowett North, OP29 Craibstone South, OP30 Rowett South and OP31 Greenferns Landward. Excluding OP32 Dyce Drive, which will be subject of a separate planning brief.</p> <p>465: The Scottish Agricultural College relocation should take place outwith any need for an approved masterplan for sites OP26 Craibstone North and OP28 Rowett North. Given the commitment by CALA/SAC to prepare a joint masterplan between sites OP26 Craibstone North and OP29 Craibstone South, it is considered that there would be no need to pursue a joint masterplan with OP28 Rowett North.</p> <p>465: There is commitment to delivering the Craibstone sites (OP26 and OP29) within early years of the Local Plan and to deliver homes by 2016. The Local Plan is intended for adoption in April 2012 and, assuming CALA are in a position to apply for planning permission in 2013, it only leaves 2 years of construction before 2016. In order to achieve any meaningful level of capacity within Phase 1 of the Plan timetable, there requires to be minimum delay or obstacles placed in the way of the development management process.</p>		
<b>Modifications sought by those submitting representations:</b>		
465: Remove requirement for joint masterplan between OP26 Craibstone North and Walton Farm and OP28 Rowett North.		
<b>Summary of response (including reasons) by planning authority:</b>		
<p>465: The requirement for a joint masterplan between sites OP26 Craibstone North and Walton Farm and OP28 Rowett North is important to set out a fundamental framework for the way in which these two closely related employment land allocations can best be developed. In order to ensure effective links between sites and a consistent approach, it may be appropriate for a development framework to be undertaken to cover a number of sites. The role of development frameworks and Masterplans is set out in the Council's supplementary guidance, 'The Aberdeen Masterplanning Process' (RD63).</p> <p>In this instance, it is understood that landowners and other interested parties have agreed to the preparation of a collaborative development framework to cover sites OP26 Craibstone North and Walton Farm, OP28 Rowett North, OP29 Craibstone South, OP30 Rowett South &amp; OP31 Greenferns Landward. This collaborative working is welcomed as it will include all sites within the masterplan zone, as set out in the table on page 20 of</p>		

the proposed plan. The requirement for a joint masterplan for sites OP26 Craibstone North and Walton Farm & OP28 Rowett North is appropriate as the sites are directly adjacent and are both allocated for the provision of employment land. It is therefore necessary to ensure that these two sites are integrated effectively and demonstrate the necessary linkages. The prospect of a combined masterplan for sites OP26 Craibstone North and Walton Farm and OP29 Craibstone South is less logical, as the sites are allocated for different forms of development and separated by the busy A96 trunk road. While OP26 Craibstone North and Walton Farm and OP29 Craibstone South are under the same ownership, the relationship between the two sites is not sufficiently strong to facilitate good masterplanning. The scope for effectively masterplanning these two sites together is limited by the barrier of the A96, and the Council maintains the position that the masterplanning of site OP29 Craibstone South would be best masterplanned with the other housing sites within masterplan zone 4 (OP30 Rowett South & OP31 Greenferns Landward), and that the two employment land designations (OP26 Craibstone North and Walton Farm & OP28 Rowett North) should be considered together.

It is acknowledged that any number of factors, many outwith the control of the developer, may influence the potential for delivery of sites in line with the phasing set out in the proposed plan, but the requirement for collaborative working between these sites is considered to be essential in order to achieve a high quality of development.

**Reporter's conclusions:****Reporter's recommendations:**



**aberdeen** local development plan

**RESPONSE TO PROPOSED PLAN  
CONSULTATION:  
ALTERNATIVE PROPOSALS: CLINTERTY**

**ISSUE 23 – 26**

<b>Issue (ref and heading):</b>	<b>ALTERNATIVE SITE: NEW SETTLEMENT AT CLINTERTY</b>	<b>23</b>
<b>Development Plan reference:</b>	Site not allocated in the Proposed Plan.	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Mr Ben Freeman of Bancon Developments Ltd (1561), Mr Ian Cox of Kingswells Community Council (1579).		
<b>Provision of the Development Plan to which the issue relates:</b>	No provision – alternative proposal for 3,000 houses.	
<b>Summary of the representation(s):</b>		
<p>1561: Bancon object to the failure of the Local Development Plan to allocate their revised 'bid' site at Clinterty as an opportunity to develop a mixed use expansion of the existing settlement. The site has capacity to accommodate circa 3,000 homes, commercial and employment opportunities, along with the necessary schools and other community infrastructure necessary to support a development of this scale. The current allocation as Green Belt should be abandoned and the site identified as an opportunity for development.</p> <p>Development here would not detract from the landscape setting of the City, and would not be a serious loss to the Green Belt. Development can be accommodated on a phased basis without significant impacts on either education or transportation infrastructure. Most importantly, the site would be a much better strategic dev option than Countesswells as an element of a deliverable spatial strategy.</p> <p>1579: This site was put forward for consideration in the Main Issues Report, but Aberdeen City Council has classed it as undesirable for development. We disagree with Aberdeen City Council's assessment and ask that the site be included in the Development Plan with the principle aim of providing a new, self-contained community which removes the need for over-development around Kingswells, Countesswells and other areas where over development would affect the quality of the development.</p> <p>1579: We ask, however, that certain conditions be applied to minimise the impact on the surrounding landscape and District Wildlife Sites. Some aspects of the developer's most recent plans go against this.</p>		
<b>Modifications sought by those submitting representations:</b>		
<p>1561: It is submitted that the development bid for Clinterty is realistic, and deliverable. It would also be a better option for inclusion within the Local Development Plan delivery strategy than Countesswells. It is accordingly submitted that the site should be removed from the GB and allocated as an opportunity for a mixed use development comprising business land, circa 3,000 homes (spread over the various plan periods), and with associated commercial and community infrastructure.</p> <p>1579: Direct some development to Clinterty to take the pressure of overdevelopment off Kingswells and Countesswells as well as other areas.</p>		
<b>Summary of response (including reasons) by planning authority:</b>		

## General

In addition to the representations listed above, there are many representations to relocate some of the housing allocations at Countesswells and the employment allocations at Home Farm to Clinterty, these are summarised within Issue 33 Allocated Site: Countesswells OP58 and Issue 31 Employment Land Allocation: West Hatton and Home Farm, Kingswells OP40. These were received from respondents that completed the form circulated by Kingswells Community Council, and is also the stance adopted by Kingswells Community Council in their response to the Main Issues Report (RD91). They support this site to see allocated land reduced in the allocations around Kingswells and Countesswells, which is seen as over-development. The Council's response to this issue deals with these representations and the reason as to why the site at Clinterty has not been identified. Both developments at Countesswells and Clinterty would require to be developed as new communities to provide a sustainable community, and in the case of both proposals there would be significant impacts on existing services and infrastructure. It is the Council's submission that to achieve this it is essential to focus the development on a single site in order to provide and support the required services and facilities. One larger allocation would be able to support a wider range of services and facilities than having to split in two.

The issues that arise in the consideration of new communities will be similar and it is appropriate to consider Clinterty as an alternative to Countesswells and the developer suggests that the site could accommodate circa 3,000 homes. However, in doing so it is important to also consider the specific impact of the development at Clinterty within the context of the proposals in the A96 corridor.

## Transport

The main point of access to development at Clinterty would be onto the A96. Within this transport corridor there are already significant allocations both in Aberdeen and in Aberdeenshire. This includes 3,700 dwellings and 36ha of employment land allocated in Aberdeen with direct access onto the A96, and an allowance for 7,500 dwellings and significant employment land allocations in the Strategic Growth Area from Blackburn to Pitcaple. The assessment of the cumulative transport impact (CD18) has identified the required improvements to accommodate the growth identified between the Aberdeen and Aberdeenshire Proposed Local Development Plans, and has not taken into consideration a new community at Clinterty on this corridor, and the cumulative impact of this development is unknown. The proposals for Development closer to Aberdeen allocated within the A96 corridor at sites OP29, OP30 and OP31 are more accessible to existing businesses and the proposed Park and Ride than Clinterty and it is the Council's submission that OP29, OP30 and OP31 are a more sustainable alternative to development at Clinterty.

Including development at Clinterty in addition to these sites will provide significant difficulties in delivering the required transport improvements and would focus a large proportion of future growth within a single transport corridor and the Council argue that this could affect the deliverability of all allocations in this area.

A key consideration for the location of future growth is how sustainable modes of transport can be provided and promoted. Clinterty does not have good pedestrian links to Aberdeen or any surrounding destinations and it is the Council's submission that it

would be difficult to provide attractive alternatives to the car in this area.

#### Infrastructure

A development at Clinterty has less opportunity to share services and facilities with existing communities in Aberdeen. All services would need to be provided on-site and be able to be sustained by the new development.

#### Landscape

The site at Clinterty was considered at the Main Issues Report Stage (Development Option 1/07) and an assessment of the site was undertaken within the Development Options Assessment Report (CD13). It is the Council's contention that the site at Clinterty will have a greater landscape impact than Countesswells. The site at Clinterty can be seen from long range views as one of the main approaches to Aberdeen (the A96) and would be prominent within a rolling agricultural landscape. The site at Clinterty would also be highly visible from a number of view points including Brimmond Hill, which is a District Wildlife Site (local designation).

#### Flooding

The site at Clinterty is also somewhat constrained by the Black Burn, which is identified by Scottish Environment Protection Agency as an area at risk of flooding from rivers, see map (RD17) and it is estimated to have a 0.5% or greater chance of flooding each year. Scottish Planning Policy (CD4) states that planning authorities should take a precautionary approach taking decisions when flood risk is an issue, and identifies that 0.5% is a functional flood plain and development will not only be at risk itself, but will add to the risk elsewhere. Development should avoid these areas, but it does compromise the ability to deliver the required housing numbers, and development in close proximity to the functional flood plain may add to the risk of flooding elsewhere.

#### **Reporter's conclusions:**

#### **Reporter's recommendations:**



<b>Issue (ref and heading):</b>	<b>ALTERNATIVE SITE: LITTLE CLINTERTY, BLACKBURN</b>	<b>24</b>
<b>Development Plan reference:</b>	Site not allocated in the Proposed Plan.	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Mr John Findlay of Ryden LLP on behalf of Messrs Leith (622).		
<b>Provision of the Development Plan to which the issue relates:</b>	No provision – alternative proposal for development near Blackburn.	
<b>Summary of the representation(s):</b>		
<p>622: Objection to the failure of the proposed Plan to identify land at Little Clinterty, Blackburn (Main Issues Report reference 1/16) for development.</p> <p>Blackburn is a suitable area for development as it benefits from a location approximately 8 miles west of Aberdeen City Centre along the A96 Trunk Road between Aberdeen and Inverurie, within the Huntly to Laurencekirk Strategic Growth Area - identified by the Aberdeen City and Shire Structure Plan.</p> <p>Table 4 of the proposed Plan highlights that only 20,483 of the total 21,000 required units have been allocated, equating to a shortfall of 517 housing units. As a result, it is contended that in order to maintain an effective five year housing land supply, this site is a deliverable option that could meet this short fall.</p> <p>Although Blackburn is identified in the Aberdeenshire proposed Local Development Plan for the development of a new primary school facility; only a limited allocation of 50 housing units is outlined for the settlement at site M1. It is therefore contended that Blackburn, is capable of more growth and should be the focus of further development.</p>		
<b>Modifications sought by those submitting representations:</b>		
<p>622: On behalf of Messrs Leith, objection is taken to the failure of the proposed Plan to identify land at Little Clinterty, Blackburn (reference 1/16) for development. It is respectfully requested that the Local Development Plan is amended to include this site as an allocation in the Dyce, Bucksburn and Woodside direction for growth area, with the site's current designation as Green Belt removed.</p>		
<b>Summary of response (including reasons) by planning authority:</b>		
<p>A site assessment for this site, reference 1/16 Little Clinterty, was undertaken as part of the development options process (CD13). This is not seen as an appropriate site to meet the Structure Plan allowances for Aberdeen.</p> <p>The Proposed Plan aims to deliver sustainable communities in the most sustainable locations. This site is divorced from Aberdeen and providing attractive linkages, encouraging walking, cycling and public transport, to Aberdeen would be difficult. The site is in close proximity to Blackburn, but it is severed from Blackburn by the A96.</p> <p>This site has areas at risk from flooding, and we would wish to avoid making allocations on land at risk from flooding or that may exacerbate flooding in the area. (RD17)</p> <p>In crossing the A96, development would have negative impacts on the surrounding</p>		

agricultural landscape and would be highly visible from a number of locations including Brimmond Hill, the A96, and Blackburn.

Whilst this site is within the Aberdeen City area, its development would be most closely related to Blackburn, and Blackburn and it is important to have consideration to the strategy adopted for development of Blackburn in the Aberdeenshire Local Development Plan (RD33). The Proposed Aberdeenshire Local Development Plan already makes provision for 50 houses within Blackburn that would not be severed by the A96, and it is the Council's view that this is a more suitable site to meet any local need, and in terms of meeting the housing allocations for Aberdeen it was not deemed a sustainable option in comparison to the sites included in the Proposed Plan as a result of the development options process.

**Reporter's conclusions:****Reporter's recommendations:**

<b>Issue (ref and heading):</b>	<b>ALTERNATIVE OPTION: TYREBAGGER QUARRY, CLINTERTY</b>	<b>25</b>
<b>Development Plan reference:</b>	Site not allocated in the Proposed Plan	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Mr David Milne of Crater Ltd (1548).		
<b>Provision of the Development Plan to which the issue relates:</b>	No provision.	
<b>Summary of the representation(s):</b>		
1548: Object to exclusion of site. This site has been in discussion with Aberdeen City Council for several years and this is not seen as fair treatment.		
<b>Modifications sought by those submitting representations:</b>		
1548: We request that the site be reinstated on the Proposed Plan		
<b>Summary of response (including reasons) by planning authority:</b>		
<p>A site assessment for this site, reference 1/11, was undertaken as part of the development options process (CD13). A small area of the site is currently used for offshore training, and the remainder of the site is a designated District Wildlife Site. The site has been designated a District Wildlife Site based on geomorphologic interest and wildlife interest and it is likely that there would be a significant compromise of this designation resulting from this proposal. The site is isolated from large areas of existing employment and from public transport and it will not encourage sustainable modes of transport. This site was classified as undesirable through this process due to the impact on wildlife and the poor linkages to Aberdeen. There was only one representation received during the consultation in disagreement with the assessment that was made by the land owner.</p>		
<b>Reporter's conclusions:</b>		
<p></p>		
<b>Reporter's recommendations:</b>		
<p></p>		

<b>Issue (ref and heading):</b>	<b>ALTERNATIVE SITE: KINELLAR MILL</b>	<b>26</b>
<b>Development Plan reference:</b>	Alternative Proposal	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Miss Christine Dalziel of Halliday Fraser Munro Planning on behalf of Mr and Mrs Alexander Stephen (1524).		
<b>Provision of the Development Plan to which the issue relates:</b>	No provision in the Development Plan	
<b>Summary of the representation(s):</b>		
<p>1524: The zoning of the land does not contribute towards the aims of the Green Belt or Green Space Network. Removing the land from Green Belt/ Green Space Network will not conflict with the aims and objectives of the policies in the Proposed Local Development Plan. The site is a perfect example of where the existing buildings are redundant and are of poor quality, should be allowed to be redeveloped. Green Belt policy restricts this kind of development.</p>		
<b>Modifications sought by those submitting representations:</b>		
<p>1524: The land at Kinellar Mill should be removed from the Green Belt and Green Space Network.</p> <p>The Green Belt policy should make provision for development as follows; "Previously used land or buildings in the green belt, which are redundant or obsolete and offer no contribution to the landscape of the city will be permitted to be redeveloped for uses appropriate to their context."</p> <p>The supporting text should state that small scale residential development will be permitted where appropriate.</p>		
<b>Summary of response (including reasons) by planning authority:</b>		
<p>1524: Scottish Planning Policy (CD3) paragraph 159 sets out the purposes of green belt designations. Designations may not necessarily fulfil all of these functions, and it is contended that the site of Kinellar Mill assists in directing planned growth to more appropriate and sustainable locations as part of the overall settlement strategy for the City area.</p> <p>The designated Green Space Network is a strategic network of woodland and other habitats, active travel and recreation routes, greenspace links, watercourses and waterways. The network includes designated Natural Heritage Sites, as set out in policy NE8, links between habitats and open spaces identified in Aberdeen's Open Space Audit 2010 (CD23), as well as opportunities for future use for physical activity and access to the outdoors. The designation of the site as Green Space Network does not preclude all development, but requires any development proposal to be assessed on the basis of its impact on the character or function of the network. Proposals that are likely to destroy or erode the character or function of an area of Green Space Network will not be permitted.</p> <p>To remove this site from the Green Belt would require re-zoning for some other purpose. The re-development of this site for a limited number of homes, ahead of substantial allocated housing sites in more sustainable locations, would be contradictory to the</p>		

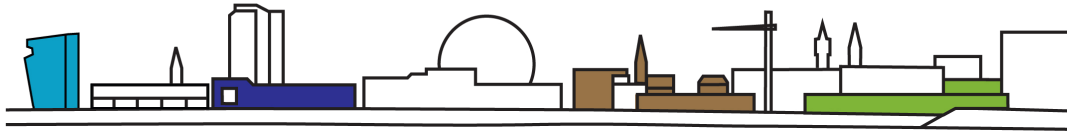
settlement pattern envisaged by the development plan. Scottish Planning Policy paragraph 163 (CD3) is clear on the type and scale of development that may be appropriate within the green belt. New build residential development is not considered appropriate in this context. The proposed plan reflects this position.

Subject to certain specified criteria, Green Belt policy allows for the restoration and change of use, to private residential use, of buildings which have a historic or architectural interest or traditional character that contributes to the landscape setting of the city. If the buildings present on the Kinellar Mill site are not of such interest then it may be that there is no compelling case in allowing conversion and change of use for residential purposes. By restricting the type of development which may be undertaken within the Green Belt, such policies direct to urban areas those types of development best suited to a City location, served by appropriate infrastructure and services.

For these reasons, it is not proposed to make any modification to the existing zoning contained in the proposed plan. It is noted that, while removal of Green Belt and Green Space Network designations is sought, no alternative zoning has been proposed. As regards development permitted within Green Belt areas, the changes suggested would be inconsistent with Scottish Planning Policy's (CD3) specified aim for Green Belt policy to "direct planned growth to the most appropriate locations and support regeneration" by permitting any previously developed land or buildings to be redeveloped with no real consideration for their merit or the sustainability of their location and relationship with the proposed plan's settlement strategy.

The changes suggested to the supporting text are not necessary as the existing policy states clearly the circumstances where residential development will be considered favourably.

**Reporter's conclusions:****Reporter's recommendations:**



**aberdeen** local development plan

**RESPONSE TO PROPOSED PLAN  
CONSULTATION:  
HAZLEHEAD, KINGSWELLS AND  
COUNTESWELLS**

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<b>Issue (ref and heading):</b>	<b>ALLOCATED SITE: SKENE ROAD, HAZLEHEAD OP68</b>	<b>27</b>
<b>Development Plan reference:</b>	OP68 and Appendix 2, Page 60	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Mr Ian Cox of Kingswells Community Council (1579).		
<b>Provision of the Development Plan to which the issue relates:</b>	Green belt site identified for a phased cemetery development .	
<b>Summary of the representation(s):</b>		
<p>1579 We agree with Aberdeen City Council in approving this site for expansion of the cemetery. We support the inclusion of Green Space Network within the site. One important consideration, however, will be possible future development of the site immediately west of OP68 on the A944 at East Middlefield. This site currently has planning permission for a garden centre. It would be highly inappropriate to allow developments on this site that might upset mourners in the adjacent cemetery. A classic example is the large garden centre on the nearby Lang Stracht which was given approval by Aberdeen City Council and is actually now a large general retail outlet with advertising banners, dining areas, a carwash and other facilities.</p>		
<b>Modifications sought by those submitting representations:</b>		
None suggested.		
<b>Summary of response (including reasons) by planning authority:</b>		
<p>1579 The principle of a retail nursery on this site has been established by the granting of detailed planning permission in February 2009 (see committee reports for the planning applications RD46 and RD47). In doing so it was agreed that the built element should be in scale with the proposed horticultural use. Planning conditions were applied to restrict the size of the building to 300 m<sup>2</sup> gfa, to restrict the range of goods sold to those specified in the applicants' letter and to ensure that the direct linkage between the cultivation of plants on surrounding land and their retail sale is established and retained (see conditions 2 and 3 of the committee report). As a consequence, this is a very different scale of operation to that at Dobbies on the other side of the Lang Stracht. Further conditions in respect of planting, landscaping, lighting, building materials and hours of operation are also imposed in order to protect the amenity of the area. The continued application of green belt policy to this site will help to ensure that any future proposals for this site, should they arise, can be dealt with in the context of the restrictive provisions of green belt policy.</p> <p>No changes to the plan are considered necessary as a result of this representation.</p>		
<b>Reporter's conclusions:</b>		
<b>Reporter's recommendations:</b>		

<b>Issue (ref and heading):</b>	<b>ALLOCATED SITES: HAZLEDENE AND PINWOOD OP52 AND OP57</b>	<b>28</b>
<b>Development Plan reference:</b>	OP52 - Hazledene, OP57 - Pinewood Appendix 2, Page 59	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Mr Mike Morrison (35), Mrs Charlotte Ryan (43), Mrs Sylvia Chesser (46), Dr Samuel Andrews (47), Mr Kevin McBain (48), Mrs Susan Frost (59), Mr & Mrs G. Russell (66), Mr Henry Innes (135), Mr Henry W. Innes of Cragiebuckler Parish Church on behalf of Cragiebuckler Parish Church (151), Mr Kenneth Murray (162), Mrs Karen Slessor (163), Mr Fraser Burr (210), Ms Heather Bramwell (227), Mrs Eleanor Webster (253), Mr James Webster (255), Mrs Kathleen Clark (365), Mrs Christine Boylan (366), Mr John Boylan (370), Mr Karl Grieve (381), Mrs Margaret Cook (516), Mr David Ledingham (557), Mr Patrick Spicer (1193), Mrs Anne Walls (1194), Mr Stephen Booth of Aberdeen City Council - Asset Management (1519).		
<b>Provision of the Development Plan to which the issue relates:</b>	Sites allocated in the 2008 Aberdeen Local Plan for 430 houses and carried forward into the Proposed Plan.	
<b>Summary of the representation(s):</b>		
<p>35 Objects to development at OP57 Pinewood.</p> <p>43, 162, 227, 381 Objects to development at OP57 Pinewood due to the generation of more CO2 and pollution from the new houses.</p> <p>43 Objects to development at OP57 Pinewood due to destruction of the countryside.</p> <p>43, 135, 151, 163, 381 Objects to development at OP57 Pinewood due to construction noise.</p> <p>43, 48, 227 Objects to development at OP57 Pinewood due to loss of recreation land/green space.</p> <p>43, 66, 135, 162, 210, 227, 1194 Objects to development at OP57 Pinewood due to loss of wildlife habitats.</p> <p>43, 135, 151, 163 Objects to development at OP57 Pinewood due to bad timing for selling Council property.</p> <p>46, 47, 59, 66, 151, 162, 163, 381, 516, 1194 Objects to development at OP57 Pinewood due to loss of green belt.</p> <p>47, Pinewood has previously been rejected for development by the Scottish Government because there were other sites that were more suitable in the city.</p> <p>46, 48, 227, 253, 255, 1194 Objects to development at OP57 Pinewood due to lack of transport infrastructure, traffic congestion and because of impacts on Countesswells Road. It would add pressure to local services and facilities.</p> <p>59, 365 Objects to development at OP57 Pinewood due to poor drainage and flooding</p>		



issues.

66, 151, 210, Objects to development at OP57 Pinewood as development would decrease the amenity of the surrounding area and destroy the peaceful rural environment. It is over-development

66 There is no need for extra houses as there are lots of empty council houses and houses for sale.

210 Objects to development at OP57 Pinewood due to loss of open views.

381 Objects to gypsy traveller pitches at OP57 Pinewood.

47 Access to OP52 Hazledene should not be through Countesswells Avenue. The road has not been designed for this amount of traffic.

557 Objects to development at OP52 Hazledene due to wildlife, lack of road infrastructure to support not only the proposed 150 houses but also future building on other sites surrounding OP52, the opening up of this field would mean direct access from Hazledene Road to Countesswells avenue which could increase crime opportunities, there are many underground streams in the area, building works could redirect the path and cause flooding, the land is designated common good land and as such is not suitable to be sold unless all proceeds of the sale go back into the common good fund. This would need to be done by an independent committee outwith the council.

1193 Objects to development at OP52 Hazledene due to loss of green belt.

366, 370 Objects to development at OP52 Hazledene due to bad timing for selling Council property, traffic congestion and added pressure on local facilities and services

1519 Supportive of the inclusion of Pinewood and Hazledene in the Plan. Note that both sites are identified in the previous Aberdeen Local Plan for a collective 300 homes. It is my understanding that the site now has full planning consent for up to 350 units, and confirm that there is an approved Committee decision from the Council's Finance and Resources Committee to formally take the site to the market at the appropriate time.

#### **Modifications sought by those submitting representations:**

35, 43, 46, 47, 48, 59, 66, 135, 151, 163, 210, 253, 255, 516, 1194 Remove OP57 Pinewood from the Plan.

162 Consideration should be given to enhancing this area at Pinewood by planting more trees and turning the area into a conservation reserve to encourage wildlife and not to force it away,

365 Seeks assurance that house or garden will not be affected by drainage as a result of development.

381 I would like to see working hours reduced. Before any development takes place I would like to see the carbon footprint calculations for the scheme vs. the existing undeveloped set-up. If any development does go ahead it is important it does not impact negatively on the carbon footprint of the existing land. Allocate space for travellers in a

completely separate area

47 For OP52 Hazledene there should be no access through Countesswells Road, access should be through a specifically designed road through the Pinewood site.

366, 370, 557, 1193 Remove OP52 Hazledene from the Plan.

**Summary of response (including reasons) by planning authority:**

It should be noted from the outset that both OP52 Hazledene and OP57 Pinewood are identified as greenfield housing allocations in the 2008 Aberdeen Local Plan (CD12). Both sites have also been granted planning permission in principle. Pinewood (Application Ref A7/2178) was granted permission on 19/08/2010 for a 'Proposed residential development and formation of access roundabout and access roads'. Hazledene (Application Ref A8/0530) was also granted permission on 19/08/2010 for 'Proposed residential development to accommodate circa 250 plots and 3 neighbourhood shop units'. Copies of the planning committee reports on these proposals are appended for information and the recommendations and conditions were accepted in full.

In this instance, we would draw your attention to paragraph 78 of Circular 1/09 Development planning (CD4) which states "Scottish Ministers intend the appointed person to, within the bounds of the issues raised in the representations, primarily examine the appropriateness and sufficiency of the content of the proposed plan. (...) The appointed person should generally not recommend modifications to parts of the plan which have been examined in previous examinations or rolled forward from previous plans, unless circumstances have clearly changed."

The only change in this instance is that both sites have been granted planning permission in principle.

We therefore consider that matters on the principle of development on these sites have already been addressed through the existing local plan. These include representation on matters such as the loss of green belt, open space, countryside and wildlife habitats. More detailed matters concerning the impact on transport and the local road network have been addressed through the Transportation Assessments accompanying the planning applications. The reserved matters application will be able to address detailed issues such as amenity, loss of views and housing density. In respect of flooding and drainage concerns, a SUDS scheme was submitted with the planning application. These details will require further refinement in the submission of a reserved matters application and in purification of the specific SUDS conditions. Construction noise is inevitable when building houses, however, conditions attached to the planning consents will control hours of working. The timing and market conditions for the sale of land is not a planning issue. In respect of the comment on gypsy traveller pitches, it should be noted that there are no such proposals here, either in the Proposed Plan or in the planning consents.

Given these sites are identified for residential development in the 2008 Aberdeen Local Plan and have planning permission in principle, there is no need to make any changes to the Plan.

**Reporter's conclusions:**

<b>Reporter's recommendations:</b>

<b>Issue (ref and heading):</b>	<b>ALLOCATED SITES: MAIDENCRAIG OP43 AND OP44</b>	<b>29</b>
<b>Development Plan reference:</b>	OP43, OP44 in Table 7,Page 16.	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Mr John G. Farrell (7), Mr Phil McCallum (12), Ms Nicola Abrams of Scottish Environmental Protection Agency (408), Mr George A Simpson on behalf of Gateside Farm Trust (450), Mr Steve Delaney of Mastrick, Sheddocksley and Summerhill Community Council (543), Dr Iain Greig (1058), Mr Ben Freeman of Bancon Developments Ltd (1561), Mr Ian Cox of Kingswells Community Council (1579).		
<b>Provision of the Development Plan to which the issue relates:</b>	Sites allocated for 750 houses.	
<b>Summary of the representation(s):</b>		
<p>7 OP43 should not be developed on. Site is valuable open space and has been promised to remain green space in the past.</p> <p>12 Development of OP43 will have a major impact on wildlife including the Maidencraig Wildlife Nature Reserve. Development will also be detrimental to personal privacy and the natural beauty of the area. The site has flooding issues. Local community has not been advised of this development. There is not the roads or the infrastructure to handle additional properties.</p> <p>408 Object to OP43 unless the issue of flood risk is highlighted in the text as being a potential constraint for the site, as required by Scottish Planning Policy. Den burn is in close proximity to OP44 which it at poor ecological potential due to impacts from sewage pollution and channel modifications.</p> <p>450 Land at Gateside Farm should be identified as strategic housing land reserve with a nominal capacity for 22 dwellings as an annex to OP43 (to the west) to give a total housing allocation of 472 units.</p> <p>543 Objects to OP44. We welcome the reduction in both land area and numbers of homes originally designated for this site. We object to this proposal on the basis of the proposed re-designation of this land from Green Belt to Residential use. Our fear is that the whole Green Belt area between Sheddocksley, Kingswells and Bucksburn will over time become a continuous built up area and lead to the coalescence of communities.</p> <p>We have significant concerns regarding infrastructure capacity in relation to the impact of development along the Lang Stracht. This road struggles to cope with current traffic levels at peak times and there's a cumulative effect of development on this corridor which has not been given due cognisance in the Local Development Plan.</p> <p>Primary children living at this proposed site could be accommodated at Kingsford School but without any remaining capacity. Kingsford School is nearer to both OP43 and OP44 than Fernielea (to Which OP43 is to be zoned). We believe that children from neighbouring OP43 (which is already zoned as SHLR) should be re-zoned to Kingsford purely on the grounds of accessibility. It should be noted that Kingsford could not</p>		

accommodate children from both these sites.

There is a lack of capacity at the only accessible secondary school in this area (Hazlehead Academy). We therefore also object to this proposal on the grounds on inaccessibility to local schools. The Plan acknowledges that some parts of this site would not be within 800m of a bus stop. We consider this to be unacceptable.

543 We offer qualified support to OP43 subject to a number of issues being addressed.

Access to the site should be shared between the Lang Stracht and the B1119 giving residents the options to exit north or south would, we believe, disperse traffic on the roads network and make the increased traffic more manageable.

No development should be permitted until such times as an agreement is reached to deliver an acceptable level of public transport provision to the site.

Concerns over the capacity of the Lang Stracht. Healthcare facilities should be provided here and not in Kingswells. Kingswells is not within easy walking distance of our community and is not well served public transport from our area.

We would expect appropriate measures to be taken in order to protect Maidencraig Local Nature Reserve.

The distance to Fernielea Primary School is at least double that to Kingsford Primary and would contend that children from this site be re-zoned to Kingsford.

1058 OP43. Development on Lang Stracht: if cyclists do not have right of way at junctions or find their passage barred by a wall of cars exiting or entering then they will simply use the road, a) making the previous Aberdeen City council attempts to encourage cycling obsolete and b) creating more friction with motorists and cyclists.

1561 Bancon objects to the limited nature of the housing allocation for development at OP43 and OP44 Maidencraig, and submits that the site is capable of accommodating a larger scale of development within the boundaries identified in the proposed Local Development Plan. The only adjustment to the boundaries shown in the proposed Local Development Plan that Bancon promote are for the inclusion of a biomass fuelled combined heat and power plant to the north of the Dobbies Garden Centre. Bancon objects to this section of the site being allocated as Green Belt.

1579 Broadly support the assessment that OP43 is suitable for development and support the inclusion of Green Space Network on the site's eastern and southern boundaries. Development of the site could easily impact adversely on the District Wildlife Site (DWS) and the Local Nature Reserve (LNR) in the Den of Maidencraig which many people enjoy for recreation. A substantial buffer zone would need to be included to safeguard these areas. Concerned about the impact of additional traffic on the already very busy Lang Stracht/A944. The necessary roads infrastructure will need to be created to alleviate this impact, but without damaging the DWS and LNR.

1579 Broadly support the assessment that OP44 is suitable for development and support the inclusion of Green Space Network on the site's eastern side to help separate the development from Sheddocksley. This site should only be approved if no other developments, including Gillahill, are approved north of the Lang Stracht and between

here and Kingswells to halt future coalescence. Concerned that it is still intended to allocate 300 homes to this site, despite the fact that the area has been reduced in size from the original proposal in order to preserve the community woodland. Concerned about the impact of additional traffic on the already very busy Lang Stracht and A944. The necessary roads infrastructure will need to be created to alleviate this impact.

#### **Modifications sought by those submitting representations:**

7, 12 OP43 should not be developed and/or remain as green belt.

408 Insert the following text in the 'other factors' section of OP43 as set out in Appendix 2 - 'This site may be at risk if flooding. A flood risk assessment will be required to accompany any future development proposals for this site.'

Insert the following text into the 'other factors' section of each of the allocation summaries as set out in Appendix 2 for OP43 and OP44 - 'Any Masterplan should take account of the existing water features within the site, the pressures which apply to these features and should direct developers to look for opportunities to protect and improve the water environment.'

450 An area of land at Gateside Farm should be incorporated into the Local Development Plan as an annex to the existing OP43 site, providing land for a further 22 dwellings.

543 For OP43 - provide an equal number of opportunities to access/egress this site from the B1119 and Lang Stracht in order to disperse the volume of traffic.

In order to address our concerns regarding capacity issues with the Lang Stracht, any development needs to be set back from the road to allow for future road widening.

Provide Developer Contributions to upgrade the road and establish a health centre on site. Appropriate screening or other methods deemed appropriate in order to protect the integrity of the Denseat Nature Reserve should be provided. An agreement should be secured to deliver public transport provision to this site (and preferably also existing housing) as there is currently no public transport to the south side of the Lang Stracht.

543 For OP44 - Request its removal from the Plan. However, in the event this proposal was to be approved, the resulting development should be set back sufficiently from the road to allow it to be widened. Secure developer contributions to cover the infrastructure cost of a major upgrade along the length of the Lang Stracht. No development should be permitted until such times as an agreement is reached to deliver an acceptable level of public transport provision to the site.

Create a more appropriate zoning for primary children in neighbouring OP43 and examine the effect a more accessible re-zoning in that site would have with regard to capacity for children from this site. Further scrutiny take place on secondary school rolls and catchment areas prior to reaching a concluded view on this proposal.

1561 The proposed allocation for housing on sites OP43 and OP44 be increased to 519 and 464 respectively, phased over two plan periods, with 750 houses in total in phase 1, and 233 houses in phase 2.

OP44 should be extended to allow for the relocated CHP plant, in accordance with the

most recent masterplan (appendix 1). The site of the CHP plant should be removed from the Green Belt. The area of Green Space Network along the eastern boundary of site OP44 and the southern and eastern boundaries of site OP43 should be removed from the proposals maps, and the inclusion of suitable green space left as a matter for detailed masterplanning and design.

1579 A buffer zone should be included to protect the integrity of the community woodland on the northern edge of OP44.

### **Summary of response (including reasons) by planning authority:**

#### OP43 Maidencraig South East

OP43 is identified in the 2008 Aberdeen Local Plan (CD12) for Strategic Housing Land Reserve (Section 2.5 page 22). Given that the principle for developing this area was established here (albeit subject to review) all such areas have been carried forward into the Proposed Plan. They were also assessed as being suitable for development in the Development Options Assessment Report 2010 (CD13).

12, 543, 1579 Transport Infrastructure In relation to transport issues, the Council undertook a process known as the Transport Framework (CD22) at an early stage in the plan preparation process. Alongside the overall Development Options assessment process, this provided a transport based assessment framework against which Development Options were assessed. The results of this work were considered against the overall Development Options process and helped the Council to decide which sites to identify as Preferred Options in the Main Issues Report. The results of the Transport Framework were published on the Council's website alongside the Main Issues Report.

There are few planning constraints within OP43 and steep slopes and flood areas can be avoided. The site is reasonably accessible to non-car transport modes such as bus routes and the cycle path along the Lang Stracht and a core path along Maidencraig Local Nature Reserve. These, together with the provision of local facilities should make OP43 less car dependent. In addition we will seek to minimise further impact on the Lang Stracht and wider transport network. It will be incumbent on the developer to provide mitigation for any net detriment impact on the transport network, including the provision of public transport as well as connections to and improvements on the existing walking and cycling facilities. All developers will be required to provide the necessary infrastructure or services, or a contribution towards its provision, in order to mitigate the impact of development.

1058, 1579 We would agree with the view expressed that cyclists along the Lang Stracht should not be disadvantaged by developments there and the opportunity to examine detailed design considerations will arise during the masterplan and planning application process. The masterplan should also deal with the issue of providing a buffer zone for the community woodland to the north.

543 In respect of sharing vehicular access between the Lang Stracht and B9119 to the south, this will be difficult to achieve due to the topography of the area. The burn to the south is in a steep valley that would have to be crossed and this could have implications for the integrity of the Local Nature Reserve and District Wildlife Site there. Taking an access point through Gateside Farm to the west of the proposal would be too close to the junction of the B9119 and the A944 Lang Stracht. Detailed access arrangements would be examined during the masterplanning and planning application process which is

required for both OP43 and OP44.

7, 12, 543, Loss of Open Space and Green Belt, Natural Heritage We accept that development will lead to the loss of open countryside. One of the objectives of the green belt is to direct development to the most suitable location. This site emerged as a desirable development option in the Development Options Assessment Report. Technically, development here will not lead to loss of green belt as the land is already zoned as Strategic Housing Land Reserve in the 2008 Aberdeen Local Plan as mentioned above. The integrity of core paths in the area will be maintained and the Action Programme (CD20) requires both north/south and east west links to be provided and maintained. These will have to be shown in the masterplan for the site. The Green Belt Review (CD19 ) shows that southern boundary of OP43 has been drawn to avoid the Local Nature Reserve and the District Wildlife Site and the steep area to the east of the site. It is acknowledged that the detailed design and layout of the site would need to be handled sensitively to ensure that there is no impact on the adjacent Local Nature Reserve and District Wildlife Site. It should also be pointed out that the Reserve will provide an attractive doorstep recreational opportunity for the residents of OP43. The boundaries of the Local Nature Reserve and District Wildlife Site are shown on the reverse Proposed Plan Proposals Map. A more detailed boundary of the District Wildlife Site (which covers a slightly larger area than the Reserve) is included in the issue folder (CD29).

12, 408 Flooding issues in this area are likely to be restricted to the southern part of this site and boundaries have been drawn to avoid development close to the burn there. Nevertheless, a Flood Risk Assessment is likely to be required as part of any planning application. In addition a Drainage Impact Assessment will be required to deal with waste and surface water drainage. We acknowledge that there may be local flooding and drainage issues which would require further examination and consider that Scottish Environment Protection Agency's submission - that a flood risk assessment should accompany any proposals for the site - has merits. Although we do not recommend making any prescribed modifications to this policy, reporters may wish to consider the merits of adding the following text under 'Other Factors' to the opportunity site reference for OP43 on page 58 of the Proposed Plan - "A flood risk assessment will be required to accompany any future development proposals for this site.."

543 Healthcare Facilities The detail of requirements for health facilities arising because of development was provided by NHS Grampian and we would concur with their assessment. Whilst we understand the desire to see health facilities provided on site, this has to be balanced against the practicality of creating new facilities, when there may be others capable of expansion nearby. Nevertheless, there is nothing in the Proposed Plan which would prevent the development of a health facility on either OP43 or OP44 should the opportunity arise.

543 School capacity for both OP43 and OP44 In respect of the schools situation for both sites, the 2009 School Roll Forecasts (CD17) indicate that there is sufficient capacity at Kingsford Primary School to cope with pupils from OP44. There may not be capacity at Fernielea Primary to accommodate all pupils from OP43. However, the masterplan submitted in support of both proposals show the provision of a primary school in site in OP44 which could serve both sites if necessary. The developers have therefore acknowledged that should school capacity or zoning be an issue, that provision can be made on site. Hazlehead Academy could be extended to cope with pupils generated and the Council is also examining rebuild options for the Academy which can take into



account school roll forecasts at that time.

#### OP44 Maidencraig North East

543, 1579 Green Belt and Natural Heritage OP44 emerged as being suitable for development in the Development Options Assessment Report 2010 (CD13). We do not think that natural heritage issues preclude development here. A priority habitat runs along the north eastern perimeter of the site has been identified as green space network. Other established tree belts and clusters can be protected and enhanced. The community woodland strengthens the tree lined ridge line along the northern boundary and this contributes to the natural heritage and recreation opportunities of the site and should be integrated into the development. Boundaries have been carefully considered in the Green Belt Review to avoid coalescence with Kingswells and this is helped by the removal of land at Gillahill, Kingswells - site 3/05 in the Main Issues Report (CD13) as a development opportunity. We think that Dobbies should mark the westwards extent of development here.

543, 1579 Transportation Issues The site is accessible by a number of transport modes and is well related to the existing urban area. There are bus routes and the cycle path along the Lang Stracht and a core path through the area from Sheddocksley. These, together with the provision of local facilities should make OP44 less car dependent. As with OP43 we will seek to minimise further impact on the Lang Stracht and wider transport network and the developer should provide mitigation for any net detriment impact on the transport network.

1561 Site Capacity and Extent of Green Space Network We would accept it may not always be practical to stick rigidly with the numbers allocated to a specific site and we could accept a small amount of flexibility in either direction. The developers proposal that both sites can accommodate a further 233 dwellings is more significant than this. The view is somewhat undermined by their initial masterplan which places the CHP plant outside the site boundary on green belt. If the CHP plant were located within the site, there would be a reduction in the number of houses that could be accommodated there, which would be more in line with the Proposed Plan allocation. The minor road to the immediate west of OP44 makes a clear boundary for the site and there is no need to cross this in order to accommodate the CHP plant. We do however, welcome the inclusion of a CHP plant within the scheme.

In respect of the removal of green space network, it is acknowledged that Policy NE1 Green Space Network allows masterplans to determine the final extent of this within their areas. However, the Local Development Plan should identify the broad extent of green space network - in this case to provide a link between the playing fields and community woodland to the north and along Maidencraig Local Nature Reserve to the south. It is therefore appropriate to retain the designation here and along the southern boundary next to the nature reserve.

450 Land at Gateside Farm The proposal to develop land at Gateside Farm has come very late in the process and was not brought up at either the Development Options or Main Issues stages. There has been no opportunity for the public or anyone else to comment on this. The Proposed Plan identifies sufficient greenfield housing land for the first two Structure Plan phases and most of the third phase. In addition, the developers at OP43 and OP44 believe the capacity of these sites is higher than that indicated in the Proposed Plan by some 233 dwellings. Regardless of the merits or otherwise of this

view, we think it is unnecessary to augment the land supply with further land at Gateside.

**Reporter's conclusions:****Reporter's recommendations:**

<b>Issue (ref and heading):</b>	<b>HOUSING LAND ALLOCATIONS: KINGSWELLS OP41 AND OP42</b>	<b>30</b>
<b>Development Plan reference:</b>	OP41 Kingswells C and OP42 Kingswells D and West Huxterstone in Table 7, Page 16.	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
<p>Mr Zong Heng Zhou (38), Mrs Yunhong Wang (51), Mr Eric Jensen (54), Ms Aileen Jensen (55), Mr Mark Ewen (61), Ms Gayle Morrice (63), Ms Gillian Ewen (64), Mr Brian Morgan (68), Ms Catriona McWilliam (70), Mr Philip Morrice (72), Mr Keir Willox (73), Ms Renata Powell (81), Mr George Hood (82), Ms Fyfe Hepburn (83), Mr Kenneth Sandison (84), Ms Lorraine Sandison (86), Mr Greig Addison (87), Mr Ali Hassanirad (89), Ms Angela Cameron (90), Mr Scott Cameron (91), Mrs June V. Shirriffs (92), Sir/Madam H. Brown (93), Dr George G. Shirriffs (94), Ms Elizabeth Binnie (95), Mr George J. Lowe (96), Sir/Madam N. Sands (102), Mr Dennis Scott Dalgarno (103), Mrs E. Cheyne (104), Mr Alexander Davidson (105), Ms Ann Perrott (106), Mr James Chalmers (108), Mrs Margaret Chalmers (109), Mr Alan Walker (110), Ms Joyce Forrest (111), Mr David W. Metcalfe (112), Mrs Gillian Millar (114), Ms Shari Ross (116), Sir/Madam M. Sands (117), Sir/Madam W. Middleton (118), Sir/Madam I. Middleton (119), Ms Morag Dalgarno (120), Ms Claudine Park (121), Ms Sandra Roach (122), Mr Peter Roach (123), Mr Ian Park (124), Sir/Madam Sam D. Sinclair (125), Mr Colin McKay (126), Mr Stuart Wilkie (143), Mr Richard Murray (144), Mr Simon Merrilees (147), Ms Olive Hunter (148), Mr David Merson (149), Mr Norman Hunter (150), Mr Derek Watt (180), Ms Elizabeth Merson (181), Ms Lyndsay Hay (182), Ms Helen Wood Barron (183), Ms Jane Watt (184), Mr Michael Alexander Barron (185), Mr John Edward Doudenmier (186), Mr Kevin A. Cowie (187), Ms Jane Anne Smart Doubenmier (190), Mr John Chung (191), Mrs Azadeh Safarvarkiani (192), Mrs P. Cram (193), Ms Susan Cameron (194), Mr Craig Cameron (195), Ms Angela M. Gibb (196), Ms Heidi Aylmer (200), Mr Gary M. Aylmer (201), Ms Carol Milne (205), Mr Keith Milne (206), Mr Charles Hall (217), Mr Charles Thorn (218), Mr Alistair Blues (219), Ms Valerie Sinclair (222), Mr &amp; Mrs G. B. Peddie (224), Mr Eric K. Johnstone (236), Mr Michael J. M. Reid (237), Mr R. Hainey (239), Mrs R. Hainey (240), Ms Karen Hughes (245), Mr David S. M. Campbell (246), Dr J. Kenneth McAlpine (248), Ms Judith Farquhar (249), Mr Raymond Farquhar (250), Ms Kathleen Thorn (251), Mr Glenn Taylor Buchan (292), Ms Ellen Buchan (293), Mr Rod Buchan (294), Mr Malcolm McDonald (295), Ms Michelle McDonald (296), Ms Susan Beard (297), Mr John Beard (298), Mrs Barrie Buchan (299), Mr Stephen Jack (300), Ms Pamela Anne Jack (301), Mr Robert Craig Moffett (308), Mr Steve Burnett (312), Mr Matthew Dunning (313), Mrs F.A. Pastuszko (315), Mr A.S.G. Pastuszko (316), Ms Shauna Gowans (354), Ms June McDonald (355), Mr William McDonald (356), Ms Pamela Gatt (357), Mr Neil Taylor (358), Mr Colin McKenna (399), Mrs Lindsay A Simpson (400), Mr Robert G Simpson (401), Mr W Guy Bentinck (403), Mrs June Bentinck of 34 Kingswood Avenue (404), Ms Nicola Abrams of Scottish Environmental Protection Agency (408), Mrs Wendy Campbell (583), Mr Colin Campbell (584), Ms Lorna Henderson (933), Mr William Simpson (936), Miss Emma Wright (938), Mrs Eziz Robertson (939), Mr Matthew Wright (941), Mrs Florence Pirie (942), Mrs Elizabeth Coutts (946), Mrs Margaret Park (947), Mr Charles Coutts (948), Sir/Madam V Hutcheon (949), Mrs Vera Mutch (951), Mr N Craig (952), Sir/Madam M Hutcheon (953), Mrs V Glennie (955), Mr Douglas Park (957), Ms Eliana Figueroa (958), Mr Derek W Martin (959), Mr Edgar Castillo (960), Mrs Pamela Wright (961), Ms Lydia A W Martin (962), Mr David Wright (963), Mr Donald Vass (964), Ms Joan Vass (965), Ms Valerie Weir (966), Mr Gerard David Cairns (967), Mr James Grant (968), Mr William P Weir (969), Ms Siobhan G Anthony (970), Mrs G Craig (972), Mrs Agnes Watson (973), Mr L Watson (975), Mr William Miller (976), Mrs Jackie Cairns (977), Mr George A Wallace</p>		

(978), Ms Margaret Miller (979), Thilini Wallace (980), Ms Heather Burns (981), Mr B J Carey (984), Mr Andrew Henderson (986), Sir/Madam A Carey (987), Sir/Madam R Holden (988), Sir/Madam Elm Holden (991), Mrs Dorothy Gray (992), Ms Catherine May (994), Ms Cath Grant (996), Mr Alexander May (997), Sir/Madam R W Wilkie (998), Ms Margaret McEwan (999), Ms Fiona Wilkie (1000), Ms Silvia Gaspar-Pereira (1002), Mrs GB Anthony (1003), Mr Stan McEwan (1004), Mr Stuart Lamond (1005), Mr William Smith (1006), Ms Helen Davidson (1007), Ms Rosemary Walker (1008), Mrs Gwendoline Jones (1009), Mr Iain Laidlaw (1010), Sir/Madam Tom Straiton (1011), Ms Florence Gunn-Folmer (1012), Ms Kaye Smith (1013), Mr Alexander Gunn (1014), Sir/Madam George Ian Gibson (1015), Ms Elaine Grosvenor (1016), Mr Stephen Anthony (1017), Mr Brian Yeats (1018), Ms Jennifer Miller (1019), Ms Julie McLulich (1021), Ms Suzanne Walker (1022), Mr Hamish McLulich (1023), Mrs Gillian Joss (1024), Mrs Fiona McRuvie (1025), Mr Brain Folan (1026), Mr William Skidmore (1027), Ms Linda Cameron (1028), Mr Lewis Joss (1029), Mrs Wendy Skidmore (1030), Mr Alexander Crawford Hair (1031), Sir/Madam A Innes (1032), Mr George Lowe (1033), Mrs Margaret Lowe (1035), Mr James Wilson (1037), Mr Derek Walker (1038), Ms Ruth Tulloch (1040), Ms Christina M Wilson (1042), Mr Samuel Stafrace (1044), Mr Zane Hair (1045), Ms Amanda Stafrace (1046), Mrs Valerie Henderson (1047), Ms Rachel Watson (1048), Dr C Hauptfleisch (1049), Mr Iain Watson (1051), Sir/Madam Arnajorn Joensen (1053), Ms Sheena Lamond (1054), Ms Marion Cumming (1055), Mr Gordon Cumming (1056), Sir/Madam N Sutherland (1057), Dr Iain Greig (1058), Ms Catherine McBain (1059), Mr Mahmoud Kamel (1060), Mr William Beattie (1061), Mr Noelle Straton (1062), Sir/Madam Bernese Kamel (1063), Ms Susan Beattie (1064), Ms Helen Ireland (1065), Miss Jean M Park (1066), Ms Katharine Hume (1067), Miss Vera M Anderson (1068), Mr Angus Morrison (1069), Mr Mike Hume (1071), Ms Catriona Morrison (1072), Sir/Madam E Young (1073), Ms Amanda-Jane Mackay (1074), Sir/Madam R Birse (1075), Mr Martin Mackay (1076), Mr David Cornet (1077), Mr Ian Sim (1078), Mr Lawrence Dean (1079), Ms Irene McKay (1080), Ms Patricia Sim (1082), Mr Munawar H Usman (1083), Ms Sadia A Usman (1085), Mrs Grace M Hepburn (1086), Mrs V Taylor (1087), Mrs Ewa Gainska (1088), Sir/Madam EA Taylor (1089), Mr Mirosław Gainski (1090), Mrs Pat Duncan (1091), Mr David Bruce (1092), Mr Robert Overy (1093), Ms Jennifer Bruce (1094), Ms Gillian Graham (1095), Mr Mark Graham (1096), Ms Marilyn Rose (1097), Mr William Robertson (1098), Mr Kenneth Rose (1099), Mr Alan Stott (1101), Mr Walter Jardine (1102), Ms Muriel Wyness (1103), Mr W R Hepburn (1105), Ms Caroline Taylor (1106), Mr Colin Taylor (1108), Ms Barbara Bruce (1109), Mr James Henderson (1110), Ms Joan Keyes (1111), Mrs Pamela Stuart (1112), Mr Tom Keyes (1113), Mr Raphael C Stuart (1114), Ms Carol Buchan (1118), Sir/Madam Selina Jardine (1122), Mr Malcolm Cameron (1123), Mr Michael Migvie (1186), Mrs Charlotte Goodbody (1484), Professor Ivan Goodbody (1486), Ms Jade Scott of Ryden LLP on behalf of Stewart Milne Homes (North Scotland) (1565), Mr John Findlay of Ryden LLP on behalf of Stewart Milne Homes (North Scotland) (1567), Mr Ian Cox of Kingswells Community Council (1579), Ms Helen Gibson (1585).

**Provision of the Development Plan to which the issue relates:**

Sites allocated for 170 homes.

**Summary of the representation(s):**

General

408 Kingswells developments may impact on Bucks Burn and Den Burn - poor ecological potential because of sewage pollution and alternations to beds and bunks. Support requirement not to impact on water quality or ecology but developers should be directed to look for opportunities to protect and improve the waterbody.

1579 Consider combined impact of developments here on local traffic - potential access problems to/from Kingswood Drive.

#### OP41 Kingswells C

54, 55, 61, 63, 64, 70, 72, 73, 81, 82, 83, 84, 86, 87, 89, 90, 91, 92, 93, 93, 95, 96, 102, 103, 104, 105, 106, 108, 109, 110, 111, 112, 114, 116, 117, 118, 119, 120, 121, 122, 123, 124, 125, 126, 143, 144, 147, 148, 149, 150, 180, 181, 182, 183, 184, 185, 186, 187, 190, 192, 193, 194, 195, 196, 200, 201, 205, 206, 217, 218, 219, 222, 224, 236, 237, 239, 240, 245, 246, 248, 249, 250, 251, 292, 293, 294, 295, 296, 297, 298, 299, 300, 301, 308, 313, 315, 316, 355, 356, 358, 399, 400, 401, 403, 404, 583, 584, 933, 936, 938, 939, 941, 942, 946, 947, 948, 949, 951, 952, 953, 955, 957, 958, 959, 960, 961, 962, 963, 964, 965, 966, 967, 968, 969, 970, 972, 973, 975, 976, 977, 978, 979, 980, 981, 984, 986, 987, 988, 991, 992, 994, 996, 997, 998, 999, 1000, 1002, 1003, 1004, 1005, 1006, 1007, 1008, 1009, 1010, 1011, 1012, 1013, 1014, 1015, 1016, 1017, 1018, 1019, 1021, 1022, 1023, 1024, 1025, 1026, 1027, 1028, 1029, 1030, 1031, 1032, 1033, 1035, 1037, 1038, 1040, 1042, 1044, 1045, 1046, 1047, 1048, 1049, 1051, 1053, 1054, 1055, 1056, 1057, 1058, 1059, 1060, 1061, 1062, 1063, 1064, 1065, 1066, 1067, 1068, 1069, 1071, 1072, 1073, 1074, 1075, 1076, 1077, 1078, 1079, 1080, 1082, 1083, 1085, 1086, 1087, 1088, 1089, 1090, 1091, 1092, 1093, 1094, 1095, 1096, 1097, 1098, 1099, 1101, 1102, 1103, 1105, 1106, 1108, 1109, 1110, 1111, 1112, 1113, 1114, 1118, 1122, 1123, 1186, 1484, 1486, 1565, 1585, Agree with the location and size of development at OP41.

1579 OP41 - Broadly support that the site is suitable for development, subject to certain conditions and safeguards. Planning gain essential to compensate for loss of community facilities (2008 Local Plan). Trees and bushes need to be protected to provide screening, reduce traffic noise and preserve leafy entrance to Kingswells.

38 OP41 - Concerned about impact on view from back of house. House value will suffer.

51 OP41 - Object to the development of site due to presence of wildlife, particularly deer.

68, 354, 357 OP41 - Disagree with location and size of proposal.

308, 1579. OP41 - Southern-most section of site regularly suffers from flooding - consider an amenity area adjacent to the Den Burn in any future development. Support for the identification of Green Space Network to preserve marshy ground here and promote biodiversity.

#### OP42 Kingswells D and West Huxterstone

61, 64, 70, 82, 83, 89, 90, 91, 92, 93, 95, 96, 102, 103, 104, 105, 106, 108, 109, 110, 111, 112, 114, 116, 117, 118, 119, 120, 121, 122, 123, 124, 125, 126, 144, 147, 148, 149, 150, 180, 181, 182, 183, 184, 185, 186, 187, 190, 191, 192, 193, 194, 195, 196, 200, 201, 205, 206, 217, 218, 219, 222, 224, 237, 240, 245, 246, 248, 249, 250, 251, 295, 296, 297, 298, 299, 300, 301, 312, 313, 315, 316, 354, 355, 356, 357, 358, 400, 401, 403, 583, 584, 933, 936, 939, 941, 942, 946, 947, 948, 949, 951, 952, 953, 955, 957, 958, 959, 960, 961, 962, 963, 964, 965, 966, 967, 968, 969, 970, 972, 973, 975, 976, 977, 978, 979, 980, 981, 984, 986, 987, 988, 991, 992, 994, 996, 997, 998, 999, 1002, 1003, 1004, 1005, 1006, 1007, 1008, 1009, 1010, 1011, 1012, 1013, 1015, 1016, 1017, 1018, 1019, 1021, 1022, 1023, 1025, 1026, 1027, 1028, 1030, 1031, 1032, 1033,

1035, 1038, 1040, 1042, 1044, 1045, 1046, 1047, 1048, 1051, 1053, 1054, 1055, 1056, 1057, 1058, 1059, 1060, 1061, 1062, 1063, 1064, 1065, 1066, 1068, 1069, 1072, 1073, 1074, 1075, 1076, 1077, 1078, 1080, 1082, 1083, 1085, 1086, 1087, 1088, 1089, 1090, 1091, 1092, 1093, 1094, 1095, 1096, 1097, 1098, 1099, 1101, 1102, 1103, 1105, 1106, 1108, 1109, 1110, 1111, 1112, 1113, 1114, 1118, 1122, 1123, 1186, 1484, 1486, 1585, OP42 - Agree with the location and size of development.

1565 OP42 - Support identification of land for residential purposes.

1579 Broadly support that the site is suitable for development, subject to certain conditions and safeguards. Support exclusion of eastern section of site. Support inclusion of Green Space Network to protect the Den Burn. Needs careful consideration of primary school capacity.

### **Modifications sought by those submitting representations:**

#### General

408. OP41 and OP42 - Clearly highlight the need to consider opportunities for the protection and improvement of the watercourses within the site by adding text to the site description in Appendix 2. "Any Masterplan should take account of the existing water features within the site, the pressures which apply to these features and should direct developers to look for opportunities to protect and improve the water environment."

1567 A further requirement should be imposed for a development framework covering all of the sites within Kingswells.

#### OP41 Kingswells C

51, 998, 1000, 1017 Remove proposal from Plan.

#### OP42 Kingswells D and West Huxterstone

998 Remove proposal from Plan.

38 Hope the plan could be scrapped.

### **Summary of response (including reasons) by planning authority:**

#### General

A Kingswells Development Framework was published in November 2008. Through the masterplan and planning application process, and by ensuring that any development proposal satisfies the policies on design and layout of development, the Council considers that concerns over relationship of the sites to adjacent properties, the retention of trees and bushes, and the noise and visual impact of development can be suitably mitigated. In addition, the Council has considered the local and cumulative transport impact of development and has identified the likely level of new and improved transport infrastructure required to support new development. Masterplans and planning applications will need to show how such infrastructure will be delivered.

The Council has undertaken an assessment of the local and cumulative transport impact of all developments allocated in the Proposed Plan. As a result we have identified where infrastructure is likely to be required to support new development. As with all

developments allocated in the Local Development Plan, through the masterplan and planning application process developers will need to submit a Transport Assessment detailing the traffic movements likely to be generated by the development along with any measures required to mitigate the transport impact of development. This will need to be agreed with the Council and Transport Scotland. Masterplans will also need to show how and when supporting infrastructure will be delivered in order to ensure that there is no detrimental impact on the surrounding transport network.

If the Report is so minded, the Council would accept the suggested modification from Scottish Environment Protection Agency relating to the issue of water features within the site and would be happy to incorporate this reference in the Action Programme for sites OP41 Kingswells C and OP42 Kingswells D and West Huxterstone.

#### OP41 Kingswells C

We note that the majority of comments agree with the location and scale of development although a small number of respondents seek the removal of the site from the Plan.

This site was carried forward from the extant Aberdeen local Plan (2008) and is identified in the 2008 Aberdeen Local Plan (CD12) for Strategic Housing Land Reserve (Section 2.5 page 22). Given that the principle for developing this area was established here (albeit subject to review) all such areas have been carried forward into the Proposed Plan. They were also assessed as being suitable for development in the Development Options Assessment Report 2010 (CD13). The Development Plan Team remains of the opinion that this site is suitable for residential development as proposed. This site was subject to the scrutiny of reporters in the 2007 Public Local Inquiry under Issue 60 (CD11).

Following the Reporter's recommendations this site (now identified as OP41 in the Proposed Plan) was identified as Strategic Housing Land Reserve in the adopted Local Plan (CD12). Part of the northern section of the site was allocated under reference OP67 for a fire station having received planning approval, with community facilities and Urban Green Space identified as an appropriate alternative use if the proposed fire station was abandoned. However, although the fire station proposal has not been implemented, as noted above, the Development Options Assessment Report 2010 (CD13) recommends that the site is appropriate for residential development and has therefore been included in the Proposed Plan. We note that the site is not currently accessible to the public. Development of the site for residential purposes will need to include an element of open space which would be incorporated into the proposed development. The southern section of the site adjacent to the Den Burn is currently proposed to be retained as open space by the developer. A suitable layout will need to be agreed with the Council and subject to consultation with local communities.

Site OP41 is currently vacant farmland with two strips of woodland along the north and eastern boundary separating the site from the bypass, and a steep embankment at the southern end of the site. It is allocated for residential development in the Proposed Plan. The Den Burn runs along the southern boundary of the site and the Development Options Assessment Report (CD12) identifies two priority habitats in the southern section of OP41 adjacent to the burn. As mentioned above, the developer proposes to retain this section of the site as open space.

The Council is not aware of any ecological issues, or in particular the presence of deer,

that would prevent the progression of this site towards implementation. However, such issues may need to be examined further through the planning application process.

One of the main influences for the amount of residential development zoned in Kingswells has been the educational capacity of Kingswells Primary School.

#### OP42 Kingswells D and West Huxterstone

We note that the majority of comments agree with the location and scale of development although a small number of respondents seek the removal of the site from the Plan.

This site was carried forward from the extant Aberdeen local Plan (2008) and is identified in the 2008 Aberdeen Local Plan (CD12) for Strategic Housing Land Reserve (Section 2.5 page 22). Given that the principle for developing this area was established here (albeit subject to review) all such areas have been carried forward into the Proposed Plan. They were also assessed as being suitable for development in the Development Options Assessment Report 2010 (CD13). The Development Plan Team remains of the opinion that this site is suitable for residential development as proposed. This site was subject to the scrutiny of reporters in the 2006 Public Local Inquiry under Issues 59 and 60 (CD11).

Following the Reporter's recommendations this site, now identified as OP42 in the Proposed was identified as Strategic Housing Land Reserve in the adopted Local Plan (CD12). It is allocated for residential development in the Proposed Plan.

#### **Reporter's conclusions:**

#### **Reporter's recommendations:**



<b>Issue (ref and heading):</b>	<b>EMPLOYMENT LAND ALLOCATION: WEST HATTON AND HOME FARM, KINGSWELLS OP40</b>	<b>31</b>
<b>Development Plan reference:</b>	OP40 in Table 7, Page 16.	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
<p>Mr Eric Jensen (54), Ms Aileen Jensen (55), Mr James Fish (56), Ms Tiffany Sims (57), Mr Mark Ewen (61), Ms Joyce Milne (62), Ms Gayle Morrice (63), Ms Gillian Ewen (64), Mr Brian Morgan (68), Mr Peter Wilson (69), Ms Catriona McWilliam (70), Mr Frederick Milne (71), Mr Keir Willox (73), Ms Renata Powell (81), Mr George Hood (82), Ms Fyfe Hepburn (83), Mr Kenneth Sandison (84), Ms Lorraine Sandison (86), Mr Greig Addison (87), Mr Ali Hassanirad (89), Ms Angela Cameron (90), Mr Scott Cameron (91), Mrs June V. Shirriffs (92), Sir/Madam H. Brown (93), Dr George G. Shirriffs (94), Ms Elizabeth Binnie (95), Mr George J. Lowe (96), Sir/Madam N. Sands (102), Mr Dennis Scott Dalgarno (103), Mrs E. Cheyne (104), Mr Alexander Davidson (105), Ms Ann Perrott (106), Mr James Chalmers (108), Mrs Margaret Chalmers (109), Mr Alan Walker (110), Ms Joyce Forrest (111), Mr David W. Metcalfe (112), Ms Oonagh Grassie (113), Mrs Gillian Millar (114), Ms Shari Ross (116), Sir/Madam M. Sands (117), Sir/Madam W. Middleton (118), Sir/Madam I. Middleton (119), Ms Morag Dalgarno (120), Ms Claudine Park (121), Ms Sandra Roach (122), Mr Peter Roach (123), Mr Ian Park (124), Sir/Madam Sam D. Sinclair (125), Mr Colin McKay (126), Dr Steven Yule (127), Mrs Susan Yule (128), Mr Graham MacPherson (142), Mr Stuart Wilkie (143), Mr Richard Murray (144), Ms Kimberley Murison (146), Mr Simon Merrilees (147), Ms Olive Hunter (148), Mr David Merson (149), Mr Norman Hunter (150), Mr Derek Watt (180), Ms Elizabeth Merson (181), Ms Lyndsay Hay (182), Ms Helen Wood Barron (183), Ms Jane Watt (184), Mr Michael Alexander Barron (185), Mr John Edward Doudenmier (186), Mr Kevin A. Cowie (187), Mr E. G. Roberts (188), Ms Jane Anne Smart Doubenmier (190), Mrs Azadeh Safarvarkiani (192), Mrs P. Cram (193), Ms Susan Cameron (194), Mr Craig Cameron (195), Ms Angela M. Gibb (196), Ms Jane Troup (198), Mr John Bedford (199), Ms Carol Milne (205), Mr Keith Milne (206), Ms Louise Wood (207), Mr Charles Hall (217), Mr Charles Thorn (218), Mr Alistair Blues (219), Ms Dorothy Hall (220), Ms Betty Johnston (221), Ms Valerie Sinclair (222), Mr &amp; Mrs G. B. Peddie (224), Mr Eric K. Johnstone (236), Mr Michael J. M. Reid (237), Mr Allan Davidson (238), Mr R. Hainey (239), Mrs R. Hainey (240), Mr John Cameron (242), Ms Karen Hughes (245), Mr David S. M. Campbell (246), Ms Arlene Wilson (247), Dr J. Kenneth McAlpine (248), Ms Judith Farquhar (249), Mr Raymond Farquhar (250), Ms Kathleen Thorn (251), Mr Glenn Taylor Buchan (292), Ms Ellen Buchan (293), Mr Rod Buchan (294), Mr Malcolm McDonald (295), Ms Michelle McDonald (296), Mrs Barrie Buchan (299), Mr Stephen Jack (300), Ms Pamela Anne Jack (301), Mr Steve Burnett (312), Mr Matthew Dunning (313), Mr P.E. Johnston (314), Mrs F.A. Pastuszko (315), Mr A.S.G. Pastuszko (316), Ms Shauna Gowans (354), Ms June McDonald (355), Mr William McDonald (356), Ms Pamela Gatt (357), Mr Neil Taylor (358), Mr Colin McKenna (399), Mrs Lindsay A Simpson (400), Mr Robert G Simpson (401), Mr W Guy Bentinck (403), Mrs June Bentinck of 34 Kingswood Avenue (404), Ms Nicola Abrams of Scottish Environmental Protection Agency (408), Mr Gary Purves of Knight Frank on behalf of Mr J Sheran (428), Ms Claire Fowler of Keppie Planning and Development on behalf of Drum Property Group Ltd (479), Mr Steve Delaney of Mastrick, Sheddocksley and Summerhill Community Council (543), Mrs Wendy Campbell (583), Mr Colin Campbell (584), Mr John Findlay of Ryden LLP on behalf of Archpeak LTD (624), Mr David Liddell of Scottish Government (665), Ms Lorna Henderson (933), Mr Alexander Kilgour (935), Mr William Simpson (936), Miss Emma Wright (938), Mrs Eziz Robertson (939), Mr Matthew Wright (941), Mrs Elizabeth Coutts (946), Mrs Margaret Park (947), Mr Charles Coutts (948),</p>		

Sir/Madam V Hutcheon (949), Ms Hilary Davern (950), Mrs Vera Mutch (951), Mr N Craig (952), Sir/Madam M Hutcheon (953), Mrs Alison Murison (954), Mr Alexander Murison (956), Mr Douglas Park (957), Ms Eliana Figueroa (958), Mr Derek W Martin (959), Mr Edgar Castillo (960), Mrs Pamela Wright (961), Ms Lydia A W Martin (962), Mr David Wright (963), Mr Donald Vass (964), Ms Joan Vass (965), Ms Valerie Weir (966), Mr Gerard David Cairns (967), Mr James Grant (968), Mr William P Weir (969), Ms Siobhan G Anthony (970), Mrs G Craig (972), Mr Stephen King (974), Mr L Watson (975), Mr William Miller (976), Mrs Jackie Cairns (977), Mr George A Wallace (978), Ms Margaret Miller (979), Thilini Wallace (980), Ms Heather Burns (981), Ms Sheila Irvine (983), Mr B J Carey (984), Mr William Irvine (985), Mr Andrew Henderson (986), Sir/Madam A Carey (987), Sir/Madam R Holden (988), Sir/Madam Elm Holden (991), Mrs Dorothy Gray (992), Mrs Isobel M Patterson (993), Ms Catherine May (994), Mr Gordon Patterson (995), Ms Cath Grant (996), Mr Alexander May (997), Sir/Madam R W Wilkie (998), Ms Margaret McEwan (999), Ms Fiona Wilkie (1000), Ms Silvia Gaspar-Pereira (1002), Mrs GB Anthony (1003), Mr Stan McEwan (1004), Mr William Smith (1006), Ms Helen Davidson (1007), Ms Rosemary Walker (1008), Mrs Gwendoline Jones (1009), Mr Iain Laidlaw (1010), Sir/Madam Tom Straiton (1011), Ms Florence Gunn-Folmer (1012), Ms Kaye Smith (1013), Mr Alexander Gunn (1014), Sir/Madam George Ian Gibson (1015), Ms Elaine Grosvenor (1016), Mr Stephen Anthony (1017), Mr Brian Yeats (1018), Ms Jennifer Miller (1019), Ms Julie McLulich (1021), Ms Suzanne Walker (1022), Mr Hamish McLulich (1023), Mrs Gillian Joss (1024), Mrs Fiona McRuvie (1025), Mr Brain Folan (1026), Mr William Skidmore (1027), Ms Linda Cameron (1028), Mr Lewis Joss (1029), Mrs Wendy Skidmore (1030), Mr Alexander Crawford Hair (1031), Sir/Madam A Innes (1032), Mr George Lowe (1033), Mrs Margaret Lowe (1035), Mr James Wilson (1037), Mr Derek Walker (1038), Ms Ruth Tulloch (1040), Ms Christina M Wilson (1042), Mr Samuel Stafrace (1044), Mr Zane Hair (1045), Ms Amanda Stafrace (1046), Mrs Valerie Henderson (1047), Ms Rachel Watson (1048), Mr Iain Watson (1051), Sir/Madam Arnajorn Joensen (1053), Ms Marion Cumming (1055), Mr Gordon Cumming (1056), Sir/Madam N Sutherland (1057), Dr Iain Greig (1058), Ms Catherine McBain (1059), Mr Mahmoud Kamel (1060), Mr William Beattie (1061), Mr Noelle Straton (1062), Sir/Madam Bernese Kamel (1063), Ms Susan Beattie (1064), Ms Helen Ireland (1065), Miss Jean M Park (1066), Ms Katharine Hume (1067), Miss Vera M Anderson (1068), Mr Angus Morrison (1069), Mr Cameron Millar (1070), Mr Mike Hume (1071), Ms Catriona Morrison (1072), Sir/Madam E Young (1073), Ms Amanda-Jane Mackay (1074), Sir/Madam R Birse (1075), Mr Martin Mackay (1076), Mr David Cornet (1077), Mr Ian Sim (1078), Mr Lawrence Dean (1079), Ms Irene McKay (1080), Ms Dorothy Higgins (1081), Ms Patricia Sim (1082), Mr Munawar H Usman (1083), Mr & Mrs J & K Massie (1084), Ms Sadia A Usman (1085), Mrs Grace M Hepburn (1086), Mrs V Taylor (1087), Mrs Ewa Gainska (1088), Sir/Madam EA Taylor (1089), Mr Miroslaw Gainski (1090), Mrs Pat Duncan (1091), Mr David Bruce (1092), Mr Robert Overy (1093), Ms Jennifer Bruce (1094), Ms Gillian Graham (1095), Mr Mark Graham (1096), Mr William Robertson (1098), Mrs Margaret Kilgour (1100), Mr Alan Stott (1101), Mr Walter Jardine (1102), Ms Muriel Wyness (1103), Mr W R Hepburn (1105), Ms Caroline Taylor (1106), Mr Colin Taylor (1108), Ms Barbara Bruce (1109), Mr James Henderson (1110), Ms Joan Keyes (1111), Mrs Pamela Stuart (1112), Mr Tom Keyes (1113), Mr Raphael C Stuart (1114), Mr Stuart Higgins (1115), Mr Barclay J Massie (1116), Ms Carol Buchan (1118), Sir/Madam E Cooper (1119), Sir/Madam Selina Jardine (1122), Mr Malcolm Cameron (1123), Mr Michael Migvie (1186), Mrs Charlotte Goodbody (1484), Professor Ivan Goodbody (1486), Mr Bob Reid of Halliday Fraser Munro Planning on behalf of Mrs M Palmer and Mrs K Gibb (1532), Mr Ian Cox of Kingswells Community Council (1579), Ms Helen Gibson (1585), Mrs Margaret Cameron (1586).

**Provision of the Development Plan to**

Allocation of 50ha of employment land at

<b>which the issue relates:</b>	Kingswells.
<b>Summary of the representation(s):</b>	
<p>Principle of Development</p> <p>54, 55, 56, 57, 61, 62, 63, 64, 68, 69, 70, 71, 81, 82, 83, 84, 86, 87, 89, 90, 91, 92, 93, 94, 95, 96, 102, 103, 104, 105, 106, 108, 109, 110, 111, 112, 113, 114, 116, 117, 118, 119, 120, 121, 122, 123, 124, 125, 126, 127, 128, 142, 143, 144, 146, 147, 148, 149, 150, 180, 181, 182, 183, 184, 185, 186, 187, 188, 190, 192, 193, 194, 195, 196, 198, 199, 205, 206, 207, 217, 218, 219, 220, 221, 222, 224, 236, 237, 238, 239, 240, 242, 245, 246, 247, 248, 249, 250, 251, 295, 296, 300, 301, 312, 313, 314, 315, 316, 354, 355, 356, 357, 358, 399, 400, 401, 403, 404, 583, 584, 933, 935, 936, 938, 939, 941, 946, 947, 948, 949, 950, 951, 952, 953, 954, 956, 957, 958, 959, 960, 961, 962, 963, 964, 965, 966, 967, 968, 969, 970, 972, 974, 975, 976, 977, 978, 980, 981, 983, 984, 985, 986, 987, 988, 991, 992, 993, 994, 995, 996, 997, 998, 999, 1000, 1002, 1003, 1004, 1006, 1007, 1008, 1009, 1010, 1011, 1012, 1013, 1014, 1015, 1016, 1017, 1018, 1018, 1021, 1022, 1023, 1024, 1025, 1026, 1027, 1028, 1029, 1030, 1031, 1032, 1033, 1035, 1037, 1038, 1040, 1042, 1044, 1045, 1046, 1047, 1048, 1051, 1053, 1055, 1056, 1057, 1058, 1059, 1060, 1061, 1062, 1063, 1064, 1065, 1066, 1067, 1068, 1069, 1070, 1071, 1072, 1073, 1074, 1075, 1076, 1077, 1078, 1079, 1080, 1081, 1082, 1083, 1084, 1085, 1086, 1087, 1088, 1089, 1090, 1091, 1092, 1093, 1094, 1095, 1096, 1098, 1100, 1101, 1102, 1103, 1105, 1106, 1108, 1109, 1110, 1111, 1112, 1113, 1114, 1115, 1116, 1118, 1119, 1122, 1123, 1186, 1484, 1486, 1579, 1585, 1586. Agree with the provision of employment land to make Kingswells sustainable but the proposed development is too large and disproportionate to Kingswells. Some state that development must also be designed to take account of rural location.</p> <p>428. Support allocation of land to west of Kingswells for employment - attractive and accessible location, opportunity to provide employment for residents at Kingswells and Westhill, and to create better mix of uses in the area.</p> <p>624, 1532. Support for the site. Developer encloses a copy of the latest masterplan.</p> <p>479. Support for site and definition of Green Space Network to the north but disagree with Green Space Network to the south between A944 and P&amp;R site.</p> <p>73, 1484. Kingswells should have no allocation of employment land. Westhill has a big retail and industrial development so unnecessary to do the same in Kingswells.</p> <p>292, 293, 294. Site is too sensitive to develop.</p> <p>Scale and Impact of Development</p> <p>299, 665, 1579. Concern over impact of development on consumption dyke and other environmental factors. Some also noting concern over impact on Quakers Graveyard and ancient woodland.</p> <p>399, 401, 968, 1008, 1012, 1023, 1027, 1030, 1031, 1040, 1044, 1063, 1065, 1069, 1072, 1086, 1090, 1091, 1094, 1095, 1112, 1114. Road infrastructure must be directed to the Aberdeen Western Peripheral Route, away from Kingswells and city centre.</p> <p>543, 1579. Concern over the scale of development proposed and the traffic likely to be</p>	

generated.

#### Alternative Development Boundary

Boundaries of OP40 should be re-examined to ensure that: a) the scale and nature of development is appropriate for the location; b) the areas zoned for development are deliverable; c) the protected features are adequately safeguarded from development; and d) the green belt policy designation is applied appropriately. Alternative boundary proposed for the site replacing northern section of the site with area of land to the west at West Hatton. This will reduce the employment land to a level appropriate for the area and includes only land which will be attractive to businesses. This would include adequate buffers to protect the consumption dyke, Kingswells House, District Wildlife Site and Burial Ground. Additional land proposed at West Hatton does not contribute to aims and objectives of green belt and physical characteristics allow for area to be incorporated into revised boundary for this site

#### Waterbodies

408. Den Burn in close proximity which has poor ecological potential due to impacts from sewage pollution and channel modifications.

#### Need for a Development Framework

408. Area not covered by SG 9.12 Kingswells Development Framework.

### **Modifications sought by those submitting representations:**

#### Principle of Development

479. Reduce the area of Green Space Network designation in the southern section of the site. Plan enclosed to show revised boundary suggested.

73, 292, 293, 294. Remove site

1579. Restrict the employment uses to Class 4 only with no ability to re-classify.

#### Scale and Impact of Development

54, 55, 56, 57, 61, 62, 64, 68, 69, 70, 71, 81, 82, 83, 84, 86, 87, 89, 90, 91, 92, 93, 94, 95, 96, 102, 103, 104, 105, 106, 108, 109, 110, 111, 112, 113, 114, 116, 117, 118, 119, 120, 121, 122, 123, 124, 125, 126, 127, 128, 142, 143, 144, 146, 147, 148, 149, 150, 180, 181, 182, 183, 184, 185, 186, 187, 188, 190, 192, 193, 194, 195, 196, 198, 199, 201, 205, 206, 207, 217, 218, 219, 220, 221, 222, 224, 236, 237, 238, 239, 240, 242, 245, 246, 247, 248, 249, 250, 251, 295, 296, 299, 300, 301, 312, 313, 314, 315, 316, 354, 355, 356, 357, 358, 399, 400, 401, 403, 404, 583, 584, 933, 935, 936, 938, 939, 941, 946, 947, 948, 949, 950, 951, 952, 953, 954, 956, 957, 958, 959, 960, 961, 962, 963, 964, 965, 966, 967, 968, 969, 970, 972, 974, 975, 976, 977, 978, 979, 98, 981, 983, 984, 985, 986, 987, 988, 991, 992, 993, 994, 995, 996, 997, 998, 999, 1000, 1002, 1003, 1004, 1006, 1007, 1008, 1009, 1010, 1011, 1012, 1013, 1014, 1015, 1016, 1017, 1018, 1019, 1021, 1022, 1023, 1024, 1025, 1026, 1027, 1028, 1029, 1030, 1031, 1032, 1033, 1035, 1037, 1038, 1040, 1042, 1044, 1045, 1046, 1047, 1048, 1051, 1053, 1055, 1056, 1057, 1058, 1059, 1060, 1061, 1062, 1063, 1064, 1065, 1066, 1067, 1068, 1069, 1070, 1071, 1072, 1073, 1074, 1075, 1076, 1077, 1078, 1079, 1080, 1081, 1082, 1083, 1084,

1085, 1086, 1087, 1088, 1089, 1090, 1091, 1092, 1093, 1094, 1095, 1096, 1098, 1100, 1101, 1102, 1103, 1105, 1106, 1108, 1109, 1110, 1111, 1112, 1113, 1114, 1115, 1116, 1118, 1119, 1122, 1123, 1186, 1484, 1486, 1486, 1585, 1586. Scale of development should be reduced and any excess should be allocated to part of a new development site at Clinterty (site 1/07)

54, 665, 1579. Fields to the south of consumption dyke should be retained as green belt. Development should not encroach beyond the field boundary north of Kingswells Home Farm to retain the 1850's pattern of field systems and maintain connection with Kingswells House and associated buildings. Natural rise in slope from dyke to Kingswells House creates a natural ridge behind which the head dyke sits and would form a suitable screen for any development. Tree planting within the field boundary would considerably alter the nature of the landscape and impact on the setting of the monument.

543. Significant developer contributions should be sought for the upgrading of the Lang Stracht to mitigate the impact of employment development (also dealt with in Issue 90 Policy I1).

1579. Development is out of scale with size of Kingswells. Aberdeen City Council should abandon any policy to provide employment land for residents of Aberdeenshire. Calculated over-provision of 24.5 ha for employment land which could be removed from Kingswells allocation or included as Green Space Network within the 50ha site.

543. Scale of development should be reduced to preserve the 200m distance required between the historic monument and the development and respect visual amenity. Shortfall could be accommodated to the south of the city.

1579. Additional Green Space Network buffer zones could be used to protect other important features within the site.

665. Field boundary should mark the northern boundary.

1579. Western-most area of OP40, between the Five Mile garage and the Aberdeen Western Peripheral Route junction, should be removed due to visual impact from a main arterial gateway to the city.

1579. Infrastructure requirements will be significant and a major contribution will be required from Aberdeen City Council and the Developer to ensure the area is an attractive place to live and work.

#### Alternative Development Boundary

428. Redraw boundary of OP40 to include the land at West Hatton. Site plan enclosed with representation.

#### Waterbodies

408. Clearly highlight the need to consider opportunities for the protection and improvement of the watercourses within the site by adding text to the site description in Appendix 2. "Any Masterplan should take account of the existing water features within the site, the pressures which apply to these features and should direct developers to look for opportunities to protect and improve the water environment."

**Summary of response (including reasons) by planning authority:****Principle of Development**

Comments agreeing to the principle of employment development in this location are noted.

The Aberdeen City and Shire Structure Plan (CD8) sets the requirements for 105ha of employment land allowances within the City boundary and authorises a review of green belt boundaries in order to accommodate them. A Development Options Assessment (CD13), Strategic Environmental Assessment (CD21), and consultation on the Main Issues Report Responses to Representations (CD15) were used to assess sites. These were used to identify the most suitable locations to deliver the required growth and in accordance with Scottish Planning Policy paragraph 159 (CD3) which requires green belts to direct growth to the most appropriate locations. This process is described in the Green Belt Review (CD19) which also sets and explains the detailed boundaries of the green belt and land release areas. This site emerged as a desirable option for employment uses because of the opportunity to create a better mix of uses and employment in the local area.

**Scale and Impact of Development**

The site identified in the Main Issues Report comprised sections of three different sites which at that stage were referred to as 3/01 West Hatton and 3/07 and 3/13 both known as Home Farm. Following publication of the Main Issues Report, and in preparing the Proposed Plan, further consideration of the site and its wider context led to the removal of the north western section of the site, and replacement with land to the north east. As a result, an employment allocation of 50 hectares is identified at OP40.

A number of comments highlight concern over the scale of development allocated. However, lying within the City Strategic Growth Area the Council considers that this location provides a suitable location for this scale of employment development when compared to other potential developments in the City. It has the potential to contribute significantly to a better mix and balance of land uses in the area and would have the potential to create employment opportunities for nearby residents which do not currently exist in Kingswells. In addition, the adjoining Park & Ride site and cycle routes along the Langstracht and Queens Road provide the opportunity to maximise use of sustainable modes of travel and, alongside the Aberdeen Western Peripheral Route, would help to create a high quality environment for headquarters development as proposed in the Aberdeen City and Shire Structure Plan (CD8).

The suggestion to relocate the employment allocation to Clinterty is not considered to be suitable. The Development Options Assessment Report (CD13) states that development here would have significant impacts on the surrounding agricultural landscape and would be highly visible from a number of locations including Brimmond Hill, the A96, and Blackburn. It also highlights that the site is very remote from the City which means that the accessibility of the site is very poor and the potential to integrate with new and existing communities is very restricted.

In relation to Green Space Network, the section to the south of, and partly within, the site is designated as Green Space Network firstly to maintain a green network from West Hatton District Wildlife Site to the Denburn using established shelter belts and

woodlands. Secondly, it is designed to provide a buffer for the Denburn which is in line with proposed Supplementary Planning Guidance 7.3 for buffer strips adjacent to water bodies (RD71). The Green Space Network also includes the neutral grassland area surrounding the burn. The purpose of the Green Space Network designation to the north of, and partly within, OP40 is to protect the landscape and heritage features associated with the consumption dyke that runs east to west. These areas are therefore considered to play an important role as Green Space Network.

Historic Scotland highlight the need to restrict development further and one in particular specifies that the field boundaries north of Kingswells Home Farm should mark the northern extent of the OP40 allocation. This is on the basis that the buffer as proposed does not provide adequate protection to the consumption dyke and the surrounding fields from which the stones originated and to which the dyke strongly relates; protection of these fields is seen to help secure both the original context and the modern setting of the dyke.

Whilst it is accepted that there needs to be a suitable buffer to protect the dyke and its setting, the Council considers that the Green Space Network designation provides adequate protection and, in negotiation with the developer and key agencies, we consider that a suitable form and layout of development could be agreed which suitably addresses the landscape setting and the relationship to the dyke. This Green Space Network buffer extends over a small ridge to the south of the consumption dyke. This will help to provide a significant visual and physical break between the consumption dyke and development and maintain its open agricultural setting.

An alternative location proposed for any reduction in the employment allocation is suggested to the south of the City although no specific site is mentioned.

The Council has taken a proactive approach to infrastructure requirements to support new developments by clearly identifying these in the Proposed Plan. As with all developments allocated in the Local Development Plan, through the masterplan and planning application process the developer will need to submit a Transport Assessment detailing the traffic movements likely to be generated by the development along with any measures required to mitigate the transport impact of development. This will need to be agreed with the Council and Transport Scotland. Masterplans will also need to show how and when supporting infrastructure will be delivered in order to ensure that there is no detrimental impact on the surrounding transport network.

#### Alternative Development Boundary

Another respondent proposes a business park on a section of land west of the current OP40 allocation, on a site referred to as West Hatton. This respondent contends that parts of the OP40 allocation are already developed and others require greater mitigation and this site should be developed instead. They suggest that land at West Hatton is more suitable and deliverable than certain sections of the OP40 allocation. We note that the central section of this site running north/south is required for the Aberdeen Western Peripheral Route which results in the site being split into two parts east and west of the Aberdeen Western Peripheral Route route. The Main Issues Report (CD14) included the western section of this site as part of a Preferred Option for employment development under site 3/01 West Hatton alongside the other parts of the site now allocated as OP40. However, following publication of the Green Belt Review (CD19) it was felt that this land should be excluded due in part to the remote nature of the north western section from

Kingswells, as well as the combination of the presence of the burial ground, steep slope and prominence of the landscape. It was also felt that the layout of the development would have been more disjointed due to the woodland and District Wildlife site between the north western parcel of land and the main body of the site to the east. The lower lying pocket of land to the south, immediately north of the A944, has the potential to form an integral part of the OP40 allocation. Land to the west of the Aberdeen Western Peripheral Route is significantly constrained by its relationship to Westhill and the views across the intervening landscape. Although the Aberdeen Western Peripheral Route will alter the landscape significantly it is not considered appropriate to locate development on the western side of the Aberdeen Western Peripheral Route. The boundary of OP40 is shown in the Proposed Plan. The trees around Kingswells House provide a suitable and attractive setting and this will need to be taken into account in any masterplan for the site.

#### Waterbodies

Scottish Environment Protection Agency's suggested amendments to the site summary of OP40 within Appendix 2 are acceptable and if the Reporter is so minded, the following text should be added into the 'Other Factors' section of Appendix 2. "This site may be at risk of flooding. A flood risk assessment will be required to accompany any future development proposals for this site."

If the Reporter is so minded, we can accept the suggested removal of West Hatton from the name to better reflect the land covered by the OP40 allocation, so that the name would become OP40 Home Farm.

#### Need for Development Framework

The Kingswells Development Framework (RD79) was prepared under the adopted Local Plan (2008) and, therefore, does not cover the land at OP40. Any masterplan should be approved as Supplementary Guidance before the application can be determined.

#### **Reporter's conclusions:**

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#### **Reporter's recommendations:**

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<b>Issue (ref and heading):</b>	<b>ALLOCATED SITE: EAST ARNHALL OP46</b>	<b>32</b>
<b>Development Plan reference:</b>	LR1 Land Release Policy	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Ms Nicola Abrams of Scottish Environmental Protection Agency (408), Mr John Findlay of Ryden LLP on behalf of Westhill Developments (Arnhall LTD) (626), Mr Roger Laird of Archial on behalf of BP North Sea Infrastructure (764).		
<b>Provision of the Development Plan to which the issue relates:</b>	Allocated site for 1ha of employment land adjacent to a larger allocation at Westhill in Aberdeenshire Local Development Plan.	
<b>Summary of the representation(s):</b>		
<p>408 Object to site unless flood risk is highlighted as a potential constraint as required by Scottish Planning Policy. Happy to remove objection if this is addressed.</p> <p>626 Welcome allocation of the site for employment use.</p> <p>764 Site is in the middle of the BP forties pipeline which limits the types of use that would be permitted.</p>		
<b>Modifications sought by those submitting representations:</b>		
<p>408 Suggests text to be inserted in the other factors in Appendix 2 reflecting the requirement for a flood risk assessment to accompany any future development proposal for this site.</p> <p>764 Insert reference to the presence of the pipeline in other factors in Appendix 2.</p>		
<b>Summary of response (including reasons) by planning authority:</b>		
<p>The Council, in collaboration with Aberdeenshire Council, will seek the preparation of a Flood Risk Assessment where necessary - it is not considered necessary to state this in the Plan for every site where this is required.</p> <p>Policy BI5 of the Proposed Plan (Pipelines and Control of Major Accident Hazards) includes adequate safeguards to control the suitability of uses within these areas and for consultation to be undertaken with the appropriate agencies. The Proposals Map also highlights the areas affected. Therefore, it is not considered to be necessary to explicitly refer to the presence of the pipeline in Appendix 2.</p> <p>If the Report is so minded, the Council would be happy to accept the suggested modification from Scottish Environment Protection Agency in Appendix 2 of the Plan to reflect the requirement for a flood risk assessment.</p>		
<b>Reporter's conclusions:</b>		
<p></p>		
<b>Reporter's recommendations:</b>		
<p></p>		

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<b>Issue (ref and heading):</b>	<b>ALLOCATED SITE: COUNTESSWELLS OP58</b>	<b>33</b>
<b>Development Plan reference:</b>	Opportunity Site OP58 - Countesswells, Pages 16 and 58 and proposals map	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
<p>Mr Robert Smith (9), Mr David Stead (42), Mr Eric Jensen (54), Ms Aileen Jensen (55), Ms Gayle Morrice (63), Mr Brian Morgan (68), Ms Catriona McWilliam (70), Mr Philip Morrice (72), Mr Keir Willox (73), Mr George Hood (82), Ms Fyfe Hepburn (83), Mr Kenneth Sandison (84), Ms Lorraine Sandison (86), Mr Greig Addison (87), Mr Ali Hassanirad (89), Ms Angela Cameron (90), Mr Scott Cameron (91), Mrs June V. Shirriffs (92), Sir/Madam H. Brown (93), Dr George G. Shirriffs (94), Ms Elizabeth Binnie (95), Mr George J. Lowe (96), Mr William Sell (101), Sir/Madam N. Sands (102), Mr Dennis Scott Dalgarno (103), Mr Alexander Davidson (105), Ms Ann Perrott (106), Mr James Chalmers (108), Mrs Margaret Chalmers (109), Mr Alan Walker (110), Ms Joyce Forrest (111), Mr David W. Metcalfe (112), Ms Oonagh Grassie (113), Mrs Gillian Millar (114), Ms Shari Ross (116), Sir/Madam M. Sands (117), Sir/Madam W. Middleton (118), Sir/Madam I. Middleton (119), Ms Morag Dalgarno (120), Ms Claudine Park (121), Ms Sandra Roach (122), Mr Peter Roach (123), Mr Ian Park (124), Sir/Madam Sam D. Sinclair (125), Mr Colin McKay (126), Mr Richard Murray (144), Ms Olive Hunter (148), Mr David Merson (149), Mr Norman Hunter (150), Dr Robin Kay (166), Mr Derek Watt (180), Ms Elizabeth Merson (181), Ms Lyndsay Hay (182), Ms Helen Wood Barron (183), Ms Jane Watt (184), Mr Michael Alexander Barron (185), Mr John Edward Doudenmier (186), Mr Kevin A. Cowie (187), Ms Jane Anne Smart Doubenmier (190), Mrs Azadeh Safarvarkiani (192), Mrs P. Cram (193), Mr Craig Cameron (195), Ms Angela M. Gibb (196), Ms Heidi Aylmer (200), Mr Gary M. Aylmer (201), Ms Libby Brand (202), Mr Keith Milne (206), Mr Charles Thorn (218), Mr Alistair Blues (219), Mr &amp; Mrs G. B. Peddie (224), Mr Eric K. Johnstone (236), Mr Michael J. M. Reid (237), Mr R. Hainey (239), Mrs R. Hainey (240), Mr John Cameron (242), Ms Karen Hughes (245), Mr David S. M. Campbell (246), Dr J. Kenneth McAlpine (248), Ms Judith Farquhar (249), Mr Raymond Farquhar (250), Ms Kathleen Thorn (251), Mrs Cathryn Duncan (267), Mr David Lindsey (271), Mr Jonathan Smith (276), Mrs Jennifer Longhurst (286), Mr Michael Longhurst (287), Mr Glenn Taylor Buchan (292), Ms Ellen Buchan (293), Mr Rod Buchan (294), Ms Susan Beard (297), Mr John Beard (298), Mrs Barrie Buchan (299), Mr Stephen Jack (300), Ms Pamela Anne Jack (301), Mr Matthew Dunning (313), Mrs F.A. Pastuszko (315), Mr A.S.G. Pastuszko (316), Mr Christopher Venn (337), Ms Shauna Gowans (354), Ms June McDonald (355), Mr William McDonald (356), Ms Pamela Gatt (357), Mr Neil Taylor (358), Mr David Henry (368), Dr John Read (385), Mrs Karen Soden (386), Mrs Joan Will (387), Mr Alan Will (388), Mr Alistar Stark on behalf of Mr. Richard J. Thompson (391), Mr Neil Rothnie of Grampian Design Associates on behalf of Caversham Management Ltd (394), Mr Guus Glass of Cults, Bieldside and Milltimber Community Council (398), Mr Colin McKenna (399), Mrs Lindsay A Simpson (400), Mr Robert G Simpson (401), Mr W Guy Bentinck (403), Mrs June Bentinck of 34 Kingswood Avenue (404), Mr James Presly (406), Mr Christopher Smith (415), Mr Richard Butler of Ashley and Broomhill Community Council (416), Mr Gary Purves of Knight Frank on behalf of Bett Homes Ltd (430), Mrs Helen Smith (437), Mrs Margaret Cook (516), Mr David Suttie (529), Mrs Maureen McPherson (578), Mrs Dorothy Semple (582), Mrs Wendy Campbell (583), Mr Colin Campbell (584), Mrs Jo Gibson (599), Mr Nick Gibson (612), Mr Daniel Gibson (638), Janine Suttie (661), Mr Thomas Gibson (673), Mr Douglas Scott (769), Ms A Bell (822), Sir/Madam M. Bell (832), Mr &amp; Mrs Jonathan and Lynn Smith (877), Miss Claire Fowler of Keppie Planning &amp; Development Ltd on behalf of IDJ Properties (903), Ms Lorna Henderson (933), Mr William Simpson (936), Ms Anna Simpson (937), Mrs Eziz Robertson (939), Mrs Margaret Park (947), Sir/Madam V</p>		

Hutcheon (949), Ms Hilary Davern (950), Mrs Vera Mutch (951), Mr N Craig (952), Sir/Madam M Hutcheon (953), Mrs Alison Murison (954), Mrs V Glennie (955), Mr Douglas Park (957), Ms Eliana Figueroa (958), Mr Derek W Martin (959), Mr Edgar Castillo (960), Mrs Pamela Wright (961), Ms Lydia A W Martin (962), Mr David Wright (963), Mr Donald Vass (964), Ms Joan Vass (965), Ms Valerie Weir (966), Mr Gerard David Cairns (967), Mr James Grant (968), Mr William P Weir (969), Ms Siobhan G Anthony (970), Mrs G Craig (972), Mr Stephen King (974), Mr L Watson (975), Mrs Jackie Cairns (977), Mr George A Wallace (978), Ms Margaret Miller (979), Thilini Wallace (980), Ms Heather Burns (981), Mr B J Carey (984), Mr Andrew Henderson (986), Sir/Madam A Carey (987), Sir/Madam R Holden (988), Sir/Madam Elm Holden (991), Mrs Dorothy Gray (992), Ms Catherine May (994), Ms Cath Grant (996), Mr Alexander May (997), Sir/Madam R W Wilkie (998), Ms Margaret McEwan (999), Ms Fiona Wilkie (1000), Ms Silvia Gaspar-Pereira (1002), Mrs GB Anthony (1003), Mr Stan McEwan (1004), Mr Stuart Lamond (1005), Mr William Smith (1006), Ms Helen Davidson (1007), Ms Rosemary Walker (1008), Mrs Gwendoline Jones (1009), Mr Iain Laidlaw (1010), Sir/Madam Tom Straiton (1011), Ms Florence Gunn-Folmer (1012), Ms Kaye Smith (1013), Mr Alexander Gunn (1014), Sir/Madam George Ian Gibson (1015), Ms Elaine Grosvenor (1016), Mr Stephen Anthony (1017), Mr Brian Yeats (1018), Ms Jennifer Miller (1019), Ms Julie McLulich (1021), Ms Suzanne Walker (1022), Mr Hamish McLulich (1023), Mrs Fiona McRuvie (1025), Mr Brain Folan (1026), Mr William Skidmore (1027), Ms Linda Cameron (1028), Mrs Wendy Skidmore (1030), Mr Alexander Crawford Hair (1031), Sir/Madam A Innes (1032), Mr George Lowe (1033), Mrs Margaret Lowe (1035), Mr Derek Walker (1038), Ms Ruth Tulloch (1040), Mr Samuel Stafrace (1044), Mr Zane Hair (1045), Ms Amanda Stafrace (1046), Mrs Valerie Henderson (1047), Ms Rachel Watson (1048), Mr Iain Watson (1051), Sir/Madam Arnajorn Joensen (1053), Ms Sheena Lamond (1054), Ms Marion Cumming (1055), Mr Gordon Cumming (1056), Sir/Madam N Sutherland (1057), Dr Iain Greig (1058), Ms Catherine McBain (1059), Mr Mahmoud Kamel (1060), Mr William Beattie (1061), Mr Noelle Straton (1062), Sir/Madam Bernese Kamel (1063), Ms Susan Beattie (1064), Ms Helen Ireland (1065), Miss Jean M Park (1066), Ms Katharine Hume (1067), Miss Vera M Anderson (1068), Mr Angus Morrison (1069), Mr Mike Hume (1071), Ms Catriona Morrison (1072), Sir/Madam E Young (1073), Ms Amanda-Jane Mackay (1074), Sir/Madam R Birse (1075), Mr Martin Mackay (1076), Mr David Cornet (1077), Mr Ian Sim (1078), Ms Irene McKay (1080), Ms Patricia Sim (1082), Mr Munawar H Usman (1083), Ms Sadia A Usman (1085), Mrs Grace M Hepburn (1086), Mrs V Taylor (1087), Mrs Ewa Gainska (1088), Sir/Madam EA Taylor (1089), Mr Mirosław Gainski (1090), Mr David Bruce (1092), Mr Robert Overy (1093), Ms Jennifer Bruce (1094), Ms Gillian Graham (1095), Mr Mark Graham (1096), Ms Marilyn Rose (1097), Mr William Robertson (1098), Mr Kenneth Rose (1099), Mr Alan Stott (1101), Mr Walter Jardine (1102), Ms Muriel Wyness (1103), Mr W R Hepburn (1105), Ms Caroline Taylor (1106), Mr Colin Taylor (1108), Ms Barbara Bruce (1109), Mr James Henderson (1110), Ms Joan Keyes (1111), Mr Tom Keyes (1113), Ms Carol Buchan (1118), Sir/Madam E Cooper (1119), Sir/Madam Selina Jardine (1122), Mr Malcolm Cameron (1123), Mr Michael Migvie (1186), Mrs Emma MacKintosh (1191), Ms Irene Deboth (1201), Mr Angus deBoth (1246), Mr Mark Cavanagh (1264), Mrs Anne Keith (1265), Mrs Victoria Cavanagh (1267), Mr John Snelling (1269), Ms Lynne Morrison of J & G Collie (1272), Mr Steven McKnight (1279), Ms Caroline Suttie (1284), Mr Graeme Cheyne of Graeme W Cheyne Builders Ltd (1290), Sir/Madam Cameron deBoth (1291), Mr Mike Forbes (1292), Mr Bruce Purdon (1322), Dr Gillian Purdon (1334), Mr Philip Anderson (1407), Mrs Angela Melvin (1423), Councillor Marie Boulton (1436), Mrs Charlotte Goodbody (1484), Professor Ivan Goodbody (1486), Mrs Shiela MacRae (1523), Councillor James Farquharson (1539), Caroline Owen of GVA Grimley on behalf of Heron Property Ltd (1547), Mr Ben Freeman of Bancon Developments Ltd (1561), Mr Gordon Thomson of Barton Wilmore on behalf of Stewart Milne Homes (1564), Mr Gordon Thomson of Barton Wilmore on behalf of

Countesswells Consortium (1566), Mr Ian Cox of Kingswells Community Council (1579), Mr Alastair Walker (1583), Ms Helen Gibson (1585), Mrs Margaret Cameron (1586).

**Provision of the Development Plan to which the issue relates:**

Site allocated for 3,000 homes and 10 ha of employment land.

**Summary of the representation(s):**

Support Countesswells

54, 55, 63, 72, 73, 86, 87, 89, 94, 95, 103, 105, 108, 109, 110, 111, 114, 118, 120, 124, 126, 148, 150, 187, 192, 206, 218, 236, 239, 240, 245, 248, 297, 298, 315, 316, 355, 358, 394, 403, 404, 403, 404, 529, 661, 903, 933, 939, 947, 949, 957, 959, 962, 963, 964, 965, 966, 967, 969, 975, 977, 978, 979, 980, 981, 984, 987, 988, 991, 992, 994, 997, 1002, 1007, 1009, 1010, 1013, 1015, 1019, 1032, 1053, 1054, 1055, 1056, 1059, 1061, 1062, 1068, 1074, 1076, 1078, 1080, 1082, 1087, 1089, 1095, 1096, 1098, 1118, 1122, 1201, 1246, 1264, 1265, 1267, 1269, 1272, 1279, 1284, 1290, 1291, 1292, 1547, 1407, 1423, 1583: Support development of OP58 Countesswells

Object to Countesswells

9, 42, 101, 166, 202, 271, 276, 286, 287, 368, 385, 387, 388, 391, 398, 406, 415, 416, 437, 516, 578, 582, 599, 612, 638, 673, 822, 877, 1017, 1191, 1322, 1523, 1561, 1334, 1436, 1539: Object to the development of this site.

Delivery

1547: The developers involved in the site confirm commitment to work with the other parties who control land in the Countesswells masterplan area to facilitate the delivery of the new community. In this respect, a Statement of Co-operation is enclosed with this representation, signed by Heron Property, Stewart Milne Group, A.R. Grieve, and I Suttie, who, together comprise the controlling interest in the Countesswells Masterplan area (the Countesswells Consortium). A masterplan solution to demonstrate the delivery of the site has been prepared.

1579: Believe that the delivery timetable for Countesswells is improbable.

1561: Unsustainable when viewed against the aims and objectives of both the Structure Plan and this Proposed Plan. The development is clearly undeliverable in the timescales envisaged by the Proposed Plan.

903, 1547: It is the opinion of the respondent that the delivery of the site will be fundamental in assisting Aberdeen City Council to meet the housing and employments land allocations as set out by the Structure Plan. It is also thought that this is an essential site which will help allow Aberdeen City to maintain the delivery of a five year supply of housing and employment land as required by the Scottish Planning Policy.

Landscape and Environmental Impact of Development

529, 661, 1246, 1264, 1265, 1267, 1269, 1272, 1279, 1284, 1290, 1291, 1292, 1407, 1423, 1583, 1407: Development in this area would have less impact on landscape features and would be of less visual impact than other sites (e.g. Bellfield, Huxterstone)

being considered.

1579: Countesswells should be a 'quality' development to attract people into Aberdeen. The amount of green space and housing density should be the same as Kingswells, and the number of houses reduced. The figures show that the proportion of green space within Kingswells is twice that proposed for Countesswells.

1523: Flood risk on this site and the impact on existing settlements are significant. Many of the fields have high water table and are prone to flood, contrary to Scottish Environment Protection Agency guidelines. Countesswells Road is prone to flooding at many points. Account has not been taken of the impact down hill on Cults, Bieldside and Milltimber. Specifying that land owners and property owners are responsible for preventing post-development flooding is insufficient. This is because ineffective provisions in the planning documents will enable both council and the developers to get away with providing inadequate and insufficient SUDS and other drainage solutions to prevent flooding of assets out with and down hill of the developments.

271, 276, 286, 287, 368, 385, 387, 388, 391, 398, 415, 437, 516, 582, 832, 1191, 1322, 1334, 1561: It is a patently inappropriate and insufficient site in terms of landscape impacts, its effect on the green belt surrounding the city. Development will have a negative impact on the Green Belt and natural environment. There is a need to preserve accessible, green belt, recreational area for those dwellers or those without access to space. Development would destroy sensitive fauna. The proposed development would most certainly result in loss of local wildlife. Within the local woods of Foggieton and Countesswells there are deer, red squirrels, bats and an abundance of wild birds. As some of these animals are protected species - Aberdeen City Council would need to take the necessary steps in ensure their protection. The area has many different species of trees some of which may be under conservation area legislation too and therefore protected against tree felling and lopping.

337: OP58 should not be released without a full habitats assessment incorporating wetlands near the Cults Burn, all small mammals, plus protected bats and raptors using these open spaces for feeding.

#### Transportation

529, 661, 1201, 1246, 1264, 1265, 1267, 1269, 1272, 1279, 1284, 1290, 1291, 1292, 1407, 1423, 1583, 1407: With appropriate investment, it could be accessed without detriment to the surrounding road network and well integrated to existing and proposed public transport.

101, 166, 202: Local roads network will require major upgrading to cope with the large increase in traffic. Reliable public transport and suitable provision for access by walking and cycling will have to be planned in from the outset and before any development begins. Kingswells and Countesswells should be masterplanned together. This way there would be a better control/planning of road improvements that will be required around Kingswells for these two large developments. Kingswells could contribute land for employment for both communities, whilst Countesswells could help provide a wider range of community facilities to serve both areas.

166: The Aberdeen Western Peripheral Route has now been moved about one mile to the west leaving the Countesswells development adrift in the countryside and linked to

the city by only narrow and winding Countesswells and Craigton roads.

271, 276, 385, 387, 388, 391, 406, 416, 437, 516, 578, 673, 822, 832, 877, 1191, 1436, 1484, 1539, 1561: This site is inappropriate in terms of roads infrastructure and is inaccessible. Development will cause traffic congestion and pollution including carbon emissions in the local area. There will be negative impacts on Deeside Road where there is no ability to make improvements and other routes into the city and to existing employment locations. Few locals believe that the Aberdeen Western Peripheral Route and the Proposed Plan will reduce traffic congestion on the A93. Employment land on OP58 would have little impact on traffic reduction because residents setting up home on the new Countesswells site would already be employed elsewhere and would have to commute to work - perhaps on one of Aberdeen's industrial estates. There are no amenities in Cults and Bieldside or within easy public transport access. Traffic congestion will have negative impacts on the environment.

337: OP58 should not be released without demonstrable means of green transportation links from these areas to primary areas of employment in Dyce, Westhill and Tullos.

1566: The proposed Local Development Plan Action Programme identifies key milestones for the Countesswells development. Of these it is stated that "inclusion of the site will be reviewed should the Aberdeen Western Peripheral Route not be delivered." It is considered that this statement is unnecessary and inappropriate and should be amended to read "The phasing of this site should be reviewed in the event that the Aberdeen Western Peripheral Route does not come forward as timely as anticipated."

1547: The Countesswells consortium seeks to change the phasing and delivery of the allocation relative to the Aberdeen Western Peripheral Route as set out in the Proposed Action Programme (p.12. This is on the basis that it has been demonstrated that up to 1,500 homes could be provided on site in advance of the Aberdeen Western Peripheral Route, without significant adverse impact on the local road network, subject to suitable mitigation measures.

#### Scale of Development

54, 55, 68, 70, 73, 82, 83, 84, 90, 91, 92, 93, 96, 102, 106, 112, 113, 116, 117, 119, 121, 122, 123, 125, 144, 149, 180, 181, 182, 183, 184, 185, 186, 190, 193, 195, 196, 200, 219, 224, 237, 242, 246, 249, 250, 251, 292, 293, 294, 299, 300, 301, 313, 354, 356, 357, 399, 400, 401, 583, 584, 936, 937, 950, 951, 952, 953, 954, 955, 958, 960, 961, 968, 970, 972, 974, 986, 996, 998, 999, 1000, 1003, 1004, 1005, 1006, 1008, 1011, 1012, 1014, 1016, 1018, 1021, 1022, 1025, 1026, 1027, 1028, 1030, 1031, 1033, 1035, 1038, 1040, 1044, 1045, 1046, 1047, 1048, 1051, 1057, 1058, 1060, 1063, 1064, 1065, 1066, 1067, 1069, 1071, 1072, 1073, 1075, 1077, 1083, 1085, 1086, 1088, 1090, 1092, 1093, 1094, 1097, 1099, 1101, 1103, 1105, 1106, 1108, 1109, 1110, 1111, 1113, 1119, 1123, 1186, 1484, 1486, 1579, 1585: Support location of the site OP58 Countesswells, but feel that it is too large for the following reasons:

#### Employment Land

1579: Employment land within the site should have the same quality and density as that proposed for Kingswells.

1579: The employment land proposed for Countesswells should be of a similar high

quality / low density as that being masterplanned at Kingswells.

#### Infrastructure

1579: Too ease the burden on Bucksburn Academy, young people in Kingswells could be rezoned to a new secondary school at Countesswells.

578: Cults Academy is already full in certain years and would have great difficulty in accommodating the numbers expected from the Countesswells development. If a new school is to be built at Countesswells and children from Friarsfield are expected to enrol there, Aberdeen City Council has not made provision for ensuring that any such schooling would be built and operational before any houses are built.

386, 769: Ensure that good infrastructure exists should the development go ahead. This should include shops, buses and schools.

#### Historic Environment

1579: The drystone dykes within the development should be preserved to give a sense of place.

1191: Countesswells House is a listed building and the proposed development would most certainly affect the surrounding areas of the house which holds regional and local importance.

#### Site Boundaries

Amendments to site boundaries of OP58 Countesswells 430: submits that there is the potential to link Gairnhill Wood and Countesswells Wood to the recreational areas at Hazlehead. This will be easier to achieve if the two sites within the control of Bett Homes Ltd (as shown in Figure 1) are included in the development area. Site 2 (as shown in Figure 1) is not currently part of OP58 and it is argued that the extent of the proposed new community should be increased to include this site as part of the development.

1564: Include Mains of Countesswells - 3 fields. This site is visually well contained, is in close proximity to site OP58 and the services it provides and it could be well integrated with that site. It is in agricultural use and is of no recreational value and low ecological value. It is considered that Mains of Countesswells offers an opportunity for future growth beyond the development of OP58.

1566: Respondent submits land is identified as Area A on Drawing 34 Rev A should be included as a part of OP58. The purpose of the additional land is to achieve the 30dph density and deliver the range of facilities required. To fit all the uses including 10ha of employment land would require increased densities and would increase the proportion of flatted development, which in the current climate are not marketable. This additional area of land has already been incorporated into the SEA, and scored favourably. The inclusion of this land would enable the successful integration of community open space in the form of sports facilities and parkland associated with the proposed secondary school. Any woodland lost as a result of development would be suitably compensated for through substantial woodland planting throughout other areas of the wider site. Development of this area would not have a significant landscape impact. This area would



not have a negative impact on the Green Belt.

1579: KCC object to extending site boundaries. The small area of marshland at OS grid reference NJ 876040 should be protected by incorporating it into the adjacent area of Green Space Network. Any extensions to address deliverability should not be allowed. Developing right up to the edge of the woodlands would spoil the amenity of the area, and cause environmental problems of noise, light, litter and disturbance of wildlife.

#### Other Comments

267: Countesswells site should be located closer to Kingswells.

1191: Established local Equestrian Centres would also be negatively affected by the proposed plans.

638, 612, 599: The Reporters were firmly opposed to Countesswells at the last LPI. Their view was that it was an unsuitable and inappropriate allocation for a variety of reasons.

337: OP58 should not be released unless clear evidence of population growth is seen for Aberdeen as a whole

#### **Modifications sought by those submitting representations:**

##### Object to Development

9, 42, 276, 337, 368, 387, 388, 398, 416, 582, 832, 1017: Remove OP58 from the Plan.

##### Reduce the size of the Development

54, 55, 70, 73, 82, 83, 84, 90, 91, 92, 93, 96, 101, 102, 106, 112, 113, 116, 117, 119, 121, 122, 123, 125, 144, 149, 166, 180, 186, 190, 193, 195, 196, 200, 219, 224, 237, 242, 246, 249, 250, 251, 286, 287, 292, 293, 294, 299, 300, 301, 313, 354, 356, 357, 385, 399, 400, 401, 578, 583, 584, 936, 937, 950, 951, 952, 953, 954, 955, 958, 960, 961, 968, 970, 972, 974, 986, 996, 998, 999, 1000, 1003, 1004, 1005, 1006, 1008, 1011, 1012, 1014, 1016, 1018, 1021, 1022, 1025, 1026, 1027, 1028, 1030, 1031, 1033, 1035, 1038, 1040, 1044, 1046, 1047, 1048, 1051, 1057, 1058, 1060, 1063, 1065, 1066, 1067, 1069, 1071, 1072, 1073, 1075, 1077, 1083, 1085, 1086, 1088, 1090, 1092, 1093, 1094, 1097, 1099, 1101, 1102, 1103, 1105, 1106, 1108, 1109, 1110, 1111, 1113, 1119, 1123, 1186, 1322, 1334, 1484, 1486, 1561, 1579, 1585: Submit that the site size should be reduced and many representations recommend relocating any additional dwellings to a new site at Clinterty Main Issues Report Reference 1/17.

##### Location of Site

267, 599, 612, 638, 673: Move site to between Kingswells and Sheddocksley

##### Transport

271: Clear and viable scheme for traffic reduction required

406: Improve pedestrian and cycle access in the area.

### Site Boundaries

430, 1547, 1564, 1566: Include additional land

### Environment

822, 832, Ensure flood risk is dealt with

1191 Further investigations into how the Proposed Plan would affect the abundance of local wildlife we have in the area. Aberdeen City Council and developers working with the necessary groups such as the Woodland Trust.

### Infrastructure

822 Action plan for delivering school places.

### House Types

1523: Development should reflect local need i.e. modest cost housing for couples, young families, single occupancy and elderly.

### Delivery

1547: The wording of the Action Programme should be amended to review the phasing of the site should the Aberdeen Western Peripheral Route not come forward as timely as anticipated.

## Summary of response (including reasons) by planning authority:

### General

The Aberdeen City and Shire Structure Plan (CD8) sets the requirements for greenfield housing and employment land allowances and authorises a review of green belt boundaries in order to accommodate them. A Development Options Assessment (CD13), Strategic Environmental Assessment (CD21), and consultation on the Main Issues Report (Responses to Representations CD15) were used to assess sites. These were used to identify the most suitable locations to deliver the required growth and in accordance with Scottish Planning Policy paragraph 159 (CD4) which requires green belts to direct growth to the most appropriate locations. This process is described in the Green Belt Review (CD19) which also sets and explains the detailed boundaries of the green belt and land release areas.

### Landscape and Environment

This site emerged as a desirable option because there are relatively few planning, natural and topographical constraints in the site itself. In landscape terms, the area sits in a shallow depression and is generally well hidden by this woodland. It is only visible from the minor (albeit busy) roads that run through the area. The development is also of a scale that can create a new community and provide self-sustaining services and facilities in an attractive setting. It is acknowledged that there will be constraints to overcome, but it is submitted that these can be addressed and OP58 Countesswells could provide a sustainable development.

Countesswells is a Greenfield development and as such will have some negative environmental impacts, but through the use of mitigation and careful consideration of the site boundaries this impact has been minimised, and it is submitted by the Council that this is a suitable location for development. Boundaries have been drawn as such to reduce impact on adjacent woodland areas, and Green Space Network is used to maintain a wildlife corridor through the site. Within the area identified there are no local, national or international natural heritage designations. This site has been indicated by Scottish Environment Protection Agency as flood risk category D (RD87) and development may have a negative impact on water and climate, to address this the Action Programme (CD20) requires that a flood risk assessment is undertaken. For further detail on the mitigation measures in the Proposed Plan refer to the Environmental Report (Table 5.1). The flood risk assessment will also take into account any marsh area areas within the site and the masterplan will reflect this assessment. More detailed environmental assessment will be required before planning permission is granted, as set out in Policy NE8 Natural Heritage.

### Transportation

A development of 3000 dwelling houses, 10 hectares of employment land and associated services and facilities is going to necessitate a need for significant transport improvements. The Countesswells site, once complete will be a new community and the existing road network is clearly not currently suitable to deal with additional traffic. Within the site a new road network will be required, and the Development Framework submitted by the Countesswells Consortium (respondent 1547, Appendix 2) indicates a proposed layout. The provision of services and facilities and employment land within walking distance will encourage walking and cycling within the development. However, it is inevitable that there will be external travel demands and consideration of the wider impact of the development on the transport network will be important for the success of this development. Specific road improvements have been identified as a part of the Action Programme, and the timing of delivery of this site will be reviewed should the Aberdeen Western Peripheral Route not be delivered (Action Programme Page 12). The Aberdeen Western Peripheral Route will take traffic away from unsuitable roads heading to the north and south of the city and it is the Council's contention that this infrastructure is necessary to support this development. The Countesswells Consortium have submitted a Transport and Access Strategy to Serve Development as a part of their representation (Respondent 1547, Appendix 4) which identifies the proposals for dealing with the demand for external travel. It will be important for the development to encourage a modal shift from car use to more sustainable modes (public transport, walking and cycling). This is a very high level assessment, but a detailed transport assessment will be required for this site, and at this stage the detailed transport improvements will be identified. Critical to this would be further discussions with the Council and Transport Scotland.

### Scale of Development

The original development bids (RD85) were for smaller parcels of land within the Countesswells site, Development Options 9/05, 9/24 and 9/50. Whilst no constraints were identified individually they were not seen as desirable options because they would not be able to deliver the required infrastructure and would simply become commuter suburbs. With a development of 3000 dwelling houses and 10 hectares of employment land a range of facilities and services can be provided, this will reduce the need to travel,

and makes this a more sustainable proposal.

### Employment Land

Employment land within Countesswells will require to be compatible with residential uses, and Policy B11 Business and Industrial Land sets out requirements for new business land to make provision for areas of recreational and amenity open space, areas of strategic landscaping, areas of wildlife value and footpaths. This policy will ensure that any employment development within Countesswells will be of a high quality.

### Infrastructure

The required infrastructure for this area is identified in the Action Programme, and the Developer Contributions Manual. This will assist developers in identifying at an early stage the infrastructure that will be required to support this development. The Council will use the Action Programme to assist in the delivery of sites and the required infrastructure. This includes requirements for additional school capacity to be delivered to support development at Countesswells. The process for delivery of infrastructure is contained in detail in Issue 90: Policy I1: Infrastructure Delivery and Developer Contributions.

### Historic Environment

There are no listed buildings on the site. Countesswells House is located at the west end of Countesswells Road outwith the site boundary and surrounded by established woodland. It is our view that development at Countesswells will not have a significant negative impact on Countesswells House. However, policies in the plan would seek to protect the setting of any listed buildings in the area, and an assessment of this would be made through the masterplanning process.

### Site Boundary

A review of the Green Belt was used to help identify the most appropriate boundaries for site OP58 Countesswells. The allocated site is 165.1 hectares, which includes an allocation of 10 hectares of employment land. The Proposed Plan seeks to make the most efficient use of land and a net density of 30 dwellings per hectare should be achieved. It is submitted that by making the most efficient use of land there would not be a requirement to increase site boundaries. Basing the calculation on 20 dwellings per hectare to take account of landscaping, strategic road infrastructure and large areas of open space, it would indicate that there is sufficient land to provide 3,000 dwelling houses ( $20\text{dph} \times 155.1\text{ha} = 3,102$ ). Area A as identified by respondent 1566 at Appendix 7, is part of a higher area of woodland that would provide a green backdrop to the development, robust eastern boundaries as well as land for recreation. The Development Framework (Appendix 1) submitted by respondent 1566, Figure 5 indicates mainly green areas within the additional land. In terms of open space provision, site OP58 Countesswells benefits from good access to areas for recreation and Hazlehead Park, which would be taken into consideration in the requirements for open space, and it would be more appropriate to provide more open space in strategic locations, which might include outdoor sports, play areas, green corridors or allotments (Open Space Supplementary Guidance RD82, Figure 5). An example is the east /west green corridor linking Countesswells Woods and Hazlehead Park (indicated by the Green Space

Network).

### Open Space

The provision of open space in OP58 Countesswells will be in line with Policy NE4 - Open Space Provision in New Development and Open Space Supplementary Guidance. This requires 2.8ha per 1,000 people of meaningful open space. Providing more quality, accessible, useful and publicly desirable open space is more appropriate than simply providing a higher quantity, and this will be the requirement for all greenfield development.

### Loanhead Equestrian Centre

Loanhead Equestrian Centre forms part of the Green Space Network identified in the Proposed Plan and Core Path 57 follows the northern boundary of the site. The Development Framework submitted by the Countesswells Consortium (Respondent 1566, Appendix 2) identifies this area as open space, and this area helps to provide a green link from Countesswells Woods to Hazlehead.

### **Reporter's conclusions:**

### **Reporter's recommendations:**

<b>Issue (ref and heading):</b>	<b>ALLOCATED SITE: GROVE NURSERY, HAZLEHEAD OP66 AND OP67</b>	<b>34</b>
<b>Development Plan reference:</b>	OP67 - Grove Nursery Recycling and OP68 - Skene Road, Hazlehead	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
<p>Mr Christopher Ness (22), Mr Alastair Green (25), Mr Martin Cox (27), Mrs Fiona Davies (28), Mr John MacLeod (29), Mrs Marjorie Kelman (31), Mr Lawrence McAllister (32), Mr Colin Pearson (39), Mr Robert Frost (40), Mrs Prudence King (52), Mr Walter Murray (58), Mrs Susan Frost (59), Mr Diarmid MacAlister Hall (67), Mr Andrew Tugwell (76), Mr Alan Humpherys (100), Mr William Sell (101), Mrs Aileen Morrison (131), Mr Hector Morrison (132), Mr Henry Innes (135), Mr Henry W. Innes of Cragiebuckler Parish Church on behalf of Cragiebuckler Parish Church (151), Mr Ian MacDonald (153), Dr Elizabeth Lindsey (157), Mrs Lesley Miller (158), Mr Ronnie Wilson (167), Mr David George Miller (204), Mr Andrew McCarry (208), Ms Kim Forsyth (215), Mr Craig Forsyth (216), Mrs Cathryn Duncan (267), Mr Sreedish Devadas (268), Mr William Sell of Cragiebuckler and Seafield Community Council (306), Mrs Mary Flegg (324), Ms Alison Fraser (332), Ms Karen Gellatly (339), Ms Julia Melloy (341), Mrs Sheila Campbell (344), Mr Charles Henderson (362), Mrs Christine Boylan (366), Mr John Boylan (370), Mrs Lynn Collins (380), Mr Richard Butler of Ashley and Broomhill Community Council (416), Mrs Jennifer Butler (419), Mrs Barbara Cornelius (457), Mr Alan Hamilton (462), Mr William Good (484), Ms Karen Gellatly on behalf of Mrs Jess Gellatly (517), Ms Karen Gellatly on behalf of Mr John Gellatly (519), Mr Derek Melloy (549), Mr David Wolfe (550), Mrs Catherine Milburn (568), Mr David Sayce (602), Mr Ian Walchester (613), Mrs Jane Wilson (620), Mrs and Mr Anne and Norman Hartley (639), Mrs Elaine Duffy (732), Ms Eileen Strachan (817), Mr Ronald Strachan (825), Mrs Anne Burnett (915), Mrs Jean Stenhouse (917), Mr Robert Stenhouse (918), Mr Andrew H.R. Goldie on behalf of Queen's Cross and Harlaw Community Council (1557).</p>		
<b>Provision of the Development Plan to which the issue relates:</b>	OP67 - recycling centre, OP66 - indoor sports, Appendix 2	
<b>Summary of the representation(s):</b>		
<p>22, 27, 28, 29, 31, 32, 40, 52, 58, 67, 76, 100, 101, 131, 132, 151, 157, 167, 216, 268, 306, 324, 332, 339, 341, 344, 362, 366, 370, 380, 416, 419, 457, 462, 484, 517, 519, 549, 550, 613, 620, 639, 732, 817, 825, 915, 918, 1557 The site is part of Hazlehead Park and conflicts with the recreational amenity of the area. it is close to playing fields, golf course and equestrian centre. These facilities are well used by families and tourists. Contrary to Policy NE3 Urban Green Space.</p>		
<p>22, 27, 29, 39, 40, 59, 67, 101, 131, 132, 135, 151, 157, 158, 208, 215, 216, 268, 306, 339, 341, 366, 462, 519, 549, 568, 732, 817, 825, 917, 918, 1557 The site is close to Hazlehead Academy and Hazlehead Primary School and has road safety implications.</p>		
<p>25, 28, 31, 39, 52, 76, 100, 101, 131, 132, 135, 151, 157, 158, 204, 208, 215, 267, 306, 332, 339, 362, 366, 370, 416, 419, 457, 462, 484, 517, 519, 549, 613, 732, 817, 825, 917, 918, 1557 Site will lead to an increase in traffic. Access to site is via a residential road (Hazlehead Avenue) which is unsuitable for heavy goods vehicles. Peak traffic here will coincide with the busiest days in the park, sunny summer weekends.</p>		
<p>22, 27, 32, 39, 131, 132, 135, 158, 167, 204, 208, 339, 366, 370, 380, 457, 517, 519,</p>		

620, 639, 817, 825, 1557 Site will lead to an increase in vermin, noise, smell and pollution. Development would be detrimental to residential amenity. Could lead to fly tipping when closed. Contamination of the ground water would be a new risk introduced by the site. Adverse impact on health.

22, 1557 Conflict with green belt.

25, 28, 39, 58, 67, 208, 267, 332, 341, 549, 550, 817, 825, 1557 Alternative Sites - This kind of development would be best placed in an industrial zone (such as the recycling centre at Greenwell Road, Tullos). There must be a more suitable location for a recycling centre in the west of Aberdeen than this location. The site in the Lang Stracht area already has a good road infrastructure and is close to a large quantity of the households it would be serving. The park and ride site at Kingswells is currently underused. The employment land zone at OP40 Kingswells be put forward as the site for the west of city recycling centre as it is in proximity of good roads, good access, in a location that will not impinge on housing or the enjoyment of parks. It would also lie adjacent to the Aberdeen Western Peripheral Route further improving access to the site for the public and heavy vehicles. Whitemyres Industrial Estate is another alternative.

25, 28, 39, 52, 76, 208, 462, 1557 The development of this site contradicts the Council's Nature Conservation Strategy. Detrimental impact on wildlife, natural heritage and trees.

31, 157 Would be a blot on the landscape. Would be unsightly as a first view of the Park.

39, 40, 101, 153 Site could be better used for other uses. The siting of a waste recycling centre here would devalue the remaining land in the Grove Nursery and make it less attractive to businesses who wish to invest in leisure, recreation and sport.

76 OP67 is inconsistent with the Structure Plan, National Planning Framework 2 and Aberdeen City Councils "Nature Conservation Strategy (2010-2015)". Development of a recycling centre on this site is also inconsistent with Local Development Plan policies Policy D6 - Landscape, Policy NE2 - Green Belt and Policy NE10 - Air Quality.

76 Should the Council be spending any money on a recycling plant at this moment in time?

208, 303, 550, 1557 OP66. This land may be identified for only indoor leisure facility use. But high value property development in this area would provide a significant injection of money into the council purse, without significant objections from local residents. I doubt that this will be possible if the proposed development on OP67 is allowed to proceed. The environmental impact of such a housing development could be minimised by controlling the number and size of plots.

This does not represent an efficient use of land because it contains development opportunities whose co-existence is potentially unsustainable as the planned industries will inevitably impinge upon other sporting activities to the extent that the recreational portion will be rendered financially unviable and, as such, will not attract businesses.

341, 366, 370, 549 OP66. I would support such a proposal as it would be in keeping with the current use of parts of the park for outdoor sports.

550, 732 The process, including the screening and scoring exercises which was

conducted to select the proposed site was seriously flawed. The sites only had a subjective assessment which was not enough and led to unsound decision making. The Site Size as published in the Aberdeen Local Development Plan (i.e. 1.5 ha) is at odds with the contents of the H&E Report 10/009 where Councillors were advised that the site was 0.75 acres

602 OP67. Supports the principle of a recycling centre at the proposed Grove Nursery site.

613 This proposal contradicts the Council's CO2 emissions policy.

#### **Modifications sought by those submitting representations:**

25, 29, 32, 100, 131, 132, 366, 370, 568, 639, 732, 917, 918, 1557 That the proposed development of the waste recycling centre be moved to an industrial area (e.g. Whitemyers Industrial Estate).

22, 40, 52, 67, 135, 151, 167, 208, 215, 216, 267, 268, 339, 362, 484, 517, 519, That the proposed development of the waste recycling centre be moved to another more appropriate area.

27, 58, 158, 204, 332, 568, 613, 817, 825, That the proposed development of the waste recycling centre be moved to Kingswells Park and Ride site.

28, 31, 39, 59, 153, 549, 550, OP67 should be removed from the Plan.

76 That the proposed development of the waste recycling centre be moved to Greenferns or East Middlefield.

101, 306, 324, 344, 380, 457, 462, 602, 620, The whole of Grove Nursery should be for sports, leisure or horticultural uses.

158 That the proposed development of the waste recycling centre be moved to the Lang Stracht near Dobbies.

208 Change the land designation from 'leisure', to 'leisure and/or housing'

416, 419, That the proposed development of the waste recycling centre be moved to Summerhill.

550 A condition should be applied to OP67 to state that the site must be returned to Green Belt after the site is no longer needed and in use.

613 That the proposed development of the waste recycling centre be moved to Westhill.

#### **Summary of response (including reasons) by planning authority:**

Costs of waste treatment and the need for more recycling centres. All Councils in Scotland are facing increasing costs from waste disposal. Landfilling waste currently costs the Council £48 per tonne and this amount will go up every April until it reaches £80 per tonne in 2014. With the closure of the Aberdeen City landfill site at Hill of Tramaud at the end of 2010 we will have to start transporting our waste to landfill up to Peterhead. This will increase transport costs. By 2014/15, as a result of landfill tax increases and additional transport costs, the Council will be paying an additional £4.5



million per year for waste disposal with no additional benefit to residents. So diverting waste from landfill through recycling will save money.

As well as financial benefits, there are environmental reasons for wanting to increase recycling and reduce the amount of waste we dispose of. Recycling prevents waste of resources and many of the materials that have traditionally gone to landfill could be manufactured into new products. Reducing this waste means that we can reduce the amount of new materials we use which in turn prevents the loss of valuable habitats and reductions in biodiversity. Recycling materials is also less energy intensive than making products from new materials and therefore we can save energy sources and reduce emissions.

All in all, it is beneficial to recycle as much as possible and that includes the 20% of waste produced by Aberdeen households that passes through Recycling Centres. Recycling Centres should be capable of recycling around 70% of the waste taken into the site. In Aberdeen there are currently 4 Recycling Centres although only the site at Greenbank Crescent in Tullos currently has enough space to provide containers for the full range of materials. The others are at Scotstown Road in Bridge of Don, Pitmedden Road in Dyce and Sclattie Quarry in Bankhead. There are no sites between the River Dee and Bankhead and none are conveniently placed for residents in the west of Aberdeen. The new facility at OP67 will ease congestion problems at the existing Recycling Centres, thereby improving services at those sites.

**Alternative Sites** The Council has sought to develop a Recycling Centre in the west of the city for many years, however, no suitable site had been identified. It is clear there are no locations that have no potentially adverse considerations but a site selection process has been undertaken to identify the best available site and to find ways of mitigating negative impacts of a chosen site. A report on the site search which looked at 12 sites and which includes consultation undertaken is included in the issues folder.

Alternative sites have been suggested by respondents and were examined in the site selection process. Employment land at Whitemyers (off the Lang Stracht) is a good location but there is a lack of available sites. The lack of sites located in employment land has to be balanced against providing a network of conveniently located facilities which will encourage their use and increase recycling. Employment land is not the only viable land use designation for a Recycling Centre which is essentially a transfer point for materials and does not involve any processing or treatment activities. The Council also wishes to provide a recycling centre at Greenferns (OP45) - see Greenferns Masterplan Supplementary Guidance 9.5 - Introduction and Summary page 7 (RD78).

The development of a significant employment allocation proposed at OP40 Home Farm Kingswells is likely to make the Kingswells Park and Ride more strategically important in transportation terms precluding its availability for alternative development. The area needed for the recycling centre could not easily be accommodated within the Park and Ride without significantly impacting on the number of parking spaces available. We acknowledge the site is not yet up to full capacity but we are working on this and would not want to jeopardise the optimum size of this site which would reduce sustainable transport choices for commuters along this corridor in the longer term. Given the pressing need for the facility and the likely timescale for development at OP45 Greenferns and OP40 Home Farm, recycling facilities are unlikely to be delivered here in the short term (3-5 years). Also, when looking at the existing and planned facilities (an existing site in Westhill in Aberdeenshire and future site in Greenferns), sites at

Kingswells and the employment area at Granitehill (close to Greenferns) do not provide an optimum spread of facilities in the west of Aberdeen.

**Noise and amenity in Hazlehead Park** It is accepted that Hazlehead Park is a busy and popular recreation destination. However, we do not think that a recycling centre here will have a significant impact on the function and users of the Park. Grove Nursery is not in public use. It is well screened and this will minimise visual impact. It is accepted that some vehicle and operational noise is inevitable. The northwest corner of Grove Nursery was chosen as it is the furthest point from residential properties (some 150m away to the east with intervening tree belts and 140m from the flats to the north with the intervening playing field and road). The site is separated by 150m from the formal areas of Hazlehead Park and by a car park and a considerable amount of tree cover which will mask noise. Noise should also be expected from activities on the playing fields to the north and west. Hazlehead No1 golf course is around 500m to the west and Hayfield Riding School is 1.2km away so no significant impact on these is anticipated.

**Pollution, smell and vermin** Recycling centres are closely regulated. They will be manned and will require a waste management license from Scottish Environment Protection Agency to ensure that they are operated to the highest standards. To obtain a waste licence, the operator needs to demonstrate that noise, dust, smells, pollution, contamination, health, safety and vermin are considered and dealt with. The issue of fly tipping is a city wide one; providing more recycling centres in convenient locations should help to reduce the temptation to fly tip.

**Proximity to local schools** Hazlehead Primary School is around 250m to the northeast and Hazlehead Academy is 425m to the northwest. Hazlehead Avenue would be used to access the site, It is also used by school traffic for the Academy and crossed by pedestrians for both the schools and park. Car traffic to Hazlehead Primary uses Provost Graham Avenue to the north, although some parents drop off on Hazlehead Avenue. Hazlehead Avenue has good visibility and has been traffic calmed. It has segregated pedestrian and cycle access. It is recognised that additional traffic will be generated by this proposal and a Transportation Assessment or Transport Statement will be required to accompany any planning application. This will examine the likely amount of traffic generated and suggest mitigation measures to deal with its impact and safety issues.

**Impact on green belt and other uses** As mentioned earlier, the tree screening present on the site will help to screen visual impacts and this can be enhanced if necessary. Because of the tree screening in the area, visual and landscape impacts can be minimised to maintain the parkland character and minimise impacts on the recreational experience. Although a re-zoning to CF2 New Community Sites and Facilities is proposed, any proposal would need to have regard to surrounding green belt areas where the highest standards in terms of siting, scale, design and materials are expected as outlined in Policy NE2 Green Belt in the Proposed Plan. This would also apply to any proposals on the adjacent site OP66. .

**Use of site for housing** This site was not promoted for housing by the Council's property arm. The indoor sports and leisure uses suggested for OP66 is considered complimentary to the recreational uses in Hazlehead. It would provide an alternative indoor facility for wet days and dark nights which doesn't currently exist. We think this would be a more complimentary use for the park than housing - the need for which has been met elsewhere in the Plan. Because the uses proposed for OP66 are indoors, they should not be unduly compromised by the recycling centre. The presumption that

housing would attract a higher value for a Council owned property is not a land use planning issue.

Natural Heritage We do not consider the site contradicts the Nature Conservation Strategy (CD26) and it has no natural heritage designation on it. The site is former nursery land and any trees and flora are more likely to be of horticultural rather than natural origin. Nevertheless, we recognise the value of the tree belts in terms of providing screening and there may be opportunities to enhance this when it comes to determining any planning applications for the site.

**Reporter's conclusions:****Reporter's recommendations:**

<b>Issue (ref and heading):</b>	<b>ALTERNATIVE SITES: KINGSWELLS</b>	<b>35</b>
<b>Development Plan reference:</b>	Sites not identified in the Proposed Plan	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
<p>Mr Eric Jensen (54), Ms Aileen Jensen (55), Mr James Fish (56), Ms Tiffany Sims (57), Mr Mark Ewen (61), Ms Joyce Milne (62), Ms Gayle Morrice (63), Ms Gillian Ewen (64), Mr Brian Morgan (68), Mr Peter Wilson (69), Ms Catriona McWilliam (70), Mr Frederick Milne (71), Mr Philip Morrice (72), Mr Keir Willox (73), Ms Renata Powell (81), Mr George Hood (82), Ms Fyfe Hepburn (83), Mr Kenneth Sandison (84), Ms Lorraine Sandison (86), Mr Greig Addison (87), Mr Ali Hassanirad (89), Ms Angela Cameron (90), Mr Scott Cameron (91), Mrs June V. Shirriffs (92), Sir/Madam H. Brown (93), Dr George G. Shirriffs (94), Ms Elizabeth Binnie (95), Mr George J. Lowe (96), Sir/Madam N. Sands (102), Mr Dennis Scott Dalgarno (103), Mrs E. Cheyne (104), Mr Alexander Davidson (105), Ms Ann Perrott (106), Mr James Chalmers (108), Mrs Margaret Chalmers (109), Mr Alan Walker (110), Ms Joyce Forrest (111), Mr David W. Metcalfe (112), Ms Oonagh Grassie (113), Mrs Gillian Millar (114), Ms Shari Ross (116), Sir/Madam M. Sands (117), Sir/Madam W. Middleton (118), Sir/Madam I. Middleton (119), Ms Morag Dalgarno (120), Ms Claudine Park (121), Ms Sandra Roach (122), Mr Peter Roach (123), Mr Ian Park (124), Sir/Madam Sam D. Sinclair (125), Mr Colin McKay (126), Dr Steven Yule (127), Mrs Susan Yule (128), Mr Graham MacPherson (142), Mr Stuart Wilkie (143), Mr Richard Murray (144), Ms Kimberley Murison (146), Mr Simon Merrilees (147), Ms Olive Hunter (148), Mr David Merson (149), Mr Norman Hunter (150), Mr Derek Watt (180), Ms Elizabeth Merson (181), Ms Lyndsay Hay (182), Ms Helen Wood Barron (183), Ms Jane Watt (184), Mr Michael Alexander Barron (185), Mr John Edward Doudenmier (186), Mr Kevin A. Cowie (187), Mr E. G. Roberts (188), Ms Jane Anne Smart Doubenmier (190), Mrs Azadeh Safarvarkiani (192), Mrs P. Cram (193), Ms Susan Cameron (194), Mr Craig Cameron (195), Ms Angela M. Gibb (196), Ms Jane Troup (198), Mr John Bedford (199), Ms Heidi Aylmer (200), Mr Gary M. Aylmer (201), Ms Carol Milne (205), Mr Keith Milne (206), Ms Louise Wood (207), Mr Charles Hall (217), Mr Charles Thorn (218), Mr Alistair Blues (219), Ms Dorothy Hall (220), Ms Betty Johnston (221), Ms Valerie Sinclair (222), Mr &amp; Mrs G. B. Peddie (224), Mr Eric K. Johnstone (236), Mr Michael J. M. Reid (237), Mr Allan Davidson (238), Mr R. Hainey (239), Mrs R. Hainey (240), Ms Barbara Steffensen (241), Mr John Cameron (242), Mr Stuart Tait (243), Mrs Susan Tait (244), Ms Karen Hughes (245), Mr David S. M. Campbell (246), Ms Arlene Wilson (247), Dr J. Kenneth McAlpine (248), Ms Judith Farquhar (249), Mr Raymond Farquhar (250), Ms Kathleen Thorn (251), Mr Glenn Taylor Buchan (292), Ms Ellen Buchan (293), Mr Rod Buchan (294), Mr Malcolm McDonald (295), Ms Michelle McDonald (296), Ms Susan Beard (297), Mr John Beard (298), Mrs Barrie Buchan (299), Mr Stephen Jack (300), Ms Pamela Anne Jack (301), Mr Steve Burnett (312), Mr Matthew Dunning (313), Mr P.E. Johnston (314), Mrs F.A. Pastuszko (315), Mr A.S.G. Pastuszko (316), Ms Shauna Gowans (354), Ms June McDonald (355), Mr William McDonald (356), Ms Pamela Gatt (357), Mr Neil Taylor (358), Mr Colin McKenna (399), Mrs Lindsay A Simpson (400), Mr Robert G Simpson (401), Mr W Guy Bentinck (403), Mrs June Bentinck of 34 Kingswood Avenue (404), Mr Steve Delaney of Mastrick, Sheddocksley and Summerhill Community Council (543), Mr Gary Purves of Knight Frank LLP on behalf of Mr E Webster (551), Mrs Wendy Campbell (583), Mr Colin Campbell (584), Ms Lorna Henderson (933), Mr Alexander Kilgour (935), Mr William Simpson (936), Miss Emma Wright (938), Mrs Eziz Robertson (939), Mr Matthew Wright (941), Mrs Florence Pirie (942), Mrs H.B Oakes (944), Mr Terence Oakes (945), Mrs Elizabeth Coutts (946), Mrs Margaret Park (947), Mr Charles Coutts (948), Sir/Madam V Hutcheon (949), Ms Hilary Davern (950), Mrs Vera Mutch (951), Mr N Craig (952),</p>		

Sir/Madam M Hutcheon (953), Mrs Alison Murison (954), Mrs V Glennie (955), Mr Alexander Murison (956), Mr Douglas Park (957), Ms Eliana Figueroa (958), Mr Derek W Martin (959), Mr Edgar Castillo (960), Mrs Pamela Wright (961), Ms Lydia A W Martin (962), Mr David Wright (963), Mr Donald Vass (964), Ms Joan Vass (965), Ms Valerie Weir (966), Mr Gerard David Cairns (967), Mr James Grant (968), Mr William P Weir (969), Ms Siobhan G Anthony (970), Mrs G Craig (972), Mr Stephen King (974), Mr L Watson (975), Mr William Miller (976), Mrs Jackie Cairns (977), Mr George A Wallace (978), Ms Margaret Miller (979), Thilini Wallace (980), Ms Heather Burns (981), Ms Sheila Irvine (983), Mr B J Carey (984), Mr William Irvine (985), Mr Andrew Henderson (986), Sir/Madam A Carey (987), Sir/Madam R Holden (988), Mr David Coull (990), Sir/Madam Elm Holden (991), Mrs Dorothy Gray (992), Mrs Isobel M Patterson (993), Ms Catherine May (994), Mr Gordon Patterson (995), Ms Cath Grant (996), Mr Alexander May (997), Sir/Madam R W Wilkie (998), Ms Margaret McEwan (999), Ms Fiona Wilkie (1000), Ms Silvia Gaspar-Pereira (1002), Mrs GB Anthony (1003), Mr Stan McEwan (1004), Mr Stuart Lamond (1005), Mr William Smith (1006), Ms Helen Davidson (1007), Ms Rosemary Walker (1008), Mrs Gwendoline Jones (1009), Mr Iain Laidlaw (1010), Sir/Madam Tom Straiton (1011), Ms Florence Gunn-Folmer (1012), Ms Kaye Smith (1013), Mr Alexander Gunn (1014), Sir/Madam George Ian Gibson (1015), Ms Elaine Grosvenor (1016), Mr Stephen Anthony (1017), Mr Brian Yeats (1018), Ms Jennifer Miller (1019), Ms Julie McLulich (1021), Ms Suzanne Walker (1022), Mr Hamish McLulich (1023), Mrs Gillian Joss (1024), Mrs Fiona McRuvie (1025), Mr Brain Folan (1026), Mr William Skidmore (1027), Ms Linda Cameron (1028), Mr Lewis Joss (1029), Mrs Wendy Skidmore (1030), Mr Alexander Crawford Hair (1031), Sir/Madam A Innes (1032), Mr George Lowe (1033), Mrs Margaret Lowe (1035), Mr James Wilson (1037), Mr Derek Walker (1038), Ms Ruth Tulloch (1040), Ms Christina M Wilson (1042), Mr Samuel Stafrace (1044), Mr Zane Hair (1045), Ms Amanda Stafrace (1046), Mrs Valerie Henderson (1047), Ms Rachel Watson (1048), Dr C Hauptfleisch (1049), Mr Iain Watson (1051), Sir/Madam Arnajorn Joensen (1053), Ms Sheena Lamond (1054), Ms Marion Cumming (1055), Mr Gordon Cumming (1056), Sir/Madam N Sutherland (1057), Dr Iain Greig (1058), Ms Catherine McBain (1059), Mr Mahmoud Kamel (1060), Mr William Beattie (1061), Mr Noelle Straton (1062), Sir/Madam Bernese Kamel (1063), Ms Susan Beattie (1064), Ms Helen Ireland (1065), Miss Jean M Park (1066), Ms Katharine Hume (1067), Miss Vera M Anderson (1068), Mr Angus Morrison (1069), Mr Cameron Millar (1070), Mr Mike Hume (1071), Ms Catriona Morrison (1072), Sir/Madam E Young (1073), Ms Amanda-Jane Mackay (1074), Sir/Madam R Birse (1075), Mr Martin Mackay (1076), Mr David Cornet (1077), Mr Ian Sim (1078), Mr Lawrence Dean (1079), Ms Irene McKay (1080), Ms Dorothy Higgins (1081), Ms Patricia Sim (1082), Mr Munawar H Usman (1083), Mr & Mrs J & K Massie (1084), Ms Sadia A Usman (1085), Mrs Grace M Hepburn (1086), Mrs V Taylor (1087), Mrs Ewa Gainska (1088), Sir/Madam EA Taylor (1089), Mr Mirosław Gainski (1090), Mrs Pat Duncan (1091), Mr David Bruce (1092), Mr Robert Overy (1093), Ms Jennifer Bruce (1094), Ms Gillian Graham (1095), Mr Mark Graham (1096), Ms Marilyn Rose (1097), Mr William Robertson (1098), Mr Kenneth Rose (1099), Mrs Margaret Kilgour (1100), Mr Alan Stott (1101), Mr Walter Jardine (1102), Ms Muriel Wyness (1103), Mr W R Hepburn (1105), Ms Caroline Taylor (1106), Mrs J MacLean (1107), Mr Colin Taylor (1108), Ms Barbara Bruce (1109), Mr James Henderson (1110), Ms Joan Keyes (1111), Mrs Pamela Stuart (1112), Mr Tom Keyes (1113), Mr Raphael C Stuart (1114), Mr Stuart Higgins (1115), Mr Barclay J Massie (1116), Ms Carol Buchan (1118), Sir/Madam E Cooper (1119), Sir/Madam Selina Jardine (1122), Mr Malcolm Cameron (1123), Sir/Madam M Maclean (1124), Mr Michael Migvie (1186), Ms Emelda Maclean of Emac on behalf of Scotia Homes (1189), Councillor Marie Boulton (1436), Mrs Charlotte Goodbody (1484), Professor Ivan Goodbody (1486), Mr Steve Crawford of Halliday Fraser Munro Planning on behalf of Barratt East Scotland (1536), Councillor James Farquharson (1539), Ms Jade Scott of Ryden LLP on behalf of Stewart

Milne Homes (North Scotland) (1565), Mr John Findlay of Ryden LLP on behalf of Stewart Milne Homes (North Scotland) (1567), Mr Ian Cox of Kingswells Community Council (1579), Ms Helen Gibson (1585), Mrs Margaret Cameron (1586).

**Provision of the Development Plan to which the issue relates:**

The overall strategy for Kingswells area and alternative developments proposed.

**Summary of the representation(s):**

Site 3/05B Gillahill

54, 55, 56, 57, 61, 62, 63, 64, 68, 69, 70, 71, 72, 73, 81, 82, 83, 84, 86, 87, 89, 90, 91, 92, 93, 94, 95, 96, 102, 103, 104, 105, 106, 110, 111, 112, 113, 114, 116, 117, 118, 119, 120, 121, 122, 123, 124, 125, 126, 127, 128, 142, 143, 144, 146, 147, 148, 149, 150, 180, 181, 182, 183, 184, 185, 186, 187, 188, 190, 192, 193, 194, 195, 196, 198, 199, 200, 205, 206, 207, 217, 218, 219, 220, 221, 222, 224, 236, 237, 238, 239, 240, 241, 242, 243, 244, 245, 246, 247, 248, 249, 250, 292, 293, 294, 295, 296, 299, 300, 301, 312, 313, 314, 315, 316, 354, 355, 356, 357, 358, 399, 400, 401, 403, 404, 543, 933, 935, 936, 938, 939, 941, 942, 944, 945, 946, 947, 948, 949, 950, 951, 952, 953, 954, 956, 957, 958, 959, 960, 961, 962, 963, 964, 965, 966, 967, 969, 970, 972, 974, 975, 976, 977, 978, 979, 980, 981, 983, 984, 985, 986, 987, 988, 990, 991, 992, 993, 994, 995, 996, 997, 998, 999, 1000, 1002, 1003, 1004, 1005, 1006, 1007, 1008, 1009, 1010, 1011, 1012, 1013, 1014, 1015, 1016, 1017, 1018, 1019, 1021, 1022, 1024, 1025, 1026, 1027, 1028, 1029, 1030, 1031, 1032, 1033, 1035, 1037, 1038, 1040, 1042, 1044, 1045, 1046, 1047, 1048, 1049, 1051, 1053, 1054, 1055, 1056, 1057, 1058, 1059, 1060, 1061, 1062, 1063, 1064, 1065, 1066, 1067, 1068, 1069, 1070, 1071, 1072, 1073, 1074, 1075, 1076, 1077, 1078, 1079, 1080, 1081, 1082, 1083, 1084, 1085, 1086, 1087, 1088, 1090, 1091, 1092, 1093, 1094, 1095, 1096, 1097, 1098, 1099, 1100, 1101, 1102, 1103, 1105, 1106, 1108, 1109, 1110, 1111, 1112, 1113, 1114, 1115, 1116, 1118, 1119, 1122, 1123, 1124, 1186, 1579, 1585, 1586. Site 3/05B Gillahill should be designated as Green Space Network. Some also state that Gillahill should never be built on. Also, request that the Council explains more clearly the removal of Green Space Network at Gillahill and area to the south, as well as change to the policy designation since adopted Local Plan.

193. Concerned about issues such as landslide and flooding if houses were built above us [at Gillahill].

543, 1579. Support the removal of Gillahill from the plan and designation as Green Belt. Query removal of site from Green Space Network - site should be given the designation which affords a higher level of protection from development.

1565. Gillahill site should be allocated as it is necessary for the replacement of Greenferns OP45 and Greenferns Landward OP31 in the first period of the Plan. Site was included in Main Issues Report for 400 homes, which stated that it would have lower landscape impacts the other options and alongside release of employment land would provide impetus for more balanced and mixed communities. Revised school capacity numbers meant the whole site was seen as unsuitable for development. Developer commissioned an Education Impact Analysis report for site which concludes that a single stream primary school should be accommodated on the development site, and managed with the existing primary school, to accommodate the pupils generated by Gillahill and the residual/overflow from the existing school. Development necessary to support new school would be 600 units. Site can be delivered pre-Aberdeen Western Peripheral

Route with local roads mitigation.

1567. An allocation of sites at Gillahill would ensure that a 5 year housing land supply was maintained. Development would also provide additional Primary School accommodation, and in conjunction with proposed Derbeth development and Countesswells would create the scope for a new secondary school. The allocation of sites would satisfy the long term demand for housing in the village.

Kingswells enjoys a strategic location which will be enhanced with the Aberdeen Western Peripheral Route, which will create additional capacity, and provide linkages to employment and the wider area.

#### Other Sites Not Allocated in the Proposed Plan

54, 55, 56, 57, 61, 63, 64, 62, 68, 69, 70, 71, 72, 73, 81, 82, 83, 84, 86, 87, 89, 90, 91, 92, 93, 94, 95, 96, 102, 103, 104, 105, 106, 108, 109, 110, 111, 112, 113, 114, 116, 117, 118, 119, 120, 121, 122, 123, 124, 125, 126, 127, 128, 142, 143, 144, 146, 147, 148, 149, 150, 180, 181, 182, 183, 184, 185, 186, 187, 188, 190, 192, 193, 194, 195, 196, 198, 199, 200, 205, 206, 207, 217, 218, 219, 220, 221, 222, 224, 236, 237, 238, 239, 240, 241, 242, 243, 244, 245, 246, 247, 248, 249, 250, 251, 292, 293, 294, 295, 296, 297, 298, 299, 300, 301, 312, 313, 314, 315, 316, 354, 355, 356, 357, 358, 399, 400, 401, 403, 404, 583, 584, 933, 935, 936, 938, 939, 941, 942, 944, 945, 946, 947, 948, 949, 950, 951, 952, 953, 954, 955, 956, 957, 958, 959, 960, 961, 962, 963, 964, 965, 966, 967, 969, 970, 972, 974, 975, 976, 977, 978, 979, 980, 981, 983, 984, 985, 986, 987, 988, 990, 991, 992, 993, 994, 995, 996, 997, 998, 999, 1000, 1002, 1003, 1004, 1005, 1006, 1007, 1008, 1009, 1010, 1011, 1012, 1013, 1014, 1015, 1016, 1017, 1018, 1019, 1021, 1022, 1024, 1025, 1026, 1027, 1028, 1029, 1030, 1031, 1032, 1033, 1035, 1037, 1038, 1040, 1042, 1044, 1045, 1046, 1047, 1048, 1049, 1051, 1053, 1054, 1055, 1056, 1057, 1058, 1059, 1060, 1061, 1062, 1063, 1064, 1065, 1066, 1067, 1068, 1069, 1070, 1071, 1072, 1073, 1074, 1075, 1076, 1077, 1078, 1079, 1080, 1081, 1082, 1083, 1084, 1085, 1086, 1087, 1088, 1089, 1090, 1091, 1092, 1093, 1094, 1095, 1096, 1097, 1098, 1099, 1100, 1101, 1102, 1103, 1105, 1106, 1108, 1109, 1110, 1111, 1112, 1113, 1114, 1115, 1116, 1118, 1119, 1122, 1123, 1124, 1186, 1484, 1486, 1579, 1585, 1586.

Respondents listed above agree that some or all of the following non-allocated sites from the Main Issues Report should remain unallocated - 3/01, 9/53, 3/05D, 3/05A, 9/54, 3/10B, 3/14, 3/02, 3/11 and sites which Kingswells Community Council refer to as 3K21 (Gillahill Croft) and 3K22 (Land south-west of Gillahill). Some respondents identify Kingswells as a village surrounded by countryside which should remain as such. Some concern over erosion of greenbelt, traffic increase and loss of amenity if developments were built.

1565. Object to the limited release proposed for this area, particularly Kingswells, and the distribution and timing of allocations within the area, and failure to make provision for long term growth in Kingswells.

551, 1565. Object to non-inclusion of site 3/05A Derbeth (north-west of Kingswells) which should be allocated for development in the second phase. The Aberdeen Western Peripheral Route will drastically alter landscape and will provide a defensible boundary for development and result in no landscape or visual impact. Aberdeen Western Peripheral Route junction to the north-east will provide good access to the area.

1567 Development at Derbeth would ensure that a 5 year housing land supply was

maintained and would also provide additional Primary School accommodation. In conjunction with Countesswells it would create the scope for a new secondary school. The allocation of sites would satisfy the long term demand for housing in the village.

Kingswells enjoys a strategic location which will be enhanced with the Aberdeen Western Peripheral Route, which will create additional capacity, and provide linkages to employment and the wider area.

1189. Development option 3/02, situated north of the bus only route, should be identified in the Plan for an integrated residential and other mixed use development, comprising residential, business, retail, leisure, and community uses. Development would help to alleviate housing pressure of housing supply in the early period of the Local Development Plan, compared to larger greenfield allocations which are dependent on infrastructure requirements in a difficult economic climate. Refers to submission made to Main Issues Report which suggests that site is largely free from technical constraint that physical infrastructure capacity is present and there is capacity in the schools.

1565. Object to the failure to include remainder of site 3/05D in the Local Development Plan for the development of 60 houses. Site is well related to Kingswells and in close proximity to local road and transport network, local shops and services. It has convenient access to employment centres.

1536 Site previously referred to as Development Option 3/11 (Newton East, Old Skene Road) is suitable for residential development. The site is left over after development and has similar characteristics to the residential site to the west. It is a sensible choice for infill development. It lies on a main road and cycle route and is situated close to park and ride facilities. It is close to proposed employment land allocations in Kingswells. It has been identified as suitable for housing development in the past by Aberdeen City Council and was supported by the local community.

1579 Agree that site at Newton East should not be developed.

#### Accompanying Infrastructure and Services

297, 298. Seeks provision of one or two shops and community areas.

543. Expansion of health care facilities will not benefit the Maidencraig development which will need to use the facility - issue covered in Issue 29 Allocated Sites: Maidencraig OP43 and OP44.

#### Transport

1012, 1014. Critical to maintain the park and ride site and to improve public transport to and through Kingswells to prevent congestion on Lang Stracht and Skene Road/Queens Road in future.

1436. Concern over impact of development in Kingswells and Countesswells on the road network, particularly the A944. Aberdeen Western Peripheral Route will not do enough to deal with current traffic never mind additional traffic. Local Development Plan doesn't demonstrate a full risk analysis of the impact of traffic from these new developments on movement of emergency vehicles.



1539, 1579. Development in this area impossible without major new road systems to provide spare capacity, as well as other infrastructure created.

#### Quality of Development

312 Development around Kingswells should equal or exceed standards to make a suburb where people will aspire to live.

#### **Modifications sought by those submitting representations:**

##### Site 3/05B Gillahill

54, 55, 56, 57, 61, 62, 63, 64, 68, 69, 70, 71, 72, 73, 81, 82, 83, 84, 86, 87, 89, 90, 91, 92, 93, 94, 95, 96, 102, 103, 104, 105, 106, 110, 111, 112, 113, 114, 116, 117, 118, 119, 120, 121, 122, 123, 124, 125, 126, 127, 128, 142, 143, 144, 146, 147, 148, 149, 150, 180, 181, 182, 183, 184, 185, 186, 187, 188, 190, 192, 193, 194, 195, 196, 198, 199, 200, 205, 206, 207, 217, 218, 219, 220, 221, 222, 224, 236, 237, 238, 239, 240, 241, 242, 243, 244, 245, 246, 247, 248, 249, 250, 292, 293, 294, 295, 296, 299, 300, 301, 312, 313, 314, 315, 316, 354, 355, 356, 357, 358, 399, 400, 401, 403, 404, 933, 935, 936, 938, 939, 941, 942, 944, 945, 946, 947, 948, 949, 950, 951, 952, 953, 954, 956, 957, 958, 959, 960, 961, 962, 963, 964, 965, 966, 967, 969, 970, 972, 974, 975, 976, 977, 978, 979, 980, 981, 982, 983, 984, 985, 986, 987, 988, 989, 990, 991, 992, 993, 994, 995, 996, 997, 998, 999, 1000, 1002, 1003, 1004, 1005, 1006, 1007, 1008, 1009, 1010, 1011, 1012, 1013, 1014, 1015, 1016, 1017, 1018, 1019, 1021, 1022, 1024, 1025, 1026, 1027, 1028, 1029, 1030, 1031, 1032, 1033, 1035, 1037, 1038, 1040, 1042, 1044, 1045, 1046, 1047, 1048, 1049, 1051, 1053, 1054, 1055, 1056, 1057, 1058, 1059, 1060, 1061, 1062, 1063, 1064, 1065, 1066, 1067, 1068, 1069, 1070, 1071, 1072, 1073, 1074, 1075, 1076, 1077, 1078, 1079, 1080, 1081, 1082, 1083, 1084, 1085, 1086, 1087, 1088, 1090, 1091, 1092, 1093, 1094, 1095, 1096, 1097, 1098, 1099, 1100, 1101, 1102, 1103, 1105, 1106, 1108, 1109, 1110, 1111, 1112, 1113, 1114, 1115, 1116, 1118, 1119, 1122, 1123, 1124, 1186, 1585, 1586. Designate Gillahill as Green Space Network. Some call for surrounding area to also be designated Green Space Network.

1579. Gillahill site should be given whichever designation affords it a higher level of protection from development.

543. Plan should remain unchanged at Gillahill and all land north of the Langstracht should remain as Green Belt.

1565, 1567. Gillahill should be removed from the greenbelt and allocated for up to 600 homes in the period 2007-2016 with a requirement to allocate land for a new primary school and for the preparation of a Development Framework covering all the allocated sites in Kingswells.

#### Other Sites Not Allocated in the Proposed Plan

551, 1565, 1567. Site 3/05A at Derbeth to the east of the Aberdeen Western Peripheral Route should be identified for future development (map shown in response) of up to 900 homes, employment land and community facilities in the second phasing.

1567 Provision should be made for a primary school alongside the suggested development of site 3/05A Derbeth.

1189. Site 3/02 Kingswells East north of the bus only route should be identified for housing in Table 7, the Proposals Map and the LOCAL DEVELOPMENT PLAN for approximately 70 mixed tenure houses and other mixed use development, comprising residential, business, retail, leisure and community uses.

1565. Remainder of site 3/05D West Huxterstone should be allocated for development alongside a rephasing of allocated sites.

1567. Additional land should be included at site 3/05D West Huxterstone to accommodate an increased allocation of 180 units.

1536. Site at Newton East (3/11) should be allocated for residential development

#### Supporting Infrastructure and Services

543. Development should be supported by various infrastructure items and should progress on the basis of existing infrastructure capacity or delivery of new infrastructure to support development - modifications addressed through Policy I1.

#### Transport

1579. Need to look into traffic and transport issues.

### Summary of response (including reasons) by planning authority:

#### Site 3/05B Gillahill

One respondent suggests that the Gillahill site 3/05B be allocated for residential development replacing sites OP45 Greenferns and OP31 Greenferns Landward in the first period. The case for reconsideration of the Gillahill site 3/05B for residential development is made through the submission of an Education Impact Assessment, within which the site promoter concludes that a single stream primary school should be accommodated within the Gillahill site, and managed alongside the existing school, to accommodate the pupils generated by the development at Gillahill and the residual overflow from the existing school. However, this would necessitate the provision of 600 housing units on the site. The Council does not consider this to be an appropriate strategy for accommodating new development.

The Development Options process undertaken at the first stage in preparing the Local Development Plan included an assessment of issues such as flooding and geology. The Proposed Plan does not include Gillahill as a proposed allocation. However, issues of flooding and are also addressed by the Council through the masterplanning and planning application processes the Council will liaise with partners, including statutory agencies, to ensure that development only takes place on areas that are appropriate for their intended use.

The Green Space Network designation has been subject to a thorough review since the Green Space Network designation that was included in the adopted Aberdeen Local Plan (CD12), following a best practice methodology. The Green Space Network as defined in the Proposed Plan is a strategic framework to protect, promote and enhance wildlife, recreation, landscape and access value of open spaces. The Green Space Network comprises Natural Designated Sites (LNR, DWS, SINS and SSSI), woodlands, ponds, wetlands, open semi natural areas and open spaces defined in the 2010 Open

Space Audit. It also includes strategic links between these sites, often following water courses, the path network and habitat information from the integrated habitat survey. The Proposed Plan does not include the Gillahill site within the Green Space Network designation as it did not meet the selection criteria. As the site consists of agricultural land, green belt status was considered to be the most suitable designation.

#### Other Sites Not Allocated in the Proposed Plan

We note the support for the non-inclusion of a number of sites in the Proposed Plan. The Development Options Assessment Report 2010 (CD13 ) includes a comprehensive assessment of the suitability of sites to accommodate future development and informed the decisions on which sites to identify in the Proposed Plan. The scale and extent of allocations proposed between Kingswells and Sheddocksley and Kingswells and Westhill has been to maintain a green buffer between these areas and maintain their separate identity.

Site 3/02 Kingswells East was assessed as being undesirable in the Development Options Assessment Report 2010 (CD13 ). Situated just below Newpark Hill and north of the bus only section of Langstracht it was identified as occupying a significant position within the landscape and would not contribute to the landscape setting of Kingswells. This echoed previous comments made by the Reporter for the adopted Local Plan (CD12), citing the harm that development would have on the watershed ridge as a feature of Aberdeen's surrounding landscape and to the setting and identity of Kingswells. The Aberdeen Green Belt Review (CD19) which accompanies the Proposed Plan also states that the old Langstracht provides a clear northern boundary and prevents development encroaching more prominent and exposed parts of the hill.

Site 3/05A Derbeth was assessed as being undesirable in the Development Options Assessment Report 2010 (CD13 ) and the main consideration was the difficulties with integrating the site with the existing Kingswells community, particularly the pedestrian connectivity. Equally, it was unclear how the proposed local centre within the new development would be accessed by residents of the existing community. The site sits on higher land than Kingswells itself and has a strong relationship with Brimmond Hill and Brimmond Hill District Wildlife Site. The Aberdeen Green Belt Review highlights the role that these areas play in providing a landscape setting for Kingswells. Although the route of the Aberdeen Western Peripheral Route lies between the area proposed for development and Brimmond Hill, the impact of development on landscape and the landscape setting of Kingswells, would be significant. The suggested use of the Aberdeen Western Peripheral Route as a defensible boundary for development does not provide a suitable case for excluding the site from the Green Belt. An easily identifiable boundary already exists with the Kingswells bypass.

#### Supporting Infrastructure and Services

In relation to the provision of shops and community uses, we note that the sites included in the Proposed Plan are less than a kilometre from the existing local centre in Kingswells. In addition, the latest masterplan for the OP40 employment land allocation includes small scale commercial elements to support the wider allocation and the needs of the existing community. In addition, sites allocated in the Proposed Plan benefit from being within reasonable walking distance of public transport services and the Park and Ride site to the west. Developers will need to provide evidence that public transport services can provide an adequate level of service to support new residents and

businesses in the area to ensure that there are attractive alternatives to the car and thereby minimise congestion. Infrastructure requirements for new roads, public transport and walking and cycling infrastructure are set out in the Proposed Plan and Action Plan, including specific requirements for the Kingswells area. Masterplans and applications for new development will need to demonstrate how they are meeting these infrastructure requirements identified and how the transport impact of development will be mitigated. The layout and design of new development will need to accord with Scottish Government's guidance contained in Designing Streets (CD6), and this includes the safe movement of emergency vehicles on the road network.

The issue concerning provision of health facilities has been dealt with in Issue 29 Maidencraig.

In respect of school provision, following publication of the Main Issues Report the 2009 School Roll Forecasts (CD17) were published which revealed that spare capacity at Kingswells Primary School was less than the 2008 forecasts had indicated. With forecasted spare capacity of 45 in 2010 falling to 33 in 2013, the Council revised the amount of new housing to be allocated in the Kingswells school catchment. The result of this exercise was the removal of the Gillahill development from the Proposed Plan.

#### Transport

The Aberdeen Green Belt Review (CD19) which accompanies the Proposed Plan sets out the issues that have been considered in defining the boundaries of the sites allocated in the Plan. The allocation of site OP42, previously referred to as 3/05D, was limited to the western portion of the site, utilising field boundaries and the location of existing dwellings to mark the eastern boundary of the development. Development further east would be remote from the main settlement.

#### Quality of development

The Proposed Plan contains a number of policies relating to the design of new development and mechanisms are also in place to ensure that development is of a suitable design and layout. Masterplans and planning applications will need to be in accordance with these policies and masterplans will need to be approved by the Council, and subject to consultation with local communities.

#### **Reporter's conclusions:**

#### **Reporter's recommendations:**

<b>Issue (ref and heading):</b>	<b>ALTERNATIVE SITES: DEVELOPMENT IN THE VACINITY OF HAZLEHEAD PARK</b>	<b>36</b>
<b>Development Plan reference:</b>	Sites not identified in the Proposed Plan.	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Mr Robert Newton of GVA Grimley Ltd on behalf of Dobbies Garden Centres plc (383), Mr Harry McNab of Bancon on behalf of The Mackenzie Club (604).		
<b>Provision of the Development Plan to which the issue relates:</b>	Sites not contained in the Proposed Plan - both zoned NE2 Green Belt.	
<b>Summary of the representation(s):</b>		
<p>383 Submits a Planning Statement, Transport Statement, Extended Phase 1 Habitat Survey and Illustrative Masterplan to support the proposal to allocate the site at the former Dobbies Garden Centre for housing development - approximately 50 houses.</p> <p>604 The site of the Hayfield Riding School (3.6Ha) The fields adjoining Dobbie's Garden Centre (5Ha) and the Golf professional's shop adjoining Hazelhead Golf Club should be identified for development. Sites are identified in Appendix B of representation 604.</p> <p>The proposals comprise: a) A 5 star, 50 bedroom hotel and conference centre on the site of the Hayfield Riding Centre, along with new stabling accommodation. b) 50 timeshare units on the site adjoining Dobbie's. c) Enabling development of 50 residential units. On the site adjoining Dobbie's</p>		
<b>Modifications sought by those submitting representations:</b>		
<p>383 Seeks removal of the site from the green belt and inclusion as an allocation for housing use, with capacity for up to 50 units.</p> <p>604 The MacKenzie Club seek an adjustment to local plan policies or zonings to facilitate this development. This could either be accomplished by: a) Identifying the sites as OP sites for the provision of tourist facilities and associated enabling development. b) Identifying the hotel, timeshare and residential sites with 'spot zonings' for these particular uses. c) Adjusting the policy covering the Hazelhead policies from Greenbelt to recreational space with capacity to absorb appropriate tourist and enabling development.</p>		
<b>Summary of response (including reasons) by planning authority:</b>		
<p>383 Dobbies The former Dobbies site was assessed as being undesirable for development at both the Development Options and Main Issues Report stages - see Technical Appendices - LOCAL DEVELOPMENT PLAN Development Options Assessment (CD13), Main Issues Report Responses to Comments (CD15) and Site Assessments for New Development Options (CD16).</p> <p>These highlight that a drawback of this site would be access. Hazledene Road is a narrow road with many blind corners. The combination of increased development and the improvements required, including street lighting for Hazledene Road will erode the rural identity of the area and blur the distinction between rural and urban that exists there. This would compromise the landscape setting of the area.</p> <p>Development at this site would be unrelated to existing settlement. Even if development</p>		

occurs at Hazledene to the south of Dobbies Garden Centre, the site will be separated from the existing settlement by the intervening woodland cover. This woodland serves to contain the northern extent of development at Hazledene and provides a strong green belt boundary.

The site was also considered at the Public Local Inquiry for the current local plan as Issue 109 (See Reporters' Report to the PLI Volume 3 (CD11)). Although the proposal considered there was for a mixture of housing and business use, the conclusions of the Reporters that the site is unsuitable for development are still relevant. Essentially they concluded that development here would form an enclave separated from the built up area. Increased development intensity and alterations to Hazledene Road would be detrimental to the landscape setting of western side of Aberdeen and to the identities of both the built up and rural components of the locality. The site is poorly related to public transport and there are few significant destinations within easy walking distance and would not reduce the need to travel.

The site is surrounded by Denwood District Wildlife Site (CD29) which is used for informal recreation and is part of the wider setting of Hazlehead Park. As such the site and the surrounding woodland contribute to recreation and landscape setting. The woodland also provides a strong and clearly identifiable green belt boundary (as suggested in paragraph 162 of Scottish Planning Policy (CD3)) and a green backdrop which contains proposed development at Hazledene. The area should therefore remain as green belt as it fulfils all green belt objectives of protecting landscape setting, providing open space for recreation and directing development to more suitable sites elsewhere.

604 MacKenzie Club These proposals were assessed as being undesirable for development at the Main Issues Report stage - see Technical Appendices - MIR Responses to Comments and Site Assessments for New Development Options.

Most of the points made in response to 383 Dobbies are also applicable to the sites promoted by the MacKenzie Club. Sites 1 and 2 are unrelated to the existing residential areas at Hazlehead and Craigiebuckler and remote from public transport.

The Hayfield Riding School site is surrounded by woodland and the Hazlehead golf course and is in recreational use. There are significant accessibility constraints to the site and the combination of increased development and the improvements required for the local roads in Hazlehead Park will erode the rural identity of the area and blur the distinction between rural and urban that exists there. This will compromise the landscape setting of the area.

The development of the undeveloped fields adjacent to Dobbies would significantly change the character of the area in the same way as development at Dobbies would. A residential development here would be even more remote from public transport and there are few easily walkable destinations nearby. The development is unlikely to be large enough to support its own facilities and would create a car-dependent residential development in a rural area. The additional traffic generated is likely to require widening of Hazledene Road, which would introduce urban elements into the rural area. The extra traffic and development from both of these proposals is likely to erode the quiet recreational experience of what is essentially a country park. The recreational function of Hazlehead Park and the contribution it makes to landscape setting means that it should remain as green belt. Accordingly, we would not support rezoning the Hazlehead area

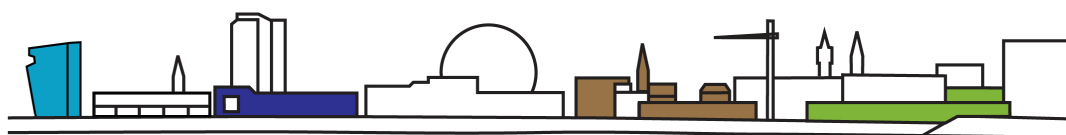
for recreational use as it fulfils all green belt objectives of protecting landscape setting, providing open space for recreation and directing development to more suitable sites elsewhere.

It should be noted that the tender by the MacKenzie Club to refurbish and redevelop the Hazlehead golf courses was rejected by the Council in May 2009. The management of the golf courses is now in the hands of the Aberdeen Sports Trust. The Proposed Plan does not support enabling development and our views on this matter are dealt with in Issue 107 Enabling Development.

**Reporter's conclusions:****Reporter's recommendations:**

<b>Issue (ref and heading):</b>	<b>ALTERNATIVE SITE: CADGERFORD FARM</b>	<b>37</b>
<b>Development Plan reference:</b>	Site not identified in the Proposed Plan.	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Miss Shelley Thomson of Stewart Milne Homes (1464).		
<b>Provision of the Development Plan to which the issue relates:</b>	Alternative development in Greenbelt NE2.	
<b>Summary of the representation(s):</b>		
1464 Object to the failure to identify Cadgerford, Development Option 3/15, for mixed use development. Site ideally located to take advantage of the recent success of Westhill as a major location for office development and can be developed for class 4 with scope for residential development as a part of a masterplan including the part of the site that is located within Aberdeenshire. There are no technical or landscape constraints that would prevent the site's development.		
<b>Modifications sought by those submitting representations:</b>		
1464 Include Cadgerford, Westhill as an opportunity site for mixed use development.		
<b>Summary of response (including reasons) by planning authority:</b>		
The Council does not consider that the site presents a suitable opportunity for development. The Development Options Assessment Report highlights the presence of a major gas pipeline to the west which restricts the scope of uses on the site, although employment uses are afforded fewer constraints within the consultation zone. The location of this site is remote from the built up area of Westhill and the accessibility of the site is therefore quite poor and difficult to integrate with the existing settlement. Any development would be considered to pose a significant impact on the surrounding agricultural landscape and would be highly visible from surrounding fields.		
<b>Reporter's conclusions:</b>		
<b>Reporter's recommendations:</b>		





**aberdeen** local development plan

**RESPONSE TO PROPOSED PLAN  
CONSULTATION:  
DEESIDE**

**ISSUE 38 - 54**

<b>Issue (ref and heading):</b>	<b>ALLOCATED SITE: FRIARSFIELD OP51</b>	<b>38</b>
<b>Development Plan reference:</b>	OP51, Table 2 and Appendix 2	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
<p>Mrs Brenda Kay (161), Mr Grant Maxwell (171), Mrs Nicola Spence (172), Mr Gary Summers (173), Mrs Sandra Maxwell (176), Mrs Mary McCallum (178), Mr Stephen McCallum (179), Mr Roger Mcilroy (212), Mrs Margaret Broadley (223), Mr Nick James of Land Use Consultants on behalf of Camphill Communities (Aberdeen City and Shire) including Aberdeen Waldorf School (259), Mrs Michelle McKechnie (264), Mr Gordon McKechnie (265), Mrs Laura Sawyer (266), Mr Jonathan Smith (276), Mrs Carolyn McNicholas (279), Mr Peter Bewsher (282), Mrs Jennifer Longhurst (286), Mr Michael Longhurst (287), Mr Mark Dunn (289), Mr Ian Drysdale (290), Dr Judith Blaiklock (305), Mrs Alison Bell (318), Mr William MacBean (326), Mr Christopher Venn (337), Mrs Gwen Aitkenhead (338), Mrs Marie Smith (346), Professor John Parnell (351), Mr Robin Matthew of PPCA Ltd on behalf of CALA Homes (East) Ltd (364), Mr David Henry (368), Mr Alistar Stark on behalf of Mr. Richard J. Thompson (391), Mr Guus Glass of Cults, Bieldside and Milltimber Community Council (398), Ms Nicola Abrams of Scottish Environmental Protection Agency (408), Mr Christopher Smith (415), Mrs Helen Smith (437), Mr Hormoz Jamshidian (464), Ms Tracey Wilson (478), Mrs Margaret Cook (516), Dr Grant Logan (521), Dr Susan Logan (522), Mr Kevin Peat (537), Mr Robin Bowden (564), Mr William Hendry Milne (566), Mrs and Mr Joyce Knowles (571), Mrs Maureen McPherson (578), Mrs Deborah Ogg (590), Mrs Jo Gibson (599), Miss Mairi MacDonald (606), Mr Nick Gibson (612), Mr Daniel Gibson (638), Mr Thomas Gibson (673), Mr Roy Angus (689), Mrs Patricia Skidmore (693), Mrs Agnes McGlynn (730), Mr Timothy McGlynn (749), Mr Robert Forrester (751), Ms Diana Forrester (754), Mr James Welsh of Halliday Fraser Munro Planning on behalf of Mr. Steven Grant (765), Mr Douglas Scott (769), Mr David Stewart (776), Ms A Bell (822), Mrs Diane Stewart (824), Sir/Madam M. Bell (832), Ms Doreen Bothwell (888), Mr Roger Laird of Archial on behalf of Mr &amp; Mrs Riley (924), Mr Douglas Seller (982), Mr James Ogg (1175), Ms Emelda Maclean of Emac on behalf of Scotia Homes (1189), Mrs Amanda Jamshidian (1282), Mr Harry Jamshidian (1283), Mr Nicholas Riley (1420), Mrs Alison Riley (1421).</p>		
<b>Provision of the Development Plan to which the issue relates:</b>	Existing housing allocation for 280 units carried over from the current Local Plan	
<b>Summary of the representation(s):</b>		
<p>161, 171, 173, 176, 178, 212, 223, 259, 264, 265, 266, 276, 279, 282, 286, 287, 289, 290, 305, 318, 326, 337, 338, 346, 351, 391, 398, 415, 437, 516, 521, 522, 537, 564, 566, 571, 578, 590, 599, 606, 612, 638, 673, 689, 693, 751, 754, 769, 776, 822, 824, 832, 888, 924, 982, 1175, 1420, 1421 Local road infrastructure is inadequate and will not be able to cope with additional traffic. Public transport is inadequate. Local roads are unsafe. Proposal will be car dependent, Traffic pollution. Public transport, pedestrian facilities and cycling are remote.</p>		
<p>171, 173, 179, 265, 346, 516, 566, 571, 590, 751, 754, 776, 822, 824, 1283, 1421 There are inadequate local amenities or facilities to support this development.</p>		
<p>161, 173, 176, 178, 223, 264, 265, 266, 276, 279, 282, 286, 287, 289, 326, 337, 338, 398, 415, 521, 522, 537, 564, 578, 590, 599, 606, 612, 638, 673, 689, 693, 730, 749,</p>		

822, 832, 888, 924, 982, 1175, 1282, 1420, 1421 The new Cults Academy and/or Cults Primary School is full and cannot cope with additional pupils from this development.

161, 172, 176, 178, 223, 264, 265, 266, 276, 279, 282, 289, 338, 391, 537, 599, 606, 612, 638, 673, 693, 730, 1420 Cults Medical Practice is full and cannot cope with additional patients. Medical centre needs to expand.

172, 1420, 1421 The sewage system is not able to cope with this development and needs upgrading

172, 178, 212, 223, 264, 265, 286, 287, 368, 415, 437, 464, 566, 599, 612, 638, 673, 689, 693, 730, 749, 751, 754, 776, 832, 1282, 1283, 1421 Loss of green belt and green space and contrary to green belt policy. Causes coalescence with Aberdeen.

266, 318, 464, 522, 590, 769 The area is used for recreation, dog walking and grazing horses.

266, 286, 337, 521, 522, 590, 769, 832, 1421 There would be a loss of wildlife. Habitats assessment of wetlands near Cults Burn required. Loss of trees.

173, 279, 282, 437, 832 Why do we need more houses? There are many vacant homes. Regeneration of the city centre and brownfield sites would be more beneficial to all.

212 Most housing of this type create cul de sacs and don't allow walkers or cyclists safe through access.

259 The Camphill Communities therefore welcome the decision not to include additional land releases in this area in the Proposed Local Development Plan.

259 Concerned that development on this site should avoid impacts on pupils travelling to the Aberdeen Waldorf School, either as a result of increased traffic along local roads, or through the loss of the footpaths that currently cross the site.

276, 290, 415, 769, 776, 824, 1175, 1283, 1421 Feeling of a village community will be lost. Loss of character and amenity.

290, 318, 337, 408, 464, 521, 522, 590, 822, 832, 1175, 1421 Increasingly heavy rainfall and events of near flooding have demonstrated poor drainage in the area and overwhelming the burn that runs by the upper part of Kirk Brae and down the Den of Cults. The proposed development involves acres of housing and surfaced ground rather than absorbent fields therefore the flow of rainwater would become great and immediate to the burn. Existing flooding problems on Kirkbrae and Friarsfield Road will be exacerbated by building houses and driveways on these fields. Flood risk should be highlighted as a potential constraint.

290 The proposed development and heavy construction traffic would cause long term road obstruction, noise, dust, mud, debris and spoil.

364 Previously agreed with the Council that Friarsfield development can accommodate more numbers than is allocated within the first phase in the Proposed Plan. Additional land currently unallocated but in the control of Cala Homes (East) could also come forward in this location to make good any shortfall identified in the housing land supply.

Friarsfield is an area of high demand. The site is deliverable and affordable housing will be included. Most key infrastructure and wildlife protection is contained in the current zoning to which this site is an extension. It is infrastructure led rather than infrastructure dependent.

398 We welcome the council's decision, prior to the start of this consultation, to remove 185 homes from the plan so that no additional houses are planned for this site through to 2023.

464 If this area is to be developed then the houses should be built such that they are self sufficient in energy. In other words they do not take power from grid or on main lines gas.

478 Residential amenity and public safety, landscape impact, natural heritage, roads and transport infrastructure, infrastructure and servicing, flooding and education.

521, 522, 924 Roads close to Craighbank will present a safety risk to the children there. Residential amenity there would be seriously affected.

521, 522, 924 Development is proposed on the high ground and will certainly have an adverse effect on the skyline from locally and beyond.

765 Main Issues Report bid sites 9/01, 9/21 and 9/27 are suitable for residential development and should be allocated in the Aberdeen Local Development Plan. There are a number of benefits that outweigh other currently preferred sites. They will be left over after development of OP51, but could be properly masterplanned as a further future phase. Clearly historic support for the allocation of this land for residential purposes. Have similar characteristics to the land at the south which has been allocated. Good choice for infill development and continuing pattern of development in the area. Contiguous with the existing settlement boundary and is situated close to facilities and services in Cults. Accessible for public transport.

769 This site has been used as a spreading and dumping area for waste from the paper industry during the late 80s and early 90s

1189 Scotia Homes Ltd considers that land at 9/01 is capable of delivering effective housing land for circa 35 residential properties possibly including retirement living accommodation. We intend to engage in a masterplanning process to ensure the site is fully integrated with Site OP51 of the Local Development Plan Proposed Plan and potential sites 9/21 and 9/27. There are no known technical or infrastructural constraints relating to the site, which would prohibit its future development. Scotia Homes considers that the Proposed Plan does not provide for a generous supply of housing land in the period 2017 - 2023 and that furthermore the identification of the entire allowance for Deeside on one site, at Oldfold, fails to ensure sufficient flexibility in the supply of housing land.

1282 Development could affect underground aquifers.

1282, 1283 Development is contrary of ambitions to achieve zero carbon development and address climate change issues.

**Modifications sought by those submitting representations:**

161 Move allocation to OP 12 Grandhome

171, 172, 178, 179, 212, 223, 265, 266, 276, 279, 282, 286, 287, 326, 337, 338, 346, 368, 464, 478, 516, 521, 522, 537, 571, 590, 599, 606, 612, 638, 673, 689, 730, 751, 754, 769, 776, 824, 832, 888, 924, 982, 1282, 1283, 1421 Remove OP51 from the Plan/retain as Green Belt

212 If this is to go ahead, Craigton Road and Countesswells Rd to have cycle paths created. Site must also have a good footpath and cycle path network throughout.

289 Plan rejected and resubmitted once the infrastructure can take the load.

305, 693, 822, 1420 Improvements to road/schooling/flooding issues and infrastructure required first.

318, 578 Reduce the number of houses on the site.

351, 415 Direct development elsewhere.

408 We suggest an appropriate way forward would be to insert the following text in the 'other factors' section of each of the allocation summaries as set out in Appendix 2.

This site may be at risk if flooding. A flood risk assessment will be required to accompany any future development proposals for this site.

564 Further details required

924 If it is considered to be retained, then a significant landscape buffer should be created around the cluster of houses and associated driveway at Craigbank. Buffer should be at least 100m in width to preserve the residential amenity of the existing occupants.

364 Allocate further house numbers to the current site.

765 Main Issues Report bid sites 9/01, 9/21 and 9/27 are suitable for residential development and should be allocated in the Aberdeen Local Development Plan.

1189 Land at 9/01 is capable of delivering effective housing land for circa 35 residential properties possibly including retirement living accommodation.

**Summary of response (including reasons) by planning authority:**

General matters of principle.

It should be noted from the outset that OP51 Friarsfield is identified as a greenfield housing allocation for 280 houses in the 2008 Aberdeen Local Plan (CD12). In this instance, we should draw your attention to paragraph 78 of Circular 1/09 Development Planning (CD4) which states "Scottish Ministers intend the appointed person to, within the bounds of the issues raised in the representations, primarily examine the appropriateness and sufficiency of the content of the proposed plan. . . . . The appointed person should generally not recommend modifications to parts of the plan

which have been examined in previous examinations or rolled forward from previous plans, unless circumstances have clearly changed."

We therefore consider that matters regarding the principle of development on this site have already been addressed through the existing local plan. These include representation on matters such as the loss of green belt, open space, countryside and wildlife habitats and on transportation matters. Details can be found in the Report of the Public Inquiry for the current Local Plan in Issue 92 Friarsfield and Issue 93 Morkeu of Volume 2 (CD11). Morkeu covers the eastern part of OP51 and the development option promoted by respondent 1189. These also deal with landscape and coalescence issues and the reporters' conclusions in paragraph 87 found that the width of the gap and lack of visibility between Friarsfield and Aberdeen would not cause coalescence and consequent loss of identity. Additional issues are considered below.

### Flooding and Drainage

Flooding and habitat concerns over the presence of the Cults Burn along the south of the site are recognised through the identification of an area of green space network along the burn with the intention of providing a riverside park. This will also provide a recreational resource. We acknowledge that there may be local flooding and drainage issues which would require further examination and consider that Scottish Environment Protection Agency's submission - that a flood risk assessment should accompany any proposals for the site - has merits. Although we do not recommend making any prescribed modifications to this policy, reporters may wish to consider the merits of adding the following text under 'Other Factors' to the opportunity site reference for OP51 on page 59 of the Proposed Plan - "A flood risk assessment will be required to accompany any future development proposals for this site."

### Transportation and School Capacity Issues

More detailed matters concerning the impact on transport and upgrading the local road network will be addressed through the Transportation Assessment which will be required to accompany any planning application for the site. Construction noise is inevitable when building houses, however, conditions attached to any planning consent will control hours of working. A masterplan is required and this will address and detailed design and local amenity issues, density and access arrangements. It will include core path improvements and public transport arrangements. Contributions will be sought to extend the existing health centre in Cults. In respect of school capacity, as an existing allocation, the likely numbers of pupils generated by Friarsfield have already been taken into account in the 2009 School Roll Forecasts (CD17). This indicates that there will be sufficient capacity at Cults Academy. A slight over capacity is anticipated for Cults Primary School but this is calculated using a very high pupil/household ratio of 0.5. This is not anticipated to cause a problem, but it is an issue for the other development options in the area and is discussed in more detail later. Details of these matters are set out in the Action Programme (CD20) which also details waste water and sewage requirements and upgrades.

### Carbon Emissions

The requirements for reducing carbon emissions is dealt with in Proposed Plan Policy R7 Low and Zero Carbon Buildings and is subject to a separate issue, as it the general

requirement for housing land.

Given this site is identified for residential development in the 2008 Aberdeen Local Plan, there is no need to make any changes to the Plan other than those in respect of flooding.

364, 765, 1189 Development Options at Friarsfield North.

These representations are in respect of 3 development options at Friarsfield North. For clarity 1189 was development option 9/01, 364 was development option 9/21 and 765 was development option 9/27.

In the Development Options Assessment, all 3 sites were regarded as 'promising' but only in respect of the southern parts of the sites on the lower slopes for landscape reasons. They were combined into one site and identified in the Main Issues Report as an allocation for 185 houses. Because of school capacity issues at Cults Academy, they were placed in Phase 2 (2017-23) for later release. However, a revision of school capacities was carried out by the Council in January 2010. This has resulted in a lowering of the capacity at Cults Primary School in whose catchment these sites lie (the Committee Report dated 7th January 2010 explaining the rationale behind these capacity changes is appended in the folder). Forecasts indicated that there would only be spare capacity for a further 50 houses in 2017 but only if a lower pupil/household ratio of 0.25 was applied (as opposed to 0.5 in the Forecasts). Because of this and the fact that there is still likely to be limited capacity at the academy, it was considered unlikely that the 185 houses proposed here could be accommodated. In addition these numbers would not be enough to justify an additional primary school.

In our response to representations on the Main Issues Report (CD15), and taking into account the reduced primary school capacity, it was felt appropriate to reduce the allocation to 50 houses. This was to be kept in phase 2 because of the limited capacity at the academy and primary schools. In order to reduce landscape impact, the increased allocation was to be limited to existing boundary of Friarsfield as set out in OP5 in the 2008 Aberdeen Local Plan - in other words raising the allocation from the current 280 houses to 330 houses. At its meeting on 18th August 2010, the Council decided instead to remove the extra 50 houses at Friarsfield and identify alternative sites in Peterculter instead in order, amongst other things, to take advantage of the spare capacity that exists at Culter Primary School.

We consider this to be the right decision. The 2009 School Roll Forecasts indicate that Culter Primary School has capacity for around 140 pupils up to 2018. This is operating at around 65% capacity so there is more than ample room to accommodate pupils from the housing allocations identified in the Proposed Plan. On the other hand Cults Primary is forecast to be slightly over capacity in 2018 (by 30 pupils) assuming a 0.5 pupil to household generation arising from the existing allocations at Friarsfield and elsewhere. Even assuming a more modest ratio of 0.25, it is clear that Cults Primary will continue to be under pressure, whereas Culter Primary has ample capacity which should be utilised.

Friarsfield does not appear in the Green Belt Review as the site was already allocated and the Proposed Plan makes no change to this in terms of the boundary or housing numbers. Development in this area should be restricted to the lower part of the slope which is within the current allocation. This would not intrude significantly into the surrounding landscape, would avoid the steeper ground and skyline and has the potential to relate well to the existing built up area of Cults. It would also restrict

development to below the 95m contour which is a common feature of all the built up areas on Deeside and help to prevent urban sprawl and coalescence. Avoiding the steep slopes at Friarsfield North will protect these features and provide a green backdrop to Cults. Development here would be further away from the shops and facilities on North Deeside Road and the local schools. These areas are more steep. As a result they are appropriately zoned as green belt as they serve to maintain the landscape setting of Cults and direct development to more accessible and less sensitive areas in the existing allocation.

This conclusion, together with the concerns we have over the sensitivity of the upper slopes north of Friarsfield (expressed in paragraph 105 of the Reporters Report for Issue 92 Friarsfield and paragraph 30 for Issue 93 Morkeu) shows that development in this areas would have an unacceptable landscape impact. The developers at OP51 believe the capacity of the site is higher than that indicated in the Proposed Plan. We think it is unnecessary to augment the land supply. The Proposed Plan identifies sufficient greenfield housing land for the first two structure plan phases and most of the third phase. We therefore consider there is no need to make any adjustments to the existing boundary or allocation which was established in the 2008 Aberdeen Local Plan.

**Reporter's conclusions:****Reporter's recommendations:**



<b>Issue (ref and heading):</b>	<b>ALLOCATED SITES: CULTER HOUSE ROAD AND EDGEHILL ROAD OP60 AND OP61</b>	<b>39</b>
<b>Development Plan reference:</b>	OP60 and OP61, Table 9 and Appendix 2	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Mr Bert Allen on behalf of Truedeal Securities Ltd (20), Mr David Robb (137), Ms Lavina Massie of Culter Community Council (518), Mr Kenny Clubb of Churchill Homes (775), Mr Richard Rose (1413).		
<b>Provision of the Development Plan to which the issue relates:</b>	Housing allocation for 10 houses	
<b>Summary of the representation(s):</b>		
<p>Support development</p> <p>20: Support identification of OP61 Edgehill Road.</p> <p>775: Support for inclusion of site OP60 Culter House Road. When developed it will complete the settlement boundary and also remove an unsightly part of Culter House Road. The site has no constraints and is immediately deliverable. It is also not reliant on any major infrastructure improvements or further provision. Within the site design, to protect and enhance this access, allowing continued usage and benefit to the local community.</p> <p>Boundary</p> <p>137: The boundary of OP61 Edgehill Road is incorrect as it includes properties and land to the north.</p> <p>Coalescence</p> <p>518: Object to the designation of these sites OP60 and OP61 Culter House Road and Edgehill Road as they are in an area of few houses with large wooded gardens, open areas/fields giving the impression of a 'green wedge' preventing the coalescence of the urban parts of Peterculter and Milltimber.</p> <p>1413: If the houses were to be built, it would then be easier for permission to be obtained for further infill housing.</p> <p>Trees</p> <p>518: Development on these sites would require trees to be felled damaging the amenity value of the local area, and indeed the cultural/historical significance.</p> <p>1413: Development will further erode the limited visual and light-screening barriers that we currently have to the Aberdeen Western Peripheral Route from these trees. Felling the trees for the proposed development would further damage the amenity value of the local area, and indeed the cultural/historical significance of the Edgehill environs.</p>		

**Built Heritage**

1413: Edgehill Lodge should be preserved. Such demolition would alter the character of this section of the North Deeside Road and further damage the cultural and historical significance of the Edgehill environs.

**Traffic/ Road Safety**

1413: The junction of the Edgehill access road with the North Deeside Road is of concern. Traffic entering onto the North Deeside Road currently has limited visibility, and there already exists a danger to pedestrians walking along the North Deeside Road. Increasing the traffic flow to and from the Edgehill environs will further exacerbate the risk of an accident at an already dangerous junction.

**Modifications sought by those submitting representations:****Support Development**

20: Keep OP61 Edgehill Road in the Local Development Plan.

**Boundary**

137: A proper site plan identifying the developable land is needed in the plan.

**Coalescence/ Trees**

518, 1413: Remove OP60 Culter House Road and OP61 Edgehill Road from the Local Development Plan.

1413: Trees should not be felled for development.

**Built Heritage**

1413: Do not allow Edgehill Lodge to be demolished.

**Summary of response (including reasons) by planning authority:**

The Aberdeen City and Shire Structure Plan (CD8) sets the requirements for greenfield housing (or employment land) allowances and authorises a review of green belt boundaries in order to accommodate them. A Development Options Assessment (CD13), Strategic Environmental Assessment (CD21), and consultation on the Main Issues Report (Responses to Representations CD15) were used to assess sites. These were used to identify the most suitable locations to deliver the required growth and in accordance with Scottish Planning Policy paragraph 159 (CD3) which requires green belts to direct growth to the most appropriate locations. This process is described in the Green Belt Review (CD19) which also sets and explains the detailed boundaries of the green belt and land release areas.

**Coalescence**

518, 1413: This site emerged as a desirable option because both sites, OP60 and OP61 Culter House Road and Edgehill Road are well concealed from the surrounding area due to mature trees and the dwellings could be accommodated without significantly impacting

on landscape setting.

#### Support Development

20, 775: The Council welcomes comments supporting development on OP60 Culter House Road and OP61 Edgehill Road.

#### Trees

518, 1413: It is agreed that tree loss should be kept to a minimum as these are an important characteristic of the sites. Any planning application should be accompanied by a tree survey which should show where further planting may be required, either to compensate for any tree loss or to supplement what is already there.

#### Built Heritage

1413: The granite lodge is not listed or in a conservation area. Any planning application would however need to take account of Policy D4 - Aberdeen's Granite Heritage.

#### Traffic/ Road Safety

1413: Any planning application that is submitted for both sites will take into consideration access, traffic management and road safety.

#### Boundary

137: The boundary contains two properties and a field to the north of the site. We are of the opinion that Culter House Road acts as a suitable northern boundary for the site. If this enclave, consisting of the two properties and field, was zoned as green belt we are of the opinion that this would not meet the objectives of the green belt policy. When this site and the adjacent Culter House Road site are developed, in the next review of the Local Development Plan, these sites will be zoned as residential which would reflect the current use of the northern part of the Edgehill Road site.

Therefore, both OP60 Culter House Road and OP61 Edgehill Road sites should remain zoned for residential development in the Plan. The boundary for OP61 Edgehill Road will remain the same.

#### **Reporter's conclusions:**

#### **Reporter's recommendations:**

<b>Issue (ref and heading):</b>	<b>ALLOCATED SITE: OLDFOLD OP62</b>	<b>40</b>
<b>Development Plan reference:</b>	OP62, Table 9 and Appendix 2	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
<p>Ms Gail Davidson (60), Mr Stephen Geddes (74), Mr Doug Connell (75), Mrs Debra Anne Merrett (136), Dr Thelma Brown (138), Mrs Brenda Kay (161), Mr Colin Morsley (168), Dr Robin Kay (233), Mr Brian Gill (258), Mr Nick James of Land Use Consultants on behalf of Camphill Communities (Aberdeen City and Shire) including Aberdeen Waldorf School (259), Mr David Lindsey (271), Mr Steve Horton (278), Professor Gordon Brown (331), Mr Ewan Robertson (335), Mr Francis Watt (347), Mr Martin Kirkham (377), Mr Guus Glass of Cults, Bieldside and Milltimber Community Council (398), Ms Nicola Abrams of Scottish Environmental Protection Agency (408), Mr Ross Malcolm (446), Mr Gordon MacCallum of Keppie Design on behalf of CALA Homes (East) Ltd and The Seven Incorporated Trades of Aberdeen Trade Widows' Fund (468), Ms Jess Gill (475), Mr David Caisley (480), Mr Alistair Clunie (534), Mrs Rosalyn Clunie (536), Sir/Madam A Dickson (545), Ms Kim Lees (559), Sir/Madam W. G. Williams (575), Mr Trevor Grose (580), Mr Scott Hendrick (779), Mrs Kathryn Caizley (807), Mr Andy Penman (879), Ms Ruth Dickson (898), Mr Bruce Purdon (1322), Mrs Susan Smedley (1324), Dr Gillian Purdon (1334), Mr Nigel K Taylor (1458), Mrs Margret Taylor (1460), Mr Robert Taylor (1461), Dr Fiona Taylor (1462), Mr Ben Freeman of Bancon Developments Ltd (1561), Ms Bea Holden (1562), Mr John Findlay of Ryden LLP on behalf of Stewart Milne Homes (North Scotland) and Messrs Jaffray (1570).</p>		
<b>Provision of the Development Plan to which the issue relates:</b>	Site allocated for 550 homes and 5ha of employment land	
<b>Summary of the representation(s):</b>		
<p>60, 74, 75, 136, 138, 258, 271, 278, 331, 335, 347, 377, 446, 475, 480, 534, 536, 545, 559, 575, 779, 807, 898, 1322, 1334, 1458, 1460, 1461, 1462, 1562 The local roads and transport infrastructure are insufficient to support this development. Traffic congestion on North Deeside Road and local residential roads exists and will be made worse. Development cannot take place prior to Aberdeen Western Peripheral Route being built</p>		
<p>60, 74, 75, 138, 258, 278, 331, 335, 475, 480, 559, 575, 580, 779, 807, 879, 1458, 1460, 1461, 1462 There is insufficient capacity at Cults Academy to support pupils from this development.</p>		
<p>74, 75, 331, 347, 377, 398, 475, 534, 536, 559, 779, 807, 1458, 1460, 1461, 1462 There are no services in Milltimber to support the development. Residents do not want any further facilities in Milltimber. Provision of employment land will not reduce traffic. No demand for employment land here.</p>		
<p>74, 258, 347, 398, 475, 480, 534, 536, 575, 580, 779, 879, 1322, 1324, 1334, 1561, 1562 This development will double the size of Milltimber and have a detrimental affect on a great many aspects of life for the residents there. Development represents overdevelopment. Development will cause disruption to rural lifestyle as will construction through noise, pollution and crime. Reduction in air quality will affect health. Development will lead to coalescence. Will give rise to soulless monotone housing.</p>		
<p>75, 258, 331, 377, 475, 480, 534, 575, 879, 898, 1322, 1334, 1458, 1460, 1461, 1462,</p>		

1561 Development would lead to loss of green belt. Binghill Road forms a definable boundary to Milltimber, which would be lost with a housing development to the east.

136, 278, 331, 398, 480, 807, Sewage and water infrastructure is inadequate and will need upgrading.

138, 75, 278, 575 Questions the need for further housing. Development should be directed to brownfield sites instead

138, 377, 534, 536, 1458, 1460, 1461, 1462 Inadequate drainage and flooding issues. The bottom of Binghill Road often floods when there is heavy rain.

168 This development needs a road connection to the north of Milltimber, preferably connecting to the Aberdeen Western Peripheral Route. Decanting further traffic onto the A93 is not an adequate solution.

233, 545, 559, 377, 1458, 1460, 1461, 1462 Path currently identified as AP4 (and AP10) between Culter and Bielside should be provided as part of development. Area is well used for recreation and countryside walks. Access to open country from the Milltimber estate via a public path will be lost.

259, 335 Development should not disrupt pedestrian movement. There should be an emphasis on public transport access in order to minimise traffic generation.

335, 377, 1322, 1334 Impact on wildlife, including protected species. Murtle Burn lies to east of site.

335 Reinstatement of Deeside rail line required.

347 The new junction connecting Oldfield to the A93 will only be effective if the new development has NO vehicular to Binghill Road.

446, 545 Previous Local Plan Inquiry concludes that this site is wholly unsuitable as a residential development opportunity

468 Support the inclusion of site OP62 at Oldfold. The site is very well connected in the landscape and is bounded by a significant and mature woodland policies to the east, thereby enclosing the site within Milltimber and not allowing visual coalescence with Bielside.

480, 807 Internet connections and downloading is very slow and a significant telecommunication upgrade would be required to allow all local businesses and future business's to operate effectively

779 Doubts expressed over the deliverability of affordable housing in this area.

1324 Rather than replicate at OP62 the facilities already available at the hall, planning gain should be directed to enhancing the existing facilities, such as an extension to the hall and provision of staffing and possibly a cafe.

1324 Self-build plots are extremely rare in lower Deeside. OP62 should contain provision

for a reasonable number of affordable self-build plots.

1458, 1460, 1461, 1462 An appropriate housing mix has not been identified for this site. Development would result in the loss of a riding school and stables.

1561 Bancon submit that this allocation should be reduced to 150 houses only, with the balance of 400 homes, and business land, re-distributed to more appropriate sites.

1570 Its location to the east of Milltimber, away from the Aberdeen Western Peripheral Route and its interchange with the A93 make it an illogical location for major development, particularly employment uses. Traffic would be discouraged from using the Aberdeen Western Peripheral Route and place further pressure on the A93.

1561 The Plan proposes to allocate the southern section of the former Tor na Dee hospital site as Urban Green Space. Bancon objects to this allocation covering the curtilage of the East Lodge. A proposed replacement house on this site has already been agreed with the Council, subject to a design brief. Bancon understood that the site was to be given a residential zoning so made no representations at the main Issues report stage. The whole site was identified as a development opportunity in the 2008 Aberdeen Local Plan

#### **Modifications sought by those submitting representations:**

60, 75, 138, 258, 377, 446, 480, 545, 575, 807, 898, 1322, 1334, 1562, Remove the opportunity site and/or retain as green belt.

74, 136, 398, 534, 536 Further details required on housing, infrastructure, affordable housing, services and facilities, access, schooling..

161, Move allocation to OP12 Grandhome

534, 536, 580, 779, 1324 Reduce the scale/density of development.

233 Respect the route of the path between Culter and Bielside and make a path along the field margin leading towards Pinecrest Drive.

559, 807, 1324 Ensure school and transport infrastructure is provided as well as services, facilities, flood alleviation, and core paths. Improved broadband required.

259 Wish to be involved in discussions to progress the extension of Peterculter Health Centre further as part of the wider development at Oldfold.

271 Clear and viable scheme for traffic reduction required, alongside comprehensive restrictions in car ownership and usage, in order to avoid unacceptable traffic problems.

278 Look at housing needs - examine new town solution.

398 Do not consider releasing until after Aberdeen Western Peripheral Route is built.

408 Insert the following text into the 'other factors' section of each of the allocation summaries as set out in Appendix 2 for the following sites: "Any Masterplan should take account of the existing water features within the site, the pressures which apply to these features and should direct developers to look for opportunities to protect and improve the

water environment."

640 Appendix 4 should identify the requirement for land sufficient to accommodate the community pharmacy.

1561 It is submitted that the eastmost portion of site OP62 should not be allowed. The westmost portion of the site should be allocated for 150 homes. The eastmost part of the 'bid' site should be included within the Green Belt and as Green Space Network.

1570 Oldfold should be restricted to a single phase of 350 units in the first period of the plan. Employment uses should be excluded from the site. Instead, Contlaw should be allocated for mixed use development comprising 650 units over 3 plan periods

### **Summary of response (including reasons) by planning authority:**

The Aberdeen City and Shire Structure Plan (CD8) sets the requirements for greenfield housing and employment land allowances and authorises a review of green belt boundaries in order to accommodate them. A Development Options Assessment (CD13), Strategic Environmental Assessment (CD21), and consultation on the Main Issues Report (Responses to Representations CD15) were used to assess sites. These were used to identify the most suitable locations to deliver the required growth and in accordance with Scottish Planning Policy paragraph 159 (CD3) which requires green belts to direct growth to the most appropriate locations. This process is described in the Green Belt Review (CD19) which also sets and explains the detailed boundaries of the green belt and land release areas.

#### **Green Belt, Topography and Landscape**

Originally there were two separate bids for this area (reference 9/11 and 9/34 in the Development Options Assessment) but they were merged together to form OP62 Oldfold. This site emerged as a desirable option and has few physical, topographical or natural constraints through the development options process. Although development would be seen from the North Deeside Road, most of it would be hidden behind Oldfold Farm. Coalescence is often an issue along the Deeside communities, but in this instance, the intervening topography and woodland around Murtle Den and Hillhead Roads would ensure that neither visual nor physical coalescence would occur between Milltimber and Bielside. An indicative masterplan shows a hill top park which will provide open space for Milltimber and will contain the main body of development below the 95m contour in line with all the Deeside settlements in Aberdeen. So although the site itself makes a limited contribution to the landscape setting of the area, land between Murtle Den Road and Bielside to the east is important in maintaining the separate identities of the two communities.

#### **Transportation/Provision of Services and Employment Land**

In relation to transport issues, the Council undertook a process known as the Transport Framework at an early stage in the plan preparation process. Alongside the overall Development Options assessment process, this provided a transport based assessment framework against which Development Options were assessed. The results of this work were considered against the overall Development Options process and helped the Council to decide which sites to identify as Preferred Options in the Main Issues Report. The results of the Transport Framework (CD22) were published on the Council's website

alongside the Main Issues Report.

We acknowledge that new greenfield housing development is likely to lead to an increase in traffic. We therefore need to ensure that the new sites which are allocated are those which maximise opportunities to use walking, cycling and public transport as a means of travel and which do not rely entirely on the car. There is currently no significant local centre or employment site in Milltimber. The nearest are all outwith reasonable walking distances and this both discourages walking and increases reliance on the car. The provision of local services and employment opportunities in Oldfold will help to reduce car dependency - not only for the site itself but for Milltimber as a whole. At the same time good cycling opportunities are present on the North Deeside Road and Deeside Line and it is important to ensure easy access and improvements to these routes to encourage cycling (See Aberdeen Cycle Map (CD30) and Action Programme CD20). Restricting development to the north by providing the hilltop park will also reduce the distance between the northern limit of development and the frequent bus services on the North Deeside Road, making them easier to reach on foot. Further details of road access (including the treatment of Binghill Road), pedestrian linkages (including core path improvements) and cycling improvements and new provision will be examined in the masterplan and in the Transport Assessment that would be required alongside any planning application.

A direct access to the Aberdeen Western Peripheral Route to the north of Milltimber or reinstatement of the Deeside railway line are not considered practical or desirable. A further access onto the Aberdeen Western Peripheral Route here would be unlikely to receive approval (it would not provide a new strategic opportunity) and future planning for the railway infrastructure does not include reinstatement of the Deeside railway line which would in any case result in the loss of a significant recreational and commuter route for pedestrians and cyclists.

#### General and amenity issues

A drainage impact assessment is required by the Action Programme. Should there be any shortfalls in service and service infrastructure arising from this development then those shortfalls would have to be provided by the developers. This would include any water and sewerage requirements. Affordable housing will be required from this development, as it would from any other. The rural setting of Milltimber will be retained as will its separate identity. Local amenity, design, noise and landscaping issues would be dealt with at the masterplanning and planning application stage. Details of these matters are set out in the Action Programme. We acknowledge that this represents a large extension to Milltimber but size in itself does not make it an inappropriate development. Local Development Plan design requirements and the need for a masterplan will direct us away from standard suburban housing. Open space will be provided as part of the development and the indicative masterplan submitted by the site promoters shows a substantial park to the north of the site which will provide outdoor access opportunities as will the provision of the aspirational core path 10 in the Core Paths Plan (CD32) and improvements to the Deeside Way outlined in the Action Programme. Construction noise arising from new development is inevitable wherever it is located but hours of construction can be controlled through planning conditions.

#### Water Features

We agree with Scottish Environment Protection Agency's comment that Masterplan



should take account of the existing water features etc should be accommodated. However, rather than repeating it for all the Masterplan sites under Appendix 2 of the Proposed Plan, it should be mentioned in the Action Programme (under the 'Water' section for each masterplan area) in the interests of keeping the Local Development Plan concise.

#### Health Provision

We concur with NHS Grampian's requirements for contributions to extending Peterculter Health Centre and the need for a pharmacy on site. This is set out in the Action Programme.

#### School Provision

Forecasts indicate that it is possible to accommodate the pupils generated from this development into Cults Academy. Milltimber Primary however has limited capacity and no means of expansion due to the limited nature of the existing site. An opportunity exists to replace the primary school (which is not in the best of condition) with a new school with an increased capacity. The new school could also incorporate community facilities.

#### Natural Heritage

There are no significant natural heritage issues. Indeed, a well planned development could lead to a greater diversity of habitat than currently exists on site. The importance of the Murtle Den District Wildlife Site to the east of OP62 is recognised and the masterplan shows open space close to this area which can act as a buffer zone from the development. At the same time, opportunities can be taken to sensitively improve the linkages into Murtle Den, thereby increasing its accessibility and its value as an educational resource.

#### Loss of Riding School

We think that the need for new housing outweighs the need for the riding school which can be relocated.

#### Self Build Housing

We think that self build housing could add diversity and interest to the housing mix but the Local Development Plan does not have a policy imposing a requirement for it on sites. It is an issue that could be negotiated with the developers through the masterplan process should there be a demand for it.

#### Alternative developments

Responses to alternative development bids around Milltimber are set out in Issue 53 Alternative Sites in Cults, Bieldside and Milltimber. Directing this allocation to Grandhome is not appropriate. Grandhome already has 7000 homes allocated to it and in order to provide a choice of living environments, allocations should be made to Deeside, whilst recognising the constraints that exist there. Increasing the supply of houses here may also encourage telecoms providers to improve broadband speeds which appear to be an issue in this area. Reducing the scale of development here would

fail to deliver a new primary school. Overall we still consider this to be an appropriate area for planned growth.

1561 East Lodge, Tor-na-Dee The Main Issues Report does not suggest a residential zoning for this site. Only the preferred development options - both brownfield and greenfield are identified there. The site is green belt in the 2008 Aberdeen Local Plan, and although it forms part of the opportunity site for Tor-na-Dee (OP25), it has never had a residential zoning. East Lodge lies within the wider landscaped grounds of Tor-na-Dee hospital which have been zoned as Urban Green Space in the Proposed Plan. A spot residential zoning for a single house in this context is inappropriate. A planning application is anticipated for the site. If dealt with under the current local plan, green belt policy could allow the redevelopment or extension of the house as an existing activity, subject to detailed design considerations. If dealt with under the proposed Urban Green Space zoning, then the fact that this has an existing residential use would be a strong material consideration.

**Reporter's conclusions:****Reporter's recommendations:**

<b>Issue (ref and heading):</b>	<b>ALLOCATED SITE: CRAIGTON ROAD, PITFODELS OP64</b>	<b>41</b>
<b>Development Plan reference:</b>	OP64, Table 9 and Appendix 2	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Mr Kelvin Park (333), Mr David Henry (368), Mr Seamus MacInnes of Braeside and Mannofield Community Council (369), Mr Fred Robertson (384), Mr Iain Ramsay (389), Mr David McLaren (460), Mrs Joyce Reid (605), Mr Lewis Gray (643), Mr & Mrs S Chinn (1281), Mr Ben Freeman of Bancon Developments Ltd (1561).		
<b>Provision of the Development Plan to which the issue relates:</b>	Housing allocation for 20 homes	
<b>Summary of the representation(s):</b>		
<p>Treed area at north east side of site</p> <p>333: Respondent has no objection to the development within the fields but would object to any development within the recreational area to the left and rear of 19 Northcote Crescent.</p> <p>Coalescence/ Green Belt</p> <p>368, 643, 1281: Object to the development of OP64 Craigton Road, Pitfodels because it is green belt and the boundary of the city will be slowly pushed outwards removing one of the key attractions of Aberdeen as a city - its compactness and closeness to the surrounding countryside. Development would lead to coalescence</p> <p>389: The site is situated in the Pitfodels Conservation Area and forms part of the Pitfodels Wedge which is to prevent to coalescence of settlements in Lower Deeside in order to retain the identity of the city and individual suburbs and preserve and enhance the landscape settings of towns.</p> <p>369: Decimation of the greenbelt within this area of Pitfodels and Braeside (e.g. International School, Airyhall House and the latest proposed rest home of Craigton Road.</p> <p>384: Respondents understanding is that this part of OP64 Craigton Road, Pitfodels is designated as Urban Green Space GS34 was advised this was would provide even greater protection.</p> <p>Site name</p> <p>369, 384: The proposal of 20 houses is located on Airyhall Road, yet the reference is Craigton Road, Pitfodels.</p> <p>Traffic/ Access</p> <p>460, 605, 643, 1281: The whole area will suffer from the increased road usage generated from this development. The existing road is not suitable for any more traffic.</p>		

1281: Access would be more appropriate from Craigton Road.

#### Wildlife

643: The area is a haven for all sorts of wildlife and parts are designated as Ancient Woodland.

#### Number of houses

643: Too many houses have been proposed for the site.

#### Original Development Option

1561: Object to the failure of the Local Development Plan to allocate the full, original site at OP64 Craigton Road, Pitfodels as suitable for low density residential development. They accordingly object to the inclusion of the site within the Green Belt and as part of the Green Space Network.

Development at OP64 Craigton Road, Pitfodels would: - a) be effective and readily deliverable b) supplement the housing land supply in a very attractive area, c) not be conspicuous in the wider landscape, and d) facilitate continuing recreational / leisure use of the site, while e) avoid continued under utilisation and dereliction on the urban fringe.

#### **Modifications sought by those submitting representations:**

##### Coalescence/ Green Belt

368: OP64 Craigton Road, Pitfodels should be zoned as Greenbelt (NE2), Green Space Network (NE1) or Urban Green Space (NE3).

369: To maintain the greenbelt and that a road is not built for additional vehicles (Airyhall Road).

384: Respondent does not wish to see any development on this land and definitely not on the part with trees entering onto Northcote Crescent. All of OP64 Craigton Road, Pitfodels should continue as Green Belt or Urban Green Space.

389: Wish to retain the 3 eastward plots of the site as public open space to enhance the amenity, shelter, privacy and bio-diversity of the landscape context. I wish to object vociferously to the artificial diagonal sub-division of the north east plot of land in this holding, immediately adjacent to Northcote Crescent, and would advocate for retention and integrity of this plot as public open space.

643, 1281: Remove site from the Plan.

1281: Reallocation land as Green Belt under policy NE2.

##### Traffic/ Access

460: Reduce the number of houses or make the access onto Craigton Road.

605: Attention should be given to the state of Airyhall Road.

### Number of houses

460: Reduce the number of houses

### Original Development Option

1561: Bancon request the following changes to the Proposed Local Development Plan :

a) That OP64 Craighton Road, Pitfodels is allocated as a low density residential development area with a capacity of 40 homes, and b) That the site is excluded from the strategic Green Belt. c) The extent of green space within the site boundaries shall be determined through the masterplanning process, and could ultimately be identified as Green Space Network following development.

### **Summary of response (including reasons) by planning authority:**

The Aberdeen City and Shire Structure Plan (CD8) sets the requirements for greenfield housing (or employment land) allowances and authorises a review of green belt boundaries in order to accommodate them. A Development Options Assessment (CD13), Strategic Environmental Assessment (CD21), and consultation on the Main Issues Report (Responses to Representations CD15) were used to assess sites. These were used to identify the most suitable locations to deliver the required growth and in accordance with Scottish Planning Policy paragraph 159 (CD3) which requires green belts to direct growth to the most appropriate locations. This process is described in the Green Belt Review (CD19) which also sets and explains the detailed boundaries of the green belt and land release areas.

### Coalescence/ Green Belt

368, 369, 389, 643, 1281: This site emerged as a desirable option because development would provide a stronger and more defensible green belt boundary than that currently proposed. A strong tree lined boundary aids its containment and retains a gap between Airyhall and Cults which in turn helps to maintain their individual identities.

The Green Belt in this area has been re-assessed, Airyhall House and the site of the new care home which was given planning permission last year have now been removed from the Green Belt.

### Treed area to the North East of site

333: This leaves three fields to the western edge of Airyhall which could accommodate 20 homes. The northern field which is heavily treed, therefore its development potential is limited. The two more southern fields could therefore accommodate 20 homes that are proposed for this site.

### Wildlife

643: Keeping development to these fields would protect many mature trees, architectural features, established wildlife and the recreational function of the fields to the west of the site.

### Traffic/ Access

460, 605, 643, 1281: Access can not be taken from Craighton Road due to the proposed

housing located at the south east edge of the site. Building a road to the north of the site to access from Craigton Road would result in the destruction of trees adjacent to the new care home site. However, development at the south east edge of the site now brings the whole development closer to the public transport routes on Airyhall Avenue and the services on Craigton Road reducing the vehicles using the access.

In relation to transport issues, the Council undertook a process known as the Transport Framework at an early stage in the plan preparation process. Alongside the overall Development Options assessment process, this provided a transport based assessment framework against which Development Options were assessed. The results of this work were considered against the overall Development Options process and helped the Council to decide which sites to identify as Preferred Options in the Main Issues Report. The results of the Transport Framework (CD22) were published on the Council's website alongside the Main Issues Report.

The Council has consulted with transport partners and colleagues, including bus operators, to examine the implications of development for the transport network and identify transport infrastructure required to create an efficient, integrated and comprehensive transport network for all travel modes. Strategic transport modelling has been undertaken to test the efficacy of the current transport network and to help determine the likely need for new infrastructure. As a result, the requirements for new roads, walking and cycling infrastructure and public transport have been identified in the Proposed Plan and attributed to eleven Masterplan Zones across the City.

Infrastructure requirements will need to be reflected in any Masterplan or planning application for development. The precise level of infrastructure requirements and developer contributions will need to be agreed with the Council through the Masterplan process and any subsequent planning application.

#### Site Name

369, 384: It has come to our attention through a representation that the site is incorrectly referenced in the Plan. The site is referred to as Craigton Road but if the Reporter is so minded the site should be referred to as Craigton Road/ Airyhall Road in the Aberdeen Local Development Plan.

#### Original Development Option

1561: Any further development to the west - as proposed by the developer - is unsuitable. The site plays an important role in separating the settlements of Aberdeen and Cults. It also contains many mature trees, architectural features and has an established wildlife and recreational function. The original layout failed to respond to the existing site features and uses and did not respond to the most recent Conservation Area appraisal (RD40) (such as the requirement to keep a 50 metre buffer from the road). Therefore, we decided to reduce the capacity to around 20 dwellings. We remain of the opinion that the western part of the original proposed site should remain undeveloped.

In conclusion, the Council supports the development of OP64 Craigton Road, Pitfodells and ultimately the inclusion of this site in the Local Development Plan. We recommend that further development to the west of Airyhall House and the new care home is unsuitable and that this site should remain zoned as green belt and green space

network.

**Reporter's conclusions:**

**Reporter's recommendations:**

<b>Issue (ref and heading):</b>	<b>ALLOCATED SITE: NORTH GARTHDEE FARM OP65 AND PROPOSAL FOR GARTHDEE LINK ROAD</b>	<b>42</b>
<b>Development Plan reference:</b>	OP65, Table 9 and Appendix 2	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
<p>Dr Alastair Govan (45), Mr Dave Thompson (78), Dr Shan Parfitt (79), Mr John Short (97), Mr Stephen Duthie (98), Mr Timothy Wells (99), Mr Peter Littlefield (134), Mrs Elizabeth Russell (154), Mrs Liz Clark (159), Mrs Shirley Butler (164), Mr Colin Morsley (168), Mr Iain Clark (169), Dr Dennis Durno (175), Ms Shirley Butler (177), Mr Alexander Prokhorov of University of Aberdeen (213), Mrs Nicola Stevenson (274), Mrs Margaret Corbett (275), Mr M. C. Leys (277), Ms Anne O'Neill (280), Mrs Mary Hunt (281), Mrs Janet Johnson (302), Mr Andrew Burnett (303), Mr Leslie Thomson (307), Mr Findlay Leask of Caber Coffee Ltd (311), Mrs Audrey Sheal (317), Mr Stephen Sheal (319), Mr Kenneth Reid (320), Mrs Diane Devine (321), Mr Andrew Walker of Laings Bathrooms, Bedrooms, Kitchens (322), Mrs Daphne Maes (325), Mr Ian Roche (330), Mrs Claire Gray (336), Mr Malcolm Merson (349), Mrs Susan Adamson (352), Ms Margaret Reid (361), Mr David Henry (368), Mr Martin Kirkham (377), Mr Ron Sawdon (378), Dr Robert Wright (379), Mrs Lesa Biccocchi (382), Mr Iain Ramsay (389), Mr Andrew Pyle (392), Mr Guus Glass of Cults, Bieldside and Milltimber Community Council (398), Mr William Morrison (405), Mr Moray Stewart (418), Mrs Susan Pyle (421), Mr Stewart Craig (423), Mrs Susan McGinty (440), Dr Alan Knox (443), Dr Eric Davidson (455), Ms Kari Aasen (546), Mr Sanjoy Sen (573), Mr Kenneth Robertson (601), Mrs Clare Harris (679), Mrs Kathleen Burgess (688), Mr Douglas Scott (769), Miss Lorna Nicol (790), Mr Grant Mckinstry (841), Mr Stuart Bale (871), Mr Richard Adams (1210), Mrs Dawne Adams (1211), Mrs Jean Hedges (1425), Mr Michael Hedges (1429), Councillor Marie Boulton (1436), Mrs Irene Inglis (1545), Mrs Catherine Thornhill of Ryden LLP on behalf of Mr Gordon McWilliam (1554).</p>		
<b>Provision of the Development Plan to which the issue relates:</b>	OP65 allocated for 80 homes. No provision in the Proposed Plan for the Garthdee Link Road.	
<b>Summary of the representation(s):</b>		
<p>45, 78, 79, 97, 98, 99, 134, 154, 159, 164, 169, 213, 274, 275, 277, 280, 281, 303, 307, 311, 317, 320, 321, 322, 325, 330, 336, 349, 352, 361, 368, 377, 378, 379, 382, 389, 392, 398, 405, 418, 421, 423, 440, 443, 455, 546, 573, 601, 679, 688, 769, 790, 841, 871, 1210, 1211, 1425, 1429, 1436, There has been no traffic provision in the Local Development Plan for the increased traffic that will be generated by the new housing developments (4000 more dwellings plus businesses) to be built in Lower Deeside and Countesswells.</p> <p>The existing minor roads that link the North Deeside Road with Garthdee are used as rat runs - they are overburdened, narrow, and dangerous to both cars and pedestrians. Roads and traffic calming measures are in a poor state of repair. The narrow roads cannot cope with the amounts of traffic generated by the new development in Aberdeen and Aberdeenshire. The continued and continuing development around Bridge of Dee the retail development there and also RGU campus puts tremendous pressure on a totally inadequate road system currently available.</p> <p>The Aberdeen Western Peripheral Route would do nothing to relieve traffic congestion in</p>		



Aberdeen except in the very short term, and that the extra traffic generated as a result of the Aberdeen Western Peripheral Route would bring congestion back to current levels within a few years.

A new road linking the North Deeside Road with Garthdee is long overdue. OP65 provides the opportunity to do that. The opportunity will be lost if it is developed for housing.

Such a road would significantly reduce traffic volume on the existing narrow, unsafe Pitfodells/Cults rat runs leading to a safer environment for local residents and a increased traffic experience for commuters and local businesses. Space should also be provided for a cycle route.

The Traffic Framework Analysis was too subjective and did not adequately address the justification for a link road and the uncertainty regarding future traffic flows post 2016 developments and Aberdeen Western Peripheral Route. Capital funding issues regarding a link are not relevant to this safeguarding. The Local Development Plan is a long term planning tool, not to capture the currently approved plans.

97, 98, 99, 154, 159, 164, 168, 169, 175, 213, 274, 281, 319, 330, 336, 349, 379, 382, 389, 769, 1210, 1242, Object to the development of houses on this site as it should be used for the development of a link road between North Deeside Road and Garthdee. There is no other available land which would be suitable for a link road.

177 Oppose the housing development on this site. The road is hardly able to accommodate existing traffic let alone more cars generated from new development.

302 I object to further housing in this area without good road provision.

1545 This would lead to the loss of yet more green belt following on from the development at RGU campus. This would not be quite so bad if Aberdeen Council had ever built anything decent but it will be the usual proto-slum-style-council-housing you have been building since the 60s. OP65 is the lowest point in Garthdee and like the flats in Morrison Drive the gardens will be flooded whenever it rains.

1554 The development bid for the site (March 2009); response to the Main Issues Report consultation (October 2009) and the representation to the Proposed Plan have all provided sound justification for the continued allocation of OP65 North Garthdee Farm in the Aberdeen Local Development Plan to accommodate 80 dwelling houses.

The construction of a link road at North Garthdee Farm would require major earthworks on both sides of the Former Deeside Railway Line in order to raise the land to support the bridge over the line the construction of which would be impracticable. The development of a further junction on the North Deeside Road and Inchgarth/ Garthdee Roads would obstruct the flow of traffic along these roads, increasing journey times along both roads. There are many link roads between North Deeside Road and Inchgarth Road at present, a further road would increase the capacity of the network and increase the amount of traffic on the roads, releasing suppressed demand. Thus the development of a link road at this site would result in a poor and unsustainable use of the land.

**Modifications sought by those submitting representations:**

45, 78, 79, 98, 134, 281, 320, 389, 769, 1210, 1211, Delete OP65 and identify the land for a new road linking North Deeside Road to Garthdee Road.

177, 97, 99, 154, 159, 164, 169, 175, 177, 213, 274, 275, 277, 280, 303, 307, 311, 319, 320, 321, 322, 325, 336, 349, 352, 361, 379, 382, 392, 421, 440, 443, 573, 679, 790, 841, 871, 1425, 1429, This site should be used to locate the link road between Garthdee and North Deeside Road. Identify as Land for Transport.

79, Require all developers in Lower Deeside and Countesswells to contribute to the cost of the new road.

79, 168, 398, 688, Require the developer of OP65 to create the opportunity to provide a new link road.

302, 317, 377, 405, 418, 455, 601, 1210, 1242, Identify land for a new link road from North Deeside Road to Garthdee Road.

423 No further housing in this area.

#### **Summary of response (including reasons) by planning authority:**

During the preparation of the Local Development Plan, a Cumulative Transport Appraisal (CD18) was carried out to investigate the infrastructure that is required to support new development across the City. This process included strategic transport modelling to consider the cumulative impact of development in the proposed Aberdeen and Aberdeenshire Local Development Plans and the effect this may have on infrastructure requirements. This has helped to establish the strategic transport interventions required to support future development. A link road at Garthdee did not however, emerge as a strategic transport intervention in this exercise. As a consequent we do not believe that a link road is necessary to alleviate strategic transport issues arising out of the wider proposals for the Deeside and Countesswells area.

The Proposed Plan does not identify all the localised infrastructure, whether new or upgraded, which may also be required. This is likely to be undertaken through future stages of masterplanning, where required, and subsequent planning applications. The site promoters have suggested a roundabout on Garthdee Road which would access the site. The Deeside Line borders the north of the site. A bus stop is 160m away and the RGU campus is close by. These characteristics will help to reduce the car dependence of development at OP65. The steep topography of the area would also need a large amount of engineering and a bridge constructed over the Deeside Line. These factors, together with the fact that this a proposal for only 80 houses makes it extremely unlikely that a link road will be required as a result of this development.

The Cumulative Transport Appraisal (CD18) does not identify a need for the link road as a strategic requirement, either now or in the future timescale associated with this plan. Therefore, there is no requirement to reserve land at OP65 for the road. By contrast, there is a structure plan requirement to identify housing land and the structure plan authorises a review of green belt boundaries in order to accommodate it. A Development Options Appraisal (CD13), Strategic Environmental Assessment (CD21), and consultation on the Main Issues Report (CD14) were used to identify the most suitable locations to deliver the required growth. The Green Belt Review (CD19) looks at precise boundaries. This site emerged as a desirable option as it has relatively few constraints and is well connected in sustainable transport terms. It is adjacent to the existing urban

area and close to public transport routes on Garthdee Road, the Deeside Line and the Robert Gordon University Campus. New development will also be required to consider sustainable travel and connectivity issues and therefore there may be opportunities to improve facilities for pedestrians and cyclists, recognising the facilities that already exist within the wider area. Comments about slum council housing are unfounded. Besides, this would be a private development subject to a planning brief and Local Development Plan policies on design, density and affordable housing. The site is not close to any flood areas and this issue has not been raised by Scottish Environment Protection Agency.

The scale of development on the site itself is unlikely to generate the need for a link road, Therefore there is no need to identify or reserve land for a link road, either on this site or around it. As mentioned above, the site is suitable for housing and the Proposed Plan provisions for this site should remain unchanged.

**Reporter's conclusions:****Reporter's recommendations:**

<b>Issue (ref and heading):</b>	<b>ALLOCATED SITE: CULTS PUMPING STATION OP49</b>	<b>43</b>
<b>Development Plan reference:</b>	OP49 in Appendix 1 and Appendix 2	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Mrs Margaret Cook (516).		
<b>Provision of the Development Plan to which the issue relates:</b>	Allocated brownfield site	
<b>Summary of the representation(s):</b>		
516: With reference to OP54 Cults Pumping Station the respondent wishes no more new building in congested Cults. Save the heart of the village. Think more carefully about people and places.		
<b>Modifications sought by those submitting representations:</b>		
516: Leave Cults alone it is already full of traffic. Please do not spoil the local atmosphere with yet more and more houses. Would you like your area spoilt?		
<b>Summary of response (including reasons) by planning authority:</b>		
516: Sites are required for 7,000 homes on brownfield sites to meet the requirements of the Structure Plan up to 2023 (CD8).		
<p>The site (1/855) was submitted as a response to the Main Issues Report (October 2009) and scored well against the sustainability checklist (CD16). Development on this site would make good use of a redundant building, and it is adjacent to Cults centre, therefore, accessible and close to many services and facilities. Its small scale, of approximately 15 flats, means there are unlikely to be any issues with traffic congestion and any such consideration would be taken into account in any subsequent planning application.</p> <p>Therefore, the Council recommend that this site is suitable for development to help meet the brownfield requirements of the Structure Plan.</p>		
<b>Reporter's conclusions:</b>		
<b>Reporter's recommendations:</b>		

<b>Issue (ref and heading):</b>	<b>ALLOCATED SITE: EARLSWELLS HOUSE OP50</b>	<b>44</b>
<b>Development Plan reference:</b>	OP50 in Table 2 and Appendix 2	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Mr Andrew Miller (44), Mrs Moira Cameron (451), Mrs Elaine Farquharson-Black of Paull and Williamsons LLP on behalf of Mr. And Mrs. Morrice (651), Mr Keith Caldwell (1239), Mrs Kathryn Wade (1495).		
<b>Provision of the Development Plan to which the issue relates:</b>	Housing Allocation for 10 houses	
<b>Summary of the representation(s):</b>		
<p>Green Belt/ Green Space Network/ Landscape</p> <p>44: Object to development on OP50 Earlswells House due to the zoning of Green Space Network. Cannot access the site without destroying the green space. The trees which form part of the site, Green Space Network, are of value as they provide screening and a backdrop to the existing residential development at Earlsark. Development will bring visual and physical coalescence.</p> <p>651: OP50 Earlswells House fails the tests applied to Area G: Deeside in the Green Belt Review as the site sits above the 95metre contour which the Green Belt Review indicates should be maintained as the northern limit to development in order to prevent urban sprawl northwards. Therefore this site should be considered unsuitable for development.</p> <p>451: Releasing this site for development could lead to pressure to release further development sites to the north of Bieldside.</p> <p>1239: This greenbelt land must be protected.</p> <p>1495: The ground in the proposed development is higher than the houses adjacent to it. The new houses would therefore have a view directly into the windows of the existing homes.</p> <p>Legal Rights</p> <p>451: Respondent lives within the site boundary. Both the access and the utility strip are legal rights to which they are entitled and must be safeguarded during any future development of site OP50 Earlswells House.</p> <p>Location to Community Facilities</p> <p>451: While well located in relation to local primary and secondary schools, the site is over 1kilometre away from the nearest shops and bus services on North Deeside Road.</p> <p>Road Safety/ Transport</p> <p>651, 1239, 1495: As the access road to the proposed development is a through crossing for Cults primary and secondary school children development on this site would change</p>		

the safety and character of this area.

The road to the proposed site is in bad condition and can not cope with an increase in traffic.

#### Environmental/ Wildlife Issues

651, 1239, 1495: A development of this scale would have a huge impact on the tranquillity and quality of life in this area. The area and woodland surrounding this site are rich in wildlife, a development of this scale would cause environmental disruption.

#### Planning History

1239, 1495: Planning for this site has previously been rejected what has changed since then. To include it in the Local Development Plan now would be a mistake.

#### Recreation

1495: The footpath along the boundary of the development is used by many walkers to access the neighbouring woods. This will be destroyed by the development.

### **Modifications sought by those submitting representations:**

#### Green Belt/ Green Space Network/ Landscape

44, 651, 1495: Remove OP50 Earlswells House from the plan.

44: Foggieton Woods should be preserved to serve as a divide between Deeside and Countesswells.

1239: A development of this scale should not be permitted.

#### Legal Rights

451: Access and the utility strip to be safeguarded during any future development of site OP50 Earlswells House. Future development of OP50 Earlswells House provide pedestrian throughway from west to east across the site.

### **Summary of response (including reasons) by planning authority:**

OP50 Earlswells House was allocated in the previous Aberdeen Local Plan 2008 (CD12) for 10 homes. It should be noted from the outset that OP50 Earlswells House is identified as a greenfield housing allocation for 10 houses in the 2008 Aberdeen Local Plan (CD12). In this instance, we should draw your attention to paragraph 78 of Circular 1/09 Development Planning (CD4) which states "Scottish Ministers intend the appointed person to, within the bounds of the issues raised in the representations, primarily examine the appropriateness and sufficiency of the content of the proposed plan. . . . . The appointed person should generally not recommend modifications to parts of the plan which have been examined in previous examinations or rolled forward from previous plans, unless circumstances have clearly changed."

We therefore consider that matters on the principle of development on this site have already been addressed through the existing local plan. These include representation on matters such as the loss of green belt, open space, countryside and wildlife habitats and

on transportation matters. Details can be found in the Report of the Public Inquiry (CD11) for the current Local Plan in Issue 100 Earlsells House. The Council recommends that this site is suitable for a small scale residential development of 10 dwellings.

#### Green Belt/ Green Space Network/ Landscape

44, 451, 651, 1239, 1495: The narrow strip of land to the south of the site is designated as Green Space Network. Providing access to the site will have minimal effect on the integrity of the Green Space Network. This strip of woodland would continue to screen and provide a backdrop for existing development. There will also be insignificant effects on the trees and wildlife from the proposed development.

One representation states that the development of Earlsells House would contradict the Green Belt Review (CD19). The Green Belt Review states that in the Deeside area development will be contained within the 90-95 metre contour to the North of the Dee Valley. As stated above this site has been carried forward from the 2008 Local Plan. In the Reporter's Report (2007) (CD11), it states that the development on this site would not be likely to detract from the quality of the landscape setting. The resultant green belt boundary would adjoin the main part of the extensive woodland to the north of Bielside and would be very robust. With a robust green belt this will discourage further development. The Reporter's Report (2007) also states that the low density development would have no significant adverse effect on green belt objectives. We also support the preservation of Foggieton Woods to act as a green wedge between the proposed development at Countesswells and existing development in Deeside. However, we do not see development at Earlsells House as a significant intrusion on this green wedge as it is surrounded by development to the south, east and west.

#### Legal Rights

451: Concerns such as access for vehicles and pedestrians as well as utility strips will be addressed at a later stage of the process when a planning application is submitted to the Council.

#### Location to Community Facilities

451: We note that the site is located in close proximity of the local primary and secondary schools and is 1kilometre walk from public transport and local facilities.

#### Road Safety/ Transport

651, 1239, 1495: We accept that vehicular access from Earlsark Avenue is satisfactory for the scale of proposed development on this site but we are still of the same opinion that the access road would need upgrading. Any planning application or design brief submitted regarding this site will give members of the public further opportunity to comment on the design and layout of the development proposed for this site.

#### Environment/ Wildlife

651, 1239, 1495: There are no wildlife designations on this site. Given the small scale nature of the site and that there are extensive areas of woodland to the north of Cults and Bielside the impact of development on this site is unlikely to have a significant

effect on wildlife and the environment.

#### Planning History

1239: The site was identified in the extant Aberdeen Local Plan

#### Recreation

1495: It is noted that this site has recreational value for the surrounding community. However, we do not feel this is a suitable justification to remove this site from the plan. There is a much more extensive area to the north of the site, occupied by Foggieton Woods, which is easily accessed for recreational purposes.

In conclusion, the Council recommend that this site is suitable for the development of 10 dwellings.

#### **Reporter's conclusions:**

#### **Reporter's recommendations:**



<b>Issue (ref and heading):</b>	<b>ALLOCATED SITE: MALCOLM ROAD OP54</b>	<b>45</b>
<b>Development Plan reference:</b>	OP54, Table 9 and Appendix 2	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
<p>Mrs Margaret Ludgate (4), Professor Graham Devereux (6), Mr Douglas Stewart (17), Mr Robert Burnett on behalf of Norma Burnett (18), Mr Allan Jack (21), Mr Jelte Van Der Veen (26), Mr Erik Stien (160), Mr Steven Smith (252), Mr James Cook (309), Mr Kenneth Flavill (343), Mr Albert Middler (371), Mr Gary Purves of Knight Frank on behalf of Ms J Nairn (439), Mr Henry Duncan (447), Ms Betty Porter (509), Ms Lavina Massie of Culter Community Council (518), Mr Alan Kennedy (558), Mrs Anne Kennedy (560), Mr David S. Mitchell (577), Mr Alistair Lewis (581), Ms Rebecca Duncan (653), Mr Stuart Duncan (655), Mr Stuart Duncan (717), Mr Kenny Clubb of Churchill Homes (775), Mrs Alison Urquhart (805), Mrs Brigitte Matthews (815), Mrs Eleanor Kennedy (830), Mr Richard Bush of Richard Bush Chartered Town Planner on behalf of Mrs Nicola Hutcheon (1205), Mr Allan Chalmers (1209), Mrs Clare Webber (1286), Mr Philip Harris (1409), Mr Donald Coutts of DG Coutts Associates on behalf of Peter Thain and other residents (1430), Mr Alistair Porter (1439), Mr William Moir (1444), Ms Vicky Thain (1559), Mr Ben Freeman of Bancon Developments Ltd (1561).</p>		
<b>Provision of the Development Plan to which the issue relates:</b>	Housing allocation for 71 homes	
<b>Summary of the representation(s):</b>		
<p>Supports local community &amp; services in Peterculter</p> <p>518, 775: Support the development of this site because: - It can be developed in the first phase - Extra families in suitable homes should reverse the fall in the population of our local primary school. - It should encourage retailers and small local businesses into our District Centre. - It will help to sustain the viability and amenity of our community -The developer, in discussions with CCC, have outlined how they will comply with the vision e.g. by *providing affordable housing *include leisure and play areas *ensure there will be no vehicle access from OP 54 on to Bucklerburn Road, *provide a paved path through the trees (mature Scots pine) in lieu of a pavement on Malcolm Road (OP 54).</p> <p>Sustainability</p> <p>1205: Development of this site is contrary to the plan.</p> <p>6, 18, 160, 252, 447, 509, 560, 577, 653, 655, 717, 815, 1209, 1286: Object to the allocation due to access, distance from facilities, school capacity and that the site is designated as Ancient Woodland.</p> <p>21, 509, 653, 655: Expansion of the village is piecemeal and lacks strategy.</p> <p>160, 447, 653, 655, 717: The site steep gradients making it unsuitable for sustainable housing development.</p> <p>252: The housing will be to the west of the WPR which is the logical boundary for expansion.</p>		

371, 509, 1286, 1439: A development of 71 houses would need public transport provision. The present bus routes are nowhere near this area.

439: Object to size of development. Original bid was for 55 houses, and site OP54 should not be allocated for housing in excess of this for the following reasons: Landscape impact, loss of woodland, accessibility. Physical constraints make it unfeasible to develop this site for as many as 71 houses over the next 5 years. There is a need to spread new development to a number of smaller sites around Peterculter in order to provide a choice of location for people to live. Reducing the number of houses on site OP54 to around 55 houses and redistributing the surplus 16 houses to alternative site(s) in Peterculter will also help to minimise the landscape impact of new development and lessen the impact on the road network at Malcolm Road. The land to the north of Peterculter at Culter House Road/Woodend, which was promoted as part of development option 9/26, would be suitable for a small-scale residential development to accommodate around 14-16 houses along with land to be gifted to the local community for sports/recreation use which would be a huge asset to residents of Culter.

447, 717: This site has numerous clear reasons for not being included in the Local Development Plan, with a more suitable alternative site being available in the locality at Peterculter West for the following reasons. Peterculter West provides the opportunity to significantly improve the housing stock of Peterculter through the construction of homes in a genuinely pleasant location with fine views, a southerly aspect and immediate access to healthy amenity - in stark contrast to the Malcolm Road sites. From a sustainability perspective, Peterculter West has short pedestrian access to the village centre and healthy opportunities for pedestrian/cycle access (via the Deeside Way and Riverside Walks).

558: I believe that 71 homes could be accommodated in the Culter area with less detrimental effect on the character and amenity of the area. This could be achieved by smaller developments particularly using brownfield sites.

#### Road Network Insufficient

4, 17, 18, 21, 26, 160, 371, 447, 509, 558, 560, 581, 653, 655, 717, 815, 1286, 1430, 1559, 1561: Object to development. Roads are substandard and not suitable for increased traffic.

309, 805: Support the development of the 71 homes in OP54. However, the additional traffic and access on to a narrow and congested Malcolm Road gives me great concern. I would expect the access to be via a roundabout on Malcolm Road which would also act as a method of slowing down traffic using said road.

#### Environmental Impact

17, 18, 160, 252, 371, 447, 509, 558, 653, 655, 717, 830, 1209, 1286, 1409, 1430, 1439, 1444, 1559: There should be no development on this site. The site has a great environmental value for the area. Development would remove a well used footpath. Woodland should be protected and is a haven for wildlife. Development here would encourage more commuting trips and more cars on an already busy Malcolm Road.

17: About quarter of the plot, the land at Nostra Casa, has recently been cleared and

excavated, leaving an ugly scar, in violation of the greenbelt

21, 26, 160, 1286, 1430: Residential development is unsuitable on this site for the following reasons. The site is woodland and important green belt land. Development would breach the green belt and open up more land for future development.

160: Woodland should be protected for biodiversity and carbon capture reasons.

1286: The visibility of the development from the North Deeside Road, on approach from the west is of concern

#### Lack Of Educational Need

17, 18, 160, 252, 509, 581, 815: It is suggested that extra housing would help to maintain the roll of Culter School, yet there can be no serious risk of its closure in a community of this size.

815, 1286: Cults Academy is full.

#### Sewerage/Drainage

371, 509, 1286, 1559: Question where the sewage capacity is going to come from. It has long been thought the sewer in Malcolm Road is at, or above capacity, especially after the Bucklerburn development in the early 1990's. I may add the soak away from my septic tank is in the development area.

1286: There are significant drainage issues in the area. The land at the site is boggy, considerable amounts of surface water drain away down Buckleburn Road.

#### Archaeological Importance

17: When the plantation was felled about 20 years ago, it was suspected that there might have been a prehistoric settlement at the small stream near its northern edge. A hand axe was found. It was identified by a geologist at Aberdeen University as being a type of rock from near Huntly that was used for tool making. Please advise your archaeologist about this.

#### Alternative Uses

343: Why has this status changed to brownfield when there is a site further up Malcolm Road at the caravan park. Construction will last for 10 years. Site was previously approved for a market garden. 1409: Thought the site had been earmarked for a market garden which never came about.

#### **Modifications sought by those submitting representations:**

Sustainability, Insufficient Road Network, Environmental Impact

4, 6, 17, 18, 21, 26, 252, 447, 577, 581, 653, 655, 717, 1286, 1430, 1559, : This site should not be designated for development it should be rezoned as green belt and green space network.

## Sustainability

160: Reduce the number of new houses proposed for Peterculter. If necessary to review the Scottish government targets for new homes, do so by joint discussion with Aberdeenshire Council as other more appropriate sites may be found within equivalent commuting distance to the City, but in the Shire. Alternatively, other areas closer the city should be preferred.

371, 558, 560, 830: If any development takes place at OP54, it should be reduced to 55 houses at most, as the original plan stated. I would suggest using land north of Peterculter which has been promoted for a small scale development of less than 20 houses at Woodend Farm on Culter House Road. I understand land could be available along with this proposal for a sport and recreation area. This would be a great benefit to the local community. I would suggest using part of the Ardbeck Hill site next to Culter House Road (away from the communications mast sited there) for a small scale development, 20-30 houses. Both of these proposals would need access to Culter House Road which would have to be upgraded to have access to the Aberdeen Western Peripheral Route.

439: Request that the number of houses allocated to site OP54 be reduced to around 55 houses with the surplus 16 houses being allocated elsewhere in Peterculter.

815: Would like to see no new housing development in the Malcolm Road area until the bypass has been built. When the bypass is build new housing can be developed along the bypass or the gap on North Deeside Road between Milltimber and Culter can be filled in.

1205: Delete site and replace with more sustainable site allocations within the Deeside Direction for Growth including land at South Cults.

1209: Housing development would have been better suited to the Hill of Ardbeck. This is nearer to the school and local shops.

## Road Network Insufficient

309: Add a roundabout at the access point to the 71 homes.

1561: Several more suitable alternative sites are available in the locality, including additional land at Peterculter East, Peterculter West , and Hill of Ardbeck. Site OP54 should therefore be omitted from the Local Development Plan, Further, it is submitted that the more deliverable and sustainable alternatives noted above, should be substituted as opportunity sites, and their areas should continue to be designated as Green Belt and Green Space Network.

## Alternative Uses

343: Stick to the plans for a market garden

## Summary of response (including reasons) by planning authority:

Supports Local Community & Services In Peterculter

Peterculter is a well established settlement to the west of Deeside and is a recognised

district centre in the Aberdeen Local Development Plan. The Planning Authority consider that the continued viability and prosperity of Peterculter is an important goal for maintaining Deeside as a whole. The Planning Authority has recognised that in order to promote and protect local facilities, shops and infrastructure present within Peterculter it is desirable and necessary to identify additional sites which are deemed acceptable for residential development and have the potential to enhance the viability of Peterculter both as a population centre and as a district centre.

The Planning Authority consider that this site is a natural extension to the existing community of Peterculter and that accordingly development on the site is appropriate and in accordance with this aim to promote and encourage the existing settlement and district centre at Peterculter.

#### Sustainability

For the avoidance of doubt it would appear that in the submission of responses in relation to this site there has been some confusion as to the number of residential units proposed. This appears to be as a result of the combination of two development options (9/42 Malcolm Road East - 16 units and the other option 9/43 Malcolm Road, Peterculter - 55 units). This site has therefore been identified as a residential opportunity site for a total of 71 units and this is reflected in the proposed plan.

Representations made reference to the distance to local facilities from the site. It is recognised that this site lies out with 800 metres from the district centre of Peterculter. It is, however, considered that a residential development here would provide additional support to the community of Peterculter and to the district centre. It is reasonable to expect that residents of this site would make use of Peterculter and its facilities and contribute towards its sustainability.

Submissions also suggested that this development should not proceed as it would lie to the west of the proposed Western Peripheral Route. This is a matter of fact but Peterculter is unique in that it is the only established settlement on Deeside which would lie out with the Western Peripheral Route. The Planning Authority is committed to maintaining and promoting Peterculter as a viable community and accordingly the identification of an opportunity site out with the Western Peripheral Route but considered a natural extension to Peterculter is deemed appropriate in the circumstances.

The Planning Authority does not consider that the gradient on the site is an insurmountable obstacle or that it should preclude allocation of this site for residential use. The developers have indicated that technical solutions to development on the existing gradients are available and could be dealt with at the planning application stage.

Proposals within the representations make reference to alternative sites at Peterculter East, Peterculter West, the Hill of Ardbeck and West Craigton Farm. The issue of alternative sites in and around Peterculter are dealt with as Issue No 52 and the Reporter will be referred to this issue for comparison purposes. Removing this housing allocation to alternative sites outwit the Peterculter area would not be considered desirable as it would not address the Planning Authority's identified desire to support and promote the existing settlement and district centre at Peterculter.

#### Road Network Insufficient

The Planning Authority note the level of objection to this site based on the assertion that Malcolm Road is sub-standard and not suitable for the increased traffic that any development would facilitate. The Planning Authority is satisfied that the developers have identified an access proposal which would allow access on to Malcolm Road. Further discussions between any developer and the Local Authority Roads Department would be required to address this issue but it is not considered that there are any technical issues which prevent access being taken from Malcolm Road to the proposed site. Perceived deficiencies in Malcolm Road itself for the level of traffic to be generated can also be addressed at the planning application stage are not deemed to preclude designation for residential use.

#### Environmental Impact

The site is designated as Ancient Woodland. Any development would be required to mitigate for any loss to established Woodland and comply with policy NE5 of the Proposed Plan. These issues do not preclude designation as an opportunity site and can be dealt at the planning permission stage.

#### Lack Of Educational Need

The Planning Authority has recognised that there is a substantial excess capacity with regards to places at the local Primary School with a capacity for 144 extra pupils in 2012. There is also a perceived extra capacity at the local Secondary School with a capacity for 134 extra pupils in 2012. It is deemed desirable to identify sites for residential development within the catchment area of these schools. Pupils attending school would not need to cross Malcolm Road.

#### Sewerage/Drainage

There is a recognised concern regarding the main sewer at this location, however, again this is not felt to preclude allocation of this site for residential use. It is a matter which can and would be dealt with at the application stage.

Reference is made to potential drainage problems on the site, however, the Main Issues Report for the site indicated there are no apparent areas of poor drainage or water logging. Drainage, therefore, is not considered a reason to preclude residential development on the site.

#### **Reporter's conclusions:**

#### **Reporter's recommendations:**

<b>Issue (ref and heading):</b>	<b>ALLOCATED SITE: MILLTIMBER PRIMARY SCHOOL OP55</b>	<b>46</b>
<b>Development Plan reference:</b>	OP55 in Appendix 1 and Appendix 2	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Mr Graeme Cawthorne (260), Mr Steve Geddes (327), Mr Daniel Smith (931), Mr John Normanton on behalf of Mr S Keenon (1133), Ms Lorraine Jones of Sport Scotland (1244), Mr James Grant of Fraser and Mulligan Solicitors on behalf of Mrs L. Grant (1543).		
<b>Provision of the Development Plan to which the issue relates:</b>	Brownfield Site	
<b>Summary of the representation(s):</b>		
<p>Urban Green Space/ Playing Field on Site OP55</p> <p>260, 327, 1543: The proposal to make the current playing field at OP55 Milltimber Primary School available for housing development will lose an important area of recreational space in an already relatively dense area of residential housing.</p> <p>1244: The existing school has what appears to be a good sized grass pitch. School pitches have a role for both school and community use and SportScotland would wish to see this pitch being compensated for in the replacement school.</p> <p>Design</p> <p>260: Development at OP55 Milltimber Primary School will have a severe negative impact on the southern aspect of all the houses on the south side of Binghill Park.</p> <p>327: Concerns with density of development and type of housing proposed. Also concerned with the design of houses on Binghill Crescent and if there will be further opportunities to comment on the development of this site.</p> <p>327, 931, 1133: Respondent concerned regarding the height of the proposed development and would expect development to be of the same height of the current development.</p> <p>There are also a number of mature trees in the area so any development would have to remain far enough away to prevent causing damage to the roots and to allow screening from existing residential development.</p> <p>1133: A Development Brief should be produced for this sensitive site as part of the Aberdeen Local Development Plan process and certainly prior to consideration of any planning applications.</p> <p>There is already congestion on Monearn Gardens and adjoining roads particularly the junction of Contlaw Brae and North Deeside Road. A Traffic Impact Analysis should be carried out before consideration of any planning application. Any highway improvements found to be necessary should be implemented before the development is occupied. In particular junction improvements may be required at the junction of Contlaw Brae with</p>		

North Deeside Road where signalling may be necessary.

#### Market Value

260: There will be a significant impact on the market value of these properties if any residential development is allowed to destroy the current playing field site.

#### **Modifications sought by those submitting representations:**

##### Urban Green Space/ Playing Field on Site

260: Development should only be on the current footprint of the existing primary school.

1244: Retention of the site for pitch(es) use; or -As part of the Local Development Plan process, consideration of the loss of the pitch(es) against the criteria outlined in paragraph 156 of the Scottish Planning Policy to assess whether the national policy is satisfied; or -If none of the criteria outlined in paragraph 156 of the Scottish Planning Policy has been met and the site is still to be allocated for redevelopment, acknowledgement in the text referring to the site that there is a pitch(es) and reference to the need for the requirements of the Scottish Planning Policy and revised Policy NE3 - Urban Green Space to be met, and that the process outlined in the Council's Pitch Strategy will be followed.

1543: The grassed area to the east of the school buildings should be redesignated as an urban greenspace.

##### Design

327: No details on the plan have been given so I am in no position to propose changes

1133: Add to the existing text for OP55 Milltimber Primary School that the development should be two storey only, the mature trees to the Southern boundary should be protected and retained, that a Development Brief must be produced before a planning application will be considered and that a Traffic Impact Analysis must be carried out and its findings implemented.

#### **Summary of response (including reasons) by planning authority:**

Sites are required for 7,000 homes on brownfield sites to meet the requirements of the Structure Plan up to 2023 (CD8).

##### Design

260, 327, 931, 1133: Milltimber Primary School site may become available in the future. This is due to the proposed development at Oldfold Farm providing a new school to accommodate the additional pupils generated by the development. However, at this current moment there is no planning application or design brief for the site. Therefore, specific questions regarding the design of the site and traffic management are unable to be answered at this time. There will be, in due course, more opportunities for the public to comment on this site when a planning application or design brief is lodged. At the moment all comments regarding the layout and design of the proposed development have been noted.



**Urban Green Space/ Playing Field on Site**

260, 327, 931, 1133: The grassed area on the site has not been zoned as Urban Greenspace on the Proposals Map due to the small scale of the school playing fields. However, this piece of land is still covered by Policy NE3 - Urban Green Space and will therefore be protected or replaced in accordance with the policy.

**Market Value**

260: The impact of development on property values is not a planning matter.

Therefore, the Council recommend that this site is suitable for development to help meet the Structure Plan targets for brownfield development.

**Reporter's conclusions:****Reporter's recommendations:**

<b>Issue (ref and heading):</b>	<b>ALLOCATED SITE: NORTH LASTS QUARRY OP56</b>	<b>47</b>
<b>Development Plan reference:</b>	OP56 and Appendix 2	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Mr Roger Laird of Archial on behalf of BP North Sea Infrastructure (764), Ms Ruth Ahmed (1289).		
<b>Provision of the Development Plan to which the issue relates:</b>	Site identified for an extension to North Lasts Quarry	
<b>Summary of the representation(s):</b>		
764 The boundary of OP56 is coterminous with the Forties Pipeline route and this should be reflected in the text of the Proposed Plan.		
1289 Do not know what this proposal is for but do not want housing on this site.		
<b>Modifications sought by those submitting representations:</b>		
764 Insert reference under the 'other factors' associated with the OP56 designation (on page 59 of the Proposed Plan) "The site lies within a pipeline notification zone and all development should conform to Policy BI5 Pipelines and Controls of Major Accident Hazards."		
<b>Summary of response (including reasons) by planning authority:</b>		
In respect of respondent 1289, this opportunity site is identified for an extension to North Lasts Quarry. There is no housing proposed here.		
764 The reason for not mentioning the pipeline consultation zone in the opportunity site reference is that the plan should be read as a whole. The pipelines are shown on the proposals map and Policy BI1 Pipelines and Controls of Major Accident Hazards deals with this issue. For reasons of brevity, no such reference was made and we would not normally wish to make one for every potential site affected. However, in this instance, given the nature of the proposal at OP56 (quarrying which could include blasting), representation 764 seems reasonable. Although we do not recommend making any prescribed modifications to the plan, reporters may wish to consider the merits of citing the pipeline consultation zone in the opportunity site reference for OP56 on page 59 of the Proposed Plan.		
<b>Reporter's conclusions:</b>		
<b>Reporter's recommendations:</b>		

<b>Issue (ref and heading):</b>	<b>ALLOCATED SITE: PETERCULTER EAST OP59</b>	<b>48</b>
<b>Development Plan reference:</b>	OP59, Table 9 and Appendix 2	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Mr William House (34), Mr Paul Foster (36), Mrs Susan Foster (37), Mrs Freda Ogston (129), Mr Hugh J. Mackay (130), Mr Gordon Williams (170), Mr Colin Braithwaite (211), Mr Nick James of Land Use Consultants on behalf of Camphill Communities (Aberdeen City and Shire) including Aberdeen Waldorf School (259), Mrs Janice Braithwaite (334), Mrs Ann McKinnell (342), Ms Lavina Massie of Culter Community Council (518), Dr Sohinee Bhattacharya (741), Mr Craig Adams (846), Mr Ben Freeman of Bancon Developments Ltd (1561).		
<b>Provision of the Development Plan to which the issue relates:</b>	Housing Allocation for 25 homes	
<b>Summary of the representation(s):</b>		
<p>Strategy</p> <p>34, 36, 211, 342: OP59 Peterculter East is so small that it hardly satisfies Aberdeen's housing needs. The negative impacts outweigh the positive impacts therefore the site should not be built on.</p> <p>741: OP59 Peterculter East should not be developed because there is no demand for housing in the area as demonstrated by the quiet housing market</p> <p>Loss of Amenity/ Coalescence</p> <p>34, 36, 37, 120, 211, 334, 741, 846: Development at OP59 Peterculter East would make a significant impact on the loss of amenity and village character. Development would result in the removal of one of the few remaining buffer areas between Milltimber and Peterculter which are essential to prevent continuation of the ribbon development along the North Deeside Road which the Aberdeen Western Peripheral Route will make worse. Development on this site will encourage further development in the area.</p> <p>130: Development is not appropriate to the sustainable and phased natural development of Peterculter.</p> <p>Traffic/ Access</p> <p>34, 129, 170, 211, 259, 334, 741: Development would add to the traffic congestion problem that currently exist in Peterculter. Access will be almost impossible and dangerous</p> <p>129, 342, 741: Concerns regarding access. Pittengullies Brae is very narrow, steep and busy. A roundabout or traffic lights would need to be provided to avoid too much delay at the junction with North Deeside Road.</p> <p>Wildlife</p>		

170, 211, 334: Wildlife will be disturbed by this development.

#### Construction Noise/ Disruption

259: There are likely to be short term impacts in terms of noise and disruption during construction. Development at OP59 Peterculter East could have visual and noise impacts on the Camphill Estate.

#### Gradient

342, 846: OP59 Peterculter East is steep which will make development difficult.

#### Built heritage

846: Concerned that development will negatively impact a stone wall running through the site.

#### Supporting development

518: Support the development of OP59 Peterculter East because it can be developed in the first phase, extra families in suitable homes should reverse the fall in the population of our local primary school, should encourage retailers and small local businesses into our District Centre, will help to sustain the viability and amenity of our community and provide affordable housing.

1561: Site is capable of supporting a greater number of houses than the 25 allocated as well as a business park

### **Modifications sought by those submitting representations:**

#### Strategy

34: OP59 Peterculter East should be limited to 4 homes at a maximum.

130: Move housing numbers to West Craigton Farm.

#### Loss of Amenity/ Coalescence

36, 37, 130, 170, 211, 334, 741, 846: OP59 Peterculter East should not be developed on. Site should be rezoned as Green Belt.

36: OP59 Peterculter East is more suited as a community area to compliment the Culter in Bloom and Plant-a-tree initiatives.

259: Consultation with Camphill Communities during the process of Masterplanning the development to ensure that issues affecting children with special needs are identified and addressed at an early stage. Inclusion of structure planting along the southern side of the development site to enhance the screening between the site and Camphill.

#### Traffic/ Access

34, 259: Any expansion of residential developments needs to be accompanied by a completed plan to accommodate the additional traffic. Development should not be

considered until completion of the Aberdeen Western Peripheral Route. 20 miles per hour speed limit or Home Zone principles for Pittengullies Brae.

741: Develop North Deeside Road either by increasing the lanes of traffic or by making an alternative route before further housing is contemplated in the area.

#### Supporting Development

1561: Expand OP59 Peterculter East to allow 71 houses on the three sites shown on the appended indicative plan, including a contribution to affordable housing that is shown as almost 30%, in addition to the provision of a high quality modern business campus and road providing access to Milltimber Brae. Additional land identified should be removed from the Green Belt /Green Space Network. Riverside Parkland and community opportunity are included in the proposal.

### Summary of response (including reasons) by planning authority:

#### Strategy

34, 36, 211, 342, 741: The Aberdeen City and Shire Structure Plan (CD8) sets the requirements for greenfield housing (or employment land) allowances and authorises a review of green belt boundaries in order to accommodate them. A Development Options Assessment (CD13), Strategic Environmental Assessment (CD21), and consultation on the Main Issues Report (Responses to Representations CD15) were used to assess sites. These were used to identify the most suitable locations to deliver the required growth and in accordance with Scottish Planning Policy paragraph 159 (CD3) which requires green belts to direct growth to the most appropriate locations. This process is described in the Green Belt Review (CD19) which also sets and explains the detailed boundaries of the green belt and land release areas.

The Council does not support the comment suggesting moving the proposed housing numbers from OP59 Peterculter East to West Craigton Farm. This site is undesirable for development. The site is not well related to existing development and all community facilities are beyond 800 meters, including the bus stop. The site has further issues with accessibility as there is only 1 core path/cycle route within 800 metres of the site which connects to Peterculter. There are no employment opportunities within a 30 minute bus and/or walk route therefore travel to employment would mostly likely be by private motor car. The Special Area of Conservation is immediately to the west of the site, along with Tree Preservation Orders 81 and the Culter Burn District Wildlife Site. The site is very visible from the South Deeside Road and would impact significantly on the landscape due to its isolation from the main settlement of Peterculter.

#### Loss of Amenity/ Coalescence

34, 36, 37, 120, 130, 211, 334, 741, 846: OP59 Peterculter East emerged as a desirable option because the site is well contained by the Deeside Line to the south and woodland to the east which could provide strong green belt boundaries. This in turn will discourage further ribbon development along North Deeside Road. We agree that it is important to retain the trees surrounding this site. These are important landscape features which provide a distinct boundary to the site and retention will help maintain biodiversity.

The public, including the Camphill Community will have further opportunities to comment on the design of the site and issues such as screening and traffic management when a

design brief or planning application is lodged by the developer. Therefore these issues can be addressed at that stage of the planning process.

#### Traffic/ Access

34, 129, 170, 211, 259, 334, 342, 741: It is acknowledged that access from Pittengullies Brae is difficult and the developer has suggested an additional access point directly onto the A93. The site is located within walking distance to Peterculter District Centre and the site is next to a bus stop and cycle route which will encourage more sustainable modes of transport. Any planning application lodged regarding the development of this site will need to demonstrate how traffic will be managed in and around the site.

In relation to transport issues, the Council undertook a process known as the Transport Framework at an early stage in the plan preparation process. Alongside the overall Development Options assessment process, this provided a transport based assessment framework against which Development Options were assessed. The results of this work were considered against the overall Development Options process and helped the Council to decide which sites to identify as Preferred Options in the Main Issues Report. The results of the Transport Framework (CD22) were published on the Council's website alongside the Main Issues Report.

The Council has consulted with transport partners and colleagues, including bus operators, to examine the implications of development for the transport network and identify transport infrastructure required to create an efficient, integrated and comprehensive transport network for all travel modes. Strategic transport modelling has been undertaken to test the efficacy of the current transport network and to help determine the likely need for new infrastructure. As a result, the requirements for new roads, walking and cycling infrastructure and public transport have been identified in the Proposed Plan and attributed to eleven Masterplan Zones across the City.

Infrastructure requirements will need to be reflected in any Masterplan or planning application for development. The precise level of infrastructure requirements and developer contributions will need to be agreed with the Council through the Masterplan process and any subsequent planning application.

North Deeside Road is constrained on both the northern and southern edge so therefore cannot be widened to allow extra lanes of traffic.

#### Wildlife

170, 211, 334: We agree that it is important to retain the trees surrounding this site to help maintain biodiversity and to minimise the landscape impact from development. It is agreed that any bats or owls nesting in the eastern trees should be protected. A survey accompanying any planning application should identify these and any mitigation measures which are required to be put in place for their protection.

#### Construction

259: Construction noise is inevitable when building houses, however, conditions attached to the planning consents will control hours of working.

**Gradient**

342, 846: We acknowledge that the site is steep in some places. However, we feel that the benefits from this site such as proximity to public transport, proximity to local services and south facing aspect outweigh this disadvantage.

**Built Heritage**

846: With regards to the wall within this field this issue will be addressed in a planning application.

**Supporting Development**

518, 1561: We are still of the same opinion that the site referenced as OP59 Peterculter East in the Proposed Plan is the only suitable area for development in the original Peterculter East submission. Other sites proposed by the developer during the planning process for further residential development and a business park are undesirable. These sites lie south of the North Deeside Line which forms a logical and well defined green belt boundary between Peterculter to the north and the more open valley floor to the south. These fields also form part of the River Dee Valley which help to maintain the landscape setting of the Deeside communities and the wider setting of Aberdeen.

In conclusion, the Council still supports the development of this site and ultimately the inclusion of this site in the Local Development Plan.

**Reporter's conclusions:****Reporter's recommendations:**

<b>Issue (ref and heading):</b>	<b>ALLOCATED SITE: MID ANGUSTON, PETERCULTER OP133</b>	<b>49</b>
<b>Development Plan reference:</b>	OP133, Table 9 and Appendix 2	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Mrs Alison Olsen (30), Mr Hugh J. Mackay (130), Mr George McClive (234), Mr Henry Duncan (447), Ms Lavina Massie of Culter Community Council (518), Mr Ian Cocker (548), Mr Kenny Clubb of Churchill Homes (775), Mr Damien Holdstock of Entec UK Ltd on behalf of National Grid (891), Mr Richard Bush of Richard Bush Chartered Town Planner on behalf of Mrs Nicola Hutcheon (1205), Ms Ruth Ahmed (1289), Mr Ben Freeman of Bancon Developments Ltd (1561).		
<b>Provision of the Development Plan to which the issue relates:</b>	Housing allocation for 9 homes	
<b>Summary of the representation(s):</b>		
<p>Supports Local Community &amp; Services In Peterculter</p> <p>518, 548, 775: Support the allocation as site is deliverable at an early stage, extra families will support schools and services in Peterculter and the development of the site will remove hazardous chicken sheds.</p> <p>Sustainability</p> <p>30, 130, 447, 1205, 1289, 1561: Object to development due to the unsustainable location and the lack of public transport opportunities.</p> <p>Impact On Amenity Of Existing Homes</p> <p>234: Concern that the indicative layout would impact the amenity of existing homes</p> <p>Proximity Of A Pipeline</p> <p>891: The proximity of a pipeline should be noted.</p> <p>Landscape Issues And Impact On District Wildlife Site</p> <p>1561: Object to development due to landscape concerns and impact on a District Wildlife Site.</p>		
<b>Modifications sought by those submitting representations:</b>		
<p>Sustainability</p> <p>30, 130, 447, 1205, 1289, 1561: Site should not be considered for development and rezoned as Green Belt. 130: Move housing numbers from Mid Anguston to West Craigton Farm.</p> <p>1205: Move housing numbers from Mid Anguston to a more sustainable site allocations within Deeside including land at South Cults.</p>		



#### Impact on amenity of existing homes

234: The exit from Plot 4 should be made to the west onto a communal exit from Plots 5,6,7 and 8. This would solve the problem without major changes to the overall site plan.

#### Proximity of a pipeline

891: Should development happen the developers should be made aware of the pipelines located nearby.

#### Landscape issues and impact on district wildlife site

1561: Move housing numbers to a more suitable site such as Peterculter East, Peterculter West and Hill of Ardbeck.

### **Summary of response (including reasons) by planning authority:**

#### Supports local community & services in Peterculter

Peterculter is a well established settlement to the west of Deeside and is a recognised district centre in the Aberdeen Local Development Plan. The Planning Authority considers that the continued viability and prosperity of Peterculter is an important goal for maintaining Deeside as a whole. The Planning Authority has recognised that in order to promote and protect local facilities, shops and infrastructure present within Peterculter it is desirable and necessary to identify additional sites which are deemed acceptable for residential development and have the potential to enhance the viability of Peterculter both as a population centre and as a district centre. The Planning Authority has recognised that there is a substantial excess capacity with regards to places at the local Primary School with a capacity for 144 extra pupils in 2012. There is also a perceived extra capacity at the local Secondary School with a capacity for 134 extra pupils in 2012. It is deemed desirable to identify sites for residential development within the catchment area of these schools.

This site is considered to offer a specific opportunity for the provision of a limited number of large residential units while providing the opportunity to be considered as living within a countryside environment. The provision of a limited number of executive type homes at this site is considered by the Planning Authority to contribute towards a variety and range of housing types which can be brought forward as potential residential development in the Deeside area and in particular within the locale of Peterculter.

Accordingly the Planning Authority maintains that the allocation of this site for the residential development of 8 houses as part of Phase 1 is appropriate and should be maintained.

Proposals within the representations make reference to alternative sites at Peterculter East, Peterculter West, the Hill of Ardbeck and West Craigton Farm. The issue of alternative sites in and around Peterculter are dealt with as Issue No 52 and the Reporter will be referred to this issue for comparison purposes. Removing this housing allocation to alternative sites out with the Peterculter area would not be considered desirable as it would not address the Planning Authority's identified desire to support and promote the existing settlement and district centre at Peterculter.

### Sustainability

It is conceded that the location of this opportunity site is out with the settlement of Peterculter and that it has poor accessibility to the major road network or to public transport facilities. As such residents can be expected to primarily make use of private motor vehicles for entry to the site. It is considered, however, that given the restricted number of units proposed for the site that the impact on sustainability is acceptable. It should be noted that as there is an existing settlement at Mid Anguston, Peterculter, the location is already well serviced, the roads are adopted, street lighting is already provided and refuse collections are made to the existing dwellings. With regards to access and travel to and from the local Primary School the school bus already calls at Mid Anguston and accordingly additional school traffic would be expected to be limited.

The access road to the site is deemed adequate for the level of additional traffic which will be generated by the number of residential units proposed and is therefore not considered sufficient to preclude development on this site. If, however, improvements to the access road were deemed necessary these could be dealt with at the stage of planning permission.

### Impact on amenity of existing homes

Concerns raised regarding the indicative layout any potential impact on the amenity of existing homes could be dealt with at the planning stage and are not deemed to be significant.

### Proximity of a pipeline

The proximity of a pipeline to the proposed site is well known. Again it is felt not to preclude residential development on this site.

### Landscape issues and impact on district wildlife site

Concerns raised regarding a potential impact on the district wildlife site located at the extreme west of the proposed site have been made. The district wildlife site in question is a pond and the settlement boundary does not impinge upon the district wildlife site. It is not considered that the proposal would have any significant adverse impact on the district wildlife site and any concerns in this regard could be dealt with as part of the planning application procedure for any future development on the site.

The current condition of the site is considered undesirable and the removal of chicken sheds which are deemed hazardous would be seen as a positive outcome from the designation of this site for residential development.

### Reporter's conclusions:

### Reporter's recommendations:

<b>Issue (ref and heading):</b>	<b>ALLOCATED SITE: PETERCULTER BURN OP134</b>	<b>50</b>
<b>Development Plan reference:</b>	OP134, Table 9 and Appendix 2	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Mr Hugh J. Mackay (130), Mr Robin Matthew of PPCA Ltd on behalf of CALA Homes (East) Ltd (364), Ms Nicola Abrams of Scottish Environmental Protection Agency (408), Mr Derek Mouat (514), Ms Lavina Massie of Culter Community Council (518), Mr I Porter (532), Mrs Clare Danielan (561), Mr David S. Mitchell (577), Ms Maire Daly of Scottish Natural Heritage (662), Ms Karen Fyfe (910), Mr Richard Bush of Richard Bush Chartered Town Planner on behalf of Mrs Nicola Hutcheon (1205), Ms Lorraine Jones of Sport Scotland (1244), Mr Fraser Gordon (1274), Ms Ruth Ahmed (1289), Mr Donald Coutts of DG Coutts Associates on behalf of Peter Thain and other residents (1430), Ms Vicky Thain (1559), Mr Ben Freeman of Bancon Developments Ltd (1561).		
<b>Provision of the Development Plan to which the issue relates:</b>	Housing allocation for 19 homes	
<b>Summary of the representation(s):</b>		
<p>Supports local community &amp; services in Peterculter</p> <p>518: Support the allocation as site is deliverable at an early stage, extra families will support schools and services in Peterculter.</p> <p>514: No objection to development as proposed.</p> <p>1274: Supports the development and provides supporting information to address potential issues with the site.</p> <p><b>SUSTAINABILITY</b></p> <p>130: Object to this site as it is not appropriate to the sustainable and phased natural development of Peterculter.</p> <p>1205: Objects to site as it clearly breaches the spatial strategy and no planning reasons were given for it's inclusion. The site is distant from Aberdeen City Centre, liable to flooding and intrusive in the landscape.</p> <p>1561: Object to site as inappropriate for development, and will bring little benefit to the town. Sites must be accessed from Malcolm Road, which is narrow, has a poor alignment and an awkward junction with the A93.</p> <p>Flood risks</p> <p>364: Site is not deliverable due to access not being in control of the landowner and is within the flood plain of Culter Burn.</p> <p>408: Object to this site unless the issue of flood risk is highlighted in the text as being a potential constraint for the site, as required by Scottish Planning Policy.</p>		

Environmental issues, impact on District Wildlife Site, TPO and SAC

532: Concerns over the possible contamination from previous landfill on the site, visual impact of the development and increased traffic on Malcolm Road.

561: Concern that the aims of the developer to provide an eco development cannot be enforced and existing access to open space will be lost.

577, 662, 1430: Object to development on this site due to environmental issues around the District Wildlife Site, TPO area and River Dee SAC, contamination, flooding, ground stability and landscape fit.

910: Objects to development because of impact on wildlife, loss of open space and increased traffic.

Impact on provision of sports pitches and playing fields

1244: Sports Scotland raises concerns re the impact on the provision of Sports Pitches and Playing Fields

#### **Modifications sought by those submitting representations:**

Supports local community & services in Peterculter

514: That the proposal for development at Peterculter Burn - OP134 is altered to state that the housing development is limited to a maximum of 19 homes and that the location of these remain as detailed by the current publicly available information published by 'Peterculter Burn Development'.

1274: Site should remain in Plan.

Sustainability

130: Rezone OP134 as Green Belt and move housing numbers to West Craigton Farm

1205: Delete site and replace with more sustainable site allocations within the Deeside Direction for Growth corridor including land at South Cults.

Flood risks

364: The site should not be allocated for residential development and the proposed allocation be redirected back to Friarsfield, Cults

408: Insert the following text in the 'other factors' section of each of the allocation summaries as set out in Appendix 2.

"This site may be at risk if flooding. A flood risk assessment will be required to accompany any future development proposals for this site."

Environmental issues, impact on District Wildlife Site, TPO and SAC

561: Want to see the eco aims of the development to be made a condition of the

planning application being granted and serious penalties written in if this is not achieved.

As a courtesy, would like the developer to be proactive in personally keeping the residents of Crombie Circle and Cornyhaugh Road regularly updated with their intentions.

Want to see clear evidence on the plan of a walking access route round the football fields (CBC and Crombie Park), linking up with the Shoddy and it to be guaranteed that there will be this access as part of the development.

577, 1289: Remove site from the Plan.

662: Remove the allocation from the plan or 2) Include an additional bullet point under table 9 page 17 of Proposed Plan stating the following: "OP134 requires a Planning Brief that sets out: a) specific measures needed to avoid damage to, and enhance the District Wildlife site, b) a requirement that any proposal will need the agreement of a construction method statement that will avoid adverse effects on the qualifying interests of the River Dee SAC (Atlantic Salmon, Freshwater Pearl Mussel and Otter)

and

2) Incorporate additional information in Appendix 2 (page 60 OP134 "Other factors") as follows: "Planning permission will include provisions requiring enhancement and management of the District Wildlife Site and Green Network and a requirement for a construction method statement that will avoid adverse effects on the qualifying interests of the River Dee SAC (Atlantic Salmon, Freshwater Pearl Mussel and Otter)"

910: Reconsider development on this site.

1559: Remove site from Plan and rezone as green belt.

Impact on provision of sports pitches and playing fields

1244: Seek Confirmation as to whether this planning permission has been implemented and if it has either 1) Retention of the site for pitch(es) use or 2) As part of the Local Development Plan process, consideration of the loss of the pitch(es) against the criteria outlined in para 156 of the Scottish Planning Policy to assess whether the national policy is satisfied or 3) If none of the criteria outlined in para 156 of the Scottish Planning Policy has been met and the site is still to be allocated for redevelopment, acknowledgement in the text referring to the site that there is a pitch(es) and reference to the need for the requirements of the Scottish Planning Policy and revised Policy NE3 to be met, and that the process outlined in the Council's Pitch Strategy will be followed.

#### **Summary of response (including reasons) by planning authority:**

Supports local community & services in Peterculter

Peterculter is a well established settlement to the west of Deeside and is a recognised district centre in the Aberdeen Local Development Plan. The Planning Authority considers that the continued viability and prosperity of Peterculter is an important goal for maintaining Deeside as a whole. The Planning Authority has recognised that in order to promote and protect local facilities, shops and infrastructure present within Peterculter it is desirable and necessary to identify additional sites which are deemed acceptable for

residential development and have the potential to enhance the viability of Peterculter both as a population centre and as a district centre. The Planning Authority has recognised that there is a substantial excess capacity with regards to places at the local Primary School with a capacity for 144 extra pupils in 2012. There is also a perceived extra capacity at the local Secondary School with a capacity for 134 extra pupils in 2012. It is deemed desirable to identify sites for residential development within the catchment area of these schools.

Proposals within the representations make reference to alternative sites at Peterculter East, Peterculter West, the Hill of Ardbeck and West Craigton Farm. The issue of alternative sites in and around Peterculter are dealt with as Issue No 52 and the Reporter will be referred to this issue for comparison purposes. Removing this housing allocation to alternative sites out with the Peterculter area would not be considered desirable as it would not address the Planning Authority's identified desire to support and promote the existing settlement and district centre at Peterculter.

### Sustainability

With regards to access to the site there are alternative routes which would allow access onto Malcolm Road. The Planning Authority's preference would be for access to be taken through Cornyhaugh Road which is considered safer and favoured over the originally marked access proposed via The Shoddy. It is considered that any concerns regarding access could be dealt with at the planning permission stage and that accordingly access does not preclude allocation of this site for residential development. The Planning Authority would submit that this site should remain identified as an opportunity site suitable for residential development for 19 units as part of Phase 1.

### Flood risks

A number of objections raised the issue that the site is subject to flood risks. It has been submitted that in accordance with the submission of Scottish Environment Protection Agency that the issue of flooding is not sufficient to preclude this site for residential development and the recommendation of Scottish Environment Protection Agency is that the following text be entered under the "Other Factors" section of the allocation summary for the site set out in Appendix 2 of the Local Plan.

"This site may be at risk of flooding. A Flood Risk Assessment will be required to accompany any future development proposals for this site".

The issue of flooding is not considered a reason to preclude this site from allocation for residential development. Although the Planning Authority do not recommend making any prescribed modifications to the plan, the reporters may wish to consider the merits of these proposed issues.

### Environmental issues, impact on District Wildlife Site, TPO and SAC

The majority of representations indicating an opposition to the allocation of this site raise concerns in relation to environmental issues surrounding the existing district wildlife site, Tree Preservation Orders on site and the proximity of the River Dee special area of conservation. These issues have been addressed by Scottish National Heritage in their response (662). The Planning Authority does not accept that these issues merit removal of the allocation from the Plan. The alternative suggested by Scottish National Heritage

requiring an additional bullet point under Table 9 Page 17 of the Proposed Plan stating:

"OP134 requires a planning brief that sets out: (a) Specific measures needed to avoid damage to and enhance the district wildlife site

(b) A requirement that any proposal will need the agreement of a Construction Method Statement that will avoid adverse effects on the qualified interests of the River Dee Sac (Atlantic salmon, freshwater pearl mussel and otter)".

In addition SNH propose that additional information be incorporated in Appendix 2 (Page 60 OP134 "Other Factors") as follows:

"Planning permission will include provisions requiring enhancement and management of the district wildlife site and green network and the requirement for a Construction Method Statement that will avoid adverse effects on the qualifying interests of the River Dee Sac (Atlantic salmon, freshwater pearl mussel and otter)".

Although the Planning Authority do not recommend making any prescribed modifications to the plan, if the Reporter is so minded, they may wish to consider the merits of these suggested modifications.

Issues in relation to contamination can be dealt with by remediation in line with development of a brownfield site. The issue of adequate remediation to deal with any identified contamination issues at the site is an issue which could be dealt with at the stage of planning permission and is not deemed by the Planning Authority to preclude the allocation of this site for residential development.

The Planning Authority consider that the environmental consideration shown in the preparation of the proposed development show a great deal of merit and a suitably designed development on this site would address the Planning Authority's desire to promote and enhance Peterculter whilst dealing sympathetically with the concerns in relation to the environment, SAC, district wildlife and Tree Preservation Orders present. It is therefore considered that the site should remain as allocated (with or without the amendments suggested by SNH and Scottish Environment Protection Agency as the Reporters deem appropriate).

Impact on provision of sports pitches and playing fields

Sports Scotland submitted comments regarding the potential loss/ provision of playing fields or pitches. Currently there are no such fields or pitches within the site boundary. There is a single extant planning approval to convert an existing tip site to a playing field. The Planning Authority understands that the owner intends to lease the land to Culter Youth Football Club to implement this approval and that work may have started on site. Without prejudice to this the developer proposing to develop the opportunity site for residential use has indicated in his own representation (1274) that land out with the proposed opportunity site has already been released to Culter Youth Football Club to increase their pitch size. In addition they have agreed to provide £275,000 to the club for new changing facilities, car parking and further upgrades if planning permission is awarded for development. A letter of support from the club is included with the representation. It would appear that the proposed site designation would have no adverse impact on existing facilities and has the potential to provide additional benefits to local youth sport should development proceed.

<b>Reporter's conclusions:</b>
<b>Reporter's recommendations:</b>



<b>Issue (ref and heading):</b>	<b>ALTERNATIVE SITE: LOIRSBANK ROAD</b>	<b>51</b>
<b>Development Plan reference:</b>	Table 2 on page 7	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Ms Natasha Douglas of Ryden LLP on behalf of Forbes Homes (633).		
<b>Provision of the Development Plan to which the issue relates:</b>	No provision in the Proposed Plan. Site zoned as green belt.	
<b>Summary of the representation(s):</b>		
<p>633 Objection is made to the City Wide Proposals Map, Table 2 Housing Sites Allocated in the 2008 Local Plan which rezones Loirsbank Road to greenbelt; and Table 9 Development at Deeside all of which fail to identify Land at Loirsbank Road as a residential allocation of 10 units carried forward from the Aberdeen Local Plan (ALP). It is requested that both the City Wide Proposals Map, Table 2 Housing Sites Allocated in the 2008 Aberdeen Local Plan and Table 9 Development at Deeside are amended to include land at Loirsbank Road for housing, removing it from the greenbelt (NE2) and green space network (NE1).</p> <p>The Main Issues Report (MIR) identifies Loirsbank Road in the proposals map for area G Deeside (page 21) as a site allocated in the Aberdeen Local Plan, and states that it should be carried forward into the proposed Development Plan. This course of action has been taken for all existing ALP allocations. Planning officers contend that any issues raised by the allocation of these sites were addressed at the time of the Public Inquiry into the extant plan and as such there is no need to readdress.</p> <p>Contrary to officer recommendation Loirsbank Road was removed from the proposed Plan at the full Council meeting on the 18th August 2010, where a decision was made by the Committee to rezone Loirsbank Road to greenbelt (NE2) and green space network (NE1). The reason for this decision was the perception that development in this location would be an eyesore and concerns of flooding.</p> <p>Planning application reference P101384 was submitted on the 27th August 2010 for the proposed development of 8 units of housing to the north of the site (please refer to figure 1 below). The application was approved at committee subject to conditions on the 28th October 2010.</p>		
<b>Modifications sought by those submitting representations:</b>		
<p>633 Loirsbank Road should be reallocated within the proposed Plan as a residential area (H1 on the proposals map); should be included within Table 2 Housing Sites Allocated in the 2008 Aberdeen Local Plan; and Table 9 Development at Deeside. This will ensure that the proposed Plan is compliant with the extant Plan and will reinstate a degree of confidence to the development industry.</p> <p>The site should also be removed from Green Belt and Green Space Network.</p>		
<b>Summary of response (including reasons) by planning authority:</b>		
<p>633 Loirsbank first emerged as a bid site for the 2008 Aberdeen Local Plan and was considered under issue 108 Inchgarth in the Report into the Public Local Inquiry (CD11). The Reporters recommended that the site should remain as green belt. However, the</p>		

Council modified the plan to include the site as an allocation of 10 houses. Subsequently the Council decided to remove the site from the Proposed Plan where the site is zoned as green belt.

The Reporters considered that in the wider context, housing on the site would be seen as a minor addition to the built up area, would not affect the setting of the city and would have no implications for coalescence. In this context, the granting of planning permission for 8 houses on this site in October 2010 would not have a significant effect on green belt objectives. However, the Reporters concluded that the green belt boundary along Loirsbank Road is clearly and satisfactorily defined but the same could not be said about a green belt boundary that followed the south side of the Loirsbank Road site. Scottish Planning Policy paragraph 162 (CD3) states that green belt boundaries should be clearly identifiable on the ground using strong visual features such as roads. Loirsbank Road is a stronger boundary than that which would be presented by the rear boundaries of houses there. There are numerous residential properties in the green belt. Because these houses are unlikely to have a significant impact, it is considered that the green belt boundary should remain clearly defined as it is. Because the Local Development Plan provisions would not override the granting of planning permission, this would not affect the ability of the developers to build their houses within the timeframe of the planning consent.

**Reporter's conclusions:****Reporter's recommendations:**

<b>Issue (ref and heading):</b>	<b>ALTERNATIVE SITES PETERCULTER</b>	<b>52</b>
<b>Development Plan reference:</b>	None	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
<p>Mr Andrew J. Mitchell (50), Mr Hugh J. Mackay (130), Mr Gary Purves of Knight Frank on behalf of Ms J Nairn (439), Mr Doug Cruickshank of Bon Accord Cricket Club (441), Miss Ilka Wolff (456), Mr Aliabbas Malik (461), Mr Charles Marshall (463), Mr Mohammad Malik (467), Mr S Stephen (469), Mr D Cruickshank (470), Mr M Ahmed (471), Sir/Madam M. Tauoeel Malik (473), Mr Rob Swiergon (476), Sir/Madam Richard Johnson (477), Sir/Madam D Jones (483), Sir/Madam Ishiaq Shah (485), Sir/Madam (487), Sir/Madam S Dow (488), Mr Derek Napier (490), Sir/Madam I F Takhar (491), Sir/Madam Awan Malik (492), Mr David S McDonald (493), Mr Thomas Bashyam of Knight Riders Cricket Club (494), Sir/Madam Vailbhav Bode (495), Sir/Madam Syed R Haider (496), Sir/Madam Vishnu Rajkumat (497), Sir/Madam Praveen Gundra (498), Sir/Madam J N Archibald (499), Sir/Madam J M Stephen (500), Sir/Madam M Bharaly of Knight Riders Cricket Club (501), Mr Richard Gravensiede (502), Sir/Madam Himanshu Saraswat (503), Mr Chris Bugg (504), Mr Grant Cordiner (505), Mr Naseer Malik (506), Sir/Madam J S M Morrison (507), Ms Lavina Massie of Culter Community Council (518), Mr Scott Leitch of Halliday Fraser Munro Planning on behalf of The Shivas Trust, D. Gray and Others (767), Mr Scott Leitch of Halliday Fraser Munro Planning on behalf of The Property Booth (778), Miss Shelley Thomson of Stewart Milne Homes (1464), Miss Jane Fox of Fox Planning Consultancy on behalf of Mr Stuart Duncan (1555), Mr Ben Freeman of Bancon Developments Ltd (1561).</p>		
<b>Provision of the Development Plan to which the issue relates:</b>	Alternative sites on Green Belt around Peterculter	
<b>Summary of the representation(s):</b>		
<p>General Strategy</p> <p>518: Could support any additional proposals which: -would deliver only a small number of houses (approximately 10 - 20, say) -especially if they included affordable housing and/or some planning gain -they did not infringe any of the policies set to 'protect and enhance the natural environment' (Policies NE 1 - 10)</p> <p>Disappointed that a small Business Park had not been proposed for Peterculter. The members would not oppose one if a suitable and agreeable site was proposed adjacent to the urban part of Peterculter. This would contribute to the sustainability of our community and compensate for the loss of business sites to housing over the past decade and more.</p> <p>9/30 Denmill</p> <p>50: Object to the Plan due to site 9/30 Denmill being designated as green belt. This site would be suitable to accommodate 5 family homes. Services such as electric, water and gas are available and the site is within walking distance to public transport.</p> <p>9/25 West Craigton Farm, Peterculter</p> <p>130: Development Option 9/25 West Craigton Farm, Peterculter is appropriate for</p>		

development. It is a much more desirable location than the site on Malcolm Road east. The site is not visibly intrusive, is sheltered, south facing and comprises of poor quality and mostly vacant agricultural land. The development of this site would also help provide family housing to support the local primary school in Peterculter. Willing to work with neighbouring landowners to prepare a masterplan for the area which would illustrate how this site could be set out. Development of this site would help support the existing settlement. The site is serviced by public transport and has footpath connections.

#### 9/46 Malcolm Road West, Peterculter

778: Extension to Development Option 9/46 Malcolm Road West, Peterculter. This site should be rezoned as residential as the character and layout of the site suggest that they should be considered part of the Peterculter settlement rather than Green Belt. Zoning an already developed area of land as green belt contributes nothing to the aims of Scottish Planning Policy paragraph 159, the Structure Plan or the proposed Local Development Plan. Removing these properties will not detract from the aims and objectives of the Green Belt and will not compromise the aims of the policy. The site is a potential location for the expansion of Peterculter in future years. It should not be unduly constrained by the Green Space Network zoning.

#### 9/26 Woodend, Peterculter

439: Object to non-identification of land to the north of Peterculter at Woodend for future development of small-scale housing and community facilities. Request that land at Woodend be identified for between 14 -16 houses with an associated cricket pitch and woodland leisure facility/amenity area.

441, 456, 461, 463, 467, 469, 470, 471, 473, 474, 476, 477, 481, 483, 485, 486, 487, 488, 490, 491, 492, 493, 494, 495, 496, 497, 498, 499, 500, 501, 502, 503, 504, 505, 506, 507: Development Option 9/26 Woodend, Peterculter. Would like to see this site included in the plan for small scale housing development (16 - 19 houses) and community cricket facilities. The cricket pavilion and public space would be a huge asset to the community. The housing could be delivered in a visually pleasing way. Development would also contribute to much needed facilities in the area.

#### 2/194 Cobblestock, Peterculter

767: MIR 2/194 - Land at Cobblestock should be included as a housing site either in the first phase or second phase. Allocations for Lower Deeside are deficient as they do not allocate enough land for residential development in Peterculter in the first phase and no development in the second or third phases. The site should not be zoned as Green Belt as it does not serve any purpose in terms of the Green Belt function in Scottish Planning Policy. The site is well contained by existing boundary features. The reliance on brownfield sites is ambitious. There is good access to the site. Site is only 350metres from the district centre with good pedestrian access. Only a small part of the site floods and this would not be developed. No evidence of drainage issues. No technical constraints.

#### 9/33 Site at Malcolm Road, Peterculter

1464: There is community support for development in Peterculter in support of sustaining the school roll of the local primary school. Development Option 9/33 Site at Malcolm

Road, Peterculter is in an ideal location for development on its own or as part of a wider development. This site scored higher than both OP54 Malcolm Road and OP59 Peterculter East in the assessment.

#### Kennerty Farm, Peterculter

1555: New Development Option at Kennerty Farm, Peterculter. We request that the Plan is amended as follows: 1. That the Green Belt boundary at Kennerty, Peterculter is amended. This site contains redundant former agricultural buildings. 2. That the land in question is included within the development boundary in order that the principle of residential development on the site may be supported. It is envisaged that the site could accommodate a four bedroom family dwelling and that this would be in keeping with and complement the character and density of development in the area. 3. That the land in question is not included within the Green Space Network.

The exclusion of the submitted site from the Green Belt designation and any green space network allocation would not conflict with the objectives of the Structure Plan or the Proposed Plan and would not compromise the viability of the Green Belt or the character and amenity of the greenspace allocations. The site provides no value and no potential value to the Green Belt designation or greenspace network.

#### 9/17 Peterculter West

1561: Development Option 9/17 Peterculter West. Object to the omission of land to the West of Peterculter from the proposed Local Development Plan. The site will contribute a better range of sites for development in phase 1 of the Local Development Plan, to ensure a deliverable strategy. The site also offers a better option for development than sites included on Malcolm Road (sites OP54 Malcolm Road and OP134 Peterculter Burn).

#### 9/15 Hill of Ardbeck

1561: Development Option 9/15 Hill of Ardbeck. Object to the omission of Hill of Ardbeck from the proposed Local Development Plan as a mixed-use development opportunity for residential development and the creation of a public park, and to the inclusion of the whole site as a District Wildlife Site. Consider there to be a clear case for the inclusion of this site for development.

The proposed Local Development Plan fails to provide a suitable range of sites to ensure the deliverability of the large numbers of houses required in phase 1 of the Plan by the Structure Plan.

### **Modifications sought by those submitting representations:**

#### 9/30 Denmill

50: 9/30 Denmill should be designated as an opportunity site for residential development.

#### 9/25 Land at West Craigton, Peterculter

130: Delete site OP51 Friarsfield and replace with 9/25 West Craigton Farm.

## Woodend 9/26

439: Land at 9/26 Woodend should be allocated for between 14-16 individual house-plots on a brownfield site on the edge of the existing village of Peterculter which blend in harmoniously and complement the rural area. Reservation of land for a cricket pitch to be gifted to, and utilised by, the local community. Reservation of land for woodland recreation facility and resource for outdoor educational activities. Retention of the valued woodland with an emphasis on linking any new development area with existing public footpaths leading into the heart of the village and to nearby District Wildlife Sites. Retention of all green fields and 'farmable' agricultural land surrounding the development.

441, 456, 461, 463, 467, 469, 470, 471, 473, 474, 476, 477, 481, 483, 485, 486, 487, 488, 490, 491, 492, 493, 494, 495, 496, 497, 498, 499, 500, 501, 502, 503, 504, 505, 506, 507: Request that the site at Woodend is allocated in the Local Development Plan for small scale housing development along with land being reserved for sports and recreation.

## 2/194 Land at Cobblestock

767: 2/194 Land at Cobblestock. Site should be allocated in the Aberdeen Local Development Plan for around 50 houses, either in the first phase or the second phase.

## 9/46 Malcolm Road West

778: 9/46. The site should be removed from the Green Belt and Green Space Network and zoned as Residential H1. The Green Space Network zoning of the southern section of development is deleted.

## 9/33 Land to West of Malcolm Road

1464: Delete sites OP54 Malcolm Road and OP59 Peterculter East as opportunity sites, identify land at 9/33 Land to West of Malcolm Road as a residential opportunity site.

## Land at Kennerty Farm

1555: Kennerty Farm. We request that the Aberdeen Local Development Plan is amended as follows: 1. That the Green Belt boundary at Kennerty, Peterculter is amended. 2. That the land in question is included within the development boundary in order that the principle of residential development on the site may be supported. It is envisaged that the site could accommodate a four bedroom family dwelling and that this would be in keeping with and complement the character and density of development in the area. 3. That the land in question is not included within the Green Space Network.

## 9/17 Peterculter West

1561: 9/17 Peterculter West. Bancon submit that the proposed Local Development Plan be amended to include land at Peterculter West for a mixed use development including business land, offices and light industrial use, as well as serviced business and industrial plots. In addition to this, around 100 houses should be included, to maximise the efficient use of the land, to cross fund the required roundabout, as well as to help facilitate improvements to the A93/Malcolm Road junction. This land should be included in the

Local Development Plan, as outlined in the appended masterplan to contribute to a more deliverable strategy of more smaller sites, and reduce the reliance on unachievable rates of development on a limited number of large sites as set out in the proposed plan. In addition to this, the site is promoted as locally preferable to sites OP54 Malcolm Road and OP134 Peterculter Burn. The site should also be excluded from Green Belt/Green Space Network.

9/15 Hill of Ardbeck

1561: 9/15 Hill of Ardbeck. Bancon therefore submit that the proposed Local Development Plan be amended to include the site at Hill of Ardbeck for 61 houses and associated parkland in phase 1. The site should also be removed from the District Wildlife Site designation.

### **Summary of response (including reasons) by planning authority:**

#### General Strategy

518: The Council continue to support the spatial strategy, in the Proposed Local Development Plan, for Peterculter. The Aberdeen City and Shire Structure Plan (CD8) sets the requirements for greenfield housing and employment land allowances and authorises a review of green belt boundaries in order to accommodate them. A Development Options Assessment (CD13), Strategic Environmental Assessment (CD21), and consultation on the Main Issues Report (CD15) were used to assess sites. These were used to identify the most suitable locations to deliver the required growth and in accordance with Scottish Planning Policy paragraph 159 (CD3) which requires green belts to direct growth to the most appropriate locations. This process is described in the Green Belt Review (CD19) which also sets and explains the detailed boundaries of the green belt and land release areas.

Relatively limited development is proposed along the Deeside corridor. This is due to transport and educational capacity infrastructure constraints in the area which restrict the scale of future development. Educational capacity in this area is limited to one primary school - Peterculter Primary School and one secondary school - Cults Academy. Any educational facilities included in the Countesswells proposal will service the needs of that site.

We note that none of the Development Options submitted to the Council were proposed for employment uses.

There are alternative sites that have been proposed by a number of respondents. These sites - except from Land at Kennerty Farm - were examined in the Development Option Assessments in March 2008 (CD13) all sites were deemed undesirable for development.

#### Hill of Ardbeck (9/15)

1561: This site is unsuitable for development. Much of the site is covered by woodland. It is a District Wildlife Site and all of it is extensively used as open space by local residents. Its recreational use and designation as a District Wildlife Site makes it an undesirable development option and it should remain as green belt.

## Peterculter West (9/17)

1561: It is recommended that this is undesirable for development. The majority of the site is exposed, open agricultural land, with some wooded areas and an area of commercial forestry to the south which has recently been cleared. There are clear views of the site from Kennerty Road and Old Station Road as well as the Deeside Way which runs through the site. The majority of site remains more than 400m from public transport and the facilities in Peterculter and the narrow roads, footways and terrain there may discourage journeys on foot. A considerable amount of new road infrastructure would be required to access the site. Although school capacity exists in Culter Primary, the development of the other preferred options would use up any capacity in the Academy.

## West Craigton Farm (9/25)

130: This site is undesirable for development. The site is not well related to existing development and all community facilities are beyond 800 meters, including the bus stop. The site has further issues with accessibility as there is only 1 core path/cycle route within 800m of the site which connects to Peterculter. There are no employment opportunities within a 30 minute bus and/or walk route therefore travel to employment would mostly likely be by private motor car. The Special Area of Conservation is immediately to the west of the site, along with Tree Preservation Orders 81 and the Culter Burn District Wildlife Site. The site is very visible from the South Deeside Road and would impact significantly on the landscape due to its isolation from the main settlement of Peterculter.

## Woodend (9/26)

439, 441, 456, 461, 463, 467, 469, 470, 471, 473, 474, 476, 477, 481, 483, 485, 486, 487, 488, 490, 491, 492, 493, 494, 495, 496, 497, 498, 499, 500, 501, 502, 503, 504, 505, 506, 507: This site is considered unsuitable for development. The site is isolated from the existing settlement and has access issues regarding distance to community facilities and public transport which lie a considerable distance away on North Deeside Road. There are also concerns regarding landscape issues. Much of the area sits above the 90-95metre contour which marks the northern extent of the Deeside settlements. It would therefore intrude into this green backdrop and it is doubtful whether tree belts and planting will mitigate against this. Development of this site will contribute towards the coalescence between Peterculter and Milltimber.

## Denmill (9/30)

50: It is noted that the original submission for this site has significantly decreased in size. However, we still recommend that the site is undesirable for development. Access to the site is poor and Malcolm Road is substandard. There is no access to the public transport network or to local facilities, such as neighbourhood or district centres and schools within 2km of the centre of this site. Parts of the area are exposed to northerly winds and subject to steeper slopes. Development here would essentially be a new settlement as it is unrelated to the main settlement of Peterculter. However, its relative remoteness and lack of containment in the landscape means that it should remain undeveloped.

## Land to the West of Malcolm Road (9/33)

1464: This site is unsuitable for development. This site is not considered suitable for



development due to its isolation and poor accessibility (in terms of both distance and gradient) to employment opportunities, public transport and local facilities. It is unrelated to the main settlement at Peterculter and would appear to be visually incongruous ribbon development along the north of Malcolm Road - essentially housing in the countryside. It is part of the green backdrop to Peterculter which contributes to protecting its landscape setting. It should therefore remain as green belt.

#### Malcolm Road West (9/46)

778: Development on this site is undesirable. This site is not considered suitable for development due to its isolation and poor accessibility (in terms of both distance and gradient) to employment opportunities, local facilities and public transport. The proposal is poorly related to the main settlement at Peterculter and is part of the countryside north of Malcolm Road which serves to maintain its setting. It is part of the green backdrop to Peterculter which contributes to protecting its landscape setting. It should therefore remain as green belt.

#### Cobblestock, Peterculter (2/194)

767: We are still of the same opinion that the site at Cobblestock in Peterculter is unsuitable for development. A major issue here is that road access is extremely poor - it is very narrow, single track, steep and with sharp bends in places. The physical characteristics of the access roads and the presence of gardens and houses next to it could restrict road widening and will make this a difficult issue to mitigate.

#### Land at Kennerty Farm

1555: The proposal to develop land at Kennerty Farm has come very late in the process and was not brought up at either the Development Options or Main Issues stages. There has been no opportunity for the public or anyone else to comment on this. The Proposed Plan identifies sufficient greenfield and brownfield housing land for the first two structure plan phases and most of the third phase. Therefore, we do not think this site should be rezoned as residential from green belt. We think the current zoning reflects the site more appropriately than residential zoning. There is no green space network zoned on this site.

In conclusion, we continue to support the spatial strategy in the Proposed Plan and do not consider any of the above sites suitable for development. Therefore, the above sites should not be rezoned as residential but should remain as green belt.

#### **Reporter's conclusions:**

#### **Reporter's recommendations:**

<b>Issue (ref and heading):</b>	<b>ALTERNATIVE SITES IN CULTS, BIELDSIDE AND MILLTIMBER</b>	<b>53</b>
<b>Development Plan reference:</b>	None	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
<p>Mr Nick James of Land Use Consultants on behalf of Camphill Communities (Aberdeen City and Shire) including Aberdeen Waldorf School (259), Mr Neil Rothnie of Grampian Design Associates on behalf of Caversham Management Ltd (394), Mr John B Cameron (586), Ms Ellen Coats of WYG Planning and Design (591), Mr John Findlay of Ryden LLP on behalf of STED Investments LTD (614), Ms Natasha Douglas of Ryden LLP on behalf of Forbes Homes (633), Mrs Catherine Thornhill of Ryden LLP on behalf of Mr Eric Yule (642), Mrs Elaine Farquharson-Black of Paull and Williamsons on behalf of Mr. Stephen Cordiner (652), Mrs Elaine Farquharson-Black of Paull and Williamsons LLP on behalf of Cordiner Pension Trust and Personal Pension JRC (654), Mr Scott Leitch of Halliday Fraser Munro Planning on behalf of Mr I. Lakin (771), Mr Scott Leitch of Halliday Fraser Munro Planning on behalf of Mr N. MacRae (772), Mr Kenny Clubb of Churchill Homes (775), Mr Richard Bush of Richard Bush Chartered Town Planner on behalf of Mrs Nicola Hutcheon (1205), Miss Christine Dalziel of Halliday Fraser Munro Planning on behalf of Mr &amp; Mrs David McLeod (1257), Mrs Elaine Farquharson-Black of Paull &amp; Williamsons LLP on behalf of Waterwheel Inn Limited (1481), Miss Christine Dalziel of Halliday Fraser Munro Planning on behalf of Deeside Golf Club (1525), Mr Steve Crawford of Halliday Fraser Munro Planning on behalf of Mr W Donald (1534), Mr Steve Crawford of Halliday Fraser Munro Planning on behalf of Barratt East Scotland (1536), Mrs Catherine Thornhill of Ryden on behalf of Craigellen Assets Limited (1549), Mr Ben Freeman of Bancon Developments Ltd (1561), Mr John Findlay of Ryden LLP on behalf of Stewart Milne Homes (North Scotland) and Messrs Jaffray (1570).</p>		
<b>Provision of the Development Plan to which the issue relates:</b>	Alternative sites on Green Belt around Cults, Bielside and Milltimber	
<b>Summary of the representation(s):</b>		
<p>General Strategy</p> <p>259: Development Option 9/07 The Waterwheel Hotel. Strongly support the council's decision not to include this site in the Local Development Plan.</p> <p>Development Option 9/14 The Waterwheel. Strongly support the council's decision not to include this site in the Local Development Plan.</p> <p>Development Option 9/20 Thornhill Craigton. Strongly support the council's decision not to include parts of this site in the Local Development Plan. Concerned the impact of increased traffic levels on the safety of pupils accessing the Aberdeen Waldorf School and the loss of the current open rural outlook and its replacement with a more suburban landscape.</p> <p>Land to the North of Bielside</p> <p>394: Baillieswells Road could be realigned through this site, Land to the North of Bielside, to eliminate the two existing sharp bends. This would dramatically improve road safety. The trade-off for this would be for the remainder of the site to be allocated</p>		

for low density housing.

#### 9/19 Land at Craigton Road

586: Development Option 9/19 Land at Craigton Road. Council has made no site specific issues in respect of this site. Considers the site to be a gap site, which should also not be identified as Green Space Network due to being enclosed on all four sides with walls of 2metres to the south rising to 3metres to the north. Whereas gardens to the east and west remain designated as Green Belt. Gap site serves no Green Belt purpose. Infill development of single house would have no adverse effect on character of the area, would not detract from the visual amenity of the Green Belt, would fill gap in a group of buildings with a continuous built up frontage, and there would be no loss of important open space.

#### 9/48 Milltimber Playing Fields (Albyn School)

591: Development Option 9/48 Milltimber Playing Fields (Albyn School). It is believed that the release of land at this location would not have a detrimental impact upon the aims and objective of the Green Belt. The respondent believes that there is no reason why the land could not be released for development in accordance with the provisions of the Scottish Planning Policy.

#### 2/156 Bride's Ward

614: Site 2/156 Bride's Ward - New Development Option submitted as a representation to the Main Issues Report. Objection is taken to the failure of the proposed Plan to identify land at Bride's Ward, Culter House Road, Milltimber (Ref 2/156) for development. Allocations in the Deeside corridor are disappointing, and additional development, if phased, could support the local schools. Also a new secondary school in the Countesswells area could remove some of the pressure from Culter Academy. The proposed Aberdeen Western Peripheral Route offers an alternative route to the main employment areas, lessening the traffic levels along North Deeside Road and in Deeside. The development of 2/156 Bride's Ward could meet the shortfall in the housing allocation for the phase 2007-2016. 2/156 Bride's Ward has been neglected for many years and would benefit greatly from development. The site is an ideal location for a high quality, low density residential development of around 7 detached residential units due to its attractive setting and its proximity to Peterculter and the Milltimber junction of the proposed Aberdeen Western Peripheral Route. The proposed development will also add to the variety of housing types and locations currently available in Aberdeen City. This site is deliverable in its entirety and should be supported for development in the first phase of the forthcoming Plan (2007-2016).

#### 9/40 Inchgarth

633: Development Option 9/40 Inchgarth. Objection is made to the Local Development Plan which fails to identify 9/40 Land at Inchgarth for residential development under Land Release Policy LR1. Advisable to reduce the allocation awarded to Oldfold and allocate additional parcels of land within the Deeside area which, due to their smaller scale, can be developed at a faster rate thus contributing to the housing land supply, ensuring that the Local Development Plan meets the targets set by the Structure Plan. Disagree with concerns raised by the site assessment. 9/40 Inchgarth does not meet the purposes of the Greenbelt. It is contended that the Greenbelt Review 2010 prepared by Aberdeen City

Council should have re-evaluated the greenbelt in Deeside to ensure that land designated as greenbelt was continuing to make a valuable contribution. Development of the site would provide an opportunity to improve the public access via footpath links from the development south to the River Dee. The only part of 9/40 Inchgarth which contributes to the green space network is the ancient woodland which is to be retained. The green space network designation should be removed from 9/40 and applied only to the areas of ancient woodland.

#### 1/195 Land at Pitfodels Station Road

642: Site 1/195 Land at Pitfodels Station Road. Objection is taken to the failure of the Proposed Plan to remove the site from the Aberdeen Greenbelt. The removal of the site from the Green Space Network is welcomed and supported. The site should instead be allocated for residential use. Additional sites require to be identified to address the significant shortfall identified by the 2010 Housing Land Audit and to ensure that a minimum 5-year land supply is maintained at all times. Additional sites are also required to ensure that Structure Plan housing targets, particularly in the early stages of the plan can be met. Submission demonstrates that site at Pitfodels Station Road does not contribute to the three main objectives for green belt designation as set out in Scottish Planning Policy, nor was it identified in the Open Space Audit (2010). As such it should be removed from the green belt and allocated for sensitive residential development. Contrary to the assertion of the Council that the site is easily accessible to a range of services and facilities and paths within acceptable walking and cycling distances specified in Planning Advice Note 75. It also lies adjacent to bus routes and is bound to the north and south by east-west footpath and cycle networks.

#### 9/37 47 Contlaw Road

652: Objects to zoning of the property (at Contlaw Road) as Green Belt under policy NE2 of proposed plan. Site should be identified for residential development. Sites OP60 Culter House Road and OP61 Edgehill Road are identified for residential development, but are considered to be less appropriate than the client's site. A limited number of dwellings on this site would not impact on the overall landscape of the area which is defined by the adjoining woodland, and would be consistent with the pattern of development on Culter house Road.

#### 9/35 Land near Culter House Road

654: Development Option 9/35 Land Near Culter House Road. Wish to see this land identified within the Local Development Plan for development. Both OP60 Culter House Road and OP61 Edgehill Road are immediately adjacent to these sites and have been identified by the Council for development and as such cannot be favoured or differentiated upon to my client's sites, when considered against the Green Belt Review criteria. The land is split by the Aberdeen Western Peripheral Route junction and will provide access to the A93 and as such will be considered in two parts: 1. The land to the east of the Aberdeen Western Peripheral Route junction is below 95 metre contour and at the Main Issues Stage of the Local Development Plan the Council acknowledged that it would be screened by a linear tree belt, this could be strengthened if development were to take place. It will not be isolated from the main community because it is adjacent to a site identified for development. Development on this site would not lead to coalescence of Milltimber and Peterculter because of the Aberdeen Western Peripheral Route junction and the tree belt. It is submitted that the land to the east of the Aberdeen

Western Peripheral Route junction in released for low density housing as an extension to OP60 Culter House Road, it could come forward 2007-2016 or failing that 2017-2023.

2. The land to the west of the Aberdeen Western Peripheral Route junction is best placed to accommodate either business/employment or retail development such as a service station given its location at the Aberdeen Western Peripheral Route junction. It is understood that there are very few if any service stations proposed for the Aberdeen Western Peripheral Route. The site would be easy to develop due to its gradient and aspect as shown in the Main Issues Report. My client no longer wishes to promote the Guttrie Hill District Wildlife Site for development, retention of this along with the Hill of Ardbeck and the Aberdeen Petroleum/Kippie Lodge golf courses will ensure that there will be no coalescence with Peterculter to the west. Should be identified for business/retail development 2017-2023 following the Aberdeen Western Peripheral Route junction construction.

#### 9/13 Pinelands

771: Development Option 9/13, Pinelands and extension. Concerned that the designation of this area as Green Belt has ignored the objectives of Scottish Planning Policy and the context of the area.

#### Bettyhill, Inchgarth Road

772: Bettyhill Inchgarth Road. The density of Bettyhill and it's neighbouring properties suggest a density that is typical of a suburban area rather than Green Belt. The housing in question is well related to Pitfodels, Cults and Garthdee.

#### 9/36 Murtle Den Road

775: Development Option 9/36 Murtle Den Road. This site should be included in the Plan. We disagree that it should be identified as undesirable. purely on the grounds of visual intrusiveness, especially with the Oldfold Farm (OP62) proposal being supported only a matter of metres away. The site scored highly in the Main Issues Report assessment and it is fantastically placed in terms of sustainability. The development would not cause any major coalescence between Milltimber and Bielside. If the site was included it would provide additional landscaping and mitigation to the Oldfold farm (OP62) development by means of substantial landscaping around the individual properties. Had this been a consideration during the Main Issues Report it would have been obvious that this would be a positive in relation to the general visual impact and also an additional landscaped "buffer" to the Murtle District Wildlife Site. The site has no constraints and is immediately deliverable. It is also not reliant on any major infrastructure improvements or provision. This proposal should be viewed in the same light as ourselves, the local community and neighbouring residents in that it offers an opportunity in providing much needed high quality family homes in the area.

#### 9/09 Land at South Cults

1205: Land at South Cults. Designation as Green Space Network is inappropriate. Not appropriate to designate site as Green Belt. Such designation would not promote any of the purposes for which the Green Belts are intended. South Cults is an eminently suitable site for a small residential development of up to 20 dwellings and allotments. Allocation would accord with Scottish Planning Policy. It is amongst the most appropriate

of the development proposals considered in the Aberdeen Local Development Plan. It is superior to many of those included in the Aberdeen Local Development Plan.

#### West Cults Farm

1257: West Cults Farm. The zoning of this does not contribute towards the aims of the Green Belt. Removing this land from Green Belt/ Green Space Network will result in only the most appropriate land in the area being zoned and ensure that sites such as this one proposed do not detract from the core purposes of Green Belt. The land offers an opportunity for the development of residential property on appropriate land related to existing development that faces no immediate threat of flooding. The land is residential in nature given the presence of the summer house and close proximity to the residential development on West Cults Road. The small scale nature of the proposed development provides a small but meaningful contribution to the housing allocations set out in the Scottish Planning Policy and the Proposed Local Development Plan.

#### 9/07 The Waterwheel Inn

1481: Development Option 9/07. It is not considered that the site should not be designated as part of the Green Belt, under policy NE2. It is felt that the Green Belt Review undertaken as part of the Local Development Plan process failed to assess the Green Belt in its entirety, focusing only on the justification of sites proposed for release and subsequent development. Redevelopment of the hotel would not result in coalescence between Milltimber and Bielside. The site does not contribute to the landscape setting of the city. The existing character of the area, which is one of discrete pockets of woodland within wooded or landscaped areas, may be maintained without the need to zone the site and its surroundings as Green Belt. The site could also be developed without the loss of existing trees.

#### 9/08 Land at Deeside Golf Club

1525: Deeside Golf Club. The Green Belt designation of the land in question at Deeside Golf Club does not serve any purpose in terms of the Green Belt functions set out in Scottish Planning Policy. The site benefits from distinct boundaries and would tie in well with adjacent. Permitting development on this previously developed land will in no way jeopardise the quality and character of the landscape. The zoning of the site as part of the Green Space Network demonstrates the lack of a specific justification and rationale for the inclusion of such sites, as this site has been given a blanket zoning, which fails to take account of areas of the site which are of no value in terms of the Green Space Network functions.

#### 2/181 Binghill Farm

1534: 181/2 Binghill Farm, and 181/2 Binghill Farm Milltimber. The site is a natural extension to the Oldfold allocation. It provides a developable site that offers a choice of housing type and location not evident in other bids. The Oldfold northern site boundary is not a natural boundary and the Binghill site can easily accommodate the development proposed without affecting the landscape setting or breaching the skyline.

#### 9/20 Thornhill Craigton

1536: Development Option 9/20 Thornhill Craigton. Housing will be designed to

complement the proposed development at Friarsfield and the wider area. Will help support local facilities and will enable appropriate infrastructure to deliver an integrated and sustainable community with effective public transport opportunities, links to leisure facilities and footpath networks. The site has been identified as a Future new Community by the Council in past development plans. It has no significant landscape issues. It can reduce the development pressure on more contentious sites. Would be an effective link between Countesswells and Cults.

#### 9/52 Baillieswells Road East

1549: Site 9/52. As demonstrated in the detailed representation there are no barriers to the development of 9/52 which can be delivered within the period 2007 - 2016 thereby supporting the housing land supply for the Countesswells area and ensuring the maintenance of a 5 year land supply at all times. Site 9/52 is ideally allocated within a cluster of existing dwelling houses to absorb an additional 8-10 dwellings; its allocation for the development of such will assist in meeting the Structure Plan targets, which given the amount of development which is restricted to a few large sites, are unlikely to be achieved in the timescales set. The site has no value in terms of recreation or landscape setting. To do this 9/52 should be removed from the Green Belt (NE2) and Green Space Network (NE1).

#### 9/41 Baillieswells Road West

1549: Site 9/41. There are no barriers to the development of 9/41 which can be delivered within the period 2007 - 2016 thereby supporting the housing land supply for the Deeside area and ensuring the maintenance of a 5 year land supply at all times. Site 9/41 is ideally allocated within a cluster of existing dwelling houses to absorb an additional 4-5 dwellings; its allocation for the development of such will assist in meeting the Structure Plan targets, which given the amount of development which is restricted to a few large sites, are unlikely to be achieved in the timescales set.

#### 9/18 Milltimber South

1561: Development Option 9/18. Objects to the failure of the Local Development Plan to allocate the reduced site, described below, as a mixed-use opportunity for development in Milltimber. It should not be allocated within the strategic Green Belt, or classed as part of the Green Space Network.

#### 9/49 Contlaw

1570: Development Option 9/49 Contlaw. Object to the limited land release proposed for Lower Deeside. Development in this area would benefit from a range of facilities, public transport and infrastructure provision. Request that additional sites be identified in the corridor for development, specifically Contlaw (Development Option 9/49), so that the increased range of sites can be spread over both plan periods with provision also made for longer term development in the period 2024-2030 and more emphasis should be placed on containing development within the confines of the Aberdeen Western Peripheral Route taking advantage of the infrastructure provided by that project.

#### **Modifications sought by those submitting representations:**

Land North of Bieldside

394: Land North of Bielside. The Plan should be amended to include this site as an opportunity for housing with limited density to reflect the pattern of development along Baillieswells Road to the south.

#### 9/19 Land at Craigton Road

586: 9/19. Site should be included in the Local Development Plan as a site suitable for development. Also asks that Council considers the introduction of supplementary planning guidance which would allow the Council to make "an adequate appraisal of a site which is so obviously an integral part of existing development".

#### 9/48 Milltimber Playing Fields (Albyn School)

591: 9/48. Subject to careful layout and design, a high quality residential development could be achieved at this site and therefore it is respectfully requested that land at Milltimber playing fields is identified for future residential development.

#### 2/156 Bride's Ward

614: It is respectfully requested that the Local Development Plan is amended to include Brides Ward as an allocation in the Deeside (Area G) area of growth, with the site's current designation as Green Belt and Green Space Network removed.

#### 9/40 Inchgarth

633: 9/40. It is recommended that Aberdeen City Council remove 9/40 from the Greenbelt (NE2) and Green Space Network (NE1) and allocate it for 10 units of housing under Land Release Policy LR1 in the proposals map and identify 9/40 in Table 9 Development at Deeside.

#### 1/195 Land at Pitfodels

642: It is recommended that site 1/195 at Pitfodels Station Road is removed from the Aberdeen and Aberdeenshire Green Belt and identified as an opportunity site for sensitive residential development.

#### 9/37 47 Contlaw Road

652: Removal of client's land from the Green Belt under policy NE2 and identification of the site as a residential site to be developed in the period 2007-2016 and consequent amendment of Table 9 and the related Proposals Map.

#### 9/35 Land near Culter House Road

654: 9/35. Removal of the Green Belt and Green Space Network zoning of the land and identification of the western most field for employment/retail use in the period 2017-2023(post Aberdeen Western Peripheral Route) and allocation of the land to the east for residential development in the period 2007-2023 and amendment of table 9 and the related Proposals Map accordingly.



#### 9/13 Pinelands

771: 9/13. Rezone this site from green belt to residential.

#### Bettyhill Inchgarth Road

772: Removal of Bettyhill and surrounding properties from the Green belt and rezone them under Policy H1 Residential.

#### 9/09 Land at South Cults

1205: Land at South Cults. Deletion of the Green Space Network designation from land at South Cults. South Cults should be excluded from the Green Belt designation. The site should be included in the Aberdeen Local Development Plan for 20 homes and allotments between 2007-2016.

#### West Cults Farm

1257: Removal of the land at West Cults Farm from the Green Belt and Green Space Network and zoning it as 'Residential H1' for up to three units.

#### 9/07 The Waterwheel Inn

1481: 9/07. the site should be removed from designation as part of the Green Belt under policy NE2. Instead, it should be identified as part of a mixed use area under policy H2. Failing such removal as part of the Green Belt, the site should be identified as an opportunity site within the Green Belt which is appropriate for residential purposes. The plan should make it clear that the restrictions on development within the green belt policy would not apply, but that a design brief would control the development.

#### 9/08 Land at Deeside Golf Club

1525: Removal of the land in question from both Green Space Network and Green Belt designations, to be re-zoned as a residential development site for up to 3 detached units under policy 'H1'.

#### 2/181 Binghill Farm

1534: Include Binghill Farm in the Local Development Plan with an allocation of between 45 and 65 houses on the southern section.

#### 9/20 Thornhill Craigton

1536: 9/20. Site should be included in the plan for 100 houses in the first phase.

#### 9/52 Baillieswells Road East

1549: 9/52. It is recommended that Aberdeen City Council remove 9/52 from the Green Belt (NE2) and Green Space Network (NE1) and allocate it for 8-10 units of housing under Land Release Policy LR1 in the proposals map and identify site 9/52 in Table 8 Development at Countesswells, or alternatively in Table 9 Development at Deeside.

#### 9/41 Baillieswells Road West

1549: 9/41. It is recommended that Aberdeen City Council remove 9/41 from the Green Belt (NE2) and Green Space Network (NE1) and allocate it for 4-5 units of housing under Land Release Policy LR1 in the proposals map and identify site 9/41 in Table 9 Development at Deeside.

#### 9/18 Milltimber South

1561: 9/18. Milltimber South site should be allocated in the Local Development Plan as a mixed Use site for 60 new homes and 1225 square metres of commercial space. The site should not be allocated as either Green Belt or Green Space Network.

#### 9/49 Contlaw

1570: 9/49. Proposed Plan modified to identify Contlaw (Development Option 9/49) for mixed-use development comprising 650 units over three plan periods. Housing numbers to the west of Peterculter should be reduced by 100 in the initial plan period.

### **Summary of response (including reasons) by planning authority:**

#### General Strategy

Relatively limited development is proposed along the Deeside corridor. This is due to transport and educational capacity infrastructure constraints in the area which restrict the scale of future development. Educational capacity in this area is limited in the two primary schools - Cults Primary School and the proposed relocation of Milltimber Primary School in the Oldfold site and one secondary school - Cults Academy. Any educational facilities included in the Countesswells proposal will service the needs of that site.

In relation to transport issues, the Council undertook a process known as the Transport Framework at an early stage in the plan preparation process. Alongside the overall Development Options assessment process, this provided a transport based assessment framework against which Development Options were assessed. The results of this work were considered against the overall Development Options process and helped the Council to decide which sites to identify as Preferred Options in the Main Issues Report. The results of the Transport Framework (CD22) were published on the Council's website alongside the Main Issues Report.

The Council has consulted with transport partners and colleagues, including bus operators, to examine the implications of development for the transport network and identify transport infrastructure required to create an efficient, integrated and comprehensive transport network for all travel modes. Strategic transport modelling has been undertaken to test the efficacy of the current transport network and to help determine the likely need for new infrastructure. As a result, the requirements for new roads, walking and cycling infrastructure and public transport have been identified in the Proposed Plan and attributed to eleven Masterplan Zones across the City.

Infrastructure requirements will need to be reflected in any Masterplan or planning application for development. The precise level of infrastructure requirements and developer contributions will need to be agreed with the Council through the Masterplan process and any subsequent planning application.

The Council continue to support the spatial strategy, in the Proposed Local Development Plan, for the Cults, Milltimber and Bielside area and we welcome all supporting comments. The Aberdeen City and Shire Structure Plan (CD8) sets the requirements for greenfield housing allowances and authorises a review of green belt boundaries in order to accommodate them. A Development Options Assessment (CD13), Strategic Environmental Assessment (CD21), and consultation on the Main Issues Report (CD15) were used to assess sites. These were used to identify the most suitable locations to deliver the required growth and in accordance with Scottish Planning Policy paragraph 159 (CD3) which requires green belts to direct growth to the most appropriate locations. This process is described in the Green Belt Review (CD19) which also sets and explains the detailed boundaries of the green belt and land release areas.

There are alternative sites that have been proposed by a number of respondents.

#### The Waterwheel Hotel (9/07)

1481: This site is unsuitable for residential and/ or retail development. This is a stand alone development which has no relationship with facilities in the existing settlements. It is over 600metres from the edge of Bielside and around 750metres from the edge of Milltimber. Because it is remote from existing residential areas, it would generate more traffic on the North Deeside Road as consumers would use their car to travel to the retail element. Retail development may also harm existing local shops in Cults and Peterculter that are more accessible to those communities. In a similar vein, the housing proposed for this site will be remote from the rest of the existing settlements. Because there are very few facilities in walking distance of the site, people would be inclined to travel in their cars. The refurbishment of the hotel would be acceptable given its existing use.

#### Land at Deeside Golf Club (9/08)

1525: This site is unsuitable for development. The site was rejected in the Reporter's Report on the Public Local Inquiry into the current Local Plan as Issue 101 (CD11). The site is part of the River Dee valley which helps to maintain the landscape setting of the Deeside communities and the wider setting of Aberdeen. It lies to the south of the Deeside Line which forms a logical and well defined boundary between development to the north and the more open valley floor to the south. This prevents development proposals in the valley area of the River Dee and complements and protects the Special Area of Conservation. The site has a disjointed relationship with the existing settlement. There are limited community facilities in walking distance from the site and no significant employment opportunities nearby so people will be inclined to travel in their cars. The site is zoned as Green Belt and Green Space Network as it offers significant recreational opportunities with the golf course and access to the River Dee. The site should therefore remain zoned as Green Belt and Green Space Network.

#### South Cults (9/09)

1205: Development at this site is undesirable. The site was rejected in the Reporter's Report on the Public Local Inquiry into the current Local Plan as Issue 102. The site is part of the River Dee valley which helps to maintain the landscape setting of the Deeside communities and the wider setting of Aberdeen. It lies to the south of the Deeside Line which forms a logical and well defined boundary between development to the north and the more open valley floor to the south. This prevents development proposals in the valley area of the River Dee and complements and protects the Special Area of

Conservation. The site also allows views from the Deeside Line thereby contributing to its recreational experience. Road access is narrow and steep. The site should therefore remain as Green Belt and Green Space Network.

#### Pinelands (9/13)

771: Development at this site is undesirable. Murtle Den Road marks a clear, defensible boundary to the east of the proposed Oldfold site. A clear boundary will help prevent development spreading into areas which will in turn help prevent coalescence with Bielside. Development on this site would lead to coalescence. Therefore, the site contributes to the landscape setting of the area and should remain zoned as Green Belt and Green Space Network.

#### Milltimber South (9/18)

1561: This site is unsuitable for development. The site was rejected in the Reporter's Report on the Public Local Inquiry into the current Local Plan as Issue 85. It is noted that the proposal has significantly been reduced. The site is designated as Green Belt and Green Space Network as it allows good views across the Dee valley which contributes to its recreational experience. Providing shops and facilities in this area would require most of the current residents of Milltimber to cross the A93 to reach them. The area contributes to a sense of place and to landscape setting and should therefore remain as Green Belt and Green Space Network.

#### Land at Craigton Road (9/19)

586: We recommend that this site is undesirable for development. Development on this site would be isolated from existing development, services and facilities. The green and rural nature of the plateau contributes to separating the northern limits of Cults and Friarsfield and the western edge of Aberdeen. In future it would also play a role in separating these areas from Countesswells. As a result the area contributes to the landscape setting of the city and should remain as Green Belt. The site is zoned as Green Space Network to maintain a green link between Hazlehead Park and Countesswells. Although this may be viewed as a gap site, Green Belt policy does not allow for housing under these circumstances. Allowing development in gap or infill sites in the Green Belt could be open to wide interpretation as to what a gap or infill site is. Current Green Belt policy is clear on this issue and should remain unchanged in line with guidance in paragraph 163 of Scottish Planning Policy and as discussed in Issue 117 NE2 - Green Belt. Therefore, Supplementary Guidance will not be written regarding this issue.

#### Thornhill (9/20)

1536: Development at this site is unsuitable. This proposal would break the skyline ridge to the north of Friarsfield which serves to contain the northern limits of Friarsfield and Cults. It would also be remote from the services and facilities in Cults, public transport on the North Deeside Road and employment areas. Even if public transport was provided at Friarsfield, the steep slopes which separate the two developments would discourage pedestrian usage. It would be very difficult to integrate new housing here with Cults. The ridge serves as a green backdrop to Cults. The green and rural nature of the plateau contributes to separating the northern limits of Cults and Friarsfield and the western edge of Aberdeen. In future it would also play a role in separating these areas from

Countesswells. As a result the area contributes to the landscape setting of the city and should remain as green belt.

#### Land near Culter House Road (9/35)

654: It is recommended that this site is unsuitable for development. The site is isolated from community facilities and from public transport. The site is disjointed from the existing settlements of Peterculter and Milltimber. Development on this site may lead to the coalescence of Milltimber and Peterculter along the Culter House Road, and even though the Aberdeen Western Peripheral Route separates them physically, it is still important to maintain a green buffer between the two settlements in order to maintain their identity. The most westerly part of the site is Guttrie Hill District Wildlife Site. For these reasons, the sites should remain as green belt.

#### Murtle Den Road (9/36)

775: It is recommended that this site is unsuitable for development. This is a very prominent site which is highly visible from the North Deeside Road. Although next to the preferred option at Oldfold, this site is located to the east of Murtle Den Road which provides a good green belt boundary for development to the west. Murtle Den Road is also tree lined and this helps to screen and contain Oldfold. The effect of this would be lost if development occurred here. The small scale of the site means that it could not act as a replacement for the proposals at Oldfold and Peterculter East.

#### Contlaw Road (9/37)

652: It is recommended that this site is unsuitable for development. The site is situated in an attractive landscape setting which provides a green wooded backdrop to Milltimber. The woodland along with Contlaw Road itself provides a clearly defined boundary between Milltimber and the Green Belt in this area. As such it contributes to the landscape setting of Milltimber and is therefore worthy of retention as Green Belt.

#### Inchgarth (9/40)

633: It is recommended that this site is unsuitable for development. The site was rejected in the Reporter's Report on the Public Local Inquiry into the current Local Plan as Issue 105. The site is located in the Pitfodels Conservation Area. Although there are other developments in this area, its predominant character is still rural. This, together with the tree and woodland cover prevents both the visual and physical coalescence of Garthdee and Culter. Further development would shift the balance from a predominantly rural to a more urban character. This site is an important part of the area which prevents coalescence and therefore serves a green belt function that should remain.

#### Baillieswells Road West and Baillieswells Road East (9/41 and 9/52)

1549: Both sites are not considered suitable for development due to their isolation and poor accessibility to employment opportunities, public transport and local services and facilities making both sites entirely car dependent. They are unrelated to the main settlement at Bieldside and would appear to be sporadic and isolated developments along Baillieswells Road. Both sites are in an area of well wooded countryside north of Bieldside which helps to contain the existing settlement and which provides a green backdrop. The sites are zoned as Green Space Network to maintain a green link

between the River Dee and Countesswells. Both sites are therefore part of an area which contributes to protecting the landscape setting of Bieldside and they should therefore remain zoned as green belt and Green Space Network.

#### Milltimber Playing Fields - Albyn School (9/48)

591: This site is unsuitable for development. It is noted that the playing fields may become surplus to requirement due to the school hoping to relocate. However, this site is also important in terms of green belt function as the site is peripheral to Peterculter. The tree lined road to Culter House provides a strong green belt boundary in this area. Development beyond this may contribute towards the coalescence of Peterculter and Milltimber, which would impact upon the character and amenity of the area and the separate identity of the two communities. The presence of the Aberdeen Western Peripheral Route through this area makes it even more important to maintain a green buffer between the two settlements. The green belt functions of the area should therefore be retained. The site is designated as Green Space Network to help improve linkages between Peterculter and Milltimber. It is recommended that this site remains zoned as green belt and Green Space Network.

#### Contlaw (9/49)

1570: This site is unsuitable for development. The site was rejected in the Reporter's Report on the Public Local Inquiry into the current Local Plan as Issue 83. Most of the site would be a long walk from the bus route on North Deeside Road although it is acknowledged that the site is large enough to accommodate its own facilities. A new primary school would be required (as with Oldfold). However, should the amount of housing development go beyond the 550 suggested for Oldfold (assuming this site replaces it) then further pressure would be added to Culter Academy which does not have the capacity to accommodate development beyond that already identified in the Proposed Plan. The site occupies rising ground to the north of Milltimber. Much of it sits well above, and some distance from there and the northern building line of the Deeside settlements which generally follows the 90metre to 95metre contour. Contlaw Road itself and the woodland north of Milltimber provides distinct green belt boundaries and these features serve to contain the settlement and protect its identity. These woodland features would be lost. The site straddles the Aberdeen Western Peripheral Route which severs most of the employment area from the rest of the proposal and Milltimber itself. The presence of the Aberdeen Western Peripheral Route through this area also makes it even more important to maintain a green buffer between Milltimber and Peterculter. The green belt functions of the area should therefore be maintained.

#### Land at Brides Ward (2/156)

614: This site is undesirable for development. Culter House Road is a narrow single track road that may be negatively affected by further traffic. Development is isolated from existing development and is also a significant distance from local services and facilities which will encourage car dependency. However, it is noted that there is a core path linking the site to North Deeside Road. The site covers Culter House Woods District Wildlife Site and contains extensive woodland which is under Tree Preservation Order 189 (RD41). There are potential effects on Culter House which is a category A listed building and its walled gardens, gazebo, doocot and gate piers which are category B listed. The site is designated as Green Space Network because of the District Wildlife Site and to maintain green linkages between Peterculter and Milltimber. The site is also

well utilised by the local people for recreation and is part of the buffer between Peterculter and Milltimber. It should therefore remain green belt and Green Space Network.

#### Binghill Farm (2/181)

1534: This site is undesirable for development. Most of the site is a significant distance from the bus route on North Deeside Road. Although local services, shops and facilities could be provided at Oldfold, much of Binghill would be over 800metres from these up a slope and would appear disjointed. School capacity is fine if this development takes place on its own. However, alongside the other preferred options on Deeside, this site could add further pressure to Cults Academy. Due to landscape, distance from public transport and secondary schooling issues, there would be little else to gain from providing additional housing land to the preferred option at Oldfold which would in itself provide significant development and open space in the area.

#### Pitfodels Station Road (2/195)

642: This site is unsuitable for development. The site is part of the green buffer between Cults and Garthdee which helps to maintain their separate identity and contributes to the landscape setting of Aberdeen. Although relatively close to bus routes the site is remote from shops and schools. The site should remain zoned as green belt.

#### Land to the North of Bielside and West Cults Farm

394, 1257: The proposals to develop land at West Cults Farm and Land to the North of Bielside have come very late in the process and were not brought up at either the Development Options or Main Issues stages. There has been no opportunity for the public or anyone else to comment on these sites. The Proposed Plan identifies sufficient greenfield and brownfield housing land for the first two structure plan phases and most of the third phase. There is therefore no need to bring forward additional land here.

Land to the North of Bielside is very isolated from existing development, facilities and services and would therefore be car dependent. The area is also not well connected with core paths. Regarding the issue with the road realignment proposed Council officers do not see the minor road alteration necessary. There have been two accidents on this part of Baillieswells Road over the past five years - both due to excessive speeding. They are also concerned that removing these bends would increase the speed of cars on this stretch of road and may result in more serious accidents. We recommend that this site should remain zoned as green belt and Green Space Network.

Land at West Cults Farm has issues with access to and from the site. The access road would be West Cults Road which has no footpath. There is also no direct connection to the Deeside Railway Line for pedestrians and cyclists from the site. Therefore, development would tend to be car dependent. The site is zoned as Green Space Network due to the recreational opportunities in the area and links to the Special Area of Conservation and District Wildlife Sites in the area. We recommend that this site should remain zoned as green belt and Green Space Network.

#### Bettyhill

772: This site is not appropriate as a residential zoning but is better reflected as green

belt. The allotments to the east of this site provide a clear boundary for development to the west. Rezoning the site would make this green belt boundary less defensible. It is therefore recommended that this site remains zoned as green belt.

In conclusion, the Council continues to support the spatial strategy in the Proposed Plan and do not consider any of the above sites suitable for development. We therefore propose, the above sites will not be rezoned as residential but will remain zoned as green belt.

**Reporter's conclusions:****Reporter's recommendations:**



<b>Issue (ref and heading):</b>	<b>GENERAL DEESIDE DEVELOPMENT ISSUES</b>	<b>54</b>
<b>Development Plan reference:</b>	Para 2.28, Table 9, OP54 - Malcolm Road, OP59 - Peterculter East, OP60 - Culter House Road, OP61 - Edghill Road, OP62 - Oldfold, OP64 - Craighton Road Pitfodels, OP65 - North Garthdee Farm, OP133, OP134	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Mr Malcolm Fyfe (156), Ms Libby Brand (202), Mr Tony Martin (367), Mr Guus Glass of Cults, Bielside and Milltimber Community Council (398), Mr Peter Wilson (482), Ms A Bell (822), Councillor Marie Boulton (1436).		
<b>Provision of the Development Plan to which the issue relates:</b>	Land Release (LR1), Opportunity Sites: 54, 59, 60, 61, 62, 64, 65, 133, 134	
<b>Summary of the representation(s):</b>		
<p>Spatial Strategy</p> <p>482: Agree that development in Lower Deeside development should be restricted to the development proposed.</p> <p>398: Pleased that the settlement strategy acknowledges the constraints on extensive development across lower Deeside. The Dee Valley is an important part of the natural landscape setting of the city that needs to be protected. In this context we particularly welcome and support the exclusion of sites for development south of the North Deeside Road in Milltimber, Bielside and Cults. We welcome the exclusion of the homes at Loirsbank from the previous local plan.</p> <p>1436: Supportive of smaller developments in Lower Deeside which don't change the sense of place but do provide the right types of housing needed in Lower Deeside. What is needed is a small number of affordable mixed sized family houses and smaller houses for the aging population.</p> <p>Green Belt/ Countryside/ Farmland</p> <p>367: Object to the proposed development of more farmland to housing.</p> <p>Feu Splitting</p> <p>482: Concerned that the feu splitting policy does not address the issue of the Bielside/Milltimber gap. Developers are already taking advantage of the abandonment of the prudent 'R3' policy - 1 house per 2 acre. This could have a serious traffic management problem and moreover could destroy the current wildlife/environment.</p> <p>Transport/ Road Infrastructure</p> <p>156: Existing roads cannot stand any increase in car use. Further development must promote public transport and get people out of cars.</p> <p>202: Concerned with the increase in pressure on the roads after the development proposals in Countesswells, Milltimber and Peterculter. Reservations as to how the roads will work. It was also not made clear to me the impact of the Aberdeen Western</p>		

Peripheral Route would make if it goes ahead or if it is cancelled or delayed.

367: The existing roads are in a extremely poor condition and the North Deeside Road becomes stationary.

822: Objecting to the Proposed Plan for the developments specified at Deeside and Friarsfield (OP51) and Countesswells (OP58) because the proposed development of ~4000 homes on green spaces near Cults, Countesswells and Milltimber is likely to increase traffic congestion and pollution including carbon emissions on the North Deeside Road (A93). There are no realistic options to improve traffic flow and/or pollution on the A93 and there are no realistic prospects or plans for mitigation of these problems. Therefore, this will increase the pressure to use cars.

1436: Whilst the Aberdeen Western Primary Route may, if built, provide minimum relief, it in itself will not be enough to significantly address the situation that currently exists on these roads, never mind deal with additional traffic created by new housing and employment areas proposed along these routes. Roads are already overwhelmed by traffic from new commercial and residential developments in the Shire both at Elrick and Westhill where further expansion is continuing.

#### Community Facilities

367: The current facilities in Cults cannot support more residential property, to mention a few reasons;

640: In the Deeside corridor there is a high proportion of development , 543 homes, which falls outwith masterplan zones 9 and 10. To support this increased population the existing medical practice at Cults requires to be extended to accommodate one additional General Practices.

822: The situation is exacerbated by the lack of amenities in Cults and Bieldside or within easy public transport access. Therefore, this scale of development on these green areas at this stage in Aberdeen's and the nation's economic history seems premature and poorly planned.

1436: I am concerned that the considerations given to schools in Lower Deeside to accommodate further children is flawed. Lower Deeside has many older couples living in family sized homes, many who are looking to down size, if these homes become available along with the proposed new developments, we will see, in particular, Cults Academy struggle to offer places to in-zone children. The primary schools still have some capacity.

#### **Modifications sought by those submitting representations:**

##### Spatial Strategy

156: Consider outside exercise parks, public gardens, walkways, cyclepaths, sports grounds etc. Improve the area rather than clog it up. Look to Europe and reduce the requirement for car usage.

822: Given the practical difficulties in preventing the increases in traffic and pollution along the A93, arising from the transport needs of the occupants of ~4000 new homes nearby, postpone the decision to release these green spaces until it can be confirmed

that it is absolutely necessary to build on them.

#### Feu Splitting

482: The increase in housing density in areas such as Dalmunzie Road, Hillhead Road, and Murtle Den Road should be revisited as this area now forms a key "break in the spread of development between Milltimber and Bielside/Cults.

### **Summary of response (including reasons) by planning authority:**

#### Spatial Strategy

398, 482, 1436: Relatively limited development is proposed along the Deeside corridor. This is due to transport and educational capacity infrastructure constraints in the area which restrict the scale of future development. The Council continue to support the spatial strategy, in the Proposed Local Development Plan, for the Deeside area but recognise that alternative sites have been proposed by a number of respondents. These are dealt with in Issue 52 Alternative Sites Peterculter and Issue 53 Alternative Sites in Cults, Bielside and Milltimber. We welcome the supporting comments regarding the Local Development Plan's spatial strategy for the Deeside area.

With regards to the exclusion of Loirsbank please see Issue 51 Loirsbank for a further response.

With regards to mixed and affordable housing please see Issue 109 Policy H3 and H4 Housing Density and Mix and Issue 110 Policy H5 Affordable Housing for a further response.

#### Green Belt/ Countryside/ Farmland

367: The Aberdeen City and Shire Structure Plan (CD8) sets the requirements for greenfield housing (and employment land) allowances and authorises a review of green belt boundaries in order to accommodate them. A Development Options Assessment (CD13), Strategic Environmental Assessment (CD21), and consultation on the Main Issues Report (Responses to Representations CD15) were used to assess sites. These were used to identify the most suitable locations to deliver the required growth and in accordance with Scottish Planning Policy paragraph 159 (CD3) which requires green belts to direct growth to the most appropriate locations. This process is described in the Green Belt Review (CD19) which also sets and explains the detailed boundaries of the green belt and land release areas.

#### Feu Splitting

482: With regards to the splitting of fues, Scottish Planning Policy paragraph 163 is clear on the type and scale of development that may be appropriate within the green belt. New build residential development is not considered appropriate. Some residential curtilages or land that may be considered to be brownfield sites in the green belt are large and could accommodate more than just small scale development. Even a single house in the wrong location can have a significant impact in a largely rural setting. The Scottish Planning Policy does allow for the conversion and re-use of traditional agricultural buildings. However, Scottish Planning Policy points out that the cumulative erosion of a green belt's integrity through the granting of individual planning permissions should be

avoided. We would agree and Policy NE2 - Green Belt complies with this stance.

### Transport/ Road Infrastructure

156, 202, 367, 822, 1436: Aberdeen City Council, Aberdeenshire Council, the North East Scotland Transport Partnership and the Scottish Government are all committed to the delivery of the Aberdeen Western Peripheral Route. The Aberdeen Western Peripheral Route shown on the proposals map represents the preferred route approved by Scottish Government. However, to allocate all land required for the construction of the Aberdeen Western Peripheral Route on the Proposals Map would leave islands of green belt within the scheme with no apparent green belt purpose. Green belt boundaries would frequently not be based on physical features that could be identified on the ground (as per paragraph 162 of Scottish Planning Policy). On balance, the Council felt that the best solution was to identify a line on the proposals map and alter the Green Belt policy to allow for the development of the Aberdeen Western Peripheral Route.

The Council, together with key partners, has undertaken transport modelling, including the Cumulative Transport Appraisal (CD18) of the North East region, which shows that the road network in the City can accommodate the extra traffic generated from development proposed in the Local Development Plan, providing the appropriate infrastructure is delivered in addition to the transport schemes currently proposed such as the Aberdeen Western Peripheral Route.

All sites within the Proposed Plan were assessed in the Development Options stage of the process. Accessibility to existing services and facilities as well as proximity to core paths, cycle routes and public transport were taken into consideration when the sites were assessed. We agree that more sustainable modes of transport must be promoted. The continued rise in travel by single occupancy vehicles is a contributor to increasing carbon dioxide emissions, and is impacting on climate change and worsening traffic congestion. A very significant change in travel patterns and travel behaviour is necessary and such a change will not be achieved unless new homes are accompanied by a commensurate increase in local services, employment opportunities and investment in walking, cycling and public transport facilities. The development of new communities should include integrated public transport and walking and cycling infrastructure to ensure that sustainable modes of travel provide an attractive alternative to the car. For site related transport issues please see Issue 33 for Countesswells, Issue 38 for Friarsfield and Issue 40 for Oldfold.

### Community Facilities

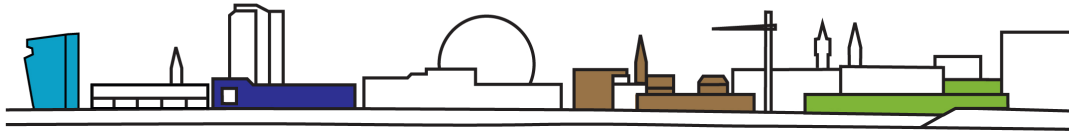
367, 640, 822, 1436: Masterplans will be developed for sites over 50 homes to make sure that adequate open space, walkways and other community facilities and services are included within the development. Masterplan Zones have been identified to help to co-ordinate the delivery of infrastructure. Contributions will be sought for any shortfalls in service and service infrastructure arising from development in the Deeside area and will be provided by the developers. This would include any water and sewerage requirements. Infrastructure requirements are set out in the Action Programme (CD20).

Appendix 4 (Infrastructure Requirements for Masterplan Zones) of the Proposed Plan sets out details of the locations where new or extended schools will be required to support new development. These have been identified following a detailed review of the number of current and forecasted capacity of existing schools and their ability to

accommodate new pupils generated by development. When developments come forward for implementation, developers will need to show how such facilities will be delivered, depending on the number of pupils likely to be generated, and taking account of the infrastructure requirements identified in the Proposed Plan. School Roll Forecasts, published annually by the Council, will provide an up to date picture of the capacity of schools.

The Council recommends that the spatial strategy for Deeside in the Plan is the preferred option for development.

**Reporter's conclusions:****Reporter's recommendations:**



**aberdeen** local development plan

# **RESPONSE TO PROPOSED PLAN CONSULTATION: COVE AND LOIRSTON**

**ISSUE 55 - 62**

<b>Issue (ref and heading):</b>	<b>ALLOCATED SITES: LOIRSTON OP77, OP80 AND OP78</b>	<b>55</b>
<b>Development plan reference:</b>	Opportunity sites OP77 - Loirston, OP80 - Calder Park and OP78 – Charleston, Table 10 and Appendix 2	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
<p>Mr Bernard Smart (174), Mrs Debra McDonald of Nigg Community Council (231), Mrs Aileen Kelly (232), Ms Rachel McGuinness (288), Mr Andrew Dalziel (291), Mr Greg Strange (323), Mr Robert Martin (328), Mr Roy Wilson of Kincorth/Leggart Community Council on behalf of Kincorth/Leggart Community Council (329), Mr Michael Gordon (340), Dr Maggie Keegan of Scottish Wildlife Trust (363), Mr Arnold Strachan (374), Ms Nicola Abrams of Scottish Environmental Protection Agency (408), Mrs Jan Harby of Jan Harby Design (410), Mr Ray Harby (413), Mr George Wilson (448), Mrs Doris Troup (466), Mrs Moira Hay (489), Mr David S. Mitchell (577), Mr Ian Wilson (579), Mr George Urquhart (609), Mr John Findlay of Ryden LLP on behalf of Balmoral Park LTD (617), Mrs Margaret Jappy Rae of Nigg Community Council (636), Ms Helen McPherson (667), Mr Graham Troup (763), Mr Gordon Pirie of Churchill Homes (801), Mr Alan Irving (881), Mr Bruce Smith of Paull &amp; Williamsons LLP on behalf of J W Muir Group plc (1217), Mr Neil Fraser (1228), Mr Carlo Crolla (1280), Mr Arthur Mutch (1303), Mrs Doris Mutch (1304), Mr Alan Duncan Mutch (1305), Mrs Jennifer Milne (1328), Mr Myles Brownhill (1366), Mr Jason Brownhill (1418), Mrs Sandra Brownhill (1419), Mr Richard Baker of MSP (1456), Mr James Brownhill (1475), Mr Stephen Booth of Aberdeen City Council - Asset Management (1519), Mr A. W. Findlayson of Cove and Altens Community Council (1537).</p>		
<b>Provision of the Development Plan to which the issue relates:</b>	Released for housing and employment under Policy LR1 with phasing for sites set out in Table 10	
<b>Summary of the representation(s):</b>		
<p>Object to Development at Loirston</p> <p>174, 231, 232, 288, 291, 323, 328, 329, 340, 410, 413, 448, 466, 489, 577, 579, 609, 617, 667, 763, 881, 1228, 1280, 1303, 1304, 1305, 1328, 1366, 1418, 1419, 1456, 1475, 1537, 231, 636: Object to development at Loirston.</p> <p>Environment and Recreation</p> <p>174, 323, 329, 340, 410, 413, 448, 489, 579, 763, 881, 1280, 1303, 1304, 1305, 1328, 1366, 1419: Loss of last area of Green Belt in this area. No justification for removal of the Green Belt designation. Contributes to the landscape setting of the City, and provides valuable physical separation between the urban core and suburbs. Not supported by Aberdeen Green Belt Review. The development of Loirston would further critically erode the green lung to the south and nullify the intended purpose of the Council's Green Belt policy. Area used for fishing.</p> <p>291, 636, 1366, 1418, 1419, 1537: Development does not comply with policies on, sustainable and active travel, landscape, and on the natural environment.</p> <p>174, 231, 232, 323, 328, 329, 410, 413, 448, 489, 609, 636, 1280, 1456: Negative impact on wildlife, the site is a nature reserve, previously a Site of Special Scientific Interest. Loirston Loch is home to many species of migrating birds. The only Loch within</p>		

the City and area has two district wildlife sites. Stadium would have a significant impact on wildlife. Ospreys have been cited and recorded. Local residents have noted bats around the loch. Bats are protected under the EU Habitats and Species directive. These would be at risk of mortality with increased levels of traffic (see Court of Appeal case R ex parte Morge v Hampshire CC [2010]). Badgers have been sighted by local residents in the area. Recent studies clearly indicate the presence of Otters, a European Protected Species.

448, 489: It is an area of natural beauty.

609: The dry stone dykes must also be protected.

232, 1475, 448, 466, 1280: Negative impact on recreational value of the area, area heavily used for dog walking.

232, 291: Lack of open space as a result of development.

291: Development goes against natural environment policies.

329: The area is also known to be wet and liable to flooding. Currently much of the surface water can soak away in the ground. Covering the area with houses, driveways and roads would cause rainfall to run off and probably land in the river Dee, a Special Area of Conservation.

363: Scottish Wildlife Trust expect that a full ecological survey of the site (s) would be necessary; significant impacts on notable ecological receptors and habitats must be mitigated by either maintaining key habitat features and by providing high quality green infrastructure that has high biodiversity value and/or that contributes to the greenspace network. The masterplanning process should engage with the community from the outset to ensure that local knowledge, expectations and aspirations are incorporated into the design layout of any proposed development.

408: Scottish Environment Protection Agency do not object to the allocation but feel that development in this area has the opportunity to protect and improve the water environment of the East Tullos Burn, which is in poor condition due to point source and diffuse pollution.

#### Transportation

229, 1475, 448, 466, 1280: Traffic to and from the stadium and this site will be a nightmare. Wellington Road and the Bridge of Dee cannot cope with additional traffic. Development would also result in noise and pollution. Thus, we contend that the development of a stadium at Loirston would cause severe traffic congestion problems on the south side of the City, in particular at the pinch points crossing the River Dee. Some of these roundabouts already have Ratio Flow Capacities in excess of 2.0 (levels above 0.85 are generally regarded as undesirable from a traffic management perspective). Developments in Aberdeenshire will add to the congestion. Development in this location will increase the need to travel, which goes against the Structure Plan objectives.

617: Access to Site OP77 should be taken from south of Loirston Loch, an additional access in close proximity to the recently approved Balmoral Park junction would severely



interrupt traffic flows on Wellington Road.

### Community Stadium

291, 577, 667, 881, 1228, 1280, 1475: The stadium and associated parked cars will detract from the local area. Cause anti-social behaviour. Aberdeen Football Club (and its partners) has failed to make a sufficient case for the proposed new football stadium at Loch Loirston. Aberdeen City and Shire Structure Plan identifies two broad areas as possible locations for a new football stadium (Kings Links and Cove / Loch Loirston). The inference of the provisions of the key diagram is that the case for one area / site over the other will be made through the local development plan preparation process. There is no attempt in the Proposed Aberdeen Local Development Plan to demonstrate why the Loirston site is (by implication) considered to be superior to the Kings Links site for a new football stadium. there is little or no support from the fan base to relocate to Loch Loirston. Its location on a Greenfield site far away from the centre of the City means that it has very limited public transport links which are vital for a facility that is proposed to accommodate around 21,000 spectators. There is no railway station in the vicinity. Bus services are limited. Aberdeen's network of park-and-ride facilities is very limited and there is not the parking capacity at those that are in use to accommodate large numbers of cars for fans transferring to bus (as proposed by Aberdeen FC). It is therefore inevitable that most of the fans would travel to the Loirston site by private car. Kings Links would be a more suitable location. The proposed location of the stadium would impact negatively on the Balmoral Business Park. A stadium would be unsuitable as the first thing people see when they enter Aberdeen.

617: The plan should be clearer about the development of a community stadium, there is only on reference at paragraph 2.29.

### Lochinch Farm

1456: Lochinch Farm that has been developed as an excellent educational centre where school children are introduced to this open environment and escorted round it by rangers.

### Gypsies and Travellers

291: Site should not include land for Gypsies/Travellers.

### Alternative Proposal

374: Alternative proposal to expand the development at site OP78 Charleston.

### Support for Allocations

801, 1217, 1519: Support the proposal, but seek a change to the boundary. A significant amount of masterplanning has been undertaken and a report called 'Loirston Aberdeen - A Place of City and National Importance' has been produced. This describes a refined masterplan resolving matters of detail and site layout.

801, 1217, 1519: The land is owned or controlled by Muir Group, Churchill Homes and Aberdeen City Council and all three parties have agreed to co-operate to bring the site forward for development. This makes the site deliverable in a way that will allow mature,

sensible, well considered and integrated design. The masterplan will continue to evolve.

801, 1217, 1519: Delivery of site OP77 is not dependent on the Aberdeen Western Peripheral Route and therefore this proposal is one of the very few proposals of this size, or possibly even the only development of this size in this position - this is another very significant positive factor.

1217: Detailed transportation issues will be worked up as a part of the ongoing masterplanning work. Messrs Fairhursts have been instructed by Muir Group in this respect and a report from them is attached as document 3.

#### OP77 Loirston Site Boundaries

801, 1217, 1519: Concerns about the boundaries of the site as shown in the Proposed Plan. The boundaries should be altered to reflect the boundaries of the most recent masterplan framework (as shown in 'Loirston Aberdeen - A Place of City and National Importance'). It is also important that there is sufficient flexibility within this process to allow further minor changes to these boundaries, should the refinement of the masterplan require: this is crucial if the highest quality design solution is to be achieved. Rather than constrain it or that detail, scope and design of the development emerging from the Masterplan should not be squeezed into the inevitably more arbitrary Local Development Plan boundaries.

1217: The Local Development Plan identifies significant areas of Green Space Network across the site. These boundaries should be indicative and should not sterilise areas from development.

#### Employment Land

1217: In Table 10 OP78 is identified for 20.5 hectares of employment land in the period 2024-2030. It is argued that the 11 hectares of employment land identified for site OP77 should be brought forward as a part of OP78. The mixed-use development proposed for OP77 will contain elements of employment land but the substantial block of 11 ha of employment land will impact on the delivery of this site. The 11ha of employment land would be more appropriately located at site OP78. It is important that, having commenced the Gateway Development should not be delayed or inhibited by the inability to bring forward land at OP78 which is identified as suitable for development but for reasons which are not justified is phased for a significantly later period of development.

#### Retail

Site OP78 is in a strategic location and it may be, having regard to proposed new development in the vicinity appropriate to allocated a large site in a strategic location for certain types of retail use. This would require to be subject to the retail policies. It is proposed that the Local Development Plan notation in respect of OP78 should recognise that possible future retail use subject to the terms of the Policy RT1.

### **Modifications sought by those submitting representations:**

#### Environment

174, 231, 291, 329, 340, 410, 413, 466, 489, 577, 579, 609: Re-zone as Green Belt

667, 881, 1228, 1247, 1280, 1303, 1304, 1305, 1366, 1418, 1419, 1456, 1475:  
Redesignate to green belt, and do not allocate football stadium on this site.

408: Scottish Environment Protection Agency requested that the need to consider opportunities for the protection and improvement of the watercourses within site OP72 is clearly highlighted.

#### Community Stadium

232: Scrap proposal and consider Beach area instead.

617: request that the community stadium proposals are specified and the site allocated in the plan. The Local Development Plan should specify that site OP77 should be accessed from the south of Loirston Loch. The stadium site should be located to the south west of Loirston loch, not as currently proposed in the planning application.

#### Alternatives

323: Parts of the large Green Belt at Cults, Kingswells and Kirkhill should be used to make up any shortfall in development land before wiping out the last bit of Green Belt in the south.

374: Additional land included at OP78.

#### Recreation

328: I would like to see kids sailing on the loch and more wildlife. Maybe a skate park and other sports would benefit the kids from this area and there would be less vandalism if they had things to do.

#### Site Boundary

801, 1217: Amend site boundary to reflect the boundary of the site indicated by the Development Framework. Alternatively there should be written into the Local Development Plan a recognition that there may require to be an early review of the Local Development Plan boundaries emerging from an approved Masterplan. In any event there should be recognition that in relation to more detailed establishment of the precise boundaries of the site and treatment of these boundaries the adoption of an approved Masterplan for the site as Supplementary Guidance by the planning authority should have the effect of establishing the detail of the location and treatment of the boundaries of the site.

#### Employment Land

1217: Reallocate dedicated employment land to OP78 Charleston. OP78 should be released immediately. It is proposed that the Local Development Plan notation in respect of OP78 should recognise that possible future retail use subject to the terms of the Policy RT1.

#### Gypsies and Travellers

291: No Travellers

**Summary of response (including reasons) by planning authority:**

## General

The Aberdeen City and Shire Structure Plan (CD8) sets the requirements for greenfield housing and employment land allowances and authorises a review of green belt boundaries in order to accommodate them. A Development Options Assessment (CD13), Strategic Environmental Assessment (CD21), and consultation on the Main Issues Report, Responses to Representations (CD15) were used to assess sites. These were used to identify the most suitable locations to deliver the required growth and in accordance with Scottish Planning Policy paragraph 159 (CD8) which requires green belts to direct growth to the most appropriate locations. This process is described in the Green Belt Review (CD19) which also sets and explains the detailed boundaries of the green belt and land release areas. This site emerged as a desirable option because this site is within a shallow bowl and the majority of the surrounding land is on higher ground. It is not expected that the housing element of this development in this location would be overly conspicuous. A stadium close to the Loch is likely to be more prominent within the landscape. However, the scenic quality of the area is compromised by intrusive buildings, pylons and overhead cables, and radio masts. It is the Council's submission that the development of an iconic building and landscaping of the land to either side of the A956 could create a gateway feature for Aberdeen. Boundaries have been drawn to avoid the Local Nature Reserve at Kincorth Hill and land required for the Aberdeen Western Peripheral Route. Wellington Road and the A90 provide clear boundaries for the southern part of the site. Planning Permission (P101299) has now been granted for the development of a community stadium on this site (RD89)

## Natural Environment and Flooding

It is acknowledged in the Environmental Report and Development Option Assessment that Loirston Loch and immediate environs and Kincorth Hill are in the site, both of which are designated as District Wildlife Sites, Kincorth Hill is also a Local Nature Reserve and Loirston Loch is a Site of Interest to Natural Science, see Maps of District Wildlife Sites (CD29). These areas are indicated on the reverse of the Proposed Plan proposals map. In order to avoid negative impacts on these areas the boundary of the site excludes Kincorth Hill to the north from the allocation, and it remains in the plan as Green Belt and Greenspace Network, Loirston Loch and its immediate environs are designated as Green Space Network. Therefore, all land free from constraints has been identified for development and a masterplan for this site will be required to work within these parameters. The Local Development Plan has made use of Green Space Network to show where negative impacts resulting from development should be mitigated and where environment needs to be considered. The Green Space Network includes the District Wildlife Site, Loirston Loch, and provides for green link between Kincorth Hill and to the coast. The Environmental Report identifies that a large proportion of development will take place on greenfield sites, which will have long-term negative impacts on habitat loss (green space, open space, Green Belt and the countryside around the City), habitat fragmentation and vegetation removal. All of the Natural Environment and Open Space policies provide protection to biodiversity and developments that may have significant impacts on biodiversity are required to strictly comply with these policies. In view of the potential significant impacts on biodiversity, developers will be required to undertake an

EIA prior to commencing some developments. EIA would address issues such as the creation of wildlife corridors. Paragraph 2.6 of the Proposed Plan states that "development proposals must take account of the mitigation measures highlighted in the SEA."

Scottish Environment Protection Agency have indicated that the site is a flood risk category D site, i.e. it has a minor water course adjacent or running through the site, and development would require careful surface water management. Policies NE6 Flooding and Drainage, Supplementary Guidance on Drainage Impact Assessment (RD72) and Supplementary Guidance on Buffer Strips (RD71) will provide mitigation for the effects of development. All allocations that have been identified as having a significant impact on water quality will be required to comply with these policies, and specific reference is made to this within the Environmental Report.

Policy NE1 Green Space Network makes it clear that it will be for the masterplanning of new developments to determine the detailed location and extent of the Green Space Network. As long as the objective to create a wildlife corridor from Kincorth Hill and Loirston Loch can be successfully achieved, the precise location may change.

#### Transport and Infrastructure

The Council undertook a process known as the Transport Framework (CD22) at an early stage in the plan preparation process. Alongside the overall Development Options assessment process, this provided a transport based assessment framework against which Development Options were assessed. The results of this work were considered against the overall Development Options process and helped the Council to decide which sites to identify as Preferred Options in the Main Issues Report. The results of the Transport Framework were published on the Council's website alongside the Main Issues Report (CD14).

The Council has consulted with transport partners and colleagues, including bus operators, to examine the implications of development for the transport network and identify transport infrastructure required to create an efficient, integrated and comprehensive transport network for all travel modes. Strategic transport modelling has been undertaken to test the efficacy of the current transport network and to help determine the likely need for new infrastructure. As a result, the requirements for new roads, walking and cycling infrastructure and public transport have been identified in the Proposed Plan and attributed to eleven Masterplan Zones across the City.

Infrastructure requirements will need to be reflected in any Masterplan or planning application for development. The precise level of infrastructure requirements and developer contributions will need to be agreed with the Council through the Masterplan process and any subsequent planning application. This will include suitable access arrangements, which will require to be supported by a transport assessment.

#### Clarity of the Allocation for Community Stadium and Assessment of Alternatives

It is accepted that the plan should have been clearer about the allocation of the community stadium. It is referred to in the text on the Loirston Area (paragraph 2.29). If the Reporter is so minded the OP77 reference in the Appendix could reference the community stadium. In 2006 it was agreed to develop proposals, without commitment, for a community stadium and three areas were selected for consideration: Bridge of Don,

King's Links and Cove (two sites at Cove were considered: Loirston Loch and Calder Park). An Outline Business Case was carried out for each location which included an assessment of the environmental impact and recommended Loirston Loch as the preferred option to be taken forward for a full feasibility study and business case. The Structure Plan recognises the significant potential a new stadium, built to modern standards, would offer to attract other sporting events and tournaments and as a venue for alternative uses. It provides strong support for a new stadium, which would bring significant economic, social and cultural benefits to the whole community of Aberdeen and the North East. The proposal would provide a prestigious and regionally important, modern, high quality sports, leisure and community facility in Aberdeen, complementing the recently constructed Sports Village at Linksfield. It would bring significant long term benefits to the economy of Aberdeen, in particular through the potential to attract major events. The policies in the Plan will provide mitigation for significant negative impacts resulting from development.

#### Lochinch Farm

At this stage there are no detailed plans for the removal of Lochinch Farm. It will be for the masterplan and ultimately the Council as owners of the property to judge if this building should remain in its current use or if this should change.

#### Gypsyies and Travellers

In order to identify the most suitable areas for Gypsy and Traveller sites an assessment of alternatives was undertaken in which the new development areas were assessed in terms of their suitability to provide a Gypsy and Traveller site. (RD86). This concluded that the site at Loirston would be one of three strategically located sites to accommodate a Gypsy and Traveller site. See response to Issue 111 Policy H6 and H7: Gypsy Traveller Sites Proposals for response on general need.

#### Retail Proposal

It is submitted that OP78 Charleston is not an appropriate location for a large scale retail development. There are retail parks in close proximity to this site at Garthdee and Portlethen 3.6km and 4.5 km, by road respectively. A development at this location is likely to have significant impacts on those existing retail areas, and dependant on the scale could have a significant impact on the City Centre. If there is a demand for additional retailing as a result of new housing, it would be more suitable to make provision for this demand in an accessible location within OP77 Loirston, Policy RT5 - Retail Development Serving New Development Areas makes provision for this and its scale should be commensurate to the local needs generated by the development.

#### Employment Land

Providing an element of employment within the development fits with the aim of the Structure Plan to create sustainable communities. The type of employment areas that could be incorporated into OP77 Loirston could be significantly different from those provided on OP78, which is strategically located close to the Aberdeen Western Peripheral Route. Within the residential area smaller scale employment opportunities could be created, supporting start up businesses in the area and Class 4 uses which are compatible with a residential environment. Taking into account the land take for a stadium, and employment there remains sufficient land to provide 1500 homes on this

site at a suitable density. Therefore, it is the Council's submission that the provision of employment land within OP77 Loirston will provide economic benefits, provide employment opportunities in close proximity to residential areas, encourage sustainable modes of transport. There is no valid justification as to why the site could not achieve the overall housing allocation and employment land allocation.

#### Additional Land

Respondent 374 suggests an increase in the development area at site OP78. The respondent has not provided a map indicating the areas, and one has not been provided on request. However, from the description it is assumed that the respondent is referring to the area of Green Belt between OP78 and the A90 and Wellington Road to the north and east. The boundaries of this site have been drawn to avoid land required for the Aberdeen Western Peripheral Route, see Green Belt Review (CD19). This land would be unable to contribute to the supply of employment land and it would be inappropriate to include this additional land within the allocation.

**Reporter's conclusions:****Reporter's recommendations:**

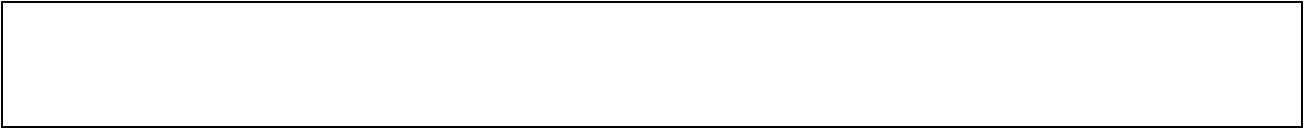
<b>Issue (ref and heading):</b>	<b>ALLOCATED SITE: SOUTER HEAD ROAD, COVE OP76</b>	<b>56</b>
<b>Development Plan reference:</b>	Opportunity Site OP76 - Souter Head Road, Cove, Appendix 2 Page 61	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Ms Nicola Abrams of Scottish Environmental Protection Agency (408), Mr Neil Fraser (1228).		
<b>Provision of the Development Plan to which the issue relates:</b>	Site identified as a possible retail use, land use zoning is residential H1	
<b>Summary of the representation(s):</b>		
<p>408: Scottish Environment Protection Agency do not object to the allocation of OP77 but feel that development in this area has the opportunity to protect and improve the water environment of the East Tullos Burn, which is in poor condition due to point source and diffuse pollution. In addition the site lies in close proximity to a licensed landfill site which is known to be actively producing gas, although the supporting text in Appendix 2 highlights that a waste management licence is still in place, this should be acknowledged.</p> <p>1228: Object to proposal because access to the site will be problematic and there is no need for retail in this location. Adequate provision at Bridge of Dee, Portlethen.</p>		
<b>Modifications sought by those submitting representations:</b>		
<p>408: Scottish Environment Protection Agency requested that the need to consider opportunities for the protection and improvement of the watercourses within site OP76 is clearly highlighted. Acknowledge a Waste Management Licence is still in place over part of the site and that any development must be preceded by suitable remediation and gas risk assessments.</p> <p>1228: Remove proposal for shopping area from plan</p>		
<b>Summary of response (including reasons) by planning authority:</b>		
<p>408: Environment and Flooding</p> <p>Scottish Environment Protection Agency's suggestions for the inclusion of text within the Proposed Plan are partially accepted. We feel that as the suggested text relates to the delivery of the site it is best placed in the Action Programme as opposed to Appendix 2. If the Reporter is so minded, the Action Programme will be amended to include reference to site OP76 and to include the following text: "Any Masterplan should take account of the existing water features within the site, the pressures which apply to these features and should direct developers to look for opportunities to protect and improve the water environment."</p> <p>If the Reporter is so minded it may be appropriate to include reference in the plan to the landfill constraint within Appendix 2.</p> <p>1228: Retail and Transport Impact</p> <p>The Proposed Plan identifies that this is a retail opportunity. For a proposal to be</p>		



acceptable it must comply with all the policies in the plan and there would be a requirement for a retail and traffic impact assessment. A retail proposal in this area would serve the local area and would only be acceptable if it does not impact on existing retail centres and demonstrates that sufficient measures have been taken to minimise traffic generated.

**Reporter's conclusions:****Reporter's recommendations:**

<b>Issue (ref and heading):</b>	<b>ALLOCATED SITE:BLACKHILLS QUARRY, COVE OP71</b>	<b>57</b>
<b>Development Plan reference:</b>	Opportunity site OP71 - Blackhills Quarry, Cove, Appendix 2 Page 70	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Mrs Elaine Farquharson-Black of Paull and Williamsons LLP on behalf of Leiths (Scotland) Ltd. (1541).		
<b>Provision of the Development Plan to which the issue relates:</b>	Green Belt, Opportunity site identified for hard rock extraction and processing	
<b>Summary of the representation(s):</b>		
<p>1541: This site has planning permission for hard rock extraction. The site has at least another 15 years of reserves left to exploit, and is a major resource for the City. Whilst the site is identified as an opportunity site, it is identified as Green Belt. This is incorrect and could cause problems for Leiths in terms of their ongoing operation.</p> <p>The boundary of OP71 should be extended to include land hatched blue and green on attached plan (Appendix 2). The area of hatching comprises the office and manufacturing/plant area and Leiths have invested significantly in their operation on this site. This should be acknowledged as an employment area. The Green Belt designation could restrict further investment.</p> <p>The area hatched in green should be protected under Policy R1 as a future area of mineral extraction. The area in question is currently agricultural land and is underlain by Cove granite. It is submitted that this area should be protected in the proposed plan by the extension of OP71.</p>		
<b>Modifications sought by those submitting representations:</b>		
1541: OP71 needs to be reorganised as a site safeguarded under policy R1 and not Green Belt. Furthermore, the boundaries of OP71 should be extended to include firstly the office plant area at Blackhills Quarry as shown hatched red on plan and secondly the area of future reserves hatched green on the plan.		
<b>Summary of response (including reasons) by planning authority:</b>		
<p>1541: Policy NE2 - Green Belt applies to this site. This policy places restrictions on the areas in which mineral extraction can take place. In response to comments on Policy R1, Issue 125 Policy R1: Minerals it is suggested that the policy is to be amended to remove test 1 allow development for the purpose of mineral extraction in the Green Belt. If this change was made by the Reporters it would allow for further mineral extraction in this area subject to other criteria in Policy R1.</p> <p>There is no desire to see development that is not associated with mineral extraction in this area and an employment zoning would be inappropriate for this site.</p>		
<b>Reporter's conclusions:</b>		
<b>Reporter's recommendations:</b>		



<b>Issue (ref and heading):</b>	<b>ALLOCATED SITES: ABERDEEN GATEWAY/MOSS-SIDE/MAINS OF CAIRNROBIN OP69 AND OP79 BLACKHILLS OF CAIRNROBIN</b>	<b>58</b>
<b>Development Plan reference:</b>	OP69 - Aberdeen Gateway/Moss-side/Mains of Cairnrobin and OP79 - Blackhills of Cairnrobin, Table 10 and Appendix 2.	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Ms Nicola Abrams of Scottish Environmental Protection Agency (408), Mr A. W. Findlayson of Cove and Altens Community Council (1537), Mrs Elaine Farquharson-Black of Paull and Williamsons LLP on behalf of Leiths (Scotland) Ltd. (1541).		
<b>Provision of the Development Plan to which the issue relates:</b>	Existing site identified as B11, future employment areas subject to LR1 and phasing in Table 10	
<b>Summary of the representation(s):</b>		
<p>408: Scottish Environment Protection Agency do not object to the allocation but feel that development in this area has the opportunity to protect and improve the water environment of the East Tullos Burn, which is in poor condition due to point source and diffuse pollution.</p> <p>1537, 1541: Object to the development for the following reasons:</p> <p>It is Green Belt and would result in over development of the area.</p> <p>Development in close proximity to the quarry could restrict its operation through the potential for complaints about nuisance. A 400m stand off would cover half of OP79 and as such this area should remain undeveloped, see Appendix 1(1541).</p> <p>Leiths have also acquired land for future mineral extraction, and wish to have this land identified as such. Leiths are concerned that development in OP79 could sterilise this area of reserves. This is contrary to national and local planning policy.</p> <p>The site was identified as a flood risk by Scottish Environment Protection Agency at the Main Issues Report Stage. Photograph at appendix 3 demonstrates this (1541).</p> <p>In approving the Aberdeen Gateway development Aberdeenshire Council indicated that severe landscape impacts were likely to occur on the borders of the site and around Blackhill and in the vicinity of Mains of Charleston.</p>		
<b>Modifications sought by those submitting representations:</b>		
<p>408: Scottish Environment Protection Agency requested that the need to consider opportunities for the protection and improvement of the watercourses within the site is clearly highlighted.</p> <p>1541: Delete site OP79 and reallocate employment land to Deeside corridor.</p>		
<b>Summary of response (including reasons) by planning authority:</b>		
<p>OP79 Blackhills of Cairnrobin</p> <p>The Aberdeen City and Shire Structure Plan (CD8) sets the requirements for greenfield</p>		

housing (or employment land) allowances and authorises a review of green belt boundaries in order to accommodate them. A Development Options Assessment (CD13), Strategic Environmental Assessment (CD21), and consultation on the Main Issues Report (Responses to Representations (CD15) were used to assess sites. These were used to identify the most suitable locations to deliver the required growth and in accordance with Scottish Planning Policy paragraph 159 (CD3) which requires green belts to direct growth to the most appropriate locations. This process is described in the Green Belt Review (CD19) which also sets and explains the detailed boundaries of the green belt and land release areas. The assessment of site OP79 Blackhills of Cairnrobin indicated that development of this site was unlikely to have any significant impact on the landscape. The site is relatively flat and shares site boundaries with the Aberdeen Gateway Development to the west and a large employment allocation in Aberdeenshire to the south and it would provide a small extension to these employment areas.

The boundary of site OP69 was drawn to reflect the current quarry operation and as such the eastern boundary of this site was moved to ensure there was no negative impact on the quarry. During the preparation of the Main Issues Report and Proposed Plan the Council were not made aware of the plans to extend the boundary of the operational quarry, and as such this conflict has arisen. The site is allocated for future growth in the period 2024-2030 in line with the Structure Plan employment land requirements for that time. It would require a review of the Local Development Plan to release this site. This development could be phased in line with Leiths plans to ensure that timing and location of development does not negatively affect the quarry. In other words, it may be possible for the quarry to be worked out in that area prior to 2024.

No objections were received at the time of the Main Issues Report and the only comment received on the Main Issues Report was from Scottish Environment Protection Agency (see Main Issues Report Consultation Responses, Area H) (RD87). Scottish Environment Protection Agency's suggestions for the inclusion of text within the Proposed Plan are partially accepted. We feel that as the suggested text relates to the delivery of the site it is best placed in the Action Programme as opposed to Appendix 2. If the Reporter is so minded, the Action Programme will be amended to include reference to site OP76 and to include the following text: "Any Masterplan should take account of the existing water features within the site, the pressures which apply to these features and should direct developers to look for opportunities to protect and improve the water environment."

OP69 Aberdeen Gateway

No objections have been received in relation to the existing site at Aberdeen Gateway or the proposed northward expansion.

#### **Reporter's conclusions:**

#### **Reporter's recommendations:**

<b>Issue (ref and heading):</b>	<b>EXISTING 2008 LOCAL PLAN HOUSING ALLOCATIONS: COVE OP72 AND OP75</b>	<b>59</b>
<b>Development Plan reference:</b>	Opportunity sites OP72 - Cove and OP75 - Stationfields, Cove, Appendix 2 page 61	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Mr Rouen Halfacre (273), Mr John Webb (372), Mr Robert Stark (393), Ms Nicola Abrams of Scottish Environmental Protection Agency (408), Mrs Jayne Seivwright (1266), Ms Deborah Message (1385), Mr Garry Beattie (1400), Mrs Heather Watt (1542).		
<b>Provision of the Development Plan to which the issue relates:</b>	Sites identified as opportunity sites for housing carried over from the current Local Plan.	
<b>Summary of the representation(s):</b>		
<p>273, 372, 393, 1385, 1400, 1542: Object to OP75 as it will result in increased traffic, especially on the coast road, which is unsuitable. It will have a negative effect on the environment. Respondents feel that the delivery of the train station is uncertain, and respondent 393 does not feel there is a need for a train station in Cove.</p> <p>1266: Object to OP72 as it would result in the loss of valuable open space in close proximity to the local community. There would also be a negative impact on biodiversity as a result of development.</p> <p>408: Scottish Environment Protection Agency do not object to the allocation of OP72 but feel that development in this area has the opportunity to protect and improve the water environment of the East Tullos Burn, which is in poor condition due to point source and diffuse pollution. In addition the site lies in close proximity to a licensed landfill site which is known to be actively producing gas, although the supporting text in Appendix 2 highlights that a waste management licence is still in place, this should be acknowledged.</p>		
<b>Modifications sought by those submitting representations:</b>		
<p>273, 393: Remove OP75</p> <p>393: If houses have to be built they should be as far away from existing houses/schemes as possible. Residential OP75 Number of dwellings to be reduced.</p> <p>408: Scottish Environment Protection Agency requested that the need to consider opportunities for the protection and improvement of the watercourses within site OP72 is clearly highlighted. Acknowledge a Waste Management Licence is still in place over part of the site and that any development must be preceded by suitable remediation and gas risk assessments.</p> <p>1266, 1385: Would prefer to see no development on OP72, but if it does go ahead respondents request the cycle path is retained. So many people make use of this path - both cyclists and pedestrians. Would request that the development is sympathetic to the 4 existing homes which will be hugely impacted.</p> <p>1542: Would prefer to see no development on OP75. If development does go ahead then there needs to be more care and consideration for the wildlife in the area and</p>		

development should be of a high quality and respect surroundings.

1400: wish to see an impact of development on traffic in the area and ensure that appropriate services are provided.

### Summary of response (including reasons) by planning authority:

#### Existing Sites

It should be noted from the outset that sites OP72 and OP75 are identified as greenfield housing allocations in the 2008 Aberdeen Local Plan (CD12). A Cove Masterplan and Charrette Report has been prepared for these two sites, Supplementary Guidance 9.6 (RD75). The majority of site OP72 Cove was also allocated in the 1991 Local Plan (CD10). In this instance, we should draw your attention to paragraph 78 of Circular 1/2009 Development planning (CD4) which states "Scottish Ministers intend the appointed person to, within the bounds of the issues raised in the representations, primarily examine the appropriateness and sufficiency of the content of the proposed plan. . . . The appointed person should generally not recommend modifications to parts of the plan which have been examined in previous examinations or rolled forward from previous plans, unless circumstances have clearly changed."

The overall housing requirements contained in the Structure Plan are significant and are in addition to the existing allocations. The absence of these sites would have knock on implications for meeting the housing land requirements. As referred to, a Cove Masterplan and Charrette Report has recently been adopted as Supplementary Guidance to the 2008 Local Plan, and planning applications have now been submitted for site OP72. It is submitted that the circumstances have not changed to warrant a review of this site.

#### Suitability of OP72 and OP75

it is contended that both sites are well located to benefit from and support local services such as primary schools, shops, which are within walking distance. Policies in the plan would help to mitigate impacts of the development on the loss of open space and impact on biodiversity. Mitigation measures for greenfield development are set out in the Environmental Report Table 5.1 (CD21). It is recognised that in the case of OP72 the previous use as a Landfill site places constraints on the development of this site. It may be appropriate to include reference in the plan for improvements to the local water environment and specifically to the landfill constraint should the Reporter consider it appropriate. Redevelopment of this site could have positive benefits in the area in the remediation of the landfill site, the Cove Masterplan and Charrette Report acknowledges the contamination and proposes a remediation strategy. Scottish Environment Protection Agency would be consulted on proposed remediation and the contaminated land as recommended by Planning Advice Note 33: Development of Contaminated Land (RD13) and this would be a material planning consideration.

Scottish Environment Protection Agency's suggestions for the inclusion of text within the Proposed Plan are partially accepted. We feel that as the suggested text relates to the delivery of the site it is best placed in the Action Programme as opposed to Appendix 2. The Action Programme will be amended to include reference to site OP76 and to include the following text: "Any Masterplan should take account of the existing water features within the site, the pressures which apply to these features and should direct developers

to look for opportunities to protect and improve the water environment."

#### Impact of OP72 on Existing Pedestrian Links

The Cove Masterplan and Charrette Report takes into consideration the core path network (RD75) in the area and has identified a route through the development of site OP72 for Aspirational Path 3. Therefore pedestrian links would be retained through this site.

#### OP75 Transport Issues

There is the opportunity within the development of OP75 Stationfields for a new train station, and land has been reserved for this purpose. A train station would improve both local and long-distance transportation and accessibility, but with no current proposal from Scotrail. The Cove Masterplan recommends that there is a further process for determining the future of the railway and the feasibility of providing a station. A transport assessment would be required by policy T2 - Managing the Transport Impact of Development and would be required to demonstrate that sufficient measures have been taken to minimise the traffic generated, this would include any impacts on the coast road.

#### **Reporter's conclusions:**

#### **Reporter's recommendations:**



<b>Issue (ref and heading):</b>	<b>ALTERNATIVE SITE: PETERSEAT</b>	<b>60</b>
<b>Development Plan reference:</b>	No provision in the Proposed Plan	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Mr John Findlay of Ryden LLP on behalf of Forbes Homes LTD (615).		
<b>Provision of the Development Plan to which the issue relates:</b>	Alternative Proposal in Green Belt	
<b>Summary of the representation(s):</b>		
<p>615: objection is taken to the failure of the proposed Plan to identify land at Peterseat (Development Option Ref 13/01) for business and industrial development.</p> <p>The submitted Development Bid (reference 13/01) proposes to extend the existing industrial land to the north east and north west, within the existing site boundary put forward in the previously granted planning permission. This will include the extension of industrial land into an area of the existing site, the majority of which already has planning permission for industrial development.</p>		
<b>Modifications sought by those submitting representations:</b>		
615: Allocate site 13/01 for an extension to the existing business and industrial development.		
<b>Summary of response (including reasons) by planning authority:</b>		
<p>The Aberdeen City and Shire Structure Plan (CD8) sets the requirements for greenfield housing (or employment land) allowances and authorises a review of green belt boundaries in order to accommodate them. A Development Options Assessment (CD13), Strategic Environmental Assessment (CD21), and consultation on the Main Issues Report (Responses to Representations (CD15) were used to assess sites. These were used to identify the most suitable locations to deliver the required growth and in accordance with Scottish Planning Policy paragraph 159 (CD3) which requires green belts to direct growth to the most appropriate locations. This process is described in the Green Belt Review (CD19) which also sets and explains the detailed boundaries of the green belt and land release areas. The assessment of site 13/01 considered this proposal and judged that it was unsuitable in landscape terms. The only comments made during the Main Issues Report came from the developer. It is the Council's position that development at this location should not encroach further north than the 75metre contour line as this would cause major skyline problems and be very prominent from many important locations throughout Aberdeen.</p> <p>A copy of the approved site boundary (RD48) does show a larger site area than indicated in the Proposed Plan. However, these areas are identified as landscaping, and it is important that these areas of landscaping are not eroded as development would have a negative impact on the skyline in this area. This is consistent with the landscaping along the eastern entrance to the Altens industrial site at Hareness Road, which is also zoned as Green Belt.</p>		
<b>Reporter's conclusions:</b>		

**Reporter's recommendations:**

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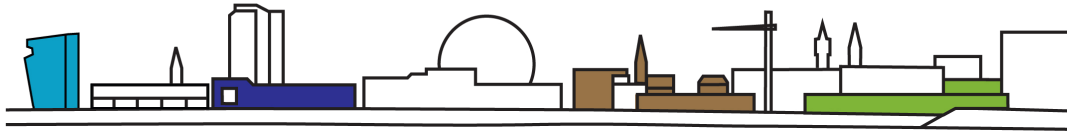
<b>Issue (ref and heading):</b>	<b>ALTERNATIVE SITE: RIGIFA FARM</b>	<b>61</b>
<b>Development plan reference:</b>	None	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Mrs Catherine Thornhill of Ryden LLP on behalf of Mr Ian Stephen (645).		
<b>Provision of the Development Plan to which the issue relates:</b>	Alternative Proposal in Green Belt	
<b>Summary of the representation(s):</b>		
645: The development bid for the site on behalf of Mr I. Stephen (March 2009); response to the Main Issues Report consultation (October 2009) and the above representation to the Proposed Plan have all provided sound justification for the allocation of site 13/07 Rigifa Farm in the Aberdeen Local Development Plan to accommodate a small proportion of development within the Loirston and Cove area.		
<b>Modifications sought by those submitting representations:</b>		
645: A reduced area of site 13/07, being the 5.27ha which lies outwith the 250m exclusion zone around Blackhills of Cairnrobin quarry should be allocated for development in the Aberdeen Local Development Plan. The site is capable of accommodating a maximum of 140 dwellings and strategic landscaping, circa 5ha of commercial or industrial development or a mix of these uses and should be allocated accordingly.		
<b>Summary of response (including reasons) by planning authority:</b>		
<p>The Aberdeen City and Shire Structure Plan (CD8) sets the requirements for greenfield housing (or employment land) allowances and authorises a review of green belt boundaries in order to accommodate them. A Development Options Assessment (CD13), Strategic Environmental Assessment (CD21), and consultation on the Main Issues Report (Responses to Representations CD15) were used to assess sites. These were used to identify the most suitable locations to deliver the required growth and in accordance with Scottish Planning Policy paragraph 159 (CD3) which requires green belts to direct growth to the most appropriate locations. This process is described in the Green Belt Review (CD19) which also sets and explains the detailed boundaries of the green belt and land release areas. The Site assessments and their scores on their own do not tell us whether a site is suitable for development or not. But, they provide a wealth of information which, when taken together, helped us to reach a view on each site. In some cases a particular constraint can out weigh positive features.</p> <p>The main constraint to development on this site is the proximity to the working quarry at Blackhills. Through consultation on the Main Issues Report two responses were received providing conflicting views about the suitability of development this close to the quarry (CD15). The development is within close proximity of the quarry, and aspects of the development would certainly be within the exclusion zone. A residential use close to but outwith the exclusion zone would not be a good neighbour for the working quarry.</p> <p>Within this area there is an allocation for 1,500 homes at Loirston, which include a mix of uses. The housing requirements contained in the Structure Plan have been met by the allocations made in the Proposed Plan on more suitable sites. Therefore, there is not a need to identify this site, it does not provide a suitable alternative to the mixed-use</p>		

development at Loirston, and it would not create a desirable environment so close to a working quarry.

The other site mentioned in the response was OP79, which is an eastward extension to the Aberdeen Gateway Business Park, is outwith a 250m buffer of the existing quarry boundary. It is also contended that this use is more compatible in closer proximity to the quarry than a residential use, landscaping and car parking can be located to increase the distance between the quarry and development.

**Reporter's conclusions:****Reporter's recommendations:**

<b>Issue (ref and heading):</b>	<b>SHELL HEADQUARTERS ALTENS</b>	<b>62</b>
<b>Development plan reference:</b>	None	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Ms Lorraine Davison of DPP on behalf of Shell (UK) Ltd (554).		
<b>Provision of the Development Plan to which the issue relates:</b>	Site is identified as BI1 - Business and Industrial Land	
<b>Summary of the representation(s):</b>		
554: As presently drafted, the Proposed Plan does not recognise this extant planning permission, and the site is merely included as part of the wider Business and Industrial Land area. Whilst this blanket policy approach is appropriate in land use terms, it does not properly acknowledge the extant permission for the redevelopment of the site for a significant new HQ facility.		
<b>Modifications sought by those submitting representations:</b>		
554: We would therefore request that the Proposed Plan is amended to include the full extent of the current Shell HQ site (as shown on the attached plan) as an Opportunity Site for the development of a high density, Class 4 Office complex. In support of this proposed amendment we have enclosed copies of the extant Planning Permission (Ref: A6/1408) and the relevant Committee Report.		
<b>Summary of response (including reasons) by planning authority:</b>		
Policy BI1 - Business and Industrial Land covers this area. This policy allows for the development of class 4, 5 and 6 developments, and the planning approval was for a class 4 office development. This policy also provides support for expansion of existing concerns. The zoning does not restrict the development of a new HQ facility, and it is appropriate to maintain a general business and industrial land zoning in order to assess alternative proposals that may be considered for this site.		
<b>Reporter's conclusions:</b>		
<b>Reporter's recommendations:</b>		



**aberdeen** local development plan

**RESPONSE TO PROPOSED PLAN  
CONSULTATION:  
PROPOSALS WITHIN THE URBAN AREA**

**ISSUE 63 - 87**

<b>Issue (ref and heading):</b>	<b>ALLOCATED SITES: OP19 HAUDAGAIN TRIANGLE, OP21 MANOR WALK, MIDDLEFIELD</b>	<b>63</b>
<b>Development Plan reference:</b>	OP19 and OP21 and Appendix 2	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Mr Craig Leuchars (743), Mr John Murray (1198), Ms Lorraine Jones of Sport Scotland (1244).		
<b>Provision of the Development Plan to which the issue relates:</b>	OP19 – improvement to roundabout, proposed retail park and open space. OP21 housing replacement from OP19.	
<b>Summary of the representation(s):</b>		
<p>743: Object to development of OP19: Haudagain Triangle, Middlefield. Traffic congestion at the Haudagain Junction is well documented as being a major traffic pinch point. Any improvements made to this junction to improve traffic flow should not be undone through the construction of a subsequent retail park encouraging more traffic back into this area.</p> <p>1198: Object to the proposed planning development of OP21: Manor Walk, Middlefield. Main concerns are, the scale of the proposed housing site overlooking my dwelling, and how close it will be to the rear of my house. Extensive excavations may destabilise the 15' high granite wall at the rear of my property. Also concerned of the impact the proposed development may have on the value of my property.</p>		
<b>Modifications sought by those submitting representations:</b>		
<p>743: OP19 should be designated Urban Green Space only and landscaped accordingly.</p> <p>1198: Withdraw the Proposed Plan.</p>		
<b>Summary of response (including reasons) by planning authority:</b>		
<p>Opportunity sites reference OP19 and OP21 are intrinsically linked via the Middlefield Regeneration Strategy. The land required to deliver the proposed improvements to the Haudagain roundabout at OP19 will result in the loss of approximately 80 homes. The OP21 site is currently zoned as Urban Green Space which the Council currently proposes to either: - replace with the same amount of Urban Green Space on the vacant land resulting from the Haudagain roundabout improvements situated between the existing roundabout and the proposed road spur, - or to enhance green space in the neighbouring area beside the Henry Rae Centre</p> <p>For the former option, a new area of Urban Green Space retail development is proposed. The Development Options Assessment Report indicates that this proposal would improve the level of accessibility to shops and services and would provide jobs in the area and generate funds for regeneration initiatives. It also indicates that whilst local convenience shopping may be appropriate, a larger superstore would require a Retail Impact Assessment and sequential test would be required to examine the impact of such a development.</p> <p>The STAG2 Appraisal for the Haudagain improvements established a 'ceiling' for any development here that would not be detrimental to the junction improvement. In addition, as part of any masterplan and subsequent planning application the applicant will need to</p>		

demonstrate that the scale of development is acceptable in this location, that it could be served by walking , cycling and public transport, and that there would be no net detriment on the road network, via the usual Transportation Assessment. It should be noted that this is currently a trunk road junction and therefore currently the responsibility of the Scottish Government and Transport Scotland.

We also note the importance and benefits of improving the transport network in this area, and the wider benefits this will have in easing traffic flow across the transport network.

In relation to the OP21 Manor Walk proposal, any development here will need to take account of the neighbouring uses including any properties adjacent to the site. An appropriate layout will need to be agreed and consultation undertaken with local communities.

**Reporter's conclusions:****Reporter's recommendations:**



<b>Issue (ref and heading):</b>	<b>ALLOCATED SITES: WOODEND HOSPITAL ANNEX AND SUMMERHILL ACADEMY, LANG STRACHT, GREENFERN INFANT SCHOOL OP38 AND OP120 OP37 AND ALTERNATIVE SITE BURNSIDE CENTRE</b>	<b>64</b>
<b>Development plan reference:</b>	OP38, OP120 and OP37, Appendix 2	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Mr Ian Kelly on behalf of Aberdeen City Council Asset Management and Operations Division (409), Mr Steve Delaney of Mastrick, Sheddocksley and Summerhill Community Council (543), Mr Robert Drysdale of RDPC Limited (1153), Ms Lorraine Jones of Sport Scotland (1244), Mr Ben Train of Tesco Stores Limited (1472), Mr Alasdair Morrison of GVA Grimley on behalf of Wm Morrison Supermarkets PLC (1560).		
<b>Provision of the Development Plan to which the issue relates:</b>	Brownfield sites in H1 Residential Areas	
<b>Summary of the representation(s):</b>		
<p>Retail Development at OP38 Woodend Hospital Annex</p> <p>543: Should Tesco fail to implement the granted planning permission, we would support the classification of residential as being an acceptable use for OP38 Woodend Hospital Annex, Lang Stracht.</p> <p>1153, 1472: Object to the designation of OP38 Woodend Hospital Annex, Lang Stracht as residential. Consent has just been issued (24th November 2010) for development of the superstore on the Woodend site, following which the conditions stipulated by the Reporter for the designation of a District Centre at Rousay Drive will have been met.</p> <p>1560: There is doubt about the deliverability of OP38 Woodend Hospital Annex, Lang Stracht due to the allocation since 1991 and permission has been granted but not implemented. OP120 Former Summerhill Academy can be more readily developed in a shorter timeframe.</p> <p>Development at OP120 Former Summerhill Academy</p> <p>409: Objection is to the description of the proposal OP120 Former Summerhill Academy (as set out on the Council's notice to notifiable neighbours) which is given as "site identified as being suitable for housing". Seeking a restoration of the previous position where the site could be considered as an opportunity site for residential development, food retail development or police campus development.</p> <p>543: A Masterplan is required in respect of OP120 Former Summerhill Academy. This is the best site in the area for a large supermarket. There are some reservations about a supermarket of the size this site could accommodate due to concerns over the significant influx of traffic this would bring to the area. However, were this to be the only large supermarket in the area, we are of the opinion these traffic concerns can be suitably mitigated with appropriate infrastructure improvements.</p> <p>Our secondary preference for OP120 Former Summerhill Academy would be residential</p>		

as a use compatible with the surrounding area. We would favour family houses rather than flats. The number of residential properties which could be accommodated on this site would give us some concern with regard to the capacity of the Lang Stracht.

#### Community Facilities and Alternative Uses

543: Whatever use OP120 Former Summerhill Academy is put to, there is the issue of loss of community facilities. The co-locating of replacement community facilities on the site would be warmly welcomed and would indeed be our preferred outcome. Other than that, an appropriate contribution towards an off site facility would be acceptable, subject to an acceptable location within the area.

Whatever the eventual designation of OP120 Former Summerhill Academy, we would like to see a proportion of the site retained as public open space.

543: The Burnside Centre site has not yet been declared surplus to requirements by Aberdeen City Council, however the respondent would like the site to be identified within the Aberdeen Local Development Plan as having potential to be redeveloped in the future for community uses. The Burnside Centre is large and is in poor condition and would likely require to be demolished. The new site could be used to construct a community centre to take over the displacement from the former Summerhill Academy building and given the use of the neighbouring unit it is thought this could be designated for similar compatible use.

543: Any future use of this site OP37 Greenfern Infant School must be particularly sensitive towards neighbouring uses. We consider this to be one of four possible sites suitable for a community centre (to replace the facility which has been lost as a result of the impending sale of OP120 Former Summerhill Academy), affordable housing, sheltered housing, or to provide much needed open space amenity ground.

Supermarkets on both OP38 Woodend Hospital Annex and OP120 Former Summerhill Academy

543: Supermarket use on both sites would be unsustainable. Only one site should be developed for retail use.

#### **Modifications sought by those submitting representations:**

Retail development at OP38 Woodend Hospital Annex

543: OP38 Woodend Hospital Annex, Lang Stracht could be suitable for a community centre (to replace the facility which has been lost as a result of the impending sale of OP120 Former Summerhill Academy), should the Tesco permission fail to be implemented.

1153, 1472: The Proposals Map should be altered to include a Policy RT3 - Town, District and Neighbourhood Centres designation at Rousay Drive, to include the approved superstore site (OP38 Woodend Hospital Annex, Lang Stracht) and the adjacent shops on Rousay Drive, which together will comprise the new District Centre. The Hierarchy of Centres should be altered to remove Rousay Drive from Fig.3 (Neighbourhood Centres) and insert it into Figure.1 as a District Centre

### Development at OP120 Former Summerhill Academy

409: The description of OP120 Former Summerhill Academy should, be changed to reflect the accepted development option which comprised three optional land uses all as above.

1560: Add reference in text to site's (OP120 Former Summerhill Academy) potential for food retail development.

### Community Facilities and Alternative Uses

543: We would welcome such designation for OP120 Former Summerhill Academy as to explicitly specify community centre as an acceptable use. We ask that recognition be given to the need for Developer Contributions to fund the building of a Community Centre. We request that a proportion of OP120 Former Summerhill Academy be set aside as open space. We ask that recognition be given to the need for Developer Contributions to fund the necessary infrastructure improvements to the Langstracht.

543: The respondent would like the Burnside Centre site to be identified in the Local Development Plan as a site suitable for a community centre. The respondent also feels that the site would also be compatible for use as open public space. The respondent would like to see developer contributions used from the sale and development of the nearby OP120 Summerhill Centre to build a new community centre on the Burnside Centre site.

543: We agree with the residential designation of OP37 Greenfern Infant School, but would like to see preference given to affordable family housing (specifically houses, not flats as flats would be out of keeping with surrounding uses) and sheltered housing. We would welcome such designation for this site as would explicitly specify a community centre as an acceptable use. We would welcome this site being designated as being suitable for public open space. We would like to see this site used to relieve pressure on Green Belt sites, with our primary focus being on the removal of OP44 Maidencraig North East from the Plan

### Supermarkets on both sites

543: We request appropriate protection through the Local Development Plan process to ensure we do not get two supermarkets within five minutes walking distance of each other on a transport corridor which could not accommodate the volume of traffic this would produce.

### **Summary of response (including reasons) by planning authority:**

#### Retail Development at OP38 Woodend Hospital Annex

543, 1153, 1472, 1560: Note: For clarification, OP38 Woodend Hospital Annex and Lang Stracht - Rousay Drive are the same site. OP38 Woodend Hospital Annex is the site reference in the Aberdeen Proposed Plan and Lang Stracht - Rousay Drive is the reference used in the extant Aberdeen Local Plan.

The capacity study carried out as part of the 2004 Aberdeen and Aberdeenshire Retail Study (CD34) revealed a degree of overprovision of convenience floorspace in the south west Aberdeen area but a shortfall in north west Aberdeen. Given that the overprovision

in south west Aberdeen is due to the concentration of superstores at Bridge of Dee, which are not conveniently located for much of west and north west Aberdeen, it is considered that there remains a need for a modern superstore to serve the western districts of the City. This must be well located to serve the main concentrations of population and served by frequent public transport. The extant Local Plan (CD12) which was adopted in June 2008 identified a site at Lang Stracht - Rousay Drive as suitable for a modern supermarket. However, another site located at the Former Summerhill Academy has come available with developer interest. Development on either of these sites may meet the need identified above.

Planning permission has been granted for a retail development on part of the OP38 Woodend Hospital Annex, Lang Stracht site in 1996. In 2001 Tesco bought the site, and in March 2008 an application was lodged for detailed planning permission. However, it wasn't until 25 November 2010 that full planning permission was granted. This permission will last three years from the date of approval (25/11/13).

In the 2008 Aberdeen Local Plan, the site was allocated for a superstore opportunity reflecting the Reporter's conclusions into this Issue 239 (CD11). The Reporter also stated that when the superstore was complete and brought into use, an additional entry should be made under District Centres at Land Stracht/ Rousay Drive.

At the time of preparing the Proposed Plan, full planning permission had not yet been granted on the site and to date the development of the supermarket is not underway. Therefore we rezoned the site as Policy H1 - Residential Areas. Under this zoning a superstore would still be an acceptable use for this site, so long as any negative impacts on surrounding residential properties are mitigated.

The site will not be designated as a District Centre as the superstore is not complete and brought into use. As local development plans are reviewed on a five year basis if development is completed then consideration will be given to redesignate this site as a District Centre. Also, if development is completed, the site could be listed as a District Centre in Supplementary Guidance 6.1 - Hierarchy of Centres (RD70) after a review of the Supplementary Guidance. The residential zoning of OP38 Woodend Hospital Annex, Lang Stracht, if the Tesco superstore permission is not implemented then community facilities would be an acceptable use for this site.

#### Development at OP120 Former Summerhill Academy

409, 543: OP120 Former Summerhill Academy was assessed at the Development Options stage. The proposer stated that the site could be redeveloped as housing, a police campus or a supermarket. The site received a high score from the sustainability criteria (CD13) due to the site being brownfield, easily accessible and free from constraints. The site is zoned as H1 - Residential Areas in the Proposed Plan and any application for planning permission will have to be assessed against the provisions of that policy.

The principle of Masterplanning is supported throughout the Proposed Plan and a site of this size would require a Masterplan. This should consider the impact of any proposed development on traffic movement, access, open space, community facilities etc. With regards to house type Policy H4 - Housing Mix encourages a mix of dwelling types and sizes on larger sites reflecting the accommodation requirements of specific groups, in particular families and older people. Any planning application on this site for residential

development will be required to meet the provisions of this policy.

With regard to potential developer contributions from the development of the OP120 Former Summerhill Academy to finance the construction of a new community centre on the site of the Burnside Centre, Circular 1/2010 (CD5) and Policy I1 Infrastructure Delivery and Developer Contributions both set out that the level of provision or contribution required will be commensurate in scale and kind with the development proposed. The need for additional community facilities would have to be identified by the Council before and planning gain could be requested.

With regard to the text within the Appendix 2 this reflects that the site is now vacant and surplus to requirements and that it is covered by a residential policy zoning. Regardless of the text in Appendix 2, any planning application would have to meet the provisions of the H1 - Residential Areas. Whilst we are satisfied that the text reflects the current position if the Reporter is so minded we could change the 'Other Factors' section for OP120 Former Summerhill Academy to read - 'Former secondary school and education facility is now vacant and surplus to requirements. This is a large brownfield site with interest for either residential development, food retail development or a police campus.

Supermarkets on both OP38 Woodend Hospital Annex and OP120 Former Summerhill Academy

543: The impact of two superstores on the Lang Stracht would have to be carefully considered in terms of the effect on the vitality and viability of nearby centres through a Retail Impact Assessment if a planning application was submitted. Community Facilities and Alternative Uses

543: There are currently no community facilities on the vacant OP120 Former Summerhill Academy site, although historically there has been a Young Persons Project facility located there. The use of OP120 Former Summerhill Academy, OP37 Greenferns Infant School, OP38 Woodend Hospital Annex or the alternative site at Burnside Centre in Mastrick would all be suitable in principle for community facilities due to the Policy H1 - Residential Areas zoning.

A residential development would be required to contribute at least 25% affordable housing and there would be a requirement for open space within the development in accordance with Policy NE4 Open Space Provision in New Development. Development of these sites for sheltered accommodation would be supported by policy, but it would not be a requirement for the redevelopment of this site. The plan seeks to promote brownfield development and the reuse of redundant buildings, and it is not appropriate to constrain the uses appropriate for this site. Any existing open space of value would be protected from development by both Policy H1 - Residential Areas and NE3 - Urban Green Space.

**Reporter's conclusions:**

**Reporter's recommendations:**

<b>Issue (ref and heading):</b>	<b>ALLOCATED SITE: BRAESIDE INFANT SCHOOL OP47</b>	<b>65</b>
<b>Development Plan reference:</b>	Map: OP47 Braeside Infant School, Text: Appendix 2 Pg 58	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Ms Marlene Grant (5), Mr Robert Smith (9), Mrs Linda Smith (10), Mrs Jacqueline McNulty (19), Mrs Carol Brown (49), Ms Sheila Reid (133), R D Anderson (304), Mr Ian Armstrong (310), Mr Seamus MacInnes of Braeside and Mannofield Community Council (369), Mr Richard Butler of Ashley and Broomhill Community Council (416), Mrs Jennifer Butler (419), Mr Malcolm Campbell (1406), Mr Stephen Booth of Aberdeen City Council - Asset Management (1519).		
<b>Provision of the Development Plan to which the issue relates:</b>	Brownfield Site	
<b>Summary of the representation(s):</b>		
<p>5, 9, 10: Rear access to the properties on Braeside Terrace should be kept.</p> <p>5, 9, 10, 19, 49, 304, 310, 369, 416, 419, 1406: The park to the south of this site should remain when redevelopment of the site takes place.</p> <p>133, 310, 369: An area of land equal or larger in size to the existing play area should be set aside for a play area as there is no comparable site nearby.</p> <p>19: Braeside Place is congested and cannot cope with any further traffic.</p> <p>369, 1406: The design, structure and density of future development must be consistent with the current private housing stock around OP47. It should be congruent with the various current design and garden layouts.</p> <p>1519: Supports the identification of the site for redevelopment. The proposed zoning is consistent with the surrounding land uses.</p>		
<b>Modifications sought by those submitting representations:</b>		
<p>9, 10, 19, 49, 310, 416, 419, 1406: Remove the playpark from OP47. Protect the established trees within the site.</p> <p>304: Convert the space currently taken up by Braeside School into a larger park.</p> <p>310: The playpark should be made twice as large as the current park and the rest of the site being suitable for housing development.</p> <p>1406: A planning brief should be prepared for the redevelopment of OP47.</p>		
<b>Summary of response (including reasons) by planning authority:</b>		
If the Reporter is so minded, the following text will be added to the "Other Factors" section in Appendix 2 for OP47 Braeside Infant School - "Development will have to respect the current residential amenity within, and surrounding the area. The Council will seek the retention of the playpark in its current location to the south of OP47 as identified		

in the City Wide Proposals Map.

Policy NE3 - Urban Green Space safeguards the playpark and established trees within the OP47 Braeside Infant School site and the text proposed to be added to the site description will seek the retention of the playpark in its current position.

It is not thought that a development brief will be required for the site. The site is relatively small (1.28 hectares including the playpark) and policies within the Local Development Plan will ensure that future development will be well designed and promote sustainable development. The design of new development will be based on an understanding of its context and respond to its location, both in terms of landscape fit and design quality.

**Reporter's conclusions:**

**Reporter's recommendations:**

<b>Issue (ref and heading):</b>	<b>ALLOCATED SITE: ABERDEEN COLLEGE, GALLOWGATE OP87</b>	<b>66</b>
<b>Development Plan reference:</b>	Map: OP87 Aberdeen College, Gallowgate, Text: Appendix 2 Pg 62	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Mrs Elaine Farquharson-Black of Paull and Williamsons on behalf of Aberdeen College (650).		
<b>Provision of the Development Plan to which the issue relates:</b>	Brownfield Site	
<b>Summary of the representation(s):</b>		
650: The identification of the site within the Aberdeen Local Development Plan - Proposed Plan is welcomed.  Site OP87 is incorrectly identified as being 1.1hectares.		
<b>Modifications sought by those submitting representations:</b>		
650: The site size for OP87 should be adjusted within Appendix 1 Table 1 and Appendix 2. Instead of 1.1hectares, the site should be 1.93hectares.		
<b>Summary of response (including reasons) by planning authority:</b>		
The site size for OP87 could be adjusted within Appendix 1 Table 1 and Appendix 2. Instead of 1.1 hectares which it is currently described as, the site size details should be changed to 1.74 hectares. The respondent indicated that the site size was 1.93 hectares, however after taking into account the site boundary submitted by the respondent (attached within the Issue folder) the site was deemed to be 1.74 hectares(measured site boundary attached within the Issue folder). Consequently the appropriate changes to Appendix 1 Table 1 and Appendix 2 will be made if the Reporter is so minded.		
<b>Reporter's conclusions:</b>		
<b>Reporter's recommendations:</b>		



<b>Issue (ref and heading):</b>	<b>ALLOCATED SITE: BROADFORD WORKS, MABERLEY STREET OP90</b>	<b>67</b>
<b>Development Plan reference:</b>	OP90 Broadford Works, Maberly Street, Text: Appendix 2 Pg 63	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Ms Michelle Wyllie (24).		
<b>Provision of the Development Plan to which the issue relates:</b>	Brownfield Site	
<b>Summary of the representation(s):</b>		
<p>24: The respondent would like to see part of the site developed into a tourist attraction.</p> <p>The respondent believes that the development would require traffic lights onto the road network surrounding the site and that this would increase congestion.</p> <p>The respondent believes that the future development of the site should be sympathetic to the other buildings on the site.</p> <p>The respondent thinks that any business that moves into the proposed Urban Village at the site will need to not make any impact on the smaller independent businesses on Charlotte, George and Hutcheon Street.</p>		
<b>Modifications sought by those submitting representations:</b>		
<p>24: The housing that is proposed for the site needs to be, as far as possible, affordable for people on low salaries and young families to afford.</p> <p>Part of the site should be set aside as a tourist attraction similar to the Verdant Mills in Dundee. Part of the site should also be used for other organisations such as City Moves or Peacock Visual Arts.</p> <p>A traffic light/crossing would not be advisable at the Hutcheon Street entrance to the site as this would cause major traffic congestion.</p>		
<b>Summary of response (including reasons) by planning authority:</b>		
<p>In terms of affordable housing, previous planning applications for development on the site have been refused due to a lack of affordable housing being proposed. However the planning application has now been allowed on appeal. It was accepted by the Reporter (RD84) that the high costs of restoring and converting the listed building made it unreasonable to expect an element of affordable housing. In previous applications for the redevelopment of Broadford Works, the developer has proposed to provide residential accommodation, retail floor space, a public house, restaurant and offices. This does not define that part of the site could not be developed as a tourist attraction in a further planning application, however the mixed use zoning of this site does not specify that a tourist attraction must be built on this site and this is ultimately dependent on the potential developments worth and viability to the developer of the site. Before development takes place at OP90 Broadford Works, the developer will have to satisfy the conditions stated within the Appeal Decision Notice (RD84) in relation to the traffic management, vehicle and cycle parking and the junction arrangement from Hutcheon Street.</p>		

<b>Reporter's conclusions:</b>
<b>Reporter's recommendations:</b>

<b>Issue (ref and heading):</b>	<b>ALLOCATED BROWNFIELD SITES: HILTON OP91, OP96 AND OP106</b>	<b>68</b>
<b>Development Plan reference:</b>	OP91 Cattofield Reservoir, OP96 Croft House, OP106 Hilton Nursery School, Text: Appendix 2 Pg 63 & Pg 64	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Miss Catriona MacLennan (1), Mr Adrian Beattie (269), Mrs Kathleen MacTaggart (1185), Miss Muriel McGregor (1268).		
<b>Provision of the Development Plan to which the issue relates:</b>	Brownfield Sites	
<b>Summary of the representation(s):</b>		
<p>OP91</p> <p>1 The respondent, who is a resident of Lilybank Place, would like to be notified if there are plans to change the cul-de-sac at Lilybank Place into a through-road and access to the proposed development at OP91 Cattofield Reservoir. This would not be acceptable.</p> <p>OP96</p> <p>1268 The respondent has no objection to development at OP96, however believes that ample parking must be provided to avoid the parking problem that currently exists around Oldcroft Place.</p> <p>OP106</p> <p>269, 1185 The respondent believes that housing should only be built on the existing buildings footprint at OP106.</p> <p>The respondent would like to see the green space and trees kept that are currently part of site OP106.</p> <p>The respondent recommends that at least 2 off-street parking spaces are provided per property due to parking being a problem in Hilton.</p>		
<b>Modifications sought by those submitting representations:</b>		
<p>OP96</p> <p>1268 Put in place a plan that guarantees current residents in the Oldcroft Place/OP96 area car parking in or near their address.</p> <p>OP106</p> <p>269, 1185 The developable area for site OP106 should be confined to the existing buildings.</p> <p>Two car parking spaces should be provided for each new property built at site OP106.</p>		

**Summary of response (including reasons) by planning authority:**

OP91

1 The planning brief for OP91 Cattofield Reservoir (RD83) envisages that vehicular access will be taken to the site from Cattofield Place. It is not thought that vehicular access will be taken from Lilybank Place, however it is proposed within the brief that pedestrian access would be taken from Lilybank Place.

OP96 &amp; OP106

The level of parking required relates to the location of the development. Three separate zones have been identified by the Council for the application of varying parking standards reflecting the controlled Parking Zones. The standards are described and shown in Supplementary Guidance on Transport and Accessibility (RD62) published alongside the Development Plan. OP96 Croft House and OP106 Hilton Nursery School is within the 3rd tier Outer City zone. This zone provides the third and least restrictive maximum standards as the area is less accessible by public transport and the distance from main residential areas may preclude walking and cycling on a significant scale. The standards should be treated as guidelines, rather than maximums and the level of parking proposed will need to be agreed with the Planning Authority. The guidelines represent that for residential houses 2 allocated spaces should be given per 3 bed dwelling and 3 per 4 bed dwelling. For flats, 1.5 spaces should be given per 1 bedroom, 2 spaces per 2 bedroom unit and 2 spaces per 3 bedroom unit. Social housing is recommended to provide 0.8 spaces per unit for rented property. These guidelines are thought to promote adequate parking for developments whilst seeking to reduce the amount of unnecessary car use and dependency. It also still maintains the right of individuals to own and keep cars at a residence.

OP106

69, 1185 OP106 Hilton Nursery School is favoured for residential development provided that development does not constitute over development, does not have an unacceptable impact on the character or amenity of the surrounding area and does not result in the loss of valuable areas of open space. Open space is defined in the Aberdeen Open Space Audit 2010 (CD23); complies with Supplementary Guidance on Curtilage Splits (RD66); and complies with Supplementary Guidance on House Extensions (RD65). The Plan aims to create sustainable communities in which amenity is maintained to a high level and for a wide choice of housing styles and types to be made available to everyone. Development at OP106 Hilton Nursery School will be expected to achieve these aims.

**Reporter's conclusions:****Reporter's recommendations:**

<b>Issue (ref and heading):</b>	<b>ALLOCATED SITE: DENBURN VALLEY/ BELMONT STREET/UNION TERRACE OP98</b>	<b>69</b>
<b>Development Plan reference:</b>	OP98 in Appendix 2	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
<p>Mr Sandy Duthie (3), Ms Michelle Wyllie (24), Mr David Stead (42), Ms Elizabeth Hay (152), Mr Robin McIntosh (272), Ms Moira Murrison (283), Sir/Madam K. J. C. McIntosh (284), Mr Paul Thomson (285), Mr Mike Shepherd of Friends of Union Terrace Gardens (345), Mrs Heather Jhurry (348), Councillor Debra Storr of Aberdeen and Aberdeenshire Green Party (353), Mr Alan Fleming (359), Mr David Briggs (360), Mr William Tough (376), Mr Alan Stubenrauch (402), Ms Nicola Abrams of Scottish Environmental Protection Agency (408), Ms Greta Young (412), Dr Richard Pelling (435), Miss Georgia Brooker (459), Ms Dorothy Bothwell (513), Mr Mike Paterson (515), Mr Mike Miller (520), Ms Jane Cromar (540), Mr Michael Shepherd (542), Mrs Rosella Young (544), Mr Iain Richardson (547), Mr John Park (553), Mr Mike Tyers (555), Dr David Northcroft (556), Mrs Betty Lyon (562), Mr Andrew Simpson (565), Mr David Fraser (570), Miss Mary Sabiston (572), Miss Kirsty Nutt (574), Mr Andrew MacGregor (585), Mr Robert Farquharson (588), Mr Paul Taylor (589), Miss Julie Thompson (592), Ms Gráinne Smith (593), Miss Susan Middler (595), Miss Claire Healy (596), Mr Iain Grieve (597), Mr Stephen Calder (598), Mrs Cheryl Duckworth (600), Ms Bronagh Sheerins (608), Mrs Annabel Stewart (610), Mrs Rhonda Reekie of Scottish Green Party (611), Miss Kathrine Lowit (618), Mr John Honey (621), Mr Colin Austin (628), Miss Laurie Robertson (634), Miss Lesley Hart (637), Mr David McSporran (641), Mr Samuel Rennie (644), Mrs V Broxton (647), Mr A Curzon-Edwards (649), Ms Helen Lynch of University of Aberdeen (657), Mrs Gillian Martin (658), Mr Craig Adams (659), Ms Katherine Rigby (663), Mrs Felicity Keefe (664), Mrs Muriel Leith (668), Prof James Friend (670), Mr Keith Grant (671), Mr Michael Fraser (674), Mr Andrew Millington (675), Mr Andrew Harper (676), Mrs Elaine Rose (677), Mrs Kim Giles (680), Ms Hannah Krueger (681), Ms Fiona Robertson (682), Miss Gill Morrison (683), Mrs Kathleen Northcroft (684), Mr Dominic Standing (685), Mrs Fiona Davidson (686), Miss Kirsty Sykes (687), Miss Emma Fowlie (691), Mrs Alison Wells (692), Mrs Elaine Mitchell (694), Mr Frederick Sarran (695), Mr Lucio Kiko Sanchez (696), Mr Simon Christie (697), Ms Jacqueline Sinclair (699), Mrs Sheila Lam (701), Mr Andrew Forbes (702), Mr Michael Hendry (703), Ms Lois Christie (704), Miss K MacLeod (705), Mr James Marnoch (706), Mr Ian Grant (707), Miss Mhairi Smith (709), Mr Alastair Minty (710), Mrs Christina McLeod (712), Dr Martin Ford (713), Mrs Alison Sage (715), Miss Sheila Crossan (716), Miss Gail Walker of Shell (718), Mr Leyton Gray (719), Miss Lindsay Bates (720), Miss Melissa Dale (722), Dr Sheila Cunningham (723), Ms Yifat Carmieli (725), Ms Tracey Noden (726), Mr David Stuart (729), Mr Keith O'Sullivan (731), Mrs Ailsa MacKintosh (733), Mrs Sarah Richardson (734), Mrs Sandra Tawse (735), Ms Catherine Simpson (736), Mrs Joanna Kunzlik (737), Ms Hazel Forbes (738), Dr Mary Masson (742), Mrs Vicky Rider (744), Ms Patricia Carlos (745), Dr Ben Marsden (747), Dr Gordon Fernie (748), Mrs Laura Morgan (752), Mrs Sheila Lam (753), Ms B Weber (755), Mr Michael Hodgson of Cause4Effect (757), Mr Philip Thompson (759), Miss Anna Tawse (768), Mr Jim Mennie (773), Mr Ryan Roberts (780), Mr Brian Carroll (781), Miss Hannah Kunzlik (784), Ms Sarah Lynn (785), Mr John Rutherford (787), Miss Clare Robertson (788), Mr Greame Smith (791), Mrs Margaret Preston (792), Mr Ennan Hamill (793), Mr John Whyte (794), Ms Kerry Milne (795), Ms Mary Deans (796), Ms Diana Dower (797), Miss Sonja Notley (798), Mrs Sue Channon (802), Mr Alan Robertson (803), Mr Brian Battersby (804), Mrs Helen Love (806), Dr Simon Burnett (809), Ms Sarah James (810), Mr Iain Middleton (811), Mr Stuart MacVicar (812), Mr Graham Davies (814), Mrs Suzanne Clark (816), Mr Ross Mackay</p>		

(818), Mr Marcel Renirie (819), Mr Michael Nieman (820), Mrs R McIntosh (821), Mr A. J. Eddie (823), Ms Renee-Margaret Slater (826), Mr John Lemon (827), Miss Sally McIntosh (828), Mrs Audrey Innes (829), Mr Christopher Smith (831), Mrs L. McLean (834), Mrs Amy Dunnett (835), Mr Craig Thorburn (836), Mrs Emma McLeod (837), Mr Bruce Collie (838), Dr Frederick Soper (839), Ms Nicola Chambury (840), Miss Rebecca Sinclair (842), Ms Emma Rochford (845), Mrs Susan Maciver (847), Mr Graham Baxter (848), Miss Alexandra Penter (849), Mrs Julie Sinclair (850), Mrs Kareen Blyth (851), Mr Ron Bird (852), Mr Alan Murphy (854), Mr Tadhg McMullan (855), Mr Scott Campbell (856), Mrs Carla Coulthard (857), Miss Ruth O'Brien (858), Mrs Sheena Wilson (859), Mr Philip Siviter (860), Mr Gordon Cantlay (861), Mr James Marsden (862), Mr Herbert Petrie (863), Mr Paul Cantlay (864), Miss Kirsty Telfer (866), Mrs Cathryn Duncan (867), Mrs Katrina Michie (868), Miss Lesley Black (870), Mrs Barbara Cantlay (872), Mr Fabio Lagana (873), Mrs M Gray (874), Mrs Valerie Stevens (875), Mrs Barbara Warren (878), Mr Alexander Whyte (880), Mr John Leith (882), Mr Peter Glennie (883), Dr Daniel MacCannell of University of Aberdeen (884), Ms Corinne Greig (885), Mrs Kathryn Reid (887), Mrs Carol Forbes (889), Mr Robert Stearn (890), Dr David Davies (892), Dr Roy Allen (893), Miss Amanda Gilmour (895), Ms Penelope Spruce (896), Miss Bex Strachan (897), Ms Diane Dobb (899), Miss Alice Gordon (900), Mr Kevin Thomson (901), Ms Hannah Gailey (904), Mr Greg Bryce (905), Mr Craig Davidson (906), Miss Beth Petrie (907), Miss Kelly Anderson (908), Ms Anna Vermehren (909), Miss Amy Knowles (921), Mr Steven Bothwell (922), Mrs Isabel Haase (926), Mr Iain Fenwick (932), Mr Gavin Kennedy (934), Miss Ada Ma (940), Mr Raymond Clarke (943), Mr Edward Day (971), Mrs Margaret Ormiston (989), Miss Anita Jean Stewart (1001), Dr Pauline Jepp (1020), Mr Stuart McKay (1120), Mr & Mrs James and Roberta Elrick (1121), Ms Diane Cantlay (1126), Ms Freda Hasler (1127), Ms Alison Taylor McCall (1128), Mrs Sheila Morrison (1129), Mr Derek Latter (1130), Mr Alasdair Corrigan (1131), Ms Susan Turriff (1132), Ms Sarah Kohn (1134), Mrs Anne Irvani of Business Plus Scotland (1135), Mrs Tianyu Kennedy (1136), Ms Clare Rochford (1137), Miss Pauline Skidmore (1138), Mrs Jayne Carmichael Norrie (1139), Mr Fred Wilkinson (1140), Mr Neil McKenzie (1141), Mr Jim Currie (1142), Mr Ken Turnbull (1143), Ms Emily Smith (1144), Mr Peter Thomson (1145), Mr Jeffrey Brodie (1146), Ms Suzanne Hunter (1147), Mr Neil Rothnie (1148), Miss Audrey Bews (1149), Mr John G. Williamson (1150), Miss C Innes (1151), Dr Alison Brown of University of Aberdeen (1154), Miss Helen Ryrie (1156), Mr David Innes (1157), Mr Iain Kay (1161), Mr Ewan Reid (1163), Mr Andrew Allan (1165), Mr Andrew Loudon (1166), Miss Ryan Johnson (1167), Mr Graeme Mackie (1169), Mr Rob Pirrie (1173), Mrs Linda Paterson (1174), Mr Iain Cameron (1177), Ms Ruby Roberts (1178), Ms Pam Simpson (1179), Mr James Pike (1180), Miss Katy Astell (1183), Mr Nishal Patel (1184), Dr Adrian Marshall (1187), Mrs Rhonda Reekie (1188), Ms Linda Niddrie (1190), Miss Catrina Staples (1195), Mr Jonathan Russell (1196), Mrs Janet Hessing (1199), Ms Anne Marquiss (1200), Mrs Ann Laing (1208), Mrs Morag Edwards (1212), Mrs Rebecca Donnelly (1218), Mr Iain Stewart (1219), Mrs Margaret Strachan (1220), Ms Barbara Mathie (1222), Miss Bethany Tranter (1224), Professor Gerard Rochford (1225), Mr Michael Cox (1226), Mrs Jane Cartney (1227), Mr Neil Fraser (1228), Mrs Vicky Mitchell (1229), Mr Andrew Leatherbarrow (1230), Miss Eloise Leeson (1231), Miss Meriel Anderson (1232), Ms P Eastwood (1233), Miss Eilidh Primrose (1234), Miss Francesca Murphy (1235), Mr Tom Hay on behalf of Fiona Soe Paing (1236), Mr Graham Love of WS Atkins Ltd (1237), Miss Nicola Paterson (1240), Ms Sarah Yule (1241), Mr Stuart Pressage (1245), Mr Steven McCann (1247), Mr Gareth Lake (1249), Mr Roddy Millar (1252), Mrs Wendy Greig (1253), Mr Robert Meldrum (1256), Mr Graham Shand (1258), Ms Sandra Strachan (1259), Mrs Kathleen Anderson-Scott (1260), Mr Alistair Thomson (1261), Miss Kadri Soerunurk (1262), Mr Graham Shand (1263), Miss Megan Wood (1270), Mr Michael Simmonds (1273), Mr Andrew McDonald (1275), Mr Paul Moran (1276), Mr David Law (1277), Mr G Alzapiedi (1278), Mr Dylan Cunningham (1311),

Miss Emma Kidd (1321), Mr R Scott (1323), Ms Jennifer Eddie (1326), Mr Alex Mitchell of Aberdeen Civic Society (1327), Mrs Sandra Hart (1329), Mrs Martha Mennie (1331), Mr Ray Berry on behalf of Gordon McWilliam (1332), Mr Herbert Petrie (1335), Miss Rachel Hudson (1337), Mr Ranald Cameron (1339), Mr Scott Styles (1340), Mr Matt McFarland (1341), Miss Indre Cepukaite (1342), Mr Iain Connell (1344), Mrs Jane Jones (1346), Mr Andrew McDonald of Satrosphere (1347), Mr Paul Munro (1348), Mr Kenneth Watt (1349), Mrs Alison Chalmers (1350), Ms J. Smith (1351), Mr Gary Lamont (1352), Mr Lucas Murray (1353), Miss Lesley Cullan (1354), Mr Alasdair Maciver (1355), Dr Gordon Smith of NHS (1356), Mrs Gina Ford (1357), Miss Joanne Tulloch (1358), Mrs Angela Cairney (1360), Mr Stewart Wells (1361), Mr Euan Bain (1362), Mrs Ashleigh Reid (1363), Mr Barrie McAllistar (1364), Mrs Jacqueline Wood (1365), Mr Alan Taylor (1367), Mrs Lorraine Oxton (1368), Ms Lillian Taylor (1369), Dr Asa Dahle-Smith (1370), Ms Davina Gray (1371), Mr David Lovie (1372), Miss Kerry Morrison (1373), Mr Robin Horn (1374), Dr Helge Nareid (1375), Mr James Brooks (1378), Miss Heather Smith (1379), Miss Lesley Crawford (1380), Miss Lucinda Fraser (1381), Mrs Margaret Stone (1382), Ms Victoria Stepien (1383), Miss Caroline Hood (1384), Mrs Lindsay Allardyce (1387), Mrs Lesley Galloway (1388), Miss Mairi Campbell (1389), Mr John Anderson (1391), Mrs Lynda Cresswell (1392), Mr Darwin Moir (1393), Mr Alexander McLeod (1394), Sir/Madam S. Raffan (1395), Mrs Faith Black (1396), Ms Genevieve Cseh (1397), Ms Ros O'Sullivan (1398), Miss Catherine Yule (1401), Mr James M Anderson (1402), Mr Angus Abbott (1403), Mrs Sue Hyland (1404), Mrs Karen Nieman (1405), Mrs Margaret Mieras (1408), Mr Bruce Elrick (1410), Mr Richard Johnson (1414), Miss Roisin Farrington (1417), Ms Julie Robertson (1424), Mr Rohan Beyts (1426), Mr Maurice McGarry (1427), Mr Tim Morgan (1428), Mr Douglas Law (1431), Mr John Aberdein (1433), Miss Catriona Cameron (1435), Miss Llinos Jones (1437), Ms Rebecca Westguard (1492), Mr Neale Bothwell (1540), Mrs Diane Morgan (1551), Miss Jennifer Brown (1552), Miss Laura Doole (1577).

**Provision of the Development Plan to which the issue relates:**

Opportunity to redevelop the gardens

**Summary of the representation(s):**

Object to development of the Gardens

3, 24, 42, 152, 272, 283, 284, 285, 345, 348, 359, 376, 402, 412, 435, 459, 513, 515, 520, 540, 547, 553, 555, 562, 565, 570, 572, 574, 585, 588, 589, 592, 593, 595, 596, 597, 598, 600, 608, 611, 621, 628, 637, 641, 657, 658, 659, 663, 664, 668, 670, 671, 675, 676, 677, 680, 681, 682, 683, 685, 686, 687, 691, 692, 694, 695, 696, 701, 702, 703, 704, 705, 706, 707, 709, 710, 712, 713, 715, 716, 718, 719, 720, 722, 723, 725, 726, 729, 731, 733, 734, 735, 736, 737, 738, 742, 744, 747, 748, 752, 753, 755, 757, 759, 761, 768, 773, 780, 781, 783, 784, 785, 787, 791, 792, 793, 794, 795, 796, 797, 798, 802, 803, 804, 810, 811, 812, 814, 818, 819, 820, 821, 823, 826, 827, 828, 831, 834, 835, 836, 837, 838, 839, 840, 842, 845, 847, 848, 849, 850, 851, 852, 855, 857, 858, 860, 861, 864, 866, 867, 870, 872, 873, 875, 878, 880, 882, 883, 884, 885, 886, 887, 889, 890, 892, 893, 895, 896, 897, 899, 900, 901, 904, 905, 906, 907, 908, 921, 922, 926, 932, 934, 943, 971, 989, 1001, 1020, 1120, 1121, 1126, 1127, 1128, 1130, 1131, 1132, 1134, 1135, 1136, 1137, 1138, 1139, 1140, 1141, 1142, 1143, 1144, 1145, 1146, 1147, 1148, 1149, 1150, 1151, 1154, 1156, 1157, 1161, 1163, 1166, 1167, 1169, 1173, 1174, 1178, 1180, 1183, 1184, 1187, 1188, 1190, 1195, 1196, 1199, 1200, 1208, 1212, 1218, 1219, 1220, 1222, 1224, 1226, 1227, 1228, 1229, 1230, 1231, 1232, 1233, 1234, 1235, 1236, 1237, 1240, 1241, 1245, 1247, 1249, 1252, 1253, 1256, 1258, 1260, 1261, 1262, 1263, 1270, 1273, 1275, 1276, 1277, 1278, 1311, 1321, 1323, 1326, 1327, 1329, 1331, 1332, 1335, 1337, 1339, 1340, 1341, 1342, 1344, 1346, 1347, 1348, 1349,

1350, 1351, 1352, 1353, 1354, 1355, 1356, 1357, 1358, 1360, 1361, 1362, 1363, 1364, 1365, 1367, 1368, 1369, 1370, 1371, 1372, 1373, 1374, 1375, 1379, 1380, 1381, 1382, 1383, 1384, 1387, 1388, 1389, 1391, 1392, 1393, 1394, 1395, 1396, 1397, 1398, 1401, 1402, 1403, 1404, 1405, 1408, 1410, 1414, 1417, 1424, 1426, 1427, 1428, 1431, 1435, 1437, 1492, 1540, 1551, 1552, 1577: Object to the development of the Gardens for one or more of the following reasons: lack of money/ funding, lack of architectural and environmental responsibility, impact on built granite heritage, integrity of City, culture, history, trees, landscape, greenspace, environment, area for relaxation, topography, recent public consultation, community, tourism, city events, Urban Green Space, air quality, Tree Preservation Orders, unique identity, citizens in Aberdeen, future generations, visual amenity, play area for children and horticulture.

#### Peacocks Proposal

272, 283, 284, 285, 345, 513, 520, 890: The Peacock proposals would have conformed to National Planning Framework 2 by providing a cultural element. The City Square does not.

513: The Peacocks Visual Arts project would have provided a pivotal project providing cultural element. The City Square Project displays little evidence of this provision.

797: Missed the opportunity to develop one part of the area for Peacock Visual Art Gallery. The Council is not listening to the public who wish to keep this valued space.

803: Let Peacocks have their gallery and cafe that will then attract more people.

#### The Gardens should be sympathetically improved

24, 152, 348, 376, 513, 515, 565, 593, 610, 694, 707, 745, 757, 773, 780, 802, 806, 854, 863, 874, 934, 940, 1129, 1165, 1208, 1212, 1225, 1231, 1253, 1259, 1273, 1321, 1378, 1391: Union Terrace Gardens could be sympathetically improved by one or more of the following: providing access down, reopening the toilets, covering the railway and dual carriageway and opening shops, cultural facilities and cafes in the archways.

#### Protection of the Gardens

272, 283, 284, 285, 345, 435, 513, 520, 540, 890: Union Terrace Gardens should be added to the inventory of gardens and designed landscapes in Scotland.

657: In line with the city's policies, it should be subject to conservation orders, like Duthie Park.

684: The Gardens need to be protected in the same way as the Duthie Park.

859: Union Terrace Gardens should be made part of a preservation order and kept as-is.

#### Location of City Square should change

24: The site occupied by the health centre at Denburn would be a better site for the City Square Project.

932: A better alternative for the City Square Project would be the site of St Nicholas House if that were to be demolished.



### Compliance with Proposed Plan

152, 272, 283, 284, 285, 345, 353, 402, 520, 542, 547, 556, 589, 684, 699, 713, 840, 890, 1174, 1540: Development of the Gardens do not comply with the Proposed Aberdeen Local Development Plan. Such as: Policy D1 Architecture and Placemaking, Policy NE3 Urban Green Space, paragraph 3.25, paragraph 3.27, Policy D6, paragraph 3.67, Policy NE5 and Policy D5, D4, NE1, NE5, NE8, NE9, NE10, NE4, D6, D1

### OP site boundary should change

272, 283, 284, 285, 345, 353, 360, 412, 520, 556: The boundaries of OP98 Denburn Valley/ Belmont Street/ Union Terrace should be changed to not include Union Terrace Gardens.

### Retention of public open space

272, 283, 284, 285, 345, 353, 513, 520, 890: Support retention of public open space other than in exceptional circumstances. Financial incentives by private sector should not count as exceptional circumstances sufficient to outweigh normal policies else planning system simply becomes a question of deep pockets.

### Denburn watercourse

272, 283, 284, 285, 345, 353, 513, 520, 890: The Denburn watercourse is currently lost to sight and the City Square project would not do anything to reverse this. The City Square proposals would involve an enormous engineering project to deck over the Denburn valley and cover over the road/railway.

272, 283, 284, 285, 345, 402, 520, 890: Union Terrace Gardens is the most obvious remnant of the Denburn the tributary of the Dee that saw the earliest habitation. It is an important topographical feature that also highlights the significant engineering features of the Union Street bridge and Rosemont Viaduct. Without the gardens these features become unintelligible and the centre of Aberdeen's history is much the poorer.

### Flood risk

408: Object to this site because the majority of it lies within the 1:200 year flood envelope of the Indicative River and Coastal Flood Map and we consider that the site does not comply with Scottish Planning Policy.

### Support development of the Gardens

674, 816: The gardens provide only limited heritage value as they mainly consist of lawns and are of no architectural merit. Redevelopment (non commercial) would allow better use of the space. The area is underused and is although beautiful, is not kept to the standards it was many years ago.

### Retail

272: Town centres rely not just on multiples but also on the more quirky independent retailers. Added costs e.g. increased rates burdens risk driving these small independent enterprises out, frequently not just to relocate in lower cost areas but often to simply close. The high vacancy rates in the Academy bears witness to the cost sensitivity and

specific requirement of some niche businesses. Proposals such as City Square will disrupt the current mix of businesses.

748: Concerned that development will negatively impact on the independent retailers in the city centre.

818: Ian Wood shouldn't be allowed to buy the Council then line his own pockets by building shops!

922: The local plan has put Aberdeen in real danger, which will only exacerbate existing fragmentation and increase empty trading spaces.

#### City Centre Development Framework

1433: The City Centre Development Framework is excellent, responsive to the considerable existing merits of Union Terrace Gardens, and alert to sensitive ways in which access, use and enjoyment might be enhanced.

#### Other comments

762: Aberdeen City Council are showing a complete lack of taste and understanding of what the people of Aberdeen want, the only thing you have achieved is strengthening the contempt the people feel towards Aberdeen City Council. Please all resign your posts asap.

854: Please consider how the Overgate centre in Dundee allows an open aspect to the church and consider similar aspect over the gardens, with a structure only covering the road/rail carriageway.

922: Providing Long Leases to public land is the last thing any responsible Council should undertake as it will automatically become ownership (as confirmed by the Scottish Governments law department) and therefore the council immediately lose the value of the asset. In the case Of Union Terrace Gardens could be several hundred million pounds. Local plan has succeeded in providing easy opportunities for disrespectful, unwanted, unneeded and pointless developments. By allowing major changes, the pockmarked face of the city centre will only become permanently 'acne'd' through over provision, and fails abysmally to achieve its goal. There are always solutions to urban planning that should be fully considered before irreversible radical damage takes place.

943: Notes the proposed development of Union Terrace Gardens with some trepidation. Firmly convinced that it will end up as an unattractive commercial walk-through. Proposal would raise the ground level and would substantially increase the value of Stewart Milne's Triple Kirks site. Notes that the Council previously wanted to knock down Provost Skenes House but now wish for it to be saved. The Council has starved the Gardens of funds over the years. Gardens should be actively promoted.

1163: The only reason its up for development is greed. A quick stroll through and you would soon realise it has to stay as it is.

#### **Modifications sought by those submitting representations:**

Object to development on the Gardens

24, 42, 348, 376, 459, 515, 540, 542, 544, 547, 555, 562, 565, 570, 572, 585, 588, 589, 592, 593, 596, 597, 598, 600, 608, 610, 611, 618, 621, 628, 634, 644, 647, 649, 657, 658, 659, 668, 671, 675, 676, 680, 681, 682, 695, 696, 697, 699, 701, 702, 703, 704, 705, 706, 710, 713, 718, 720, 731, 737, 745, 747, 748, 752, 755, 757, 768, 784, 785,

788, 793, 798, 804, 806, 809, 818, 820, 821, 823, 828, 829, 831, 835, 836, 837, 838, 840, 842, 848, 849, 850, 851, 855, 856, 857, 858, 859, 862, 867, 868, 870, 873, 874, 878, 880, 882, 887, 889, 892, 896, 904, 908, 909, 921, 922, 926, 940, 943, 989, 1001, 1020, 1121, 1126, 1127, 1130, 1131, 1132, 1135, 1136, 1137, 1139, 1144, 1146, 1147, 1149, 1150, 1151, 1154, 1156, 1157, 1161, 1163, 1165, 1166, 1167, 1173, 1174, 1177, 1179, 1183, 1184, 1187, 1188, 1190, 1196, 1199, 1200, 1218, 1219, 1220, 1222, 1226, 1227, 1228, 1229, 1230, 1231, 1232, 1233, 1236, 1237, 1240, 1241, 1245, 1249, 1252, 1253, 1256, 1258, 1259, 1260, 1262, 1263, 1270, 1273, 1276, 1277, 1278, 1327, 1329, 1331, 1332, 1335, 1337, 1341, 1342, 1344, 1346, 1349, 1351, 1352, 1353, 1354, 1355, 1356, 1358, 1360, 1361, 1362, 1368, 1370, 1371, 1372, 1373, 1374, 1375, 1378, 1379, 1380, 1381, 1382, 1383, 1384, 1389, 1391, 1392, 1393, 1394, 1395, 1396, 1397, 1398, 1401, 1402, 1403, 1404, 1405, 1408, 1410, 1417, 1424, 1427, 1428, 1431, 1435, 1437, 1492, 1552: Union Terrace Gardens should be removed from the Local Development Plan as an opportunity site

24, 659, 859, 922, 1261, 1401, 1426: Union Terrace Gardens should be legally protected.

The Gardens should be sympathetically improved

152, 272, 283, 284, 285, 345, 353, 513, 520, 691, 704, 731, 733, 753, 762, 781, 792, 794, 826, 839, 845, 883, 884, 890, 922, 934, 971, 1120, 1129, 1134, 1140, 1141, 1145, 1169, 1180, 1224, 1225, 1234, 1237, 1245, 1261, 1321, 1327, 1339, 1363, 1373, 1382, 1414, 1540, 1551: Representations suggest one or more of the following changes to the opportunity site: Opportunity site should be limited to Denburn/Woolmanhill with a requirement to provide an attractive green North-South route for pedestrians and cyclists to both the high level Schoolhill and direct into Union Terrace Gardens. Inclusion of the excessive road space associated with the Denburn dual carriageway into the site may provide greater flexibility of solution. Upgrade and maintain the site to make it more accessible, reopen and upgrade the public facilities. To address safety concerns perhaps police foot patrols could be introduced. Regeneration of the gardens without car parks or shopping. Encourage events/ concerts including markets.

Protection of the Gardens

272, 283, 284, 285, 520, 1426: Add 'but Aberdeen City Council is supporting and promoting Friends of Union Terrace Garden 's bid for Union Terrace Gardens to be included in the Inventory.'

922: Work with Historic Scotland to afford it permanent protection from development.

Location of City Square should change

932, 1138, 1261: Move the plan from Union Terrace Gardens to St Nicholas House. Target development in already developed parts of the city.

Compliance with Proposed Plan

547, 589: Add Union Terrace Gardens as a protected site as per Policy D4 - Aberdeen's Granite Heritage.

OP site boundary should change

359, 360, 435, 513, 556, 684, 715, : Respondent would like a change in the boundary of

OP98 Denburn Valley/ Belmont Street/ Union Terrace so that it does not include Union Terrace Gardens.

#### Flood risk

408: Happy to remove our objection either if this allocation is removed from the Final Plan, or if a Flood Risk Assessment is carried out prior to plan adoption and this demonstrates that: -The site itself is not at risk of flooding (this may require the allocation outline to be redrawn to remove the area at significant risk of flooding); -The flood storage and conveyancing capacity of the function floodplain is safeguarded; - Development of these allocations will not increase the risk of flooding elsewhere and subsequently the flood risk constraint is highlighted in the Final Plan.

#### Support Development of the Gardens

674: Union Terrace Gardens must be raised to street level to allow the gardens to be better used by all citizens and visitors to Aberdeen regardless of their age or ability. Existing gardens are poorly designed, inaccessible and lack welfare facilities.

#### City Centre Development Framework

1433: The respondent wants Aberdeen City Council to take into consideration the need to increase amenity, improve access and connectivity, and to envisage a new public building as a focal point for enjoyment of the city centre. This should be achieved by enhancing and improving Union Terrace Gardens; Clean up railway line; enhance dual carriageway area; improve access to Union Terrace Gardens and to the Cultural Quarter in general; and construct enhancement to the rear of Belmont Street in line with City Centre Development Framework.

#### General

839: Form a public group to oversee the restoration of the Gardens to their former state

#### **Summary of response (including reasons) by planning authority:**

Object to development on this site The Gardens should be sympathetically improved OP site boundary should change

The Policy NE3 - Urban Green Space zoning for Union Terrace Gardens has been carried forward from the current Local Plan (2008) (CD12). The boundary of the opportunity site covering Union Terrace Gardens has been enlarged in the Local Development Plan to cover the Gardens. The previous opportunity site boundary reflected a proposal in The Urban Realm Strategy to cover over the dual carriageway and improve linkages between Belmont Street and the Gardens. As consideration has been given to a wider improvement to the Gardens we have reflected this in the new opportunity site boundary. Whilst there is clearly a high level of debate regarding the Gardens it is our contention that it is important to identify that options for the redevelopment of the Gardens are currently under consideration. Any development proposal for the Gardens will need to be considered against the Local Development Plan, including the City Centre Development Framework, which sets out criteria for the future of the Gardens. The scale and nature of any improvements will be subject to other consultations and ultimately a planning application.

In light of the above, the Council does not agree with the suggestion to remove this opportunity site from the Proposed Plan and to remove the Gardens from the opportunity site.

Any proposal to develop on the Gardens should adhere to Policy NE10 - Air Quality and Supplementary Guidance 7.1 - Air Quality Supplementary Guidance (RD92).

#### Peacocks Proposal

We understand there is contention surrounding the development of this site but it must be stressed that no other proposals except from the Peacocks Visual Arts application has been through the planning process. We note that this application proposal was not implemented and has since expired.

#### Protection of the Gardens

The legal protection of the Gardens is not a planning matter. There are a number of listed structures surrounding the Gardens, the site lies in a conservation area and all the trees within the Gardens have Tree Preservation Orders. A number of respondents have stated that they have requested Historic Scotland to add Union Terrace Gardens to the Inventory of Gardens and Designed Landscapes. If this was approved, and if the Reporter is so minded, then the Council would be happy to reference this within the plan. In addition, the Council does not consider it appropriate to refer specifically to a certain group's proposals for the Gardens in the Local Development Plan.

#### Location of the City Square proposal should change

At the moment, it is not an option to use the current St Nicholas House as an alternative for a civic square development. There has been no decision made by the Council on the future of St. Nicholas House after the move to Marischal College. We also note that the suggested alternative of the current Denmore General Practice is currently in use as a health centre and is allocated in the plan for a mix of uses. This site is covered in more detail in Issue 70 (Allocated Site: Denburn and Woolmanhill OP99).

#### Compliance with Proposed Plan

Any planning application that comes into the planning authority must adhere to the relevant policies in the Local Development Plan and the City Centre Development Framework (CD24). Policy D4 already seeks to protect Aberdeen's granite heritage and it is therefore not necessary to make reference to specific granite features in the City.

#### Retention of public open space

The Council welcome all comments regarding the support of Policy NE3 - Urban Green Space and protecting public open space. The source of funding for any development proposal is not a planning matter.

#### Denburn Watercourse

Any issue with regard to the Denburn Watercourse should be addressed in a Masterplan and/ or planning application, which should provide further opportunity for public consultation.

### Flood Risk

Scottish Environment Protection Agency state that the site should not be developed because of the potential for flooding. The wording is that "the majority of the site" is medium to high risk of flooding. However, Scottish Environment Protection Agency go on to say (at paragraph 5.2.9) that they would be happy to remove this objection if a flood risk assessment is carried out prior to plan adoption and this demonstrates that the site itself is not at risk of flooding (which may be done by the allocation outline being redrawn to remove the area at significant risk of flooding). However, in light of these comments it is likely that any development proposal would be required to submit a Flood Risk Assessment with any planning application. If the Reporter is so minded, the Council would accept a reference to the need for a Flood Risk Assessment to be prepared in Appendix 2 of the Plan.

### Support Development of the Gardens

The suitability of any future planning application for development will need to be assessed against the policies in the Local Development Plan, including the City Centre Development Framework, which sets out criteria for the future of the Gardens.

### Retail

The impact that development of the Gardens will have on independent retailers is not a planning issue. There is no set proposal for retail development as part of any proposal for the Gardens.

### City Centre Development Framework

The Council welcome comments supporting the content of the City Centre Development Framework. The Council notes that any proposal will need to adhere to the City Centre Development Framework which, upon implementation, should help to meet the main principles of the suggested proposal.

### General Comments

There were a number of comments received regarding Union Terrace Gardens that are not matters for the Local Development Plan. These include the leasing of public land and developer interests.

With regards to a public group overseeing the development of this site this is not a planning matter and due to democratic processes it will ultimately be a decision for the elected Council.

The comment referring to the Overgate Centre in Dundee as an example of good design is noted but any development proposal for Union Terrace Gardens should adhere to the relevant policies within the Local Development Plan, including the City Centre Development Framework. A design competition is also to be organised to the proposed development of the Gardens.

### **Reporter's conclusions:**

**Reporter's recommendations:**

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<b>Issue (ref and heading):</b>	<b>ALLOCATED SITE: DENBURN AND WOOLMANHILL OP99</b>	<b>70</b>
<b>Development Plan reference:</b>	OP99 in Appendix 2	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Ms Michelle Wyllie (24), Mrs Catherine Thornhill of Ryden LLP on behalf of NHS Grampian (640).		
<b>Provision of the Development Plan to which the issue relates:</b>	Brownfield Site	
<b>Summary of the representation(s):</b>		
<p>24: OP99 Denburn and Woolmanhill could provide an alternative for the City Garden Project.</p> <p>640: There is a requirement for a new healthcare facility close to the city centre to accommodate the two practices seeking to relocate from the existing Denburn Centre. This requires to be within half a mile of the existing location.</p>		
<b>Modifications sought by those submitting representations:</b>		
<p>24: Where flooding normally occurs in the current car park could possibly be caused by the Denburn's culvert being weakest at this point. It would be lovely if this could be removed and the Denburn become a nice water feature which would enhance the area close to the Well o' Spa.</p> <p>If flats are planned for Woolmanhill, the Archibald Simpson designed facade must remain and as many of those flats must be affordable.</p> <p>640: The commentary for site OP99 Denburn and Woolmanhill in Appendix 2 should read "subject to the development of a replacement healthcare centre to accommodate the two practices currently at the Denburn Centre".</p>		
<b>Summary of response (including reasons) by planning authority:</b>		
<p>The Council notes the comment regarding the design of the site but these more specific comments would be addressed through a planning application. Any development on this site should adhere to the Denburn and Woolmanhill Development Guidance and Design Brief (RD44) adopted in 2004. The site is within the boundary of the City Centre Development Framework (CD24), therefore the brief will be updated to be inline with the City Centre Development Framework. With regards to the comment regarding affordable housing, any residential development must adhere to Policy H5 - Affordable Housing.</p> <p>We also note the representation that suggests that the site of the current Denmore General Practice would be a better alternative to develop the City Gardens than Union Terrace Gardens. However, the Council is not leading on the project and would advise anyone with a proposal to send it to the Aberdeen City Gardens Trust who will be running a design campaign in due course.</p> <p>The comment regarding the replacement accommodation for the two General Practices wishing to relocate is not a planning matter and cannot be taken into consideration through the Proposed Aberdeen Local Development Plan.</p>		



<b>Reporter's conclusions:</b>
<b>Reporter's recommendations:</b>

<b>Issue (ref and heading):</b>	<b>ALLOCATED SITE: DONSIDE PAPER MILL OP100</b>	<b>71</b>
<b>Development Plan reference:</b>	OP 100 shown on Proposals map. Appendix 2, Opportunity Sites, p.64.	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Mr Steve Crawford of Halliday Fraser Munro Planning on behalf of Donside Ltd (1535).		
<b>Provision of the Development Plan to which the issue relates:</b>	Brownfield site covered by Policies NE1, NE2 and H2	
<b>Summary of the representation(s):</b>		
<p>1535: Respondents say that the Opportunity Site OP100 is designated as Green Space Network, which conflicts with the existing planning permissions in place and there is no justification for this. The site requires decontamination due to historical industrial processes. It has previously been considered as a potential site for a relocated Aberdeen College. There is an opportunity to include additional previously developed land within the mixed-use allocation at OP100 that can contribute to the wider redevelopment of the Tillydrone area. The River Don has not been treated in the same way as the River Dee where it flows through the urban area in terms of zonings. The site is on the route of the proposed Light Rapid Transport identified in the North Don Masterplan.</p>		
<b>Modifications sought by those submitting representations:</b>		
<p>1535:- Respondent seeks to:- Remove Green Space Network designation from the northern part of OP100 on Proposals Map.</p> <p>Remove the Green Belt and Green Space Network designations from the formerly developed land sandwiched between the route of the Third Don Crossing and the OP100 allocation (as shown as "A" in DL4 of the HFM submission.</p> <p>Include the land shown as area "A" in DL4 as part of the OP100 site for future development.</p> <p>Change the zoning of the River Don valley at this location (i.e. within the built-up urban area) from Green Belt to Urban Green Space in line with the River Dee valley.</p>		
<b>Summary of response (including reasons) by planning authority:</b>		
<p>1535 The Green Space Network in this area seeks to enhance linkages along the River Don valley with the aim of creating a footpath/cyclepath connection between Seaton Park and Grandhome. It is therefore important to retain a Green Space Network designation here. Planning permission was granted in 2009 for a shared footpath and cycle path, together with landscaping, through this area and this is currently under construction. The layout of the approved plan for the development of an urban village on the Donside Mills OP 100 site also makes allowance for retention of the Green Space Network. The Green Space Network designation does not preclude the successful development of the OP100 site which is also given a Mixed use designation. The area the objector wishes taken out of Green Space Network is also predominantly a flood risk area and is shown as public open space/play area in the approved planning application for the urban village. The proposed hydropower scheme obviously has to be adjacent to the river for drawing water and is acceptable within the context of the Green Space Network Policy (NE1).</p>		

Land to the south and west of the OP100 site is not suitable for development because of its likely impact on a District Wildlife site, flood risk and loss of Green Space Network . The objector's refer to previous discussions concerning the possible sale of the site by the City Council to facilitate a potential development by Aberdeen College. At that time the Head of Planning and Infrastructure confirmed to the Resources Management Committee that the area was zoned within the 2008 Local Plan as Green Belt and Greenspace Network and, as a result, any potential future use would be limited. The other issues arising were identified as the likelihood of flooding and the loss of a playing field which would require a replacement area to be identified. Proximity to the River Don, a recreational resource and District Wildlife Site, was also highlighted as an issue as were possible roads matters related to the proposal for a third Don crossing. This sale is no longer being pursued by the City Council or Aberdeen College. The City Council did not include this site as a possible development option when it considered all the options for inclusion in the Proposed Plan.

The objector refers to the site's connection with a Light Rapid Transport route. This should be discounted as the Proposed Plan makes no reference to such a project.

The site next to OP100 referred to by the objector is designated as Green Belt as well as Green Space Network. This is considered to be an appropriate designation. The objector believes this is inconsistent with the designations given to the River Dee Valley. We acknowledge that the lower part of the River Dee Valley, where it flows through the built up area to the East of Garthdee/Leggart, is designated as Urban Green Space rather than Green Belt. However, the bulk of the Dee Valley, heading west from Garthdee/Leggart out to Peterculter, is designated in the same way as the Don valley. The designations are based on a careful assessment of the characteristics of the river valleys along their lengths. The landscape and character of the lower Don valley is considered to be less formal and less urbanised than the lower Dee valley within the city, and it forms a continuous corridor linking directly with the countryside thereby warranting a green belt designation. The lower Dee Valley is directly bordered by much more formal open space (playing fields and highly managed parkland) or by major development (eg Garthdee retail park, housing, business and industry and harbour activities). We conclude therefore that the existing designations remain appropriate.

Accordingly it is recommended that no change be made to the Plan

**Reporter's conclusions:****Reporter's recommendations:**

<b>Issue (ref and heading):</b>	<b>ALLOCATED SITE: OP101 DUNBAR HALLS OF RESIDENCE, DON STREET</b>	<b>72</b>
<b>Development Plan reference:</b>	Appendix 2, Opportunity Sites, p.64 OP101	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Ms Nicola Abrams of Scottish Environmental Protection Agency (408).		
<b>Provision of the Development Plan to which the issue relates:</b>	Brownfield Site	
<b>Summary of the representation(s):</b>		
408: This site or part of it lies within the 1:200 year flood envelope of the Indicative River and Coastal Flood Map and may be at medium to high risk of flooding.		
<b>Modifications sought by those submitting representations:</b>		
408: Insert the following text in the 'other factors' section of Appendix 2 relating to site OP101 (page 64):-  This site may be at risk of flooding. A flood risk assessment will be required to accompany any future development proposals for this site.		
<b>Summary of response (including reasons) by planning authority:</b>		
Accept the suggested modification if the Reporter is so minded. An indicative River and Coastal Flood Map is included within the Issue folder.		
<b>Reporter's conclusions:</b>		
<b>Reporter's recommendations:</b>		

<b>Issue (ref and heading):</b>	<b>ALLOCATED SITE: OP109 LINKSFIELD ACADEMY</b>	<b>73</b>
<b>Development Plan reference:</b>	OP109 Linksfield Academy, Text: Appendix 2 Pg 64	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Mr John Findlay of Ryden LLP on behalf of The University of Aberdeen (619).		
<b>Provision of the Development Plan to which the issue relates:</b>	Brownfield Site	
<b>Summary of the representation(s):</b>		
<p>619: The respondent objects to NE3 Urban Green Space Policy that covers the majority of the OP109 site. This area of the site is identified for the proposed 50metre swimming pool. Therefore with this and the construction of the Aberdeen Sports Village it is thought that the designation of Urban Greenspace is no longer applicable and the designation of New Community Facilities CF2 would be more appropriate.</p>		
<b>Modifications sought by those submitting representations:</b>		
<p>619: Its is requested that the proposed designation of Urban Greenspace NE3 for the majority of OP109 be removed and instead zoned as New Community Facilities CF2. The City Wide Proposals Map and Appendix 2 should be amended accordingly.</p>		
<b>Summary of response (including reasons) by planning authority:</b>		
<p>Site OP109 Linksfield Academy will remain zoned as 'Policy NE3-Urban Green Space' within the Aberdeen Local Development Plan. The policy designation covering this site will not threaten the viability of the continued development of the Aberdeen Sports Village and more specifically the proposed 50metre swimming pool.</p> <p>Development on the part of OP109 Linksfield Academy zoned as Urban Green Space could potentially progress if the development was for recreation or sport, of which the site is proposed to be developed for with the proposed 50metres swimming pool. In addition to this, the development would also have to satisfy all other relevant policies within the Local Development Plan as per the usual planning process. Finally the site has been identified over time for development as a Sports Facilities site (North Beach Planning Study 2003 (RD42) and Aberdeen Local Plan 2008(CD12).</p> <p>Part of site OP109 Linksfield Academy is covered by Policy H1 Residential Areas. This designation will remain in the Aberdeen Local Development Plan. The policy is carried forward from the Aberdeen Local Plan (2008). The policy is flexible enough to allow for development of non-residential uses provided the use is considered complementary to the residential uses or that it can be demonstrated that the use would cause no conflict with, or any nuisance to, the enjoyment of existing residential amenity. Consequently the development of the 50metre swimming pool would likely be considered complimentary to the residential use within the area. The 50metres swimming pool would be a joint project by Aberdeen University, Aberdeen City Council and Sport Scotland which would be of benefit to the student population, surrounding community and wider population. The development would also be unlikely to cause conflict with, or any nuisance to, the enjoyment of existing residential amenity. The development could be seen as an improvement to what is currently an underused brownfield site and would compliment the newly developed Aberdeen Sports Village.</p>		

<b>Reporter's conclusions:</b>
<b>Reporter's recommendations:</b>

<b>Issue (ref and heading):</b>	<b>ALLOCATED SITE: OP110 MILE END PRIMARY SCHOOL</b>	<b>74</b>
<b>Development Plan reference:</b>	OP110 Mile End Primary School, Text: Appendix 2 Pg 64	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Mr John Skinner (420), Mrs Mabel Murray (422), Mrs Catherine Mogford (424), Mr & Mrs Lawrence Ewen (425), Mr Alan Butler (427), Mrs Mary Christie (429), Mrs Ina Mackland (431), Miss Nell Crosher (434), Mr & Mrs Irene and Robert Reid (436), Mrs Nellie Russell (438), Mr & Mrs Derek and Moira Davidson (445), Mrs Carole Wilson (449), Mrs Margaret Cruikshank (452), Mrs Jeanne Leith (454), Mrs Doreen Jeffrey (1050), Mrs Sheila Stewart (1125).		
<b>Provision of the Development Plan to which the issue relates:</b>	Brownfield Site	
<b>Summary of the representation(s):</b>		
420, 438, 449, 1050, 1125: The respondents would reject to a hotel, office or Council housing development which would likely cause an increase in traffic and noise.		
420, 422, 424, 425, 427, 429, 431, 434, 436, 438, 445, 449, 452, 454, 1050, 1125: The respondents would approve of residential private flats being developed on the site but nothing else.		
<b>Modifications sought by those submitting representations:</b>		
No modifications sought.		
<b>Summary of response (including reasons) by planning authority:</b>		
Site OP120 Mile End Primary School has been carried forward from the Aberdeen Local Plan 2008 (CD12) and in keeping with the character of the local area and residential designation within the Aberdeen Local Plan (2008) and it is thought that the site would be appropriate for residential redevelopment. Policies within the Local Development Plan will look to encourage the retention of the granite building and make sure that the character of the area is not lost and that a high level of amenity is maintained.		
No modifications have been sought and all representations have been noted. Development would be in line with policy zoning. The issue is regarded as resolved.		
<b>Reporter's conclusions:</b>		
<b>Reporter's recommendations:</b>		

<b>Issue (ref and heading):</b>	<b>ALLOCATED SITE: OP111 NAZARETH HOUSE</b>	<b>75</b>
<b>Development Plan reference:</b>	OP111 Nazareth House, Text: Appendix 2 Pg 65	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Mr Edward Carroll (77), Mr C Lenehan (711).		
<b>Provision of the Development Plan to which the issue relates:</b>	Brownfield Site	
<b>Summary of the representation(s):</b>		
<p>77: The respondent objects to the new development proposed on this site. Development will destroy the gardens and trees on the site. There will also be privacy, devaluation, reduction of light and noise issues affecting the adjacent properties.</p> <p>711: The respondent believes that the proposed development of the site will cause traffic and parking issues.</p>		
<b>Modifications sought by those submitting representations:</b>		
77: The respondent believes that the alterations to Nazareth House are acceptable, however the new build development should not be allowed and subsequently scrapped.		
<b>Summary of response (including reasons) by planning authority:</b>		
<p>OP111 Nazareth House has listed building consent approved, subject to conditions. Planning application 09/0485 (RD57) was approved subject to a legal agreement on 18 March 2010 by the Development Management Sub-Committee. The approval is for the redevelopment of the site including the conversion of the existing building to form 47 flats and for 5 town houses and 40 new build flats to be erected, and for associated demolitions, car park and landscape works.</p>		
<b>Reporter's conclusions:</b>		
<p></p>		
<b>Reporter's recommendations:</b>		
<p></p>		



<b>Issue (ref and heading):</b>	<b>ALLOCATED SITE: OP114 PITTODRIE PARK</b>	<b>76</b>
<b>Development Plan reference:</b>	OP114 Pittodrie Park, Text: Appendix 2 Pg 65	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Mr Scott Leitch of Halliday Fraser Munro Planning on behalf of Aberdeen Football Club (1203).		
<b>Provision of the Development Plan to which the issue relates:</b>	Brownfield Site	
<b>Summary of the representation(s):</b>		
<p>1203: The respondent supports the site boundary that is set out in the Proposed Local Development Plan City Wide Proposals Map. The respondent also supports the reference to OP114 Pittodrie Park in Appendix 1 (Table 1) and Appendix 2.</p> <p>The respondent recognises that the majority of the site is covered by Policy H2 Mixed Use Areas, however it is felt that the site would be better rezoned to be covered by the Residential Areas H1 Policy.</p>		
<b>Modifications sought by those submitting representations:</b>		
1203: The respondent believes that site OP114 Pittodrie Park should be rezoned as Residential H1 in the Aberdeen Local Development Plan.		
<b>Summary of response (including reasons) by planning authority:</b>		
<p>1203 Site OP114 Pittodrie Park should remain zoned as 'Policy H2 Mixed Use Areas' within the Aberdeen Local Development Plan. The area surrounding the site is predominantly mixed use with several businesses present amongst housing. It is therefore felt that the land designation mixed use reflects this. The policy designation covering this site will not threaten the viability of residential development. Policy H2-Mixed Use Areas states that "Applications for development or change of use within Mixed Use Areas must take into account the existing uses and character of the surrounding area and avoid undue conflict with the adjacent land uses and amenity. Where new housing is proposed, a satisfactory residential environment should be created which should not impinge upon the viability or operation of existing businesses in the vicinity..." Consequently a planning application for residential development on the OP114 Pittodrie Park site would likely be acceptable in principle if it could achieve the aspirations of the policies within the Aberdeen Local Development Plan.</p>		
<b>Reporter's conclusions:</b>		
<b>Reporter's recommendations:</b>		

<b>Issue (ref and heading):</b>	<b>ALLOCATED SITE: OP123 TRIPLE KIRKS, SCHOOLHILL</b>	<b>77</b>
<b>Development Plan reference:</b>	OP123 Triple Kirks, Schoolhill, Text: Appendix 2 Pg 66	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Mr William Tough (376), Mr R Scott (1323).		
<b>Provision of the Development Plan to which the issue relates:</b>	Brownfield Site	
<b>Summary of the representation(s):</b>		
376, 1323: The respondents believe that Belmont Street must be considered a Conservation Area and be enhanced. Redevelopment of OP123 Triple Kirks must recognise and be in character with the original site, buildings and surrounding area.		
<b>Modifications sought by those submitting representations:</b>		
No modifications sought.		
<b>Summary of response (including reasons) by planning authority:</b>		
<p>OP123 is covered by Policy C1 - City Centre Development (Regional Centre) and Policy C2 - City Centre Business Zone and Union Street. The redevelopment of OP123 Triple Kirks into office accommodation would be acceptable within these two policies. The site is a brownfield site and is also listed as an Opportunity Site within the Proposed Local Development Plan where acceptable future uses include office, retail, residential or hotel use. The site contains the remains of an A Listed building including the landmark spire and is within the Union Street Conservation area. Any redevelopment here will be expected to demonstrate a quality of design appropriate to the importance and sensitivity of the setting and in addition to the national protection given to these areas, OP123 Triple Kirks is also covered by Policy D5 Built Heritage of the Proposed Local Development Plan.</p> <p>Consequently any proposed development at site OP123 Triple Kirks will have to be in line with the relevant policies within the Aberdeen Local Development Plan. This will ensure that any potential development will recognise and be in character with the original site, buildings and surrounding area.</p>		
<b>Reporter's conclusions:</b>		
<b>Reporter's recommendations:</b>		

<b>Issue (ref and heading):</b>	<b>ALLOCATED SITE: OP128 VSA GALLOWGATE</b>	<b>78</b>
<b>Development Plan reference:</b>	OP128 VSA Gallowgate, Text: Appendix 2 Pg 66; Proposals Map	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Dr Alexander Emsley Nimmo of Diocese of Aberdeen and Orkney (226).		
<b>Provision of the Development Plan to which the issue relates:</b>	Brownfield Site	
<b>Summary of the representation(s):</b>		
<p>226: The respondent is not averse to the redevelopment of OP128 VSA Gallowgate.</p> <p>The respondent is concerned that the boundary of the site is incorrect. The area concerned should actually be smaller.</p> <p>The respondent also has concerns relating to the north retaining wall which is of great historical heritage.</p> <p>The respondent has evidence that the site is of very poor soil quality.</p> <p>The respondent is concerned that major construction that may require pile driving could affect the structure of St Margarets Church.</p> <p>The respondent wishes that if OP128 is to be redeveloped then the re-use of granite is desirable and that the new development would have to be sympathetic to the existing neighbouring church.</p>		
<b>Modifications sought by those submitting representations:</b>		
No modifications sought.		
<b>Summary of response (including reasons) by planning authority:</b>		
<p>If the Reporter is so minded the boundary of site OP128 VSA Gallowgate shown on the City Wide Proposals Map could be reduced with the Aberdeen Local Development Plan. This is due to the current site including land within the boundary which is common access ground used by both the VSA Gallowgate building and St Margarets Episcopal Church. The revised boundary runs tight to the eastern and southern edges of the VSA building and joins the current boundary to the west of the site adjacent to the Gallowgate road. The northern edge of the site boundary could remain as depicted in the Proposed Local Development Plan. Consequently the site size changes from 0.12hectares to 0.079hectares.</p> <p>Site OP128 VSA Gallowgate is covered by Policy H2-Mixed Use Areas within the Proposed Local Development Plan. This states that applications for development or change of use within the Mixed Use Areas must take into account the existing uses and character of the surrounding area and avoid undue conflict with the adjacent land uses and amenity. Where new housing is proposed, a satisfactory residential environment should be created which should not impinge upon the viability or operation of existing businesses in the vicinity. Conversely, where new industrial business or commercial uses are permitted, development should not adversely affect the amenity of people living and</p>		

working in the area.

This policy will ensure that any redevelopment of OP128 VSA Gallowgate will be sympathetic to the existing neighbouring St Margarets Church.

Policy D4 Aberdeen's Granite Heritage looks to conserve the existing granite heritage and encourage its use in new development. The policy also favours the conversion and adaption of redundant granite buildings. Consequently the re-use of granite would be desirable in the redevelopment of OP128 VSA Gallowgate.

The building within OP128 VSA Gallowgate is a category C listed building. Therefore in addition to the national protection given to these buildings, OP128 VSA Gallowgate is also covered by Policy D5 Built Heritage of the Proposed Local Development Plan which defines that proposals affecting Conservation areas and Listed Buildings will only be permitted if they comply with Scottish Planning Policy (CD3). As the wall to the north of the site sits within the curtilage of a Listed Building due consideration would have to be given to this feature within any proposed redevelopment. Policy D6 Landscape would also provide protection to the north retaining wall which has historical significance. The policy sets out that development should avoid significant adverse impacts upon the existing landscape elements, including linear and boundary features or other components, which contribute to local amenity, and provide opportunities for conserving, restoring or enhancing them.

**Reporter's conclusions:****Reporter's recommendations:**

<b>Issue (ref and heading):</b>	<b>ALLOCATED SITE: OP129 THE WATERFRONT, TORRY</b>	<b>79</b>
<b>Development Plan reference:</b>	OP129 in Appendix 2 and Appendix 3	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Mrs Jayne Carmichael Norrie (1139), Ms Lorraine Jones of Sport Scotland (1244).		
<b>Provision of the Development Plan to which the issue relates:</b>	Brownfield Opportunity Site in Torry Regeneration Area	
<b>Summary of the representation(s):</b>		
<p>1139: Concerned about the increasing levels of housing making an adverse impact on the local area. I am worried that the existing roads and infrastructure will not be able to cope with the increase in cars, which will lead to greater noise pollution and road accidents.</p> <p>1244: OP129 The Waterfront, Torry appears to contain a pitch and comprise part of a golf course. If the area is that considered as part of planning application reference A8/0574 then SportScotland has no objection to the proposal as compensation measures were considered as part of that proposal. If the site contains a pitch then the allocation of this for redevelopment needs to be considered against this national policy position, ideally as part of the Local Development Plan process.</p>		
<b>Modifications sought by those submitting representations:</b>		
<p>1139: Wish to see the plan incorporating the policies of the Old Torry planning study such as: - general improvement in pedestrian network, catering for pedestrian flows -long term aim of pedestrianising the waterfront area, parking with all new developments must be provided and does not rely on over-spill on-street parking -improvements to junctions on Abbey Road/ St. Fitticks Road required to improve visibility for access.</p> <p>There is also no consideration of new legislation on noise pollution with regard to brownfield sites. Planning applications should analyse the impact on the ambient noise of the area and should approve a layout and design that will have the least impact on the surrounding quiet area.</p> <p>1244: Confirmation as to whether OP129 The Waterfront, Torry is covered by the planning permission A8/0574.</p> <p>If not: -Retention of the site for pitch(es) use; or -As part of the Local Development Plan process, consideration of the loss of the pitch(es) against the criteria outlined in paragraph 156 of the Scottish Planning Policy to assess whether the national policy is satisfied; or -If none of the criteria outlined in paragraph 156 of the Scottish Planning Policy has been met and the site is still to be allocated for redevelopment, acknowledgement in the text referring to the site that there is a pitch(es) and reference to the need for the requirements of the Scottish Planning Policy and revised Policy NE3 - Urban Green Space to be met, and that the process outlined in the Council's Pitch Strategy will be followed.</p>		
<b>Summary of response (including reasons) by planning authority:</b>		
Any planning application for development on OP129 - The Waterfront, Torry should		

reflect The Waterfront, Old Torry Masterplan Study (2003) (RD43) and should take into account Supplementary Guidance 2.2 - Transport and Accessibility (RD62). Therefore, any planning application will take into consideration; pedestrian movement, parking, road improvements and noise mitigation.

OP129 The Waterfront, Torry does include the sports pitch site which was covered by planning application A8/0574. This part of the site has now been developed. The part of the site which is currently part of a golf course was proposed to be developed into a car park for the proposed Aquarium in the Old Torry Masterplan. The Aquarium is no longer a viable option for development, therefore it will be unlikely that the car park will be developed.

If the Reporter is so minded the reference to the Old Torry Planning Study should be removed from the OP commentary and replace with Old Torry Masterplan. The Masterplan should then be included in the list of Supplementary Guidance if the Reporter is so minded.

**Reporter's conclusions:**

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**Reporter's recommendations:**

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<b>Issue (ref and heading):</b>	<b>ALLOCATED SITE: SMITHFIELD PRIMARY SCHOOL OP116</b>	<b>80</b>
<b>Development Plan reference:</b>	OP116 Smithfield Primary School; Text: Appendix 2 Pg 65; Proposals Map OP116	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Mrs Lesley Milne (350), Ms Lorraine Jones of Sport Scotland (1244), Mr Stephen Booth of Aberdeen City Council - Asset Management (1519).		
<b>Provision of the Development Plan to which the issue relates:</b>	Brownfield Site	
<b>Summary of the representation(s):</b>		
<p>Support</p> <p>350 Support development of the site but would like access to be considered if houses are to be built. Would not like to see flats being built in this area.</p> <p>1519 Support development of this site.</p> <p>Sports Pitches</p> <p>1244 The respondent notes that there may be a sports pitch at the site. The respondent writes that the allocation of this site for redevelopment needs to be considered against national policy, ideally as part of the Local Development Plan process.</p> <p>1244 The respondent feels that the Sports Pitch Strategy needs fully updated in order to get a clear and accurate picture of what the current state of pitches are within Aberdeen.</p> <p>The responded notes that any funds obtained through the sale of pitches is subject to re-investment back into pitches.</p>		
<b>Modifications sought by those submitting representations:</b>		
<p>Housing Style and Layout 350 Consideration should be given to the access into the site and the style of homes built. A style similar to those in Berryden (behind the old Printagraph factory)</p> <p>Sports Pitches 1244 The respondent would like to be assured that the pitches at the former schools in the area have been adequately compensated for at the new Manor Park School.</p> <p>Policy Designation 1519 Wider zoning should be placed on the site to be further developed as part of the future regeneration proposals for the area.</p>		
<b>Summary of response (including reasons) by planning authority:</b>		
<p>Support</p> <p>350, 1519 The Council welcomes the support given to the identification of site OP116 Smithfield Primary School as having potential for residential development in the future.</p>		

### Housing Style and Layout

350 As with all developments and planning applications a number of factors have to be taken into consideration before planning permission is granted, access arrangements being one of them. The Council's vision is for Aberdeen to be a place that offers a high quality of life, creating sustainable communities in which amenity is maintained to a high level and for a wide choice of housing styles and types to be made available for everyone.

### Policy Designation

1519 Site OP116 Smithfield Primary School is within the Middlefield Regeneration Priority Area and is covered by a residential designation. The site would therefore have potential for redevelopment as part of the future regeneration proposals for the area.

1244 SportScotland query whether there is a sports pitch on the site. The Council notes that this is within the school grounds. Any development proposal which affects playing pitches will be considered against Policy NE3.

The Council agrees that Aberdeen's Pitch Strategy is out of date and requires review and updating. It welcomes offers of assistance from SportScotland on this and has initiated discussions on taking this forward. Once completed, the Strategy will be taken into consideration as Scottish Planning Policy, along with local policy is applied. For the above reasons the Council considers it unnecessary to amend Policy NE3 or add a specific policy in relation to outdoor sports area redevelopment.

The redirection of finance from the sale of Council property is not a planning consideration.

### Reporter's conclusions:

### Reporter's recommendations:



<b>Issue (ref and heading):</b>	<b>ALTERNATIVE SITE: WOODEND HOSPITAL</b>	<b>81</b>
<b>Development Plan reference:</b>	None	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Mr Steve Delaney of Mastrick, Sheddocksley and Summerhill Community Council (543), Mrs Catherine Thornhill of Ryden LLP on behalf of NHS Grampian (640).		
<b>Provision of the Development Plan to which the issue relates:</b>	Alternative Proposal on Urban Green Space	
<b>Summary of the representation(s):</b>		
<p>543, 640: Land at 3/04 Woodend Hospital to be redesignated and housing is an appropriate use for site. It is land which has no real amenity value. The site has significantly less impact by way of location, scale and traffic impact than Maidencraig North East. If this and other smaller scale sites across the city could cumulatively relieve some pressure from Green Belt sites, we feel their development should be encouraged by way of alternative provision.</p> <p>640: Object to 3/04 Woodend Hospital not being allocated in the Local Development Plan for sensitive development of circa 40 dwelling houses. Any development would be elevated from the burn and drainage would be designed to specifications approved by Scottish Environment Protection Agency, ensuring that run-off from the development would be sustainably managed and would not contribute to flooding downstream. Development would not be as close to the burn as the Westholme building to the south of the complex. Development of the site is deliverable in phase 1 of the plan, it has ready access to service infrastructure and is well connected to the community, public services and has public transport access within the specified walking distances.</p>		
<b>Modifications sought by those submitting representations:</b>		
543, 640: Site to be redesignated in the Plan.		
543: Site to replace Maidencraig North East in Plan.		
<b>Summary of response (including reasons) by planning authority:</b>		
<p>The Council recommend that this site is undesirable for development. The site was submitted during the Development Options (CD13) stage and was recommended undesirable due to the Urban Green Space designation.</p> <p>This site was scrutinised during the Public Inquiry for the extant Local Plan in 2006. The Reporters Report (Chapter 15 Issue 169) (CD11) said that the site has the character of abandoned farmland and not that of hospital grounds. The undeveloped strip of the Den Burn valley at this location is by no means of generous width, however, as part of a continuous and relatively secluded valley it has huge potential as an extension of a linear park, linking the Den of Maidencraig into the city's built-up area, and including an off-road route for cycling and walking, of strategic value and enhanced by easy gradients and pleasant surroundings.</p> <p>It is difficult to see much potential for development on the site without endangering the open valley profile which is fundamental to its landscape value if probably not its function</p>		

as a wildlife corridor.

As the site is identified as urban green space, if it were to be developed an equivalent and equally convenient and accessible area for public access would need to be provided. Sections of the site also appear to show the possibility of poor drainage and potential flooding issues. On the Scottish Environment Protection Agency Flood Risk Map (RD17) it shows that parts of this site adjacent to the burn are at risk of flooding.

The allocation of Woodend Hospital could not replace the allocation of Maidencraig North East. The Woodend Hospital site can only accommodate approximately 40 homes whereas Maidencraig North East can accommodate 300 homes. There would be a need for another site to be allocated to meet the 260 homes.

**Reporter's conclusions:****Reporter's recommendations:**

<b>Issue (ref and heading):</b>	<b>ALTERNATIVE SITE: LAND ADJOINING SUNNYBANK PARK</b>	<b>82</b>
<b>Development Plan reference:</b>	None	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Mr John Findlay of Ryden LLP on behalf of The University of Aberdeen (619).		
<b>Provision of the Development Plan to which the issue relates:</b>	Site covered by Green Space Network	
<b>Summary of the representation(s):</b>		
<p>619: The respondent would like the land immediately south-west of the main University of Aberdeen campus to be taken out of the Green Space Network (Policy NE1). In the Aberdeen Local Plan (2008) the land is recognised as being part of the University Campus and is designated as Existing Community Sites and Facilities (Policy CF45) as a result.</p> <p>The respondent believes that the land is clearly within the boundary of the University campus and that it remains under the control and ownership of the University.</p>		
<b>Modifications sought by those submitting representations:</b>		
<p>619: The respondent concludes that the land may be required for development and expansion of the University in the future and as a result it is requested that it is removed from the Green Space Network and returned to the Existing Community Sites and Facilities (Policy CF1) designation solely.</p>		
<b>Summary of response (including reasons) by planning authority:</b>		
<p>The Council will look to retain the Green Space Network designations allocated at the land adjoining Sunnybank Park. It is thought that the Policy NE1 Green Space Network notation is relevant and appropriate. The Green Space Network has been identified by overlaying a number of datasets and the rationale for this has been explained in Supplementary Guidance on Open Space. This rationale has sought to ensure that the Green Space Network designation only applies to land that offers significant value to Green Space Network features, (habitat, natural heritage, landscape, active travel and recreation), or land that offers clear opportunities to link these areas, and therefore enhance their value further. It is important to maintain the integrity of the Green Space Network by applying a strong and consistent rationale, and this required a review of the previous Green Space Network designations. The area is a valuable part of a wildlife corridor, where the trees and woodland help to maintain the green linkages through the area from Sunnybank Road to Bedford Road. The land is also important in terms of setting of the local townscape, thus justifying designation under policy NE1. Ownership of land does not change its suitability as part of the Green Space Network.</p> <p>The Open Space Audit (CD23) which informs the Supplementary Guidance on Open Space (RD82) due to be presented to the Enterprise, Planning and Infrastructure Committee for approval to publish for public consultation in March 2011, provides more information on the implementation of Policy NE1. The Audit scores each part of Green Space Network. The land adjoining Sunnybank Park is valued using National Best Practice Guidance on Open Space Audits. The site scores an overall 21 out of 25. When the overall score is analysed Biodiversity achieves 3 out of 5; Accessible and Well</p>		

Connected scores 4 out of 5; Attractive and Appealing Place scores 5 out of 5; Community Support scores 5 out of 5; and Supporting, Health and Wellbeing scores 4 out of 5. The scores presented in the Open Space Audit indicate that the Land adjoining Sunnybank Park is of sufficient relevance to merit Green Space Network designation and that the site contributes significantly to the setting, character and appearance of the Old Aberdeen area.

**Reporter's conclusions:****Reporter's recommendations:**

<b>Issue (ref and heading):</b>	<b>ALTERNATIVE SITES: BROWNFIELD SITES NEAR WOODEND HOSPITAL</b>	<b>83</b>
<b>Development Plan reference:</b>	None	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Mr John Findlay of Ryden LLP on behalf of Albyn Developments LTD (623), Mrs Catherine Thornhill of Ryden LLP on behalf of NHS Grampian (640).		
<b>Provision of the Development Plan to which the issue relates:</b>	Alternative proposals on CF1 - Existing Community Sites and Facilities and H1 - Residential Areas.	
<b>Summary of the representation(s):</b>		
<p>623: Objection is taken to the failure of the Proposed Plan to identify land to the north of Woodend Lodges, Queen's Road (Ref 10/01) for residential development. It is respectfully requested that the Local Development Plan is amended to include this site as an allocation with the site's current designation as Existing Community Sites and Facilities (Policy CF1 - Existing Community Sites and Facilities) removed. To accommodate this, Appendix 1 (Brownfield Sites) of the proposed Aberdeen Local Development Plan should be amended to include the land to the north of Woodend Lodges as an opportunity site for residential development.</p> <p>Supportive of the decision to withdraw site 10/01 from the green space network. This designation is unacceptable as this site has not contributed to the services of Woodend Hospital for many years and has, for a significant period of time, been surplus to requirements.</p> <p>640: Request that Summerfield House and its feu are identified as an opportunity site in the forthcoming Aberdeen Local Development Plan to accommodate a range of uses. Identifying the site to accommodate redevelopment for a mix or range of uses, which are wholly compatible with the area increases the amount of brownfield development identified within the Local Development Plan, in line with the aspirations of both the Structure Plan and the Local Development Plan.</p> <p>Request that Westholme and its feu are identified as an opportunity site in the forthcoming Aberdeen Local Development Plan to accommodate housing. The site at Westholme is an opportunity to provide sensitive brownfield development which protects the Northburn of Rubislaw corridor and reflects the Craighden residential development to the west of Woodend Road.</p>		
<b>Modifications sought by those submitting representations:</b>		
<p>623: Appendix 1 (Brownfield Sites) of the proposed Aberdeen Local Development Plan should be amended to include the land to the north of Woodend Lodges as an opportunity site for residential development.</p> <p>640: Request that Summerfield House and its feu are identified as an opportunity site in the forthcoming Aberdeen Local Development Plan to accommodate a range of uses.</p> <p>Request that Westholme and its feu, are identified as an opportunity site in the forthcoming Aberdeen Local Development Plan, with accompanying text highlighting its</p>		

suitability to accommodate sensitive residential development and strategic landscaping to the south of the site.

**Summary of response (including reasons) by planning authority:**

We note the comments received regarding Summerfield House, Eday Road and Westholme, Woodend Hospital. We were unaware of these sites being considered for development. However, the sites will be included in the Urban Capacity Study at a later date.

It is not thought reasonable to try and identify brownfield sites too far ahead in the future as sites tend to become available or get redeveloped all the time - sometimes unpredictably. For this reason, brownfield sites have only been identified for the first Structure Plan phase.

As these sites are currently in use they will not be designated as an opportunity site in this Local Development Plan and when they do become surplus to requirement they will be reviewed in the next Plan. Any planning application submitted to the Council to redevelop these sites must adhere to the relevant policies in the Local Development Plan. Westholme, Woodend Hospital is designated under Policy CF1 - Existing Community Sites and Facilities and Summerfield House, Eday Road is designated under Policy H1 - Residential Areas.

The Council is of the opinion that the Land at Woodend Lodges is an undesirable location for development. This was determined at the Development Options stage (CD13). The area has severe physical constraints such as aspect and slope. The slope is much steeper than 1:12 and part of the site has the potential to flood and drain poorly. The proposal severely affects the landscape from the North West view of the development in the valley. It also adversely affects the surrounding listed buildings and viaduct. It is accepted that the proposed development does have some positive attributes. It is well related to the existing settlement and is accessible to both public transport and community facilities. It is also close to significant employment opportunities with well connected foot and cycle paths. However, we recommend that this site is undesirable for development.

**Reporter's conclusions:**

**Reporter's recommendations:**

<b>Issue (ref and heading):</b>	<b>ALTERNATIVE SITE: CAUSEWAYEND</b>	<b>84</b>
<b>Development Plan reference:</b>	None	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Mr Bob Reid of Halliday Fraser Munro Planning on behalf of Mr M Hickey (1530).		
<b>Provision of the Development Plan to which the issue relates:</b>	Alternative proposal on Green Belt	
<b>Summary of the representation(s):</b>		
<p>1530 The role of the Bridge of Don should be much more significant and at the same time it is emphasised that developing the land available should address many of the present deficiencies in the area.</p> <p>Bridge of Don should also by now have a town centre of its own. New development north of the Don can capitalise upon energy and sustainability initiatives. There is readily developable land north of the Don and it has clear geographic advantages in terms of sustainability.</p> <p>The North of the Don masterplan and the Energetica initiative can be taken forward jointly and would develop the sustainability theme mentioned above. Energetica will require land serviced with the level of infrastructure and facilities set out in the North of Don Masterplan.</p> <p>The delivery of land elsewhere in Aberdeen is likely to be more constrained in the first phase of the Structure Plan than it will be North of the Don. The location of facilities should be a major Masterplanning Exercise carried out by/on behalf of the council and should go beyond the quality of individual neighbourhoods. The assembly of the neighbourhoods as a whole means a higher level of masterplanning as illustrated in the North of Don Masterplan.</p>		
<b>Modifications sought by those submitting representations:</b>		
1530: The respondent would like to see the site, identified as 2/17 Causewayend in the Main Issues Report, to be included within the Local Development Plan as being suitable to accommodate residential use. The submission includes the Proposed North Of Don Masterplan.		
<b>Summary of response (including reasons) by planning authority:</b>		
<p>It is the opinion of the Council that to designate land at Causewayend, Bridge of Don, (known as site 2/17 within the Main Issues Report) would not be appropriate. Development at this site would have a severe impact on the surrounding landscape. The views from the B997 Scotstown Road would be very prominent. These views help contribute to a sense of place around Aberdeen and this would be damaged and eroded should development be progressed at this site. The tree belts are a prominent local feature which screens the existing housing development at Bridge of Don. The B997, although having the appearance of a minor carriageway, is a busy road carrying a considerable amount of traffic. The site is not well integrated to the existing settlement and it is thought that it would be difficult to link a new road between the existing settlements to the south at Woodcroft to the proposed development. Consequently road access would need to be made on the road to the north of the site and this may have</p>		

safety implications. There would be some concern for pedestrians or cyclists aiming to avoid the use of the car. This could lead to increased car dependency which is against policies described in national, regional and local policy. A small housing estate at the site, in current conditions, would have rather poor access to public transport and neighbourhood facilities, where there are effectively no opportunities for walking to destinations. The distance from bus stops, although measured at 460metres from the Number 2 bus in the Development Options Assessment (CD13), would be difficult to access due to the tree belts and existing housing. This would not be favourable. Alternative sites in more appropriate and sustainable locations throughout the city have been identified. These allocations meet the requirements set out in the Structure Plan.

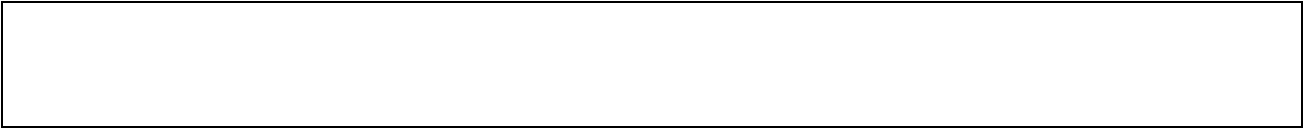
In terms of the Green Space Network designation, the site has access value which connects the rural areas north of the built settlement with the rural hinterland. The site allows for connectivity between habitats and maintains the green linkages that Green Space Network seeks to protect. Supplementary Guidance on Open Space was presented to the Enterprise, Planning and Infrastructure Committee for approval to publish for public consultation in March 2011. The delay in publishing the guidance has been due to the need to develop it in parallel with the Open Space Strategy, a draft of which is also going before that Committee.

The North of Don masterplan proposal would have an impact on the overall settlement strategy and would require a major reassessment of the proposed sites across the entire city. Transport impacts would have to be reworked and further consultation carried out. Many of the sites within the masterplan area have been assessed as being 'undesirable' when measured against a range of sustainability criteria. Many of the aims of the North of River Don Masterplan are equally achievable by masterplanning the sites which are allocated in the Aberdeen Local Development Plan Proposed Plan. It is also likely that the North of Don Masterplan would exacerbate the people of Bridge of Don's concerns that too much development is being planned for the Bridge of Don. Evidence to suggest this comes from the fact that the Bridge of Don masterplan would redistribute more than 60% of the city's greenfield housing allocations to the Bridge of Don. This is compared to approximately a third of the greenfield housing allocations currently proposed. In addition to this, having such a high proportion of allocations in the Bridge of Don area would reduce the choice of sites available elsewhere in the city and may prove more difficult to deliver the required development within the timescales envisaged, requiring a large number of landowners and developers to work together.

It is thought that sufficient allocations have already been made in the Bridge of Don area to support the Energetica project. In addition to the 75 hectares already zoned at Berryhill and Findlay Farm for employment use in the 2008 Aberdeen Local Plan, but which remains undeveloped, there has been 32 hectares of employment land zoned in the Proposed Plan. Sites capable of accommodating over 7500 homes have also been allocated to the area which is believed to be a significant allocation to support the Energetica project. Major masterplanning exercises have already been undertaken to plan future developments at Grandhome and Dubford.

**Reporter's conclusions:****Reporter's recommendations:**





<b>Issue (ref and heading):</b>	<b>CHANGE OF LAND USE ZONING: FORESTERHILL</b>	<b>85</b>
<b>Development Plan reference:</b>	None	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Mr John Findlay of Ryden LLP on behalf of The University of Aberdeen (619).		
<b>Provision of the Development Plan to which the issue relates:</b>	Proposals Map, Policy NE1 Green Space Network	
<b>Summary of the representation(s):</b>		
<p>619: The respondent objects to the proposed areas of Green Space Network to the north and south west of the Foresterhill Site. The designation is completely unjustified and will lead to undue restrictions which will jeopardise any future opportunities for upgrading and expansion.</p> <p>The Proposals Map does not reflect the Foresterhill Development Framework. These areas have been outlined for future development and the emphasis put on the site being able to expand in the future in paragraph 3.54 of the Proposed Plan. It is thought that the designation is a clear contradiction to the proposed Supplementary Guidance and approved Development Framework.</p>		
<b>Modifications sought by those submitting representations:</b>		
619: The proposed areas of Green Space Network to the north and south west of the Foresterhill site should be removed. The current designation as Existing Community Sites and Facilities from the Aberdeen Local Plan 2008 should be retained. The City Wide Proposals map for Aberdeen should be amended accordingly.		
<b>Summary of response (including reasons) by planning authority:</b>		
<p>The Green Space Network has been identified by overlaying a number of datasets and the rationale for this has been explained in Supplementary Guidance on Open Space (RD82). This rationale has sought to ensure that the Green Space Network designation only applies to land that offers significant value to Green Space Network features, (habitat, natural heritage, landscape, active travel and recreation), or land that offers clear opportunities to link these areas, and therefore enhance their value further. It is important to maintain the integrity of the Green Space Network by applying a strong and consistent rationale, and this required a review of the previous Green Space Network designation. The Council will look to retain the Green Space Network designations allocated at the Foresterhill site. Foresterhill currently has an approved Development Framework adopted by the Council in 2008 (RD77). Policy NE1 Green Space Network will allow for the location and extent of Green Space Network to be reviewed within Masterplanned sites. CF1 land at Foresterhill was designated Green Space Network because it forms part of the Open Space Audit, having biodiversity and access value. The site was also identified as a 'stepping stone', as explained in the Supplementary Guidance on Open Space and could offer a greenspace resource for the rest of the site.</p>		
<b>Reporter's conclusions:</b>		

**Reporter's recommendations:**

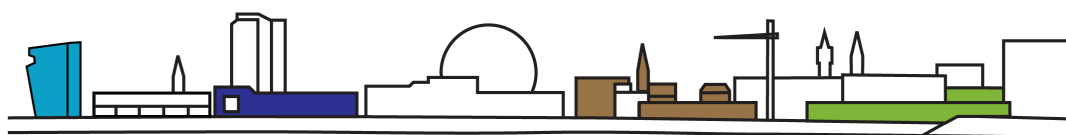
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<b>Issue (ref and heading):</b>	<b>ALTERNATIVE LAND USE ZONING: KING'S COLLEGE RECREATIONAL GROUNDS</b>	<b>86</b>
<b>Development Plan reference:</b>	None	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Mr John Findlay of Ryden LLP on behalf of The University of Aberdeen (619).		
<b>Provision of the Development Plan to which the issue relates:</b>	Proposals Map, Policy NE1 Green Space Network	
<b>Summary of the representation(s):</b>		
<p>619: The respondent would like the proposed area of Green Space Network (Policy NE1) at the King's College recreational grounds removed and its designation as Existing Community Sites and Facilities (Policy CF1) retained.</p> <p>The respondent adds that the ground is private university land and does not provide any amenity value to the local community and as a result the land should simply be classified as part of the university facility.</p> <p>The respondent does not believe that the site meets the criteria set out in Scottish Planning Policy for the local designation of green networks.</p> <p>The respondent sets out that the site is an isolated pocket of open space surrounded on all sides by high walls and development and cannot therefore contribute to the objectives of Green Space Network.</p>		
<b>Modifications sought by those submitting representations:</b>		
619: The respondent would like to see the proposed area of Green Space Network (Policy NE1) at Kings College recreational grounds removed and remain as Existing Community Sites and Facilities (Policy CF1). This policy encompasses the remaining site area of the main University of Aberdeen campus.		
<b>Summary of response (including reasons) by planning authority:</b>		
<p>619 The Green Space Network has been identified by overlaying a number of datasets and the rationale for this has been explained in Supplementary Guidance on Open Space (RD82). This rationale has sought to ensure that the Green Space Network designation only applies to land that offers significant value to Green Space Network features, (habitat, natural heritage, landscape, active travel and recreation), or land that offers clear opportunities to link these areas, and therefore enhance their value further. It is important to maintain the integrity of the Green Space Network by applying a strong and consistent rationale, and this required a review of the previous Green Space Network designations. The Council will look to retain the Green Space Network designations allocated at the King's College Recreational Grounds. It is thought that the Policy NE1 Green Space Network notation is relevant and appropriate. This is due to the fact that the site is in active recreational use. The issue of the ground being in private ownership should not be of any more relevance than that of many other sports pitches around the City. The site is a valuable part of a wildlife corridor and the local townscape, thus justifying designation under Policy NE1. The Open Space Audit (CD23) which informs the Supplementary Guidance on Open Space was approved for consultation by the Enterprise, Planning and Infrastructure Committee for approval to publish for public</p>		

consultation in March 2011 and provides more information on the implementation of Policy NE1. The Audit scores each part of Green Space Network. Kings College Recreational Grounds are valued using National Best Practice Guidance on Open Space Audits. The site scores an overall 19 out of 25. When the overall score is analysed Biodiversity achieves 1 out of 5; Accessible and Well Connected scores 4 out of 5; Attractive and Appealing Place scores 5 out of 5; Community Support scores 5 out of 5; and Supporting, Health and Wellbeing scores 4 out of 5. The scores presented in the Open Space Audit indicate that the Kings College Recreational Grounds site is of sufficient relevance to merit Green Space Network designation and that the site contributes significantly to the setting, character and appearance of the area. There is concern that if the site was covered by Policy CF1 then this would facilitate development for University uses, even if this is not a current intention.

**Reporter's conclusions:****Reporter's recommendations:**

<b>Issue (ref and heading):</b>	<b>ALTERNATIVE LAND USE ZONING: ABERDEEN COLLEGE CLINTERTY CAMPUS</b>	<b>87</b>
<b>Development Plan reference:</b>	None	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Mrs Elaine Farquharson-Black of Paull and Williamsons on behalf of Aberdeen College (650).		
<b>Provision of the Development Plan to which the issue relates:</b>	Alternative proposal on Green Belt	
<b>Summary of the representation(s):</b>		
650: Support the allocation of a campus at Clinterty under policy CF1 - Existing Community Sites and Facilities. Zoning should include all land owned and operated by the College		
<b>Modifications sought by those submitting representations:</b>		
650: Remove the Green Belt zoning from the land within the red line on the attached plan and expand the Policy CF1 - Existing Community Sites and Facilities zoning to include this land.		
<b>Summary of response (including reasons) by planning authority:</b>		
<p>The built area of the college has been zoned as Policy CF1 - Existing Community Sites and Facilities to reflect the site's current use. The remaining fields are in agricultural use and in common with the surrounding land and we have zoned them as Policy NE2 - Green Belt.</p> <p>We have no evidence that the zoning of the fields as green belt restricts the operation of the college in any way - and the college has operated on this site within a green belt designation for many years. Should the college declare the property surplus to requirements we consider the built up areas are of a different character to the agricultural fields and whilst under Policy CF1 - Existing Community Sites and Facilities alternative uses which are compatible with adjoining uses may give scope for redevelopment of the built up area we would not wish to see the redevelopment of extensive areas of agricultural land. As such we are satisfied that the land remain zoned as Policy NE2 - Green Belt.</p>		
<b>Reporter's conclusions:</b>		
<b>Reporter's recommendations:</b>		



**aberdeen** local development plan

# **RESPONSE TO PROPOSED PLAN CONSULTATION: POLICIES**

**ISSUE 88 - 136**

<b>Issue (ref and heading):</b>	<b>POLICY C1 AND C2: CITY CENTRE</b>	<b>88</b>
<b>Development Plan reference:</b>	Policy C1 - City Centre Development - Regional Centre Policy C2 - City Centre Business Zone and Union Street City Centre Business Zone (C2) also shown on Proposals Map	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Ms Michelle Wyllie (24), Mr Andrew Woodrow of CBRE - CB Richard Ellis on behalf of John Lewis (235), Councillor Debra Storr of Aberdeen and Aberdeenshire Green Party (353), Mr Andrew MacLeod of George Street Community Council (417), Mr Craig Leuchars (743), Ms Rita Stephen of Aberdeen City and Shire Economic Future (760), Mr David Halliday of Aberdeen Bid Development Company Ltd (782), Mr Fraser Littlejohn of Montagu Evans LLP on behalf of Threadneedle Property Limited (843), Mr Malcolm Campbell of Knight Frank LLP on behalf of Scottish Enterprise (1182), Ms Emelda Maclean of Emac on behalf of Scotia Homes (1189), Mr Brian Wallace of Traverse Ltd on behalf of ACCA (1285), Mr Steven Robb of GVA Grimley on behalf of Scottish Retail Property Limited Partnership (1438), Mrs Lisa Russell of Rappleys LLP on behalf of HSBC Bank Plc (1553), Mr David Henderson (1576).		
<b>Provision of the Development Plan to which the issue relates:</b>	Sets out a vision for the City Centre and sets criteria to assess development proposals within the City Centre.	
<b>Summary of the representation(s):</b>		
<p>Strategy/ Vision for the City Centre</p> <p>235, 760, 1438: Support the plan regarding the City Centre, i.e. to maintain the City centre as the key commercial centre; that it requires new development and continues to be enhanced and promoted as a safe, attractive, accessible and well connected place which contributes to an improved quality of life; and that most new shopping floor space will be directed to the city centre.</p> <p>Also supports the content of para 3.56 of the Proposed Plan which indicates how the Council will encourage further developments in the City centre and will use the City Centre Development Framework to guide improvements</p> <p>782: Support the city centres future growth. The vision needs to be enhanced.</p> <p>The Business Improvement District Company is determined to be ambitious and deliver marketing, and physical improvements to the City.</p> <p>1182: Important that the Local Development Plan and its policies support tourism and business tourism in particular. Scottish Enterprise considers that the policies (e.g. City Centre Policy C1) are generally supportive of tourism. However, it is felt that it would be beneficial if greater mention was made regarding tourism and its importance to the economy in the text of the Plan.</p> <p>An Action Programme should be produced which identifies the key stakeholders with responsibility for delivering each project and the timescales involved.</p> <p>1189: Increasing the commercial activity in the centre of the city at the expense of the resident is not the way to increase the vitality and viability of the town centre.</p>		



Preferentially locating commercial activity to the centre also threatens to take away the opportunity to create the mixed-use areas, that are proposed by the plan, from having their own vitality and viability. It is considered that the proposed plan has not properly taken into account the development of mixed use areas. Alternative locations for commercial activity should be made available within the greenfield mixed-use allocations that will be taking place elsewhere within the city boundary.

1285: The vision for the City Centre, paragraph 2.9 differs from the Structure Plan vision and Aberdeen City and Shire Economic Futures vision. It is unclear how this policy will be encouraged and implemented. We suggest that the delivery mechanism of Policy C1 - City Centre Development - Regional Centre be set out in the Aberdeen Local Development Plan or the City Centre Development Framework.

Paragraph 2.8 is not forward looking.

Paragraph 2.9 has no business development context and makes references to policies that are not defined.

Policy C1 - City Centre Development - Regional Centre

235, 760, 1438 Fully support Policy C1- City Centre Development - Regional Centre

Policy C2 - City Centre Business Zone and Union Street

235, 760, 1438 Fully support Policy C2 - City Centre Business Zone and Union Street.

843: Supportive of Policy C2 - City Centre Business Zone and Union Street in principle. However feel that greater flexibility is necessary in primary frontages, such as Frontage 'G' to allow consideration of changes of use. Non retail uses need not detrimentally affect the frontage and can in many cases enhance vitality and viability. It is considered that proposals should be considered on a case by case basis.

1285: We note the introduction of the City Centre Business Zone. This is not defined in the City Centre Development Framework. It does not include Justice Mill Lane and Langstane Place which is actually zoned as Housing, Mixed Use Area (H2). We suggest that any defined City Centre Business Zone takes cognisance of existing and intended uses and that the City Centre Development Framework refers to the differential policies to be implemented within that zone.

1553: Frontages policy is out of date. Higher number of vacancies now on Union Street. There are a number of supporting uses, akin to Class 1 that are appropriate. We do not consider that adequate review of the Aberdeen retail destinations has been undertaken. Shopping patterns and preferred locations for occupiers has altered. Accordingly, the policy and supplementary guidance should be updated and some flexibility provided for suitable, alternative uses.

1576: In Policy C2 - City Centre Business Zone and Union Street, the respondent would like to change the policy on change of use from retail, where 2 conditions are stipulated, from 'and how..' to '.. and/or how the new aims..' so as to make more flexibility of use, to increase possibility of use of underused premises, as long as within aims of city centre aims objectives.

Should there be something in policy to say that where there are underused units in the city centre business zone, then owners should show how they are encouraging retail or other use compliant with city centre aims. If not, consideration could be given for encouragement, support or compulsion to change terms and conditions or other factors that could be reasonably be expected to bring these underused premises into use.

#### Diversity of shops

24: Aberdeen has more than enough retail which has resulted in multiple branches of the same chains. To revitalise this unique shops need to be attracted into the city centre.

#### Development above or below businesses in the City Centre

353: For a large portion of buildings in the city centre, office or retail use is unlikely to be economic on upper floors and there is an existing high vacancy rates. It is desirable to bring these buildings back into economic use and therefore reversion to residential use should be encouraged. But there will inevitably be a problem with car parking therefore restrictions on the keeping of cars for such residential uses should be inhibited.

#### Transport/ Traffic

417: Respondent expresses a series of measures they would like to see incorporate into the Aberdeen Local Development Plan. The measures proposed include; reduced speed limit of 20 miles per hour on George Street, altered traffic signal phasing, implementation of a one-way traffic system on lower section of George Street, Implement angled parking bays to increase number of spaces available, introduce free parking for 20 minutes, provide better street lighting, provide additional police foot patrols and install a cover over the pavement on one side of George Street.

1285: The support of the Aberdeen City Centre Alliance, and the retail community in the city, for the Aberdeen Western Peripheral Route was and remains conditional upon (a) the avoidance of retailing at the node points on the route of the Aberdeen Western Peripheral Route and (b) a strict application of the sequential test.

There is no mention of pedestrianisation of Union Street in the Aberdeen Local Development Plan. However, it forms a key part of Aberdeen City Council policy. This will have a significant influence on access, functionality and place making within the city centre. The Aberdeen City Centre Alliance supports a phased introduction of pedestrianisation on Union Street between Bridge Street and Market Street with the first phase permitting access of public transport.

#### Development Opportunities

743: Aberdeen City Council should take this unique opportunity to purchase Greyfriars John Knox Church which is currently being offered for sale and incorporate the renovation and preservation of this building into their new corporate headquarters.

#### Tourism

760: Aberdeen must become 'a must visit' destination. This can only be achieved through the encouragement of bold ambitious plans which will transform the city, particularly the

city centre.

Access to and from the city centre needs be improved and the offering in terms of business premises, culture and leisure also further enhanced. Hotel and commercial development must continue.

### **Modifications sought by those submitting representations:**

Strategy/ Vision for the City Centre

782: Enhance the vision element and make mention of the emerging Business Improvement District Plan to ring fence investment in the City Centre area.

1182: Include a reference in Chapter 2 of the Local Development Plan under the Section on the City Centre which makes reference to the importance of tourism and in particular business tourism to the economy of Aberdeen.

1189: Policies C1 - City Centre Development - Regional Centre and C2 - City Centre Business Zone and Union Street should therefore be amended to include the following wording, or similar: 'At all times preference will be given to the effective use of upper floors within new and existing buildings in the city centre. Should there be no viable commercial use for this space, then residential use will be encouraged.'

Policy C2 - City Centre Business Zone and Union Street

843, 1553: Policy C2 - City Centre Business Zone and Union Street of the proposed plan and supplementary guidance should allow for greater flexibility in considering proposals for a change of use on primary frontages where it can be demonstrated that an exception to the policy is justified.

1576: In Policy C2 - City Centre Business Zone and Union Street, on city centre developments, I would like to change the policy on change of use from retail, where two conditions are stipulated, from 'and how...' to '.. and/or how the new aims..' so as to make more flexibility of use, to increase possibility of use of underused premises, as long as within aims of city centre aims objectives.

Development above or below businesses in the City Centre

353: In Policy C2 - City Centre Business Zone and Union Street add '3. Where residential use is proposed, a legal agreement will be required to ensure that the occupiers of such properties do not require parking facilities.' and delete final sentence of policy.

Transport/ Traffic

417: The Community Council wish to see their proposal incorporated as part of the Aberdeen Local Development Plan.

### **Summary of response (including reasons) by planning authority:**

Strategy/ Vision

235, 760, 782, 1182, 1189, 1285, 1438: The Council welcomes all comments expressing support for the City Centre chapter and related policies. The Local Development Plan will

continue to focus new retail, commercial, leisure and other appropriate uses in the City Centre in accordance to the sequential approach.

The City Centre chapter of the Proposed Plan sets out the Council's vision for developing the City in terms of business, retail, culture and leisure. The plan also encourages sustainable travel choices that in turn will improve access to and from the city centre as well as city wide. Therefore, we think that the text regarding the City Centre is appropriate for the Local Development Plan.

At the moment, the Council is working along with the Business Improvement District Project to make Aberdeen City Centre one of the most vibrant, attractive, prosperous and liveable city centres in Northern Europe. A vote of the business owners of the BID area will take place in August which will determine the success of the Business Improvement District Project.

The City Council is in partnership with the Business Improvement District Project and if the Reporter is so minded we could make mention of this in the supporting text i.e. at the end of paragraph 2.9 'In addition, a Business Improvement District Project has been proposed in Aberdeen City Centre.'

#### Policy C1 - City Centre Development - Regional Centre

235, 760, 1438: The Council welcomes all comments expressing support for this Policy.

#### Policy C2 - City Centre Business Zone and Union Street

235, 760, 843, 1285, 1438, 1553, 1576: With regards to Policy C2 - City Centre Business Zone and Union Street, it does not relate to residential development as the policy refers to commercial development within the City Centre Business Zone which includes Union Street. Supplementary Guidance 1.5 - Harmony of Uses (RD61) gives more detail about living or working above or below a business within the City Centre. Therefore there is no mention of residential development in upper or lower floors in Policy C2 - City Centre Business Zone and Union Street but this use is supported subject to other provision of the Plan being met. With regards to low or no car housing, the Council would be happy to accept proposals for low or no car housing and criteria for the suitability of such proposals is set out in Supplementary Guidance 2.2 Transport and Accessibility (RD62) published alongside the Proposed Plan (please see Issue 95 (Policy T2 - Managing the Transport Impact of Development)).

It is noted that two respondents wish Policy C2 - City Centre Business Zone and Union Street and related Supplementary Guidance to be relaxed. In light of these representations we will consider reducing the percentage threshold of Sector A from 50% to 40% if the Reporter is so minded. This would be in line with the current percentage thresholds at the west end of Union Street. However, we will not support a change to the percentage threshold of Sector G which will remain at 90%. This is due to the primary location of this sector of Union Street. The Council does not support any relaxation to the policy. We wish Union Street to remain the focus of comparison shopping in the city and relaxing this policy further will negatively impact this.

The Council welcomes all comments expressing support for this Policy.

### Diversity of shops

24: Commercial development is one of the many uses that we encourage in the City Centre Business Zone as well as the rest of the City Centre. Major commercial developments such as Union Square and the Bon Accord Centre extension complement the individual shops that the city boasts in the West End, Belmont Street and The Green. However, the type of retailer that moves into a unit is not a planning consideration therefore as a planning authority we are unable to attract unique shops into the city centre.

As previously mentioned, the Council is in partnership with the Business Improvement District Project. This in turn will help encourage more independent and unique shops into Aberdeen.

### Development Above or Below the Business

353: The Council continues to encourage the reuse of upper and lower floors of buildings in the city centre. The Transport and Accessibility Supplementary Guidance published alongside the Proposed Plan states that low and no car housing, and car clubs, would be encouraged where there is evidence that car ownership and use will be low enough to justify proposals, and where public transport and other travel options are sufficient to allow residents to reduce dependence on the car. Ideally opportunities for low and no car housing would be suitable where residents would not be eligible for an on-street parking permit. The Supplementary Guidance includes a list of criteria upon which proposals for low or no car housing will be determined.

### Transport/ Traffic

417, 1285: The Council notes the comments regarding the regeneration of George Street. However, these issues are not addressed through Planning. Most of the issues raised are matters of local traffic management and have been forwarded to the respective Council team dealing with them. The Business Improvement District proposal includes the most southern part of George Street therefore the issue of a cover over part of George Street could be raised via a successful Business Improvement District Board and addressed through this project, subject to the appropriate legislation, planning or otherwise, relating to such a proposal. With regards to the higher level of police patrols this is an issue that must be raised with Grampian Police.

The pedestrianisation of Union Street is mentioned within the Vision section of the Aberdeen City Centre Development Framework (CD24) Supplementary Guidance. However, if the Reporter is so minded, a sentence saying that "Appropriate pedestrian priority measures are currently under consideration for Union Street." could be added to section 2.1 in the Aberdeen Local Development Plan after the sentence... A specific policy for Union Street seeks to enhance its vitality and viability in recognition of its key location at the heart of the City.

### Development Options in the City Centre

743: With regards to the sale of Greyfriars John Knox Church the Council have pursued an offer to buy the building but an agreement could not be made with the Church of Scotland. However, the sale of the church is not a Local Development Plan issue.

**Tourism**

760: With regards to tourism in the City Centre, the Council agrees that tourism is an important driver of the Aberdeen economy, however we feel that paragraph 2.8 deals with the importance of tourism in the city.

**Reporter's conclusions:****Reporter's recommendations:**

<b>Issue (ref and heading):</b>	<b>POLICY LR2: DELIVERY OF MIXED USE COMMUNITIES</b>	<b>89</b>
<b>Development Plan reference:</b>	Policy LR2 - Delivery of Mixed Use Communities	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Ms Emelda Maclean of Emac on behalf of Scotia Homes (1189), Mr Stuart Winter of Jones Lang LaSalle (1556).		
<b>Provision of the Development Plan to which the issue relates:</b>	Requirement for the delivery of mixed use communities where they have been identified.	
<b>Summary of the representation(s):</b>		
<p>1189: supportive of this Policy and encouraging mixed-use but feel that it should be given even more credence in the proposed plan.</p> <p>1189: Policy LR2 in the Local Development Plan correctly addresses the requirement that development will need to include a mix of uses. However, the need for mixed use should be the default for all development of a reasonable size. This policy should be strengthened.</p> <p>1556: The policy recognises, among other matters, that the delivery of electricity infrastructure will require to be considered for mixed use developments and communities. This is supported. However, the policy does not refer to gas network infrastructure. As set out within the representation to the MIR, Scottish Gas Networks (SGN) has a statutory obligation to maintain the gas networks and provide connections to it upon request. It is recommended that the policy also acknowledges that appropriate provision for gas network infrastructure may also be required to support the development of mixed use communities and accordingly should be a matter considered by the developer.</p>		
<b>Modifications sought by those submitting representations:</b>		
<p>1189: To strengthen this policy, and bring it into line with the requirement for masterplanning sites of a certain size, additional wording should be added: Any site that comprises more than 50 units of housing or 2 Ha of development land should contain mixed-use in terms of residential and employment. Design Statements should normally be submitted with detailed applications of this scale justifying the mix of uses proposed and explaining why a proposal does not contain mixed-use, if this is the case.</p> <p>1556: A revised policy wording is recommended: Mixed used developments will be required to services employment land along with the associated phases of the housing development. This means that the road, water, gas and electricity infrastructure will need to be considered for the whole site.</p>		
<b>Summary of response (including reasons) by planning authority:</b>		
<p>Part of the spatial strategy adopted by the Proposed Plan, paragraph 2.3, is to provide a "mixture of house types and employment opportunities to encourage a balanced population structure" As can be seen from pages 14-17 of the Proposed Plan each area has employment allocations to encourage sustainable communities. It is our view that the delivery of mixed sustainable communities does have a key role in the plan and the</p>		

purpose of Policy LR2 is to ensure that employment land is serviced along with housing, and not just land left over after housing development. This will help to encourage business to the area because it will increase the supply of immediately available employment land and reduce constraints to delivery.

It is inappropriate to apply a blanket policy for a mix of housing and employment across all sites over 50 dwelling houses. In some areas, particularly brownfield developments in more industrial areas, it may be more appropriate to deliver a single use housing development to improve the mix of the area, so long as it does not affect the viability of existing businesses.

The Council recognises the importance of infrastructure provision and if the reporter was so minded Policy LR2 could include gas networks and connections within the infrastructure required.

**Reporter's conclusions:****Reporter's recommendations:**



<b>Issue (ref and heading):</b>	<b>POLICY I1: INFRASTRUCTURE DELIVERY AND DEVELOPER CONTRIBUTIONS</b>	<b>90</b>
<b>Development Plan reference:</b>	Policy I1 - Infrastructure Delivery and Developer Contributions	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
<p>Ms Michelle Wyllie (24), Mr Eric Jensen (54), Mr James Fish (56), Ms Tiffany Sims (57), Mr Mark Ewen (61), Ms Joyce Milne (62), Ms Gayle Morrice (63), Ms Gillian Ewen (64), Mr Brian Morgan (68), Mr Peter Wilson (69), Ms Catriona McWilliam (70), Mr Frederick Milne (71), Mr Philip Morrice (72), Mr Keir Willox (73), Ms Renata Powell (81), Mr George Hood (82), Ms Fyfe Hepburn (83), Mr Kenneth Sandison (84), Ms Lorraine Sandison (86), Mr Greig Addison (87), Mr Ali Hassanirad (89), Ms Angela Cameron (90), Mr Scott Cameron (91), Mrs June V. Shirriffs (92), Sir/Madam H. Brown (93), Dr George G. Shirriffs (94), Ms Elizabeth Binnie (95), Mr George J. Lowe (96), Sir/Madam N. Sands (102), Mr Dennis Scott Dalgarno (103), Mrs E. Cheyne (104), Mr Alexander Davidson (105), Ms Ann Perrott (106), Mr James Chalmers (108), Mrs Margaret Chalmers (109), Mr Alan Walker (110), Ms Joyce Forrest (111), Mr David W. Metcalfe (112), Ms Oonagh Grassie (113), Mrs Gillian Millar (114), Ms Shari Ross (116), Sir/Madam M. Sands (117), Sir/Madam W. Middleton (118), Sir/Madam I. Middleton (119), Ms Morag Dalgarno (120), Ms Claudine Park (121), Ms Sandra Roach (122), Mr Peter Roach (123), Mr Ian Park (124), Sir/Madam Sam D. Sinclair (125), Mr Colin McKay (126), Dr Steven Yule (127), Mrs Susan Yule (128), Ms Susanne Steer of Scottish Water (141), Mr Graham MacPherson (142), Mr Stuart Wilkie (143), Mr Richard Murray (144), Ms Kimberley Murison (146), Mr Simon Merrilees (147), Ms Olive Hunter (148), Mr David Merson (149), Mr Norman Hunter (150), Mr Derek Watt (180), Ms Elizabeth Merson (181), Ms Lyndsay Hay (182), Ms Jane Watt (184), Mr John Edward Doudenmier (186), Mr Kevin A. Cowie (187), Mr E. G. Roberts (188), Ms Jane Anne Smart Doubenmier (190), Mrs Azadeh Safarvarkiani (192), Mrs P. Cram (193), Ms Susan Cameron (194), Mr Craig Cameron (195), Ms Angela M. Gibb (196), Ms Jane Troup (198), Mr John Bedford (199), Ms Heidi Aylmer (200), Mr Gary M. Aylmer (201), Ms Carol Milne (205), Mr Keith Milne (206), Ms Louise Wood (207), Mr Charles Thorn (218), Mr Alistair Blues (219), Ms Dorothy Hall (220), Ms Betty Johnston (221), Ms Valerie Sinclair (222), Mr &amp; Mrs G. B. Peddie (224), Mr Eric K. Johnstone (236), Mr Michael J. M. Reid (237), Mr Allan Davidson (238), Mr R. Hainey (239), Mrs R. Hainey (240), Ms Barbara Steffensen (241), Mr John Cameron (242), Mr Stuart Tait (243), Mrs Susan Tait (244), Ms Karen Hughes (245), Mr David S. M. Campbell (246), Ms Arlene Wilson (247), Dr J. Kenneth McAlpine (248), Ms Judith Farquhar (249), Mr Raymond Farquhar (250), Ms Kathleen Thorn (251), Mr Derek Williams of Aberdeen Cycle Forum (254), Mrs Shiela Young of Bridge of Don Community Council (256), Mr Jonathan Smith (276), Mr Glenn Taylor Buchan (292), Ms Ellen Buchan (293), Mr Rod Buchan (294), Ms Michelle McDonald (296), Ms Susan Beard (297), Mr John Beard (298), Mrs Barrie Buchan (299), Mr Stephen Jack (300), Ms Pamela Anne Jack (301), Mr Steve Burnett (312), Mr Matthew Dunning (313), Mr P.E. Johnston (314), Mrs F.A. Pastuszko (315), Mr A.S.G. Pastuszko (316), Ms Shauna Gowans (354), Ms June McDonald (355), Mr William McDonald (356), Ms Pamela Gatt (357), Mr Neil Taylor (358), Mr Guus Glass of Cults, Bieldside and Milltimber Community Council (398), Mr Colin McKenna (399), Mrs Lindsay A Simpson (400), Mr Robert G Simpson (401), Mr W Guy Bentinck (403), Mrs June Bentinck of 34 Kingswood Avenue (404), Mr Alan Rae (426), Miss Ilka Wolff (456), Ms Fiona McInally of Paths For All (472), Ms Claire Fowler of Keppie Planning and Development on behalf of Drum Property Group Ltd (479), Miss Megan Runciman (508), Ms Lavina Massie of Culter Community Council (518), Mr Steve Delaney of Mastrick, Sheddocksley and Summerhill Community Council (543), Mrs Wendy Campbell (583), Mr Colin Campbell (584), Mrs</p>		

Catherine Thornhill of Ryden LLP on behalf of NHS Grampian (640), Ms Rita Stephen of Aberdeen City and Shire Economic Future (760), Ms Naomi Cunningham of The Scottish Property Federation (800), Mr Bob Salter of Geddes Consulting on behalf of Lynch Homes (833), Ms Lorna Henderson (933), Mr Alexander Kilgour (935), Mr William Simpson (936), Ms Anna Simpson (937), Miss Emma Wright (938), Mrs Eziz Robertson (939), Mr Matthew Wright (941), Mrs H.B Oakes (944), Mr Terence Oakes (945), Mrs Elizabeth Coutts (946), Mrs Margaret Park (947), Mr Charles Coutts (948), Sir/Madam V Hutcheon (949), Ms Hilary Davern (950), Mrs Vera Mutch (951), Mr N Craig (952), Mrs Alison Murison (954), Mr Alexander Murison (956), Mr Douglas Park (957), Ms Eliana Figueroa (958), Mr Derek W Martin (959), Mr Edgar Castillo (960), Mrs Pamela Wright (961), Ms Lydia A W Martin (962), Mr David Wright (963), Mr Donald Vass (964), Ms Joan Vass (965), Ms Valerie Weir (966), Mr Gerard David Cairns (967), Mr James Grant (968), Mr William P Weir (969), Ms Siobhan G Anthony (970), Mrs G Craig (972), Mrs Agnes Watson (973), Mr Stephen King (974), Mr L Watson (975), Mr William Miller (976), Mrs Jackie Cairns (977), Mr George A Wallace (978), Ms Margaret Miller (979), Thilini Wallace (980), Ms Heather Burns (981), Ms Sheila Irvine (983), Mr B J Carey (984), Mr William Irvine (985), Mr Andrew Henderson (986), Sir/Madam A Carey (987), Sir/Madam R Holden (988), Mr David Coull (990), Sir/Madam Elm Holden (991), Mrs Dorothy Gray (992), Mrs Isobel M Patterson (993), Ms Catherine May (994), Mr Gordon Patterson (995), Ms Cath Grant (996), Mr Alexander May (997), Sir/Madam R W Wilkie (998), Ms Margaret McEwan (999), Ms Fiona Wilkie (1000), Ms Silvia Gaspar-Pereira (1002), Mr Stan McEwan (1004), Mr Stuart Lamond (1005), Mr William Smith (1006), Ms Helen Davidson (1007), Ms Rosemary Walker (1008), Mrs Gwendoline Jones (1009), Mr Iain Laidlaw (1010), Sir/Madam Tom Straiton (1011), Ms Florence Gunn-Folmer (1012), Ms Kaye Smith (1013), Mr Alexander Gunn (1014), Sir/Madam George Ian Gibson (1015), Ms Elaine Grosvenor (1016), Mr Stephen Anthony (1017), Mr Brian Yeats (1018), Ms Jennifer Miller (1019), Ms Julie McLulich (1021), Ms Suzanne Walker (1022), Mr Hamish McLulich (1023), Mrs Gillian Joss (1024), Mrs Fiona McRuvie (1025), Mr Brain Folan (1026), Mr William Skidmore (1027), Ms Linda Cameron (1028), Mr Lewis Joss (1029), Mrs Wendy Skidmore (1030), Mr Alexander Crawford Hair (1031), Sir/Madam A Innes (1032), Mr George Lowe (1033), Mrs Margaret Lowe (1035), Mr Derek Walker (1038), Ms Ruth Tulloch (1040), Ms Christina M Wilson (1042), Mr Samuel Stafrace (1044), Mr Zane Hair (1045), Ms Amanda Stafrace (1046), Mrs Valerie Henderson (1047), Ms Rachel Watson (1048), Dr C Hauptfleisch (1049), Mr Iain Watson (1051), Sir/Madam Arnajorn Joensen (1053), Ms Sheena Lamond (1054), Ms Marion Cumming (1055), Mr Gordon Cumming (1056), Sir/Madam N Sutherland (1057), Dr Iain Greig (1058), Ms Catherine McBain (1059), Mr Mahmoud Kamel (1060), Mr William Beattie (1061), Mr Noelle Straton (1062), Sir/Madam Bernese Kamel (1063), Ms Susan Beattie (1064), Ms Helen Ireland (1065), Miss Jean M Park (1066), Ms Katharine Hume (1067), Miss Vera M Anderson (1068), Mr Angus Morrison (1069), Mr Cameron Millar (1070), Mr Mike Hume (1071), Ms Catriona Morrison (1072), Sir/Madam E Young (1073), Ms Amanda-Jane Mackay (1074), Sir/Madam R Birse (1075), Mr Martin Mackay (1076), Mr David Cornet (1077), Mr Ian Sim (1078), Mr Lawrence Dean (1079), Ms Irene McKay (1080), Ms Dorothy Higgins (1081), Ms Patricia Sim (1082), Mr Munawar H Usman (1083), Mr & Mrs J & K Massie (1084), Ms Sadia A Usman (1085), Mrs Grace M Hepburn (1086), Mrs V Taylor (1087), Mrs Ewa Gainska (1088), Sir/Madam EA Taylor (1089), Mr Miroslaw Gainski (1090), Mrs Pat Duncan (1091), Mr David Bruce (1092), Mr Robert Overy (1093), Ms Jennifer Bruce (1094), Ms Gillian Graham (1095), Mr Mark Graham (1096), Ms Marilyn Rose (1097), Mr William Robertson (1098), Mr Kenneth Rose (1099), Mrs Margaret Kilgour (1100), Mr Alan Stott (1101), Mr Walter Jardine (1102), Ms Muriel Wyness (1103), Mr W R Hepburn (1105), Ms Caroline Taylor (1106), Mr Colin Taylor (1108), Ms Barbara Bruce (1109), Mr James Henderson (1110), Ms Joan Keyes (1111), Mr Tom Keyes (1113), Mr Stuart Higgins (1115), Mr Barclay J Massie (1116), Ms Carol Buchan (1118),

Sir/Madam E Cooper (1119), Sir/Madam Selina Jardine (1122), Mr Malcolm Cameron (1123), Mr Malcolm Campbell of Knight Frank LLP on behalf of Scottish Enterprise (1182), Mr Michael Migvie (1186), Ms Emelda Maclean of Emac on behalf of Scotia Homes (1189), Mr Andrew Roberts of Network Rail (1202), Mr George Niblock of Niblock Environmental Ltd (1238), Ms Lorraine Jones of Sport Scotland (1244), Councillor Marie Boulton (1436), Mrs Nicola Barclay of Homes for Scotland on behalf of Grampian House Builders Committee (1442), Miss Shelley Thomson of Stewart Milne Homes (1464), Mr James Brownhill (1475), Mrs Charlotte Goodbody (1484), Professor Ivan Goodbody (1486), Mr Joe Davidson (1518), Mr A. W. Findlayson of Cove and Altens Community Council (1537), Ms Trudi Craggs of Dundas & Wilson CS LLP on behalf of ASDA Stores Ltd (1558), Mr Ben Freeman of Bancon Developments Ltd (1561), Mr David Henderson (1576), Ms Helen Gibson (1585), Mrs Margaret Cameron (1586).

**Provision of the Development Plan to which the issue relates:**

Provides the framework for planning and delivering infrastructure and securing appropriate developer contributions

**Summary of the representation(s):**

General / Process

141, 640, 1182. Support the identification of Masterplan Zones to deliver strategic infrastructure through a joined up process, including the requirement for a Delivery Statement and the ability to ensure new facilities are accessible through Masterplan approach. Will provide clarity to developers.

800, 1182. Support developer contributions and the use of planning agreements but Council should be mindful of development viability in the current economic climate.

543. Support the multi-agency approach to identifying infrastructure requirements but concern over lack of community involvement. Views of local people should have been considered by FIRS before publishing final recommendations. Communities were ignored which is contemptible.

24, 236, 237, 238, 239, 292, 293, 294, 358, 398, 399, 400, 401, 403, 404, 583, 933, 935, 936, 938, 939, 941, 944, 945, 946, 947, 948, 949, 950, 951, 952, 954, 956, 957, 958, 959, 960, 961, 962, 963, 964, 965, 966, 967, 968, 969, 970, 972, 974, 975, 976, 977, 978, 979, 980, 981, 983, 984, 985, 986, 987, 988, 990, 991, 992, 993, 994, 995, 996, 997, 998, 999, 1000, 1002, 1004, 1005, 1006, 1007, 1008, 1009, 1010, 1011, 1012, 1013, 1014, 1015, 1016, 1017, 1018, 1019, 1021, 1022, 1023, 1024, 1025, 1026, 1027, 1028, 1029, 1030, 1031, 1032, 1033, 1035, 1038, 1040, 1042, 1044, 1045, 1046, 1047, 1048, 1049, 1051, 1053, 1054, 1055, 1056, 1057, 1058, 1059, 1060, 1061, 1062, 1063, 1064, 1065, 1066, 1067, 1068, 1069, 1070, 1071, 1072, 1073, 1074, 1075, 1076, 1077, 1078, 1079, 1080, 1081, 1082, 1083, 1084, 1085, 1086, 1087, 1088, 1089, 1090, 1091, 1092, 1093, 1094, 1095, 1096, 1097, 1098, 1099, 1100, 1101, 1102, 1103, 1105, 1106, 1108, 1109, 1110, 1111, 1113, 1115, 1116, 1118, 1119, 1122, 1123, 1186. Emphasise the need for new development to be supported by sufficient infrastructure, including roads, accessibility to public transport, schools, shops, community facilities and open space. Existing infrastructure cannot cope with additional housing.

276, 584. Requirement for new roads, schools and utilities is inadequately defined. Funding is not described sufficiently. Complete lack of thought given to infrastructure and

added facilities.

1576. Costs for infrastructure requirements need to be examined in more detail and should take account of the funding streams and resources available.

221. Good to develop Aberdeen for the future but in present climate we cannot maintain services and existing needs are not met. More houses only are not an option which should be entertained.

1182. Scottish Enterprise may be able to facilitate or assist to help identify funding mechanisms which will deliver key strategic and employment generating proposals, and help facilitate developer contributions secured through Section 75 agreements. Local Development Plan should refer to the consideration of a range of funding mechanisms, such as Tax Incremental Finance (TIFs) and Prudential Borrowing in addition to the standard developer contributions of S75. Plan should also refer to the role of FIRS Group and the need to now identify how up-front infrastructure required can be funded and prioritised.

1189. List of potential contributions is extensive and the costs associated are unknown. Other policies and Supplementary Guidance impose further stringent financial and design requirements on developments. Uncertainty of cost implications gives concern that this may impede and constrain the effective delivery of sites. Unsustainable burden on house building industry.

1244 Support the policy but suggest that sports facilities should have been considered in detail. Sport Scotland happy to work with Council in defining these in the future. It would be logical to look at combining sports provision for schools and communities within new schools. The plan makes reference to this which is welcomed. It may be that existing facilities, with upgrading, could meet the additional needs.

The Council's Sports Pitch Strategy is now out of date and the opportunity exists for it to be reviewed as part of the Local Development Plan process. This may be done by undertaking a Facility Strategy and a Pitch Strategy, both of which could inform masterplan sites.

The respondent has access to a Facilities Planning Model which models demand for sports facilities. It would be a helpful tool in seeking to determine patterns of demand as part of a strategic approach to provision.

1442 List of contributions appear excessive and do not relate in scale and kind to the proposed developments. Infrastructure and policy requirements are placing unsustainable burden on house building industry. Developer contributions must take account of available capacity and must not be used where there is no link with the development proposed or too remote to be considered reasonable. Fear that this will result in many schemes being unviable. Also, developers cannot determine viability without knowing the full extent of their abilities.

1442 Evidence required for any new community facilities before contributions can be justified to ensure they are not used to resolve existing deficiencies. Consideration should be given to enhancement of existing services.

1442, 1464. Development industry cannot be accountable for delivering these facilities in

their entirety - fair and proportionate investment in infrastructure is also required by the Local Authority. Full assessment of existing capacities is required and contributions should be fair and accurately assessed and only sought where they relate in scale and kind to the development proposal.

1561. Current system of calculating developer contributions is effective, and the Council are, and will remain, in a strong position to negotiate contributions on a site by site basis. It is also reasonable for the Council to publish, and maintain up to date, a list of expected contributions from the masterplan zones, as included in Appendix 4 of the proposed Local Development Plan. This information can be effectively used by developers and landowners in the preparation of viable schemes.

1561. Although the 'Infrastructure and Developer Contributions Manual' helps to provide clarity, it is both specific in the detail it provides, limiting flexibility based on site specific circumstances, and also lacking in important information (several references to 'more information to follow shortly').

#### Conformity with Scottish Planning Policy and Guidance

833. Policy I1 is dependent on the Infrastructure and Developer Contributions Manual which is incomplete and, therefore, the implications of Policy I1 cannot be fully assessed. The Supplementary Guidance does not take account of development viability which is a requirement of Circular 1/2010 Planning Agreements. Policy I1 should be placed on hold until the Manual has been completed and consulted upon so that meaningful responses can be made to both the policy and manual.

1558. Policy I1 is insufficient - it should make clear that all the tests relevant to conditions and agreements must be met for provisions and/or contributions to be required: - relevant to planning; relevant to the development to be permitted; enforceable; precise; and reasonable in all other respects. Also, a number of the contributions identified in the Manual fail to meet these tests - see separate response to the Supplementary Guidance.

1561. If the SG is to be as detailed as it is, then it needs to be complete and have been subject to the appropriate levels of consultation.

640. Support the infrastructure requirements in Appendix 4 for various areas of the City. However, Appendix 2 should also refer to the health facilities in the development descriptions.

1442. Possible financial contributions required are separately listed within 3 separate documents, including Supplementary Guidance, contrary to Circular 1/2009.

#### Planning and Delivery of Infrastructure

54, 56, 57, 61, 62, 63, 64, 68, 69, 70, 71, 72, 73, 81, 82, 83, 84, 86, 87, 89, 90, 91, 92, 93, 94, 95, 96, 102, 103, 104, 105, 106, 108, 109, 110, 111, 112, 113, 114, 116, 117, 118, 119, 120, 121, 122, 123, 124, 125, 126, 127, 128, 142, 143, 144, 146, 147, 148, 149, 150, 180, 181, 182, 184, 186, 187, 188, 190, 192, 193, 194, 195, 196, 198, 199, 200, 201, 205, 206, 207, 218, 219, 220, 221, 222, 224, 236, 237, 240, 241, 242, 243, 244, 245, 246, 247, 248, 249, 250, 251, 292, 293, 294, 296, 297, 298, 299, 300, 301, 312, 313, 314, 315, 316, 354, 355, 356, 357, 358, 398, 399, 400, 401, 403, 404, 583, 584, 933, 935, 936, 938, 939, 941, 944, 945, 946, 947, 948, 949, 950, 951, 952, 954,

956, 957, 958, 959, 960, 961, 962, 963, 964, 965, 966, 967, 968, 969, 970, 972, 974, 975, 976, 977, 978, 979, 980, 981, 983, 984, 985, 986, 987, 988, 990, 991, 992, 993, 994, 995, 996, 997, 998, 999, 1000, 1002, 1004, 1005, 1006, 1007, 1008, 1009, 1010, 1011, 1012, 1013, 1014, 1015, 1016, 1017, 1018, 1019, 1021, 1022, 1023, 1024, 1025, 1026, 1027, 1028, 1029, 1030, 1031, 1032, 1033, 1035, 1038, 1040, 1042, 1044, 1045, 1046, 1047, 1048, 1049, 1051, 1053, 1054, 1055, 1056, 1057, 1058, 1059, 1060, 1061, 1062, 1063, 1064, 1065, 1066, 1067, 1068, 1069, 1070, 1071, 1072, 1073, 1074, 1075, 1076, 1077, 1078, 1079, 1080, 1081, 1082, 1083, 1084, 1085, 1086, 1087, 1088, 1089, 1090, 1091, 1092, 1093, 1094, 1095, 1096, 1097, 1098, 1099, 1100, 1101, 1102, 1103, 1105, 1106, 1108, 1109, 1110, 1111, 1113, 1115, 1116, 1118, 1119, 1122, 1123, 1186, 1484, 1486, 1585, 1586. Agree that development should be of high quality and that Aberdeen should develop communities, not just housing. Essential that development should only proceed when financially viable including full developer contribution. It is not acceptable to develop housing without community facilities or the infrastructure to support the community.

640. Support the statement that the precise level of infrastructure requirements will need to be agreed with the Council and other statutory agencies.

314. No housing development should be approved until actual roads and retail have been built to cope with the present housing developments.

256, 426, 937, 973, 1537. Opposition to building any houses before major infrastructure is delivered, including one or more of these - ABERDEEN WESTERN PERIPHERAL ROUTE, Third Don Crossing and Haudagain roundabout improvements. Respondent 256 states that these should be completed and their efficacy assessed before any further development can be considered. Respondent 426 specifically refers to a need for the Third Don Crossing and Haudagain before any housing is developed in Bridge of Don.

1537. Suggests a masterplan is required for the whole Cove area before any development is considered.

1537. All infrastructure on and off site must be completed before building commences.

1436. Query how requirements will be enforced if developers choose to stop midway through. How will stakeholders' views be taken into account in the master planning process and how will this be monitored by planners giving credibility to the system and confidence to all parties that fairness prevails? Developer contributions are required early in the development to ensure that essential infrastructure is provided. Yet we may have to compromise on infrastructure/contributions in order not to hinder development.

1475. Cove masterplan zone is too restrictive. Seems to be little thought about the impact on the area outwith the zone.

1518. OP3 already benefits from an approved Development Framework and outline planning permission. It is unduly onerous to require the developers of OP3 to produce a masterplan which includes OP2.

1561. Policy I1 may lead to problems where it is clear that phasing of the site may favour one particular developer or owner.

## Transport

543. Infrastructure requirements unlikely to mitigate effects of increasing population and car ownership.

1182. Longer term, would like to see improved roads and sustainable transport infrastructure across the city co-ordinated where appropriate through development corridor masterplans.

314. Road infrastructure cannot cope and ABERDEEN WESTERN PERIPHERAL ROUTE will do little to deal with this.

24. In order to encourage public transport, more competition required to reduce fares encourage punctuality.

518. Developer contributions should be maximised to ease traffic and transport problems as much as possible.

1475 Aberdeen City Council have failed before to predict the current traffic congestion caused at Bridge of Dee by the development of Garthdee.

472. No mention of how masterplan zones will be integrated, particularly by active travel options.

543 Lang Stracht is badly designed and with or without development something needs to be done to avoid complete gridlock. Concerned that cumulative impact of development along this corridor has not been considered by the FIRS Group. Principle of improving this road needs to be agreed before any new development is approved. Suggest that removing bus lanes and widening sections of the road would help to speed up flow of traffic at peak times.

254. Support commitment to cycle infrastructure in new development but Local Development Plan does nothing to develop wider cycle network meaning that development areas will become islands of cycle infrastructure with no connections to destinations people want to cycle to.

1202. Support infrastructure requirements but Network Rail should be clearly excluded from having to make developer contributions. Rail transport and associated infrastructure should be seen as something which already contributes to the public good and railway developments should not be expected to support other public projects.

1442 Cumulative transport infrastructure is contrary to paragraph 23 of Circular 1/2010.

1561. Transport infrastructure contributions may be based on past experience, but guidance elsewhere in the plan, and in national planning guidance seeks to reduce reliance on car travel, and encourage cycling, walking and public transport use.

## Education

301. Query whether school provision for new housing has been assessed

479 Object to the requirements associated with Kingswells developments, in particular

the need for a contribution towards a new school within Newhills expansion.

1244 It would be logical to combine new schools and community sports provision at the new schools. The reference to this within the Plan is welcomed and it should be noted that in some locations upgrading existing facilities could meet the additional needs. A strategic approach would help in defining where this would be the case.

1442 Size of new schools should be determined through the masterplanning process.

#### Water

141 In Section 3 of the Action Programme, Masterplan Zone 2, the comment "(see above comments on Area B developments)" refers to a note originally made by Scottish Water about Whitestripes, which stated that the current spare capacity at Persley PFI was unable to support all development proposed at Bridge of Don, Stoneywood, Craibstone and Rowett. However, this doesn't mean that we can't provide growth, if required.

141 In Section 3 of the Action Programme, the water comment for Masterplan Zone 6 Maidencraig has been missed off.

141 Section 3 of the Action Programme, under Masterplan Zone 9 Friarsfield, specifies 50 homes. Without conducting a Water Impact Assessment we would not be able to provide a threshold number above which a water mains upgrade would be required.

#### Other Infrastructure

1238. Plan fails to recognise the existing and much increased future demand for waste resource infrastructure to meet municipal and business needs.

543. To support development at Maidencraig Local Development Plan proposes contributions from developer towards health facilities in Kingswells. This is too far away and only benefits Kingswells residents - on-site health facilities should be provided.

640. Welcome reference to expansion of healthcare facilities in the Kingswells area and need for developer contributions towards their provision.

456, 508. Those who are willing to contribute towards sporting facilities should be allowed to have planning permission.

1244. Sport facilities should have been considered in detail but Sport Scotland are happy to work with the Council in defining these needs.

1442 Concerned about the lack of clarity for water infrastructure.

1442 The level of contributions required for health facilities is totally unreasonable. Unless a transparent and independent audit of all existing health facilities clearly demonstrates a deficiency of facilities, member companies will not be contributing to new ones. No other Local Authority in Scotland requires the house building industry to contribute to the NHS.

1442 Open Space Strategy and Supplementary Guidance not yet available and references should be removed.



**Modifications sought by those submitting representations:**

## General / Process

1182 Suggests additional text before Policy I1 which refers to contribution of FIRS group and the potential use of a range of funding mechanisms to fund infrastructure such as Tax Incremental Finance (TIF) initiatives.

1189 Further clarity on methods and exact levels of contributions should be included in supplementary guidance. Standard charges and formulae should be set out in a way that helps landowners and developers predict the size and types of commitments likely to be sought.

1244 The Council should undertake a Facility Strategy and update the Pitch Strategy. Detailed requirements for the provision of outdoor and indoor sports spaces required for masterplan areas.

1442 Cumulative burden of affordable housing, open space and other infrastructure requirements are placing an unsustainable burden on the house building industry.

1442, 1464 Requirements must take account of available capacity within existing infrastructure and need to be in scale and kind to the proposed development.

1561 I1 should be amended to be less specific. Appendix 4 should be provided as a guide for developers, to make land deals and masterplanning a more straightforward process. The Supplementary Guidance entitled 'Infrastructure and Developer Contributions Manual' should be omitted, or published as a clear guide, and less of a supplementary policy. Decisions on developer contributions should continue to be negotiated on a site by site basis, on the premise that contributions must be directly related to the impact of the development.

## Conformity with Scottish Planning Policy and Guidance

833 Supplementary Guidance document should instead set out mechanisms for preparing Development Viability Appraisals and ensure that the Council take account of their conclusions in order to meet the policy tests in Circular 2/2010.

1189 Policy should reflect that contributions will only be sought where they comply with the requirements of Circular 1/2010 on Planning Agreements.

1558 Wording of Policy I1 should be amended to reflect these tests

1558 Second paragraph - delete the final two sentences ("The precise level... development proposed") and replace with the following: Infrastructure requirements and developer contributions may be required through appropriate conditions and/or planning agreements. Guidance on the potential scale and type of contributions is provided in the Infrastructure and Developer Contributions Manual. Any requirement for contributions and/or provisions shall be made only where they fully satisfy the appropriate planning tests set out in Scottish Government Circular 4/1998 and/or Scottish Government Circular 1/2010 or any subsequent replacement of these Circulars.

640 Amend Appendix 4 (and Appendix 2 where stated) as follows: - Stipulate that land is

required for community pharmacy in Masterplan Zone 1 Bridge of Don. - Identify requirement to provide land for health centre, dental surgeries and community pharmacies at Grandhome and refer to these in Appendix 2. - Identify the requirement for land to accommodate Community Pharmacy at Stoneywood. - Reflect the increased capacity requirement from 13 GPs to 14 and 6 dental chairs to 7 at Newhills Expansion, as well as any land required. - Identify requirement for 3 additional GP places and a 3 chair dental facility as part of masterplan zones 6 and 7 Kingswells and Maidencraig. - Identify potential requirement for land to accommodate dental surgery at Kingswells should it not be accommodated as an extension to existing health centre. - Need to identify the four existing and three additional GPs at a new seven-GP health centre at new health centre at Greenferns, and reference in Appendix 2. - Health infrastructure requirements for Countesswells should be referenced in Appendix 2 and requirement for a community pharmacy should be included in Appendix 4. - Existing medical practice at Cults needs to be extended by one GP. - Identify the requirement for land to accommodate community pharmacy at Peterculter. - Identify the requirement for land to accommodate Community Pharmacy at Kincorth/Loirston.

833 Policy I1 and associated Supplementary Guidance should be put in holding position until issues have been resolved.

833, 1189, 1442, Further clarity and/or contents of the Supplementary Guidance Reference number 2010/2.1 Infrastructure and Developer Contributions Manual should be elevated to policies within the Local Development Plan.

1182 Infrastructure projects in section 2 of the Action Programme should be prioritised by status and estimated year of delivery.

1189 Live status of the Action Programme should be acknowledged together with commitment to ongoing consultation.

#### Planning and Delivery of Infrastructure

256 Fewer houses should be considered and only when current problems have been dealt with to the satisfaction of existing residents.

543 Development should progress on the basis of existing infrastructure capacity and the delivery of new or improved infrastructure to support new development.

1475 Should look beyond boundary of masterplan zone 11 and include developments in Aberdeenshire.

1518 OP2 should be dealt with through the preparation of a Planning Brief or Development Framework which dovetails with Berryhill OP3 development.

1537 In line 1 of paragraph 1 the word accompanied should be replaced by the word preceded.

#### Transport

254 Local Development Plan should clearly state the intention to develop a city-wide quality cycle network, especially along main transport corridors. Developer contributions should be used to ensure that sites provide quality connections to the wider cycle

network, as well as shops, schools and other destinations.

398 Local Development Plan requires a clear plan for the timing and delivery of transport infrastructure.

472 Local Development Plan should state how integration of masterplan zones will be achieved.

543 Have looked at cumulative effect of development in Mastrick/Sheddocksley/Summerhill area and adjoining areas and found that there will be an unacceptable burden on existing roads and facilities, in particular medical facilities, Lang Stracht, particularly the need to widen the Lang Stracht, and the need for a transport fund that all developers must contribute towards. Significant developer contributions should be sought for the upgrading of the Lang Stracht to mitigate the impact of employment development (also dealt with in Issue 31 (Employment Land Allocation: West Hatton and Home Farm, Kingswells OP40)).

1475 Should look at combined effect on citywide road network.

#### Education

398 Local Development Plan requires a clear programme for school provision required to support different scales of new development and provides a proper forecast of private and public spending.

479 Suggest that the Council reassess the education contribution for Kingswells given that site OP40 will not be developed for residential use.

1464 Remove specific reference to areas for schools within the SG i.e. 3.25ha for primary schools and 10ha for secondary schools.

#### Water

141 In Section 3 of the Action Programme, recommend removing the text "(see above comments on Masterplan Zone 2 developments)" altogether from OP26, OP26/OP29, OP30, OP28 and OP31.

141 In Section 3 of the Action Programme, the water comment for Masterplan Zone 6 Maidencraig should read "Invercannie and Mannofield WTW". This area is served by Kingshill Water Supply Zone. Development on higher contour levels may require pumping.

141 In Section 3 of the Action Programme, under Masterplan Zone 9 Friarsfield, I would recommend replacing the comment "a development of 50 homes" with "this development".

#### Other Infrastructure

456, 508. People who donate money for sporting facilities should receive planning permission.

1238 Plan needs to acknowledge the urgent need for a network of waste resource

treatment infrastructure to meet existing and future needs, and the Zero Waste Plan. The scale and locational requirements need to be recognised and identified.

1244 Council should undertake a Facility Strategy and update the Pitch Strategy.

1464 Remove developer requirement to provide NHS facilities i.e. GP surgeries, dental chairs and community pharmacies.

### **Summary of response (including reasons) by planning authority:**

#### General / Process

It is noted that the majority of responses support the principle of the approach taken by the City Council in assessing infrastructure requirements associated with new development and publishing these in the Local Development Plan, as well as the aim of providing clarity to the development industry and other stakeholders. Also note support for the identification of Masterplan Zones to distribute infrastructure requirements and to assist the coordination of planning and delivering such infrastructure. There are also supporting comments on the requirement for developers to prepare a Delivery Statement in support of Masterplans.

The Council considers that this approach represents a positive step forward for the planning and delivery of infrastructure by providing details of infrastructure requirements clearly and early in the Development Plan preparation process, based on the latest information available. Infrastructure provision and developer contributions will continue to be negotiated at the planning application stage. However, the approach provides clarity to all parties on what is generally expected to be provided as part of new development.

From the outset of the Local Development Plan preparation, the Council has taken a proactive approach by identifying infrastructure required to support new development. This process has involved working with a range of organisations through the FIRS Group to assess the capacity of existing infrastructure and its ability to cope with new development in each area of the City, and to then assess additional infrastructure required. This work has assessed water supply and waste-water treatment, roads, public transport, walking and cycling infrastructure, schools, health facilities and community facilities. The Council has worked closely with Aberdeenshire Council in taking a cross-boundary approach to the impact of development on services and infrastructure within both respective authorities. The main areas of proposed development in the City have been separated up into eleven Masterplan Zones and the infrastructure identified has been applied to these Zones.

The Council recognises the important role of the FIRS Group in identifying infrastructure requirements. If the Reporter is so minded, the Council would accept the suggestion to add a new sentence to the start of paragraph 3.4 to highlight the significant role undertaken by the FIRS Group.

Having taken account of the capacity of existing services, facilities and infrastructure the Council considers that the new infrastructure identified is in scale and kind with the development proposed and the costs for providing such infrastructure will be fair and proportionate.

The Council has considered comments made on infrastructure related issues during consultations on the Development Options, Main Issues Report and Proposed Plan. As

such, the views of local communities and other stakeholders have been taken into account. The FIRS group and the component agencies will continue to play an important role in assisting with the delivery of development and supporting infrastructure. Local communities will further opportunities to engage with the developers and to give their views on development proposals through the masterplanning and planning application processes.

The Council is aware that a Pitch Strategy does need to be reviewed and updated and are currently determining the scope of work and have initiated discussions on taking this forward. We welcome the offers of assistance from SportScotland particularly the potential to use the facilities planning model which could form part of the preparation of the Pitch Strategy.

#### Conformity with Scottish Plan Policy and Guidance

Taking account of Circular 1/2009 Development Planning and Circular 1/2010 Planning Agreements, the Council has listed items that will need to be provided or towards which financial contributions made. Infrastructure requirements are summarised in Appendix 4 of the Proposed Plan with detailed descriptions in the Local Development Plan Action Programme. The requirement for affordable housing is set out in Policy H5 of the Proposed Plan. We consider that the approach taken is consistent with Circular 1/2009 Development Planning and Circular 1/2010 Planning Agreements. If the Reporter is so minded, the Council would accept the insertion of a sentence in the supporting text to Policy I1 to clarify the 'live' status of the Action Programme and that revised versions will be formally published on the Council's website every two years.

Although the Action Programme itself will not be subject to consultation, updated versions will reflect progress with each development proposal, including ongoing discussions with developers, key agencies and other stakeholders. It will also reflect progress in implementing policies in the Plan. Section 2 of the Action Programme includes information on timescales and actions for implementation of infrastructure proposals of 'citywide significance'. The Council agrees that it is useful to give any further timescales for the implementation of these projects in the Action Programme where possible. However, we do not agree that these schemes should be prioritised because they are all essential items of infrastructure.

The Council does not think it is appropriate to detail all infrastructure requirements in the descriptions of Opportunity Sites in Appendix 2 of the Proposed Plan as the Action Programme already covers this.

An explanation of the methodology used to calculate these requirements and any other developer contributions is set out in the Infrastructure and Developer Contributions Manual which is published as Supplementary Guidance to the Proposed Plan. We refer to Section 22 of the Town and Country Planning (Scotland) Act 1997 (the Act) and section 27 of the Town and Country Planning (Development Planning) (Scotland) Regulations 2008 which set out the provisions for supplementary guidance. These set clear requirements for the adoption of supplementary guidance in connection with local development plans and what can be classified as supplementary guidance. Circular 1/2009 adds to this by stating that "Any such guidance will form part of the development plan." Therefore, in the decision making process supplementary guidance adopted under section 22(1) of the Act will have the same weight as the Local Development Plan.

In light of the above, the approach taken in the Proposed Plan is considered to be acceptable and appropriate with a summarised list of infrastructure requirements in Appendix 2 of the Plan complementing Policy I1, and full details on infrastructure provision contained within Supplementary Guidance.

The Council will take account of views submitted on the policy and Supplementary Guidance on infrastructure and will aim to publish a final version of the Supplementary Guidance alongside the adopted Local Development Plan. The Council does not agree with the suggestion to put Policy I1 and the Supplementary Guidance on hold. Policy I1 and the accompanying Supplementary Guidance provide a framework for ensuring that all development is accompanied by the appropriate level of infrastructure to mitigate the impact of development. It is therefore an essential policy for the effective implementation of the Local Development Plan.

In accordance with Scottish Planning Policy (CD3) developer contributions can only be sought where they comply with the requirements of Circular 1/2010 on Planning Agreements. The Council does not consider it to be necessary to amend the policy or supporting text, to repeat Scottish Government guidance in the Local Development Plan or, in particular, to include reference to Circular 1/2010 in Policy I1 or to the relevant tests for developer contributions contained therein.

#### Planning and Delivery of Infrastructure

The planning, phasing and delivery of infrastructure identified will need to be reflected in any masterplan through a Delivery Statement and any subsequent planning applications. The Delivery Statement should confirm how and when new infrastructure will be delivered within the phasing of new development. This will need to be agreed with the Council and any statutory bodies. In some cases infrastructure will be required up-front but this will depend on individual circumstances of sites and the capacity of existing services and infrastructure. The suggested amendment to the first sentence of the policy to always require that infrastructure precedes development is therefore not appropriate.

There are comments highlighting concern that development viability has been insufficiently addressed by the Council. As mentioned above, the Council's approach to this issue has been to provide as much clarity as possible to the development industry to assist in calculating development viability. The Council is mindful of the present economic circumstances but is not privy to information on land values in each individual parcel of land. We also note that the requirements identified will need to be agreed with the Council and relevant agencies at the appropriate masterplanning and planning application stages. The Council has identified approximate costs for certain infrastructure items and these have led to the costs identified in the Infrastructure and Developer Contributions Manual. However, definitive costs for infrastructure items will not be fully known until they have been costed by the appropriate agency. Therefore, we cannot finalise exact costings for infrastructure against corresponding land values and it is therefore unreasonable to expect a full development viability assessment to be undertaken for each site in the Local Development Plan. If the developer does not agree with the infrastructure requirements identified, suitable justification will need to be provided to and agreed with the Council in order to ensure that impact of development and the corresponding mitigation measures proposed are appropriate for the development in question.

These requirements have been listed against the Masterplan Zones and, in some cases,

individual sites identified in the Proposed Plan and Action Programme. It is not considered necessary to prepare a Masterplan for each area of the city, as this is provided through the identification of infrastructure and the preparation of Masterplans and development briefs which will need to reflect the requirements identified.

There are instances where new development allocations have been made in the Proposed Plan which adjoin or lie adjacent to, existing allocations, such as sites OP2 Murcar and OP3 Berryhill adjoining to the south. Any Masterplan for the OP2 Murcar site will need to show how the site will relate and integrate with the adjoining site OP3 Berryhill. We note that the boundary shown in the Murcar Development Framework already includes a large section of the land at OP2 Murcar. As such, the Council agrees that a Development Brief or Development Framework could be prepared for OP2 Murcar which shows how it will integrate with the OP3 Berryhill site.

It is possible that other funding sources could become available during the plan period in addition to developer contributions. If the Reporter is so minded, the Council would accept a reference to the potential use of such alternative funding sources should they become available and where they are appropriate, along with a reference to the role of Scottish Enterprise in assisting with the identification of such funding sources to be included in the Action Programme.

## Transport

In relation to transport infrastructure we have consulted with transport partners and colleagues, including bus operators, to help identify transport infrastructure requirements and to help create an efficient, integrated and comprehensive transport network for all travel modes. Transport modelling has been undertaken taking account of the latest demographic and travel trends data from the Scottish Government. The first stage of modelling provided an assessment of the transport network and its ability to accommodate new development. This confirmed that with the appropriate infrastructure the level of development allocated in the Aberdeen City and Shire Structure Plan could be accommodated in the region. The second stage of modelling (Nestrans Cumulative Transport Appraisal (CD18)) assessed the efficacy of the current transport network and helped to determine the likely need for new infrastructure. It identifies a number of strategic locations across the region where roads and public transport infrastructure will be required to support the scale of development proposed.

The combination of transport modelling and gathering the views of partners and stakeholders has helped the Council to identify requirements for new walking and cycling infrastructure, including Core Paths, as well as public transport and roads.

Transport infrastructure requirements have been attributed to the Masterplan Zones and, in some cases, individual sites identified across the City. Transport Assessments submitted in support of development Masterplans and planning applications will need to show the impact of development on the transport network and provide details of how any impacts will be mitigated. Transport Assessment should also show how development will integrate with the wider transport network as well as within the Masterplan zone. This should cover all types of transport infrastructure to ensure that all modes are integrated with all new and existing infrastructure. The wider transport network will continue to be developed and improved through the Local Transport Strategy.

Roads-based infrastructure has been separated into three categories - committed, local

and cumulative. Committed schemes are those which are already identified by the Regional Transport Strategy, Local Transport Strategy, Structure Plan and/or Scottish Government's Strategic Transport Projects Review (STPR) as priorities for improving the road network. In addition, Local roads infrastructure included road schemes that are directly related to new development in specific Masterplan Zones where developers will need to deliver such schemes. Finally, Cumulative roads infrastructure relates to a package of measures identified in the Local Development Plans Cumulative Transport Appraisal (CD18), published by Nestrans. In partnership with Nestrans, Aberdeenshire Council, and the two Council's Planning Gain Team, and in liaison with Transport Scotland and Scottish Government, Aberdeen City Council is currently working to establish a mechanism for attributing the costs of these Cumulative roads infrastructure to the proposed developments. This approach acknowledges that all development will have an impact on these transport infrastructure schemes, not just the transport network within and adjacent to a proposed development. Scottish Government, Transport Scotland and key agencies have been involved in formulating this approach, and consultations are being undertaken with the development industry.

Currently, there are no land allocations in the Local Development Plan that are being promoted by Network Rail and nor are we aware of any circumstances where rail improvements, or infrastructure directly related to the function of railways, would be subject to developer contributions. Therefore the Council does not consider it to be necessary to refer to Network Rail being excluded from liability for developer contributions.

#### Education

Appendix 2 of the Proposed Plan sets out details of the locations where new or extended schools will be required to support new development. These have been identified following a detailed review of the number of current and forecasted capacity of existing schools and their ability to accommodate new pupils generated by development. When developments come forward for implementation, developers will need to show how such facilities will be delivered, depending on the number of pupils likely to be generated, and taking account of the infrastructure requirements identified in the Proposed Plan. School Roll Forecasts, published annually by the Council, will provide an up to date picture of the capacity of schools. Given that new pupils are generated by residential development, non-residential development will not be liable for making contributions towards education provision.

#### Water

Scottish Water's suggestion to remove a section of text from the Action Programme relates to a previous version of the Proposed Plan, published for consultation to the Enterprise, Planning and Infrastructure Committee. This text was deleted prior to the Proposed Plan being published. The Council accepts that, in order to clarify the infrastructure requirements for water supply identified by Scottish Water, reference to the Invercarnie and Mannofield Water Treatment Works should be included in Section 3 of the Action Programme under Masterplan Zone 6 Maidencraig. Whilst the Council notes Scottish Water's comments in relation to the number of units at Masterplan Zone 9 Friarsfield, we note that the final number of housing units and the supporting infrastructure required will need to be agreed with the Council and any statutory agencies when a development proposal comes forward for implementation.



## Other Infrastructure

Infrastructure requirements for water supply and waste water infrastructure have been identified by Scottish Water, highlighting where new or upgraded facilities will need to be provided to support new development. It has not been possible to obtain more detailed information from Scottish Water and the precise level of infrastructure and developer contributions will need to be agreed with Scottish Water at the masterplanning and planning applications processes.

For health facilities, NHS Grampian has assessed the capacity and catchment areas of existing services and facilities, and have recommended where new or improved facilities are required. The Council considers that it is reasonable to highlight where new development would trigger the need for new services such as health facilities. The delivery of health facilities will need to be discussed and agreed with NHS Grampian at the masterplanning and planning application stages. The Council does not consider that it is necessary to repeat these infrastructure requirements in the list of opportunity sites in Appendix 2.

In relation to waste infrastructure, the Council recognises the need for municipal waste facilities through Policy R4 of the Proposed Plan and paragraphs 3.94 and 3.95 list the types of facilities that may be required and 3.94 specifically refers to the need to implement the Zero Waste Plan. In relation to the need for non-municipal waste, Policy R3 includes criteria to assess proposals for any waste facilities including non-municipal waste.

In relation to sport facilities, the Development Options process took account of the impact of development proposals on recreational land, and the emerging Open Space Strategy has included an assessment of the extent and standard of outdoor sport facilities and has set proposed standards for the provision. The Council is keen to promote co-location of services and infrastructure and is keen to ensure that any new schools provided also include dual-use sport facilities and community facilities, thereby providing an important resource to local communities. The Council is undertaking a detailed review of playing pitches through the Playing Pitch Strategy with a draft document likely to be published within the next year. Notwithstanding the above, the Council cannot use the provision or payment of contributions towards sport facilities as the only criteria for assessing planning applications and many other factors need to be considered.

The Proposed Plan includes reference to the Open Space Strategy and the Supplementary Guidance emerging in parallel with the Local Development Plan. Draft versions of these documents were considered by the Council's Enterprise, Planning and Infrastructure Committee on 15th March 2011 and following approval, the documents have now been published for consultation. It is therefore considered acceptable to include reference to the Open Space Strategy and the Supplementary Guidance.

### Reporter's conclusions:

### Reporter's recommendations:



<b>Issue (ref and heading):</b>	<b>POLICY T1: LAND FOR TRANSPORT</b>	<b>91</b>
<b>Development Plan reference:</b>	Policy T1 - Land For Transport and Proposals Map	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Mr Alexander G. Shirran of Bucksburn and Newhills Community Council (65), Mr Craig Leuchars (155), Mrs Anna Kidd of Tillydrone Community Council (228), Councillor Debra Storr of Aberdeen and Aberdeenshire Green Party (353), Dr Maggie Keegan of Scottish Wildlife Trust (363), Mrs Catherine Thornhill of Ryden LLP on behalf of NHS Grampian (640), Ms Maire Daly of Scottish Natural Heritage (662), Mr David Liddell of Scottish Government (665), Mr Roger Laird of Archial on behalf of BP North Sea Infrastructure (764), Mr David Halliday of Aberdeen Bid Development Company Ltd (782), Mr Rab Dickson of NESTRANS (913), Mr William Simpson (936), Mr Malcolm Campbell of Knight Frank LLP on behalf of Scottish Enterprise (1182), Mr Jonathan Russell (1196), Ms Lorraine Jones of Sport Scotland (1244), Councillor Marie Boulton (1436), Mr A. W. Findlayson of Cove and Altens Community Council (1537), Ms Susan Lai (1546).		
<b>Provision of the Development Plan to which the issue relates:</b>	Supports the provision of transport infrastructure schemes	
<b>Summary of the representation(s):</b>		
<p>Need for the Aberdeen Western Peripheral Route</p> <p>65, 936: No development can take place without the Aberdeen Western Peripheral Route.</p> <p>1182, 228: Support for implementation of Aberdeen Western Peripheral Route. Vital to the continued success and economic growth of Aberdeen City and Shire.</p> <p>1436: Aberdeen Western Peripheral Route itself will not be enough to address the current transport situation never mind deal with additional traffic created by new development.</p> <p>Need for the Berryden Corridor Scheme</p> <p>155: Support Berryden Corridor project, which would bring economic benefits through reduced traffic congestion, improved journey times and air quality, and would support National Transport Strategy.</p> <p>353: Against Berryden Corridor improvements. It would be more effective to reinstate public transport initiatives such as A947 Park and Ride.</p> <p>Strategy for Transport</p> <p>363: Should be reference to a sustainable transport system - this would reflect public transport services, walking and cycling infrastructure.</p> <p>640: Emphasis placed on transport and accessibility of new development is welcomed - it is essential that new communities are accessible to a range of local facilities, including health facilities in order to ensure that NHS Grampian's objective of providing services in</p>		

the community is achieved.

665 Supportive of Policy T1 which identifies the land required for transport interventions proposed to support existing transport issues within the City. Recognise that these schemes will not be subject to developer contributions and will be delivered by a range of organisations including Aberdeen City Council and Transport Scotland. Recommend that, as the Aberdeen Western Peripheral Route is a committed scheme of the Scottish Government, that it be included within the list of transport projects in Policy T1. The land required for the Aberdeen Western Peripheral Route is included in two Compulsory Purchase Orders which were made on 11 March 2010.

782 Support major infrastructure projects, i.e. Aberdeen Western Peripheral Route for access and image, similarly, the airport extension to the runway. Access to the city is poor and the parking charges prohibitive. In addition the planning response should be swift and inclusive to promote development.

913: Suggested rewording to help clarify paragraph 3.15 and Policy T1. Also, although these schemes are identified to address existing transport issues and will therefore be delivered by Transport Scotland or Aberdeen City Council as appropriate, in the present economic climate and difficult funding situation for public bodies it might be better to leave the option of developer contributions to assist earlier implementation of the schemes in Policy T1 or provide an enhanced solution.

1182 Support for the allocation of land for transport schemes to facilitate economic growth in the region - this will help to support new development hubs around the City, particularly A96 Park & Ride, Third Don Crossing, Haudagain improvements Dyce Drive Link Road.

1196: This would affect the Third Don crossing and the expansion of Aberdeen Airport. All these developments do not meet sustainable criteria and encourage transport which would have serious repercussions. Present financial restraints mean the Aberdeen Western Peripheral Route and the Third Don Crossing are not affordable. We have already wasted considerable financial costs on these proposals.

1244: Recognises the need for reserving land for transport projects. It has not been possible to look in detail at all proposals shown in the draft Plan but highlight that where these affect outdoor sports areas, the provisions of the Scottish Planning Policy (in particular paragraph 156) apply.

1537: No land has been safeguarded to the south of the city for transport projects.

1546: Concern over impact of new roads on climate change. Very serious consideration must be given to environmental and community impacts of giving land over for roads.

#### Mapping of T1 allocations

662: It is difficult to identify which Land for Transport (T1) allocation applies to which location on the map.

#### Comments on specific T1 designations

662 The Aberdeen to Edinburgh rail services allocation crosses the River Dee SAC (it is

presumed that this is an upgrade to an existing railway line). The SEA of the National Planning Framework 2 identifies that development plans are one way of ensuring mitigation at the local scale is addressed. However, failure of the SEA or the Habitats Regulations Appraisal to list any specific mitigation measures to address possible impacts on the River Dee SAC, and instead relying on assessment at the proposals stage, is not sufficient, in line with recent guidance on the Habitats Regulations Appraisal of Plans.

764: Concern over compatibility of T1 designation at Kirkhill and complementary uses (crèche/shop) with PAHDI guidelines.

### **Modifications sought by those submitting representations:**

Need for the Aberdeen Western Peripheral Route

228: Get Aberdeen Western Peripheral Route running as soon as possible.

Need for the Berryden Corridor Scheme

155: CLAN House should be acquired and demolished with a view to widening Rosemount Terrace to help traffic bypass signalised junction. Powis Terrace should be dualled from the Northern Hotel to Powis Place to improve traffic flow.

353: Remove Berryden Corridor from list of transport projects and remove from Proposals Map.

Strategy for Transport

228: Provide a flyover for Haudagain and learn from Central Belt initiatives.

665: Amend Proposals Map to identify the land required for the construction of the Aberdeen Western Peripheral Route.

913: Change wording in paragraph 3.15 from 'we have identified...' to 'The Regional Transport Strategy and Local Transport Strategy have identified...' The section should also include textual reference to the Aberdeen Western Peripheral Route.

913: The Policy should make reference to the Action Programme to clarify the status of each of the transport schemes. Leave the option of contributions helping the earlier implementation of the schemes in Policy T1 or provide an enhanced solution.

1182: The implementation and delivery of these projects is of the highest importance, this importance should be reflected in the Action Programme.

1196: Sustainable changes in transport infrastructure are required and financing methods such as congestion charging or tolls should be considered.

1244: None, but only if policy NE3 is revised as suggested. In such, an amendment to the policy NE3 which makes clear the specific national policy requirements applying where pitch redevelopment is proposed. This to be either a specific policy, or section within policy NE3, which outlines the particular policy requirements which will relate to the redevelopment of outdoor sports areas, with this to follow the criteria set out in

paragraph 156 of the Scottish Planning Policy.

1546: Greater stress and firmer policies required surrounding the need for very thorough assessment, real consultation and genuine consideration of the impact of land given for roads on the environment and local communities.

Mapping of T1 allocations

662: Number Land for Transport allocations on the Proposals Map and reference these in the Action Programme.

Comments on specific T1 designations

662: Amend Action Programme Section 2 table final column, item 8 Aberdeen to Edinburgh rail services, to refer to the need for a construction method statement. The following text should be added, "The detailed proposal will require a construction method statement that avoids an adverse effect upon the qualifying interests of the River Dee SAC (Atlantic Salmon, Freshwater Pearl Mussel and Otter). This will need to address the following: \*Impact of construction in proximity to watercourses (water crossings, soil storage, sediment release, timing and duration of works, pollution prevention and species survey) \*Implications of flood events during construction for sediment release \*Details on drainage of allocated sites during construction \*Details of future monitoring of the qualifying interests potentially affected by this new infrastructure."

764: Specific reference should be made that requires land affected by pipelines at Kirkhill under policy BI5 Pipelines and Control of major hazards.

### **Summary of response (including reasons) by planning authority:**

Need for the Aberdeen Western Peripheral Route

65, 228, 936, 1182, 1436 Support for the Aberdeen Western Peripheral Route is welcomed and the recognition that this scheme will bring economic benefits. Should the Aberdeen Western Peripheral Route not be delivered, it is likely that the development plan, comprising the Local Development Plan and Aberdeen City and Shire Structure Plan (CD8) as appropriate, would require to be reviewed. The Council has identified an integrated package of measures in the Local Transport Strategy (RD34), also reflected in the Regional Transport Strategy (RD30), for improving the transport network and the Aberdeen Western Peripheral Route is an important part of this package. Aberdeen City Council, Aberdeenshire Council, the North East Scotland Transport Partnership and the Scottish Government are all committed to the delivery of the Aberdeen Western Peripheral Route. This scheme is currently subject to legal challenges so a delivery timescale is difficult to establish at this point in time. Aberdeen City Council supports the delivery of the Aberdeen Western Peripheral Route as soon as possible. Any development implemented before or after the Aberdeen Western Peripheral Route would need to provide appropriate mitigation measures including any additional infrastructure required.

Need for the Berryden Corridor Scheme

155, 353 Support for the Berryden Corridor is noted and the recognition that this scheme will bring economic benefits. Park & Ride services and public transport are an integral part of the City Council's Local Transport Strategy, the Regional Transport Strategy and

the Scottish Government's National Transport Strategy (RD97) and Strategic Transport Projects Review (RD96), all of which provide a strategic direction for dealing with congestion reduction, managing travel behaviour and reducing the impact of transport on the environment. Nevertheless, a number of road-based schemes are still considered necessary, including the Berryden Corridor and Third Don Crossing, to enable the safe and effective movement of all traffic around the transport network. In the development of proposals for the Berryden Road Corridor a range of options were tested starting with minor traffic management improvements and developing to the final dual carriageway. It was found that minor interventions would not allow the network to operate i.e. gridlock occurred. Due to the confined urban environment and the desire of stakeholders and the Council to minimise impact on the built heritage along the route, construction options were limited to what could be achieved within the current footprint of the corridor with some demolition or land required, only where it is considered absolutely necessary. Traffic modelling has been used to provide road users with the maximum flexibility at the junction through the proposed traffic signal configuration around the existing Grade C listed building (Clan House) so no further land take is likely to be necessary. Powis Terrace is not felt to be appropriate for upgrade to dual carriageway due to the limitations set by the location of the railway infrastructure in the area.

#### Strategy for Transport

228, 363, 640, 665, 782, 913, 1182, 1196, 1244, 1537, 1546 Support for major infrastructure schemes, and the aim of the policy to integrate of transport and accessibility, is welcomed.

Whilst it is also noted that there is some support for the statement that the new infrastructure items listed in Policy T1 will not be subject to developer contributions, there is some concern from respondent 913 that ruling out this possibility might prevent earlier implementation of the schemes or to provide an enhanced solution. The Council has attempted to distinguish these schemes from others which have been directly attributed to new development and will need to be delivered alongside. However, if the Reporter is so minded, the Council would accept the suggested word changes in order not to preclude any opportunity for the use of developer contributions towards earlier implementation or an enhanced solution.

All the schemes mentioned in Policy T1, as well as the Aberdeen Western Peripheral Route, are highlighted in the Proposed Action Programme (CD20) which accompanies the Proposed Plan. The Action Programme is directly linked to the Local Development Plan and will be updated regularly in order to reflect the status of each policy and proposal contained therein. It should be read in conjunction with the Local Development Plan. As such, the Council does not consider that a specific reference to the Action Programme is necessary in Policy T1.

If the Reporter is so minded the Council would accept an amendment to the reference to "we have identified", in paragraph 3.15, to "the Regional Transport Strategy and Local Transport Strategy have identified" in order to clarify the circumstances in this case.

Aberdeen City Council, Aberdeenshire Council, the North East Scotland Transport Partnership and the Scottish Government are all committed to the delivery of the Aberdeen Western Peripheral Route. The Aberdeen Western Peripheral Route shown on the proposals map represents the preferred route approved by Scottish Government. However, to allocate all land required for the construction of the Aberdeen Western

Peripheral Route on the Proposals Map would leave islands of green belt within the scheme with no apparent green belt purpose. Green belt boundaries would frequently not be based on physical features that could be identified on the ground (as per paragraph 162 of Scottish Planning Policy (CD3)). On balance, the Council felt that the best solution was to identify a line on the proposals map and alter the Green Belt policy to allow for the development of the Aberdeen Western Peripheral Route. However, if the Reporter is so minded, the Council would accept the inclusion of a reference to the Aberdeen Western Peripheral Route in Policy T1 or the supporting text (possibly at paragraph 3.15) and text to guide readers to the Aberdeen Western Peripheral Route website which includes details of the route.

Scottish Planning Policy (CD3) states that "Opportunities for personal travel should be prioritised by mode in the following order - walking, cycling, public transport, car and other motorised vehicles" (paragraph 169). This principle is reflected throughout the Transport & Accessibility Supplementary Guidance (RD62), published alongside the Proposed Plan. The Proposed Plan contains several policies and proposals for dealing with transport issues in the City. Walking, cycling and public transport, including Park & Ride services, are an integral part of the City Council's Local Transport Strategy, the Regional Transport Strategy and the Scottish Government's National Transport Strategy and Strategic Transport Projects Review. All of these documents provide a strategic direction for dealing with congestion reduction, managing travel behaviour and reducing the impact of transport on the environment. Nevertheless, a number of road-based schemes are still considered necessary, including the Berryden Corridor and Third Don Crossing, to enable the safe and effective movement of all traffic around the transport network. The development of roads and transportation projects includes significant consideration of environmental and community impacts and involves consultation with a wide range of stakeholders and the general public at various stages.

The Council will continue to review its own budgets and explore opportunities for external funding and alternative delivery models to secure the delivery of priority projects such as the Third Don Crossing. The Aberdeen Western Peripheral Route is being delivered by the Scottish Government with Aberdeen City and Aberdeenshire Councils as funding partners, and continues to be considered as a priority project for the North East of Scotland.

As part of the Council's Priority Based Budgeting exercise for the coming 5 years, the issue of congestion charging was explored. In reporting on this service option officers highlighted that the time scales to develop such a scheme, identification of likely significant set up and operational costs and the risks of securing the necessary legislation with political and community buy in, are too great at this time to generate useful funding in the short to medium term. In setting the budget for 2011/12, within the context of the 5 year budget, the Council did not progress this option.

In examining the impact of development, a number of transport related improvements have been identified and attributed to the sites allocated in the Proposed Plan throughout the eleven Masterplan Zones and other sites. This includes walking and cycling infrastructure, public transport and roads. In addition, the Nestrans Cumulative Transport Appraisal (CD18) identifies a number of strategic locations across the region where roads and public transport infrastructure will be required to support the scale of development proposed. The Cumulative Transport Appraisal identifies the need for improvements to road capacity at the Bridge of Dee. However, at the time of this Proposed Plan a preferred option has yet to be identified and it is therefore not possible



to define the allocation for this intervention until more details are available. Through future reviews of the Local Development Plan, appropriate land will be safeguarded for the appropriate transport scheme. Transport infrastructure requirements have been identified for Masterplan Zone 11 Loirston. It should also be noted that the Aberdeenshire Proposed Local Development Plan Settlement Statement: Kincardine and Mearns (RD33) includes a proposal (reference Portlethen R2) for a new Park & Choose site at Schoolhill.

The design of roads is governed by the Design Manual for Roads and Bridges (RD21), and projects which requires Scottish Government support and/or approval and also requires that the Scottish Transport Appraisal Guidance (STAG) (RD22) is followed for the development of roads and transportation initiatives. STAG requires all schemes to be assessed against five key themes of Environment, Economy, Safety, Accessibility and Social Inclusion, and Integration. This appraisal process is considered best practice and is utilised to develop projects even where they don't require Scottish Government approval/support. This process also encourages participation by stakeholders and the wider public all the way through. The Council complies with the appropriate standards and regulations, and continues to utilise the STAG process as best practice in the development and delivery of roads and transport initiatives.

The Council's response to the issues raised under Policy NE3 demonstrates that the Policy as drafted is compliant with Scottish Planning Policy (CD3). Respondent 1244 does not state what changes they would wish to be made to Policy T1. However, any development proposal which affects playing pitches will be considered against Policy NE3.

#### Mapping of T1 allocations

662 There are only a handful of transport schemes listed under T1, but there are additional land designations not listed in the policy text which are shown on the Proposals Map. In this light, it is not considered appropriate to number the T1 designations. The map should be read in conjunction with the overall Local Development Plan and not in isolation.

#### Comments on specific T1 designations

662 The Aberdeen to Edinburgh rail service improvements highlighted in Policy T1 are taken from the Scottish Government Strategic Transport Projects Review. No details are available on this scheme as yet. If the Reporter is so minded, the Council would accept the inclusion of the suggested additional text in the Proposed Action Programme (CD20) in order to reflect the need to consider the potential impact on the River Dee SAC should any development proposal arise.

764 The area designated under Policy T1 at Kirkhill relates to Raiths Farm rail freight terminal and does not relate to a new development proposal. As such, it has not been given an OP reference number. Any development proposal which affects this land, and any other land covered by the pipeline designation marked on the Proposals Map, will have to comply with all policies in the Local Development Plan, including Policy BI5. Therefore, we do not consider that an OP reference is necessary for the area in question or that a specific designation should be given.

All the schemes mentioned in Policy T1, and the Aberdeen Western Peripheral Route,

are highlighted in the Proposed Action Programme (CD20).

**Reporter's conclusions:****Reporter's recommendations:**

<b>Issue (ref and heading):</b>	<b>THIRD DON CROSSING</b>	<b>92</b>
<b>Development Plan reference:</b>	Specific scheme referenced in Policy T1 and shown on Proposals Map	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
<p>Mr Craig Leuchars (155), Mr Ronald McDonald (189), Mr William Kidd (197), Mrs Anna Kidd of Tillydrone Community Council (228), Mr Brian Downie of Tillydrone Community Network (230), Councillor Debra Storr of Aberdeen and Aberdeenshire Green Party (353), Miss Elizabeth Wilson (375), Mr Andrew MacLeod of George Street Community Council (417), Mrs Linda Barclay (442), Mr Francis Paterson (512), Mr Gordon Mutch (603), Mr Gordon Legge (607), Mrs Rhonda Reekie of Scottish Green Party (611), Mrs Lynne Digby (646), Mr Glen Grassick (656), Mrs Katrina Bird (666), Mr Kenneth Hardie (690), Mr &amp; Mrs Alexander and Agnes Wyllie (698), Mr &amp; Mrs William Wood (708), Mrs Eileen Grassick (721), Mr Douglas Dutch (740), Mr Peter Jeffels (756), Mr Colin Lawrence (774), Mr Ian Stewart (777), Mrs Margaret Dutch (789), Ms Debbie Mitchell (844), Mrs Shona Mutch (865), Ms Chrstine Burgess of Old Aberdeen Community Council (869), Mr Ronald Barclay (902), Mrs Mary Weir (911), Mr James Weir (912), Mrs Morag Weir (914), Mrs Evelyn Gavin (920), Mr James Gavin (923), Mrs Patricia McMillan (925), Mrs Lesley Farquahar (927), Mr Cyril James Clark (928), Mrs Marie McKenzie (929), Mr Derek Elliot-Jones (1036), Mr Derek Grant (1041), Mrs Donna Grant (1052), Mr Gordon James Legge (1104), Mr Charles Fallon (1117), Mr &amp; Mrs James and Roberta Elrick (1121), Ms Amanda Cardy (1152), Mr Simon Barker (1155), Miss Jennifer Thomson (1158), Mr &amp; Mrs William &amp; Anna Kidd (1159), Mrs Edith Wyness (1160), Mr Kenneth Armstrong (1162), Miss Carol Guhh (1164), Mr &amp; Mrs Rebecca &amp; George Armstrong (1181), Mr &amp; Mrs Alistair and Monica Laird (1204), Mr Edward Mitchell (1206), Mr John Buchan (1207), Mr Robert Leslie (1213), Mr Stephen Adams (1214), Mr &amp; Mrs William and Roberta Crawford (1215), Mr Peter Duff (1216), Ms Barbara Mathie (1222), Miss Hazel Fraser (1248), Mrs Kathleen Fraser (1250), Miss Rachel Duncan (1251), Mrs Lorna Robertson (1254), Mrs Muriel Benzie (1294), Mr Andrew Grant (1295), Ms Cathy Drever (1296), Mrs Eleanor Senior (1297), Mr John Fowler (1298), Mr G Kellighan (1299), Mr Anthony Cunningham (1300), Mr Evan Thomson (1301), Miss Teila Thomson (1302), Miss Ellie Sangster (1306), Mr Ross Grant of Tillydrone Community Council (1307), Mr David Michael Williamson (1308), Mrs Jill Bowie (1309), Miss Lynn Cunningham (1310), Mr Dylan Cunningham (1311), Dr Tim Smith (1312), Miss Shana-Michelle Cunningham (1313), Mrs Eileen Morrison (1315), Miss Lisa Hutchison (1316), Mrs Winifred Armstrong (1317), Mr David Humphrey (1318), Mr James Thom (1319), Mrs Patricia Hutchison (1320), Mr R Scott (1323), Mr Greg Morrison (1333), Mr George Copland (1336), Mrs Jeanette Copland (1338), Mr Kevin Copland (1343), Mr Ronald Watt (1345), Mrs Muriel Sim (1359), Mr William Cocker (1376), Mr Jack Sangster (1377), Miss Erica McLennan (1411), Mr &amp; Mrs Imre &amp; Marjory Nemeth (1412), Ms Marion McLean (1422), Mr Clive Kempe (1434), Mrs Yvonne McDonald (1440), Miss Kim Macwilliam (1441), Ms Anne Macwilliam (1443), Mrs Nancy Small (1445), Mr James Weir (1446), Ms Sandra MacDonald (1447), Miss Melissa Morrison (1448), Mr Brian Copland (1449), Mrs Susan Morrison (1450), Mr Glen Morrison (1451), Mr Ross Grant (1452), Mr Garyth Grant (1453), Ms Sylvia Allan (1454), Mrs Norma Cunningham (1455), Mr Richard Baker of MSP (1456), Mr Stanley Forbes (1459), Mr George Milne (1463), Mrs Mary Chalmers (1465), Mrs Emma McLeod (1466), Mr &amp; Mrs Richard &amp; Ruth Brown (1467), Mr Martin Gallagher (1468), Mrs Pauline Garden (1470), Mrs Ann Flett (1471), Mr James Flett (1474), Miss Carol Gunn (1476), Mr Kenneth Armstrong (1477), Miss Michelle Stewart (1478), Ms Kate McIntyre (1479), Miss Linda Duck (1480), Miss Kim Sleigh (1482), Mrs Millie Smith (1483), Ms Christine Burgess (1485), Mr William Smith (1488), Mr William Kidd of Tillydrone Community Centre on behalf of Tillydrone</p>		

Community Centre (1489), Miss Melanie Dawson (1490), Mrs Sharon Sangster (1491), Miss Kelly Duthie (1493), Mrs Ann Mulloy (1494), Miss Melanie Dawson (1496), Mr Joseph Sim (1497), Miss Cali Bissett (1498), Mr Tyler Bissett (1499), Mr Greig Lawson (1500), Mrs Lilian Christie (1501), Miss Kelsea Cocker (1502), Mrs Kim Cackle (1503), Mr Harold Dawson (1504), Mrs Anne Dawson (1505), Mr Barry Hay (1506), Mr Gordon Duncan (1507), Mr Graeme Simpson (1508), Mr John Pollock (1509), Mr Rodney Cole (1510), Mr Jayne Lindsay (1511), Mr Brian Skene (1512), Mr Andrew Robertson (1513), Ms Morag Robison (1514), Mr Alistair Gray (1515), Ms Dorothy Irvine (1516), Mr James Grant (1517), Mrs Lesley Kellighan (1520), Mrs Clotide Main (1521), Mrs Julie Stewart (1522), Dr Lewis MacDonald (1538), Mrs Moira Watson (1544), Mr Ross Grant of Don Crossing Communities Alliance (1575), Ms Lynn Cunningham of Riverbank Parent Council (1575).

**Provision of the Development Plan to which the issue relates:**

Designation of land to support the delivery of the Third Don Crossing

**Summary of the representation(s):**

Support for scheme

155: Support delivery of Third Don Crossing. It is required to alleviate existing and future transport issues and will bring economic benefits to the region.

Impact and effectiveness of scheme

189, 228, 230, 353, 417, 603, 607, 646, 656, 666, 690, 698, 708, 721, 740, 756, 774, 777, 789, 844, 902, 911, 912, 914, 920, 923, 925, 927, 928, 929, 1036, 1041, 1052, 1104, 1117, 1121, 1152, 1155, 1158, 1159, 1160, 1162, 1164, 1181, 1204, 1206, 1207, 1214, 1215, 1216, 1248, 1250, 1251, 1254, 1294, 1295, 1296, 1297, 1298, 1299, 1300, 1301, 1302, 1306, 1307, 1308, 1309, 1310, 1311, 1312, 1313, 1315, 1316, 1317, 1318, 1319, 1320, 1333, 1336, 1338, 1343, 1345, 1359, 1376, 1377, 1411, 1412, 1422, 1440, 1441, 1443, 1445, 1446, 1447, 1448, 1449, 1450, 1451, 1452, 1453, 1454, 1455, 1456, 1459, 1463, 1465, 1466, 1467, 1468, 1470, 1471, 1474, 1476, 1477, 1478, 1479, 1480, 1482, 1483, 1488, 1490, 1491, 1493, 1494, 1496, 1497, 1498, 1499, 1500, 1501, 1502, 1503, 1504, 1505, 1506, 1507, 1508, 1509, 1510, 1511, 1512, 1513, 1514, 1515, 1516, 1517, 1520, 1521, 1522, 1538, 1544, 1575, 1582: Object to the Third Don Crossing proposal. Concerns over the negative impacts that the Third Don Crossing will cause. These include traffic impact into Tillydrone, road safety issues, air quality, noise, pollution, reduction in health for local people, community severance, flooding, damage to scenic areas, impact on landscape, use of compulsory purchase orders, the shifting of congestion into city centre and loss of habitat. Hatton Road may be used as a rat-run. Other proposals have not been given enough consideration (The non-statutory document 'Access from the North' -which the proposal is based on, did not comprehensively consider alternatives to the preferred proposal). The Haudagain should be addressed first. The Plan does not provide up to date traffic flow estimates.

375: Object to Third Don Crossing due to loss of front garden, and traffic being very close to property. The project would reduce the value of the property. Widening of Gordon's Mills Road will cause havoc and walls and trees surrounding the Old Donside Mills would be demolished. Also have concerns that a lack of weight restriction on the road will allow Heavy Goods Vehicles to affect the foundations of nearby properties. Carbon emissions and noise would be unbearable.

1222: Object to Third Don Crossing. People could use better public transport links and

the whole of King Street could be used solely for bus lanes. Stop bin lorries from picking up along King Street during rush hours.

1434: Object to Third Don Crossing. It will encourage commuting, increase pollution, divide communities, reduce accessibility, lead to further deprivation and social problems in North Aberdeen, will fail to complement Aberdeen's architectural heritage. More sustainable transport improvements should be investigated such as Cross Rail and parking charges.

1489: The location of the proposed Third Don Crossing will make getting to amenities very difficult. Underpasses are scary to the young and elderly.

1544: New cycle lane will bring pavement closer to my house leading to impact on our privacy and quality of life.

1582: The Third Don Crossing proposal goes against the 'Eco-Schools Scotland' programme guidelines which suggest that pupils, staff, communities and local government can work together to come up with practical and sustainable transport solutions. Living Streets Walk to School Campaign encourages pupils, parents and staff to incorporate regular physical activity into their lives by walking to and from school wherever possible. Also, road and traffic danger is identified as one of the main fears which presents a barrier to children walking to school in May 2010 study "Is it safe to let our children walk to school?" by Living Streets. The proposal will violate these studies and will in no way encourage children, staff and all residents to walk. The proposal would jeopardise ongoing cycling proficiency classes during spring and summer as parents will not let their children cycle to school. The Council would be violating Articles 6, 24 and 31 of the United Nations Convention on the Rights of the Child. The SEA is deficient and fails to properly assess the negative impacts of Policy T1, as Third Don Crossing will increase health impacts and would have significant adverse impact on the environment.

197: The Third Don Crossing is a waste of money, it will not work with only one lane to the North and one lane to the South.

353: It would be more effective to reinstate public transport initiatives such as the A947 Park and Ride.

375, 721: The previous planning application was thrown out by Scottish Government on 14 separate points. Money spent so far would have been better spent on improving the Haudagain and upgrading Persley Bridge.

512: The Proposed Plan does not address sustainable development, it encourages greater road use which is unsustainable and will destroy Aberdeen's heritage.

611: The Third Don Crossing is not feasible in terms of reducing traffic or solving current issues. Its proposed location is detrimental to the people of Tillydrone and surrounding areas. It should be cancelled and money should be spent on more public transport initiatives.

865: The Third Don Crossing will only move congestion to St Machar Drive and Bedford Road. The bridge would encourage private car use at peak periods, not help to alleviate congestion. It will bring unacceptably high concentrations of nitrogen oxide & fine particulate matter to the Grandholm and Tillydrone, Old Aberdeen & George Street

areas.

869, 1485: There is nothing to suggest that the Third Don crossing as proposed will create anything other than more traffic congestion on both sides of the bridge. Has concerns about the potential for gridlock around the Tillydrone roundabout with a massively increased volume of traffic being fed on to an already over-congested St Machar Drive, both east to King Street and west past a major school to Great Northern Road or straight ahead along Bedford Road to the already chaotic junction at Powis Terrace. The designation of parts of Tillydrone Avenue and St Machar Drive as T1 is not supported since this is a tacit acceptance of the Third Don Crossing. At the very least it degrades the perceived value of public consultation and suggests 'fait accompli'.

869: Supports the Council's contention that the city needs a wholesale modal shift to public transport: a third Don crossing, however, will simply attract more car commuters into and out of the City Centre and lead to a deterioration in the quality of life for all of Aberdeen's citizens.

1213: The crossing will cause traffic congestion in the Gordonmills Road/St Machar Drive area which will be exacerbated with the current development of the Donside Paper Mills. The future proposals by the Grandholm Estate would add further traffic to this bottleneck. Aberdeen City will fail in achieving the prescribed air quality targets and it seems perverse that rather than reducing car usage in the city, the City is encouraging car use by providing another road bridge. This is another example of piecemeal infrastructure development within the City with no strategic overview. The City is already suffering from schemes which have resulted in traffic bottlenecks e.g. Powis Place/Great Northern Road and also Skene Square/Berryden Road. The City should concentrate on completing schemes which in some cases have remained unfinished for some thirty years.

1307, 1575: The issue of alternatives to the Third Don Crossing should have been reopened at the Main Issues Report stage. Failure to have done so meant that local people and others reading the document had no idea where the crossing was to be located and so were less inclined to comment. The Third Don Crossing should only be determined within the context of a more strategic review and there should be cross-examination of evidence. There are existing problems at Haudagain roundabout in advance of any Third Don Crossing.

1323: A total review of traffic management policies for in and around Tillydrone is required. The Third Don Crossing will only cause more traffic congestion along St Machar Drive and the surrounding areas.

#### Compliance with other policies

869: Supports the assessment of developments in respect of impact on air quality (paragraphs 3.86-3.89). Seeks the same rigorous assessment to be applied to the St Machar Drive and King Street roundabout to support the contention of an unavoidable deterioration in the quality of life and the environment in both Tillydrone and Old Aberdeen with regard to the Third Don Crossing.

1251, 1538: The Third Don Crossing proposal goes against Proposed Plan policy D3 which states that "new development will be designed in order to minimise travel by private car". There would also be severe impacts on Old Aberdeen, a conservation area

with the national, cultural and historical importance as well as a residential area.

### **Modifications sought by those submitting representations:**

#### Impact and effectiveness of scheme

189, 197, 228, 230, 353, 375, 417, 442, 512, 603, 607, 611, 646, 656, 690, 698, 708, 721, 740, 756, 774, 777, 789, 844, 865, 902, 911, 912, 914, 920, 923, 925, 927, 928, 929, 1036, 1041, 1052, 1104, 1117, 1121, 1152, 1155, 1158, 1159, 1160, 1162, 1164, 1181, 1204, 1206, 1207, 1214, 1215, 1216, 1248, 1250, 1251, 1254, 1294, 1295, 1296, 1297, 1298, 1299, 1300, 1301, 1302, 1306, 1307, 1308, 1309, 1310, 1311, 1312, 1313, 1315, 1316, 1317, 1318, 1319, 1320, 1323, 1333, 1336, 1338, 1343, 1345, 1359, 1376, 1377, 1411, 1412, 1422, 1440, 1441, 1443, 1445, 1446, 1447, 1448, 1449, 1450, 1451, 1452, 1453, 1454, 1455, 1456, 1459, 1463, 1465, 1466, 1467, 1468, 1470, 1471, 1474, 1476, 1477, 1478, 1479, 1480, 1482, 1483, 1485, 1488, 1489, 1490, 1491, 1493, 1494, 1496, 1497, 1498, 1499, 1500, 1501, 1502, 1503, 1504, 1505, 1506, 1507, 1508, 1509, 1510, 1511, 1512, 1513, 1514, 1515, 1516, 1517, 1520, 1521, 1522, 1538, 1544, 1575:  
Remove all references to the Third Don Crossing from the Proposed Plan and relevant red lines from Proposals Map.

603: No development on Green Belt land. Less houses are needed now, this plan was conceived when the UK - Scottish economy was buoyant. Developers can't sell the houses they have already built never mind tens of thousands of new ones.

197: Get more bus companies into Aberdeen.

607: Spend money on Haudagain roundabout.

1213, 1538: Make improvements to the Parkway, widen the Persley Bridge and improve Muggiemoss Road and the Haudagain roundabout. If these improvements were made and the Western Peripheral route was completed these would have a more beneficial impact on traffic movements than just building another bridge.

1412: An alternative flyover could be built in Middlefield. It could go over the cemetery joining up with the A92 passed Laurel Drive roundabout.

### **Summary of response (including reasons) by planning authority:**

#### Support for scheme

The Council welcomes the supporting comment for the Third Don Crossing proposal. The planning application for the proposal was approved subject to conditions on 23rd February 2011 (RD50).

The proposal is identified in the Aberdeen City and Shire Structure Plan (CD8) as part of the strategy for strategic growth. One of the key objectives of the Structure Plan is economic growth and part of this is the provision of essential infrastructure. The Structure Plan requires the emerging Local Development Plan (the Proposed Plan) to identify a site for the Third Don Crossing and safeguard the associated land for development. The Regional Transport Strategy (RD30) and the Local Transport Strategy (RD34), as well as the Local Development Plan Main Issues Report (CD14), also reflect the importance of the Third Don Crossing. The Regional Transport Strategy identifies it as a priority for action and the Local Transport Strategy as an element of the Access

from the North integrated transport scheme.

#### Impact and effectiveness of scheme

The Access from the North study (RD52) was carried out in compliance with nationally recognised assessment methods for transport projects. Various transport options were considered within the study which included:

- Doing minimal improvements or nothing to the network;
- Public transport improvements;
- Light rail;
- Improvements to Haudagain Roundabout and the dualling of the A90(T) Parkway;
- Widening of the existing bridges over the River Don;
- Application of Travel Plans on new development;
- Congestion charging;
- Improvements to cycle facilities only;
- A bus only river crossing.

For various reasons the above solutions did not adequately address the existing transport problems or meet the objectives of the study. The study concluded that a new river crossing was required to adequately address the transport problems within the north of the city. Three separate route corridor options for a new crossing were considered. The preferred line was chosen as the best of the three options based upon environmental, economic and engineering issues. The preferred line was also most favoured during two separate public consultation exercises.

Inclusion of the Third Don Crossing in the Structure Plan, Regional Transport Strategy and Local Transport Strategy highlights that the principle of the scheme has been accepted, and forms a key element of a range of transport initiatives for the region, which together form an integrated package of measures. This package of measures also includes other transport schemes such as improvements to the Haudagain roundabout and the Scottish Government has indicated that work will begin on this scheme following delivery of the Aberdeen Western Peripheral Route.

The proposed Third Don Crossing is seen as being required to ease existing and future congestion. By easing congestion across the overall road network this will enable more efficient traffic movements for all vehicles. Extensive traffic modelling suggests that the proposed scheme will cope with predicted traffic volumes (RD51). The traffic modelling was updated in 2009/10 to reflect the changes identified within the current Structure Plan. It is the proposed development within the Structure Plan that will have the most significant impact upon traffic in and around the city. As the scheme leads to a reduction of congestion in the area it is considered unlikely that traffic will use roads inappropriate for through traffic e.g. Hayton Road, although the Council will monitor the situation and introduce traffic management measures if required.

The proposal would not have an adverse impact on the landscape from the gateway entrances into the city. The landscape impact is capable of mitigation to some extent by tree planting. It is considered that overall the adverse impact is local to the proposal. The proposal would also enhance accessibility for existing residents to cross the river in both directions for employment as well as leisure purposes, and from new areas of sustainably located development, providing the opportunity for enhanced public transport to new and existing communities. It is noted that segregated cycle and footways are provided alongside the carriageway. The issue of severance would not impact upon the majority of residents in Tillydrone, as there would be access provided to the riverside and pedestrian and cyclist crossings of the road would be provided at various points and an underpass. Lighting will need to be provided in underpasses to make them safe routes



for all.

The proposal would enable quicker and easier access to areas of employment to the north of the river, with the possibility that public transport would be extended to cover the new road. It is noted that there are many other residential areas of the City through which busy roads run, for example, Queens Road, North Deeside Road and Great Western Road. It is considered to be the case that the burden of traffic congestion is not only carried by those in deprived areas of the city.

We note that a small number of residential properties are affected by the implementation of this scheme, and the Environmental Statement (RD53) submitted with the planning application highlights that the proposed bridge, associated new road and road widening would only have a significant impact on a relatively small number of local residents and the environment within the local area, including a listed structure and a large number of trees. The Environmental Statement also looks at the impacts on a wider scale, and confirms that issues such as air quality, noise and vibration have an overall neutral impact, and air quality will improve for some residents in the King Street area. As such we do not consider there to be any issue for public health.

The Environmental Statement also confirms that, in relation to habitats, due to the location of designated sites in relation to the proposed Access from the North proposals and no anticipated tree removal from designated woodlands, residual impacts on protected sites are considered to be neutral. In addition, habitats and notable flora are not predicted to be significantly adversely affected by the Access from the North proposals. It also notes that provided tree removal is limited and compensation planting is implemented, minor positive impacts are predicted for Local Biodiversity Action Plan species, Wych Elm, due to eradication of invasive species.

With regards to the use of Compulsory Purchase the Scottish Government guidance on the use of Compulsory Purchase (RD23) states that: "Compulsory purchase is a valuable tool to facilitate projects in the public interest where it is impossible or impractical to acquire the land by agreement. These are often vital schemes that can promote economic recovery and sustainable economic growth and bring real benefits to our communities. But without compulsory purchase they could not go ahead."

A Flood Risk Assessment has been submitted with the application for the Third Don Crossing (RD93). This shows that the north bridge embankment lies within the existing floodplain of the 1 in 200 year flood event and would cause displacement of 3332m<sup>3</sup> of flood storage. The Flood Risk Assessment identifies two possible flood storage areas to mitigate the effects of the new raised embankment.

In response to the suggestion that improvements to the Haudagain roundabout should be implemented first, we note that the Scottish Government have committed to the improvements at the Haudagain roundabout and work will begin after the Aberdeen Western Peripheral Route has been implemented.

In light of the issues set out above, we do not consider that the proposed scheme will violate the United Nations Convention on the Rights of the Child.

We also note that conditions attached to the planning application approved by Council include the need for further information on issues such as pedestrian crossings, external materials and tree planting, among others. The economic benefits of the proposal are

significant. Traffic related economic benefits of the Third Don Crossing in terms of consumer and business user benefits are approximately £55million (taking into account Structure Plan growth), and without traffic growth the benefits are £29 million. These figures are based on an Appraisal Report (RD94) that was carried out in March 2010 and included economic appraisal of the application scheme, and do not include deductions for the cost. The appraisal is based on a Department for Transport methodology and considers traffic related benefits to private and business users, such as time spent in congestion and the fuel and vehicle cost savings. The proposed bridge would take local traffic into the city, dispersing traffic from the bottlenecks at the existing bridges, easing congestion on these strategic routes. The Regional Transport Strategy picks up the transport contribution to economic growth and specifically recognises the dependency on the delivery of the Third Don Crossing to implement improvements to the Haudagain.

The proposed road will be designed to national standards suitable for the predicted volumes of traffic including an upgraded signalised junction at St Machar Drive / Tillydrone Avenue. Extensive traffic modelling (see RD51) suggests that the proposed scheme will cope with predicted traffic volumes. The traffic modelling was updated in 2009/10 to reflect the changes identified within the current Structure Plan. It is the proposed development within the Structure Plan that will have the most significant impact upon traffic in and around the city. As the scheme leads to a reduction of congestion in the area it is considered unlikely that traffic will use roads inappropriate for through traffic e.g. Hayton Road, although the Council will monitor the situation and introduce traffic management measures if required.

Discussions with local transport operators have identified that the scheme will provide the opportunity to extend existing bus services across the River Don, thereby providing improved direct links between Bridge of Don, Tillydrone and the Powis / Berryden area. It has also been identified that the crossing will significantly increase the reliability of bus services and that the combination of these two items will assist achieving modal shift (RD50).

#### Compliance with other policies

The Environmental Statement (RD53) submitted with the planning application highlights that the proposed bridge, associated new road and road widening would have a significant impact on a relatively small number of local residents and the environment within the local area, including a listed structure and a large number of trees. It also looks at the impacts on a wider scale, and confirms that issues such as air quality, noise and vibration have an overall neutral impact, and air quality will improve for some residents in the King Street area. As such we do not consider there to be any issue for public health.

The application site abuts the Old Aberdeen Conservation Area. However, paragraph 5.10 the Environmental Statement (RD53) accompanying the planning application confirms that there will be an insignificant impact on the Old Aberdeen Conservation Area. Table 1.2 of the Environmental Statement confirms that the relevant potential impact types are visual construction/operational and the magnitude if impact is described as "minor/negative".

The City Council's Local Transport Strategy, the Regional Transport Strategy and the Scottish Government's National Transport Strategy and Strategic Transport Projects Review (RD96) provide a strategic direction for dealing with congestion reduction, managing travel behaviour and reducing the impact of transport on the environment.

Nevertheless, a number of road-based schemes are still considered necessary, including the Third Don Crossing, to enable the safe and effective movement of all traffic around the transport network.

In light of the above, the Council does not accept any of the changes suggested in relation to the Third Don Crossing

**Reporter's conclusions:****Reporter's recommendations:**

<b>Issue (ref and heading):</b>	<b>BERRYDEN CORRIDOR ROAD IMPROVEMENTS</b>	<b>93</b>
<b>Development Plan reference:</b>	Specific scheme referenced in Policy T1 and shown on Proposals Map	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Mr Craig Leuchars (155), Mr Derek Williams of Aberdeen Cycle Forum (254), Councillor Debra Storr of Aberdeen and Aberdeenshire Green Party (353).		
<b>Provision of the Development Plan to which the issue relates:</b>	Designation of land to support delivery of the Berryden Corridor Improvements	
<b>Summary of the representation(s):</b>		
<p>155: Berryden Corridor project would bring economic benefits to the region through a reduction in traffic congestion, and in improved journey times and air quality, all of which are key transport objectives and priorities supported by the National Transport Strategy (NTS).</p> <p>254: 'Improvements' is a euphemism for creating a new urban dual carriageway. This will blight the area and encourage more traffic into and through the city centre, when the priority should be to reduce traffic volumes in the city centre. This is an outdated scheme at a time when other cities are trying to improve the quality of their city centres by reducing traffic volumes. This project will subvert the intentions of the City Centre Development Framework which aims to emphasise the 'place' functions of the city centre over the 'movement' function, thereby increasing the attractiveness of the city centre and its viability.</p> <p>353: Objects to Berryden Corridor, it would be more effective to reinstate public transport initiatives such as the A947 Park and Ride.</p>		
<b>Modifications sought by those submitting representations:</b>		
<p>155: CLAN House should be acquired and demolished with a view to widening Rosemount Terrace to help traffic bypass signalised junction. Powis Terrace should be dualled from the Northern Hotel to Powis Place to improve traffic flow.</p> <p>254: The proposal to dual the Berryden corridor should be accepted as an out of date solution that will transfer and increase congestion in other parts of the city centre. The Berryden corridor should instead be improved for public transport, walking and cycling, and not for car users, in line with the transport hierarchy in Scottish Planning Policy.</p> <p>353: Remove Berryden Corridor from Policy T1 and remove relevant designation on proposals map.</p>		
<b>Summary of response (including reasons) by planning authority:</b>		
<p>The need for improvements along the Berryden Corridor was established in the Local Transport Strategy (RD34) and two studies were undertaken - the Access from the North study (RD52) - to determine the minimum measures required to improve all transport movements within the area. The resulting dualled route creates space within the network to improve public transport, cycle and pedestrian facilities.</p> <p>Through consultation it was concluded that public transport routes on Powis Terrace should be prioritised to reduce delays and this is provided by the Berryden proposals.</p>		

Cycle facilities are to be provided, both along the corridor and across the area. Pedestrians will benefit from greater signalised crossing points and improved footpath provisions. The route provides a completion of the road network from the north of the city through the centre. This has many benefits for the city centre, including the provision of infrastructure to support a possible future pedestrianisation of Union Street and the removal of a significant pinch point in the network.

These Corridor Improvements, which are referenced in the Local Transport Strategy (RD34), also support the Aberdeen City Centre Development Framework Supplementary Guidance (CD24) via the key theme of 'Connections'. Whilst this project layout has developed within the scope of the 2009 study, a version of this scheme has been considered for this area for many years. As such, development along the corridor has been informed by the layout of the scheme. This means that those moving into the area over the last couple of decades have had access to this information which remains in the public domain.

In the development of proposals for the Berryden Road Corridor a range of options were tested starting through the Berryden Corridor Improvements Study (RD55). This included minor traffic management improvements and developing to the final dual carriageway. It was found that minor interventions would not allow the network to operate i.e. gridlock occurred. Due to the confined urban environment and the desire of stakeholders and the Council to minimise impact on the built heritage along the route, construction options were limited to what could be achieved within the current footprint of the corridor with some demolition or land required, only where it is considered absolutely necessary. Traffic modelling has been used to provide road users with the maximum flexibility at the junction through the proposed traffic signal configuration around the existing Grade C listed building (Clan House) so no further land take is likely to be necessary. Powis Terrace is not felt to be appropriate for upgrade to dual carriageway due to the limitations set by the location of the railway infrastructure in the area.

**Reporter's conclusions:****Reporter's recommendations:**

<b>Issue (ref and heading):</b>	<b>SOUTH COLLEGE STREET IMPROVEMENTS</b>	<b>94</b>
<b>Development Plan reference:</b>	Specific scheme mentioned in Policy T1	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Miss Catriona MacLennan (1).		
<b>Provision of the Development Plan to which the issue relates:</b>	Designation of land required to deliver South College Street Improvements	
<b>Summary of the representation(s):</b>		
2: Object to the proposal to remove section of wall between property at 134 South College Street and Ferryhill Tavern. Removing this wall will take away what little deterrent there is from people who think that they have a right to damage other people's possessions.		
<b>Modifications sought by those submitting representations:</b>		
2: Consideration should be give to retaining the wall and in fact increasing its height.		
<b>Summary of response (including reasons) by planning authority:</b>		
This wall is owned by the City Council. On one side of it is the public road and on its other side is land owned by the Council. The wall is required to be removed as part of a Council approved road improvement project.		
<b>Reporter's conclusions:</b>		
<b>Reporter's recommendations:</b>		

<b>Issue (ref and heading):</b>	<b>POLICY T2: MANAGING THE TRANSPORT IMPACT OF DEVELOPMENT</b>	<b>95</b>
<b>Development Plan reference:</b>	Policy T2 - Managing the Transport Impact of Development	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Ms Elizabeth Hay (152), Mr Alan Drugan (225), Mr Jonathan Russell (1196), Mr Andrew Roberts of Network Rail (1202), Mr A. W. Findlayson of Cove and Altens Community Council (1537), Mr Ben Freeman of Bancon Developments Ltd (1561), Mr David Henderson (1576).		
<b>Provision of the Development Plan to which the issue relates:</b>	Provides the framework for assessing and managing the transport impact of development	
<b>Summary of the representation(s):</b>		
<p>Purpose and effectiveness of the policy</p> <p>1202: Support Policy T2 as it requires development proposals that involve travel generation to include sufficient information with applications to enable the Council to consider any likely on-and off site transport implications of the development.</p> <p>1537: Query the ability to minimise traffic generated due to dispersed pattern of employment &amp; shopping locations, limitations in public transport systems, topography and weather.</p> <p>1561: Object to Policy T2 as it does not provide forward thinking and innovative solutions to traffic congestion and promoting sustainable modes.</p> <p>Prioritisation of sustainable modes</p> <p>225: Cycle lanes should be mandatory on all routes and park &amp; ride sites.</p> <p>225: Private vehicles should be restricted within the city centre to enable pedestrianisation of shopping areas.</p> <p>1196: Priority should be given to sustainable modes in new developments.</p> <p>Low and No Car Housing</p> <p>152: City centre developments including Pittodrie should be car free and/or car share developments.</p> <p>Stakeholder Involvement</p> <p>1202: Network Rail should be consulted to assist with mitigation of new developments.</p> <p>Low Carbon Technology</p> <p>1576 As well as road impacts the assessment of transport impact of developments should also consider ability to work with partners to provide infrastructure to support low-</p>		

carbon technologies.

### **Modifications sought by those submitting representations:**

Purpose and effectiveness of the policy

1537: To minimise traffic generated from new development a practical and sensible approach should be adopted that faces realities. 1561: Delete Policy T2 and replace with a new forward thinking policy inserted under the same name that enables the delivery of a City-wide approach to promoting modal shift.

Prioritisation of sustainable modes

1196: New development should give priority to buses, cycling, walking and rail.

### **Summary of response (including reasons) by planning authority:**

Purpose and effectiveness of the policy

1202, 1537, 1561 Welcome supporting comments for this policy. The Transport Framework (see CD22) undertaken in support of the Local Development Plan, has helped to steer development towards the most appropriate locations. New development will need to be supported by a comprehensive transport network which offers new and existing residents the ability to use sustainable modes of travel. The Proposed Plan includes a number of employment land allocations across the City, and new development will need to be supported by new shops, services and infrastructure which can be accessed by sustainable modes of travel. Whilst the car will still have an important role for some journeys, the Plan seeks to ensure that sustainable modes provide an attractive and viable alternative to the car, thereby reducing the number of car journeys, and the impact of transport on the environment. The primary role of the road network is to enable the efficient and effective movement of people and goods, and therefore supports all modes of transport. The Proposed Plan has taken account of the Local Transport Strategy (RD34) which reflects the policies and interventions for the planning and improvement of the transport network in the City.

Prioritisation of sustainable modes

225, 1196 Policy D3 reflects the modal hierarchy set out in Scottish Planning Policy (CD3). The Proposed Plan identifies requirements for walking and cycling infrastructure. This will include new and improved cycle routes along key corridors and those serving Park & Choose sites. Sustainable travel will be maximised through careful attention to the design and layout of development, giving priority to those on foot, cycling or using public transport ahead of car user requirements, and measures to improve infrastructure and services to encourage sustainable travel within the catchment area of the development. New development will also need to reflect the principles of Scottish Government's policy guidance Designing Streets (CD6).

The City Council is exploring opportunities for the pedestrianisation of part of Union Street and this is reflected in the Aberdeen City Centre Development Framework (CD24) which is published as Supplementary Guidance alongside the Proposed Plan. The Regional Transport Strategy (RD30) and Local Transport Strategy (RD34) are key drivers of the pedestrianisation project.

Policy T2 reflects the aims and objectives of the Local Transport Strategy which sets the



framework for the transport network in the City. The Proposed Plan and the Local Transport Strategy both prioritise the provision of a comprehensive network for sustainable travel and the delivery of modal shift.

#### Low and No Car Housing

152 The Transport and Accessibility Supplementary Guidance (RD62) published alongside the Proposed Plan states that low and no car housing, and car clubs, would be encouraged where there is evidence that car ownership and use will be low enough to justify proposals, and where public transport and other travel options are sufficient to allow residents to reduce dependence on the car. Ideally opportunities for low and no car housing would be suitable where residents would not be eligible for an on-street parking permit. The Supplementary Guidance includes a list of criteria upon which proposals for low or no car housing will be determined.

#### Stakeholder Involvement

1202 Network Rail have been notified as a key agency at each stage of the Local Development Plan consultation, and the same details will be added to the list of bodies that the Masterplanning Team advise developers to contact during the preparation of Masterplans.

#### Low Carbon Technology

1576 Opportunities for low carbon technologies, and the forecasted benefits of providing such infrastructure, will be considered through the Transport Assessment process. In addition, the Council is working with partners locally, across the UK and Europe to develop and implement carbon reduction strategies. The Local Transport Strategy (RD34) includes clear objectives and actions for reducing carbon emissions from road transport. It also includes objectives and actions which aim to indirectly reduce carbon emissions for example by encouraging modal shift towards more sustainable and active modes of transport.

#### **Reporter's conclusions:**

#### **Reporter's recommendations:**

<b>Issue (ref and heading):</b>	<b>POLICY D1: ARCHITECTURE AND PLACEMAKING</b>	<b>96</b>
<b>Development Plan reference:</b>	Policy D1 - Architecture and Placemaking	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Mr Graeme Stewart (214), Dr Maggie Keegan of Scottish Wildlife Trust (363), Ms Judith Munro of Aberdeen and Grampian Chamber of Commerce (510), Ms Dorothy Bothwell (513), Ms Chrstine Burgess of Old Aberdeen Community Council (869), Mr Brian Wallace of Traverse Ltd on behalf of ACCA (1285), Mr Richard Johnson (1414), Mr A. W. Findlayson of Cove and Altens Community Council (1537), Mr Abdul Latif of The New Aberdeen Mosque and Community Centre Project (1578).		
<b>Provision of the Development Plan to which the issue relates:</b>	Seeks to ensure delivery of well designed, sustainable places that respect their surroundings and have a sense of place	
<b>Summary of the representation(s):</b>		
<p>General</p> <p>214 Does this policy apply to industrial development?</p> <p>363 Supportive of the concept of promoting high quality design for development. Well designed places and high quality green infrastructure improve the health and well being of the population.</p> <p>869 Support the policy</p> <p>363 Very supportive of the policy.</p> <p>1537 Agree and support the proposals contained therein.</p> <p>1578 Agree that high quality design is of significant importance</p> <p>Applying Policy</p> <p>363 High quality masterplans are should be produced for each of the development zones. Community engagement is paramount to ensure developments deliver regional and local expectations.</p> <p>510 Keen to see planners less restricted by overly prescriptive design guidelines, quality and choice are more important to the resident than a multitude of identical properties. Keen to avoid heavy restrictions that in the past have contributed to uninspiring development of identical properties.</p> <p>Tall Buildings</p> <p>513 Care should be taken to avoid negative impact of development on the existing skyline and context.</p> <p>1285 The Tall Building Supplementary Guidance referred to in paragraph 3.21 does not</p>		

exist. The ACCA strongly supports a policy to encourage vertical development in the city centre, business development on the edge of the city has been unfortunate. Union plaza's success illustrates the demand and interest for more vertical development. Essential in maintaining the business functionality of the city centre.

#### Design Quality

1414 Concern over design, unsympathetic materials and layout of housing developments in the past. Design of public buildings is also a concern. Agree with the policy and hope Aberdeen City Council live up to it and are more forceful in regulating the design and materials of buildings.

#### **Modifications sought by those submitting representations:**

##### General

214 needs to be clearer to what the policy relates to.

510 Calls for greater flexibility in the policy

#### **Summary of response (including reasons) by planning authority:**

##### General

363, 869, 1537, 1578, 214 The support shown for this policy is noted. The policy covers all types of development, including industrial. If the Reporter is so minded, the Council would accept the insertion of the word 'all'. This makes it clear that the policy is not just for housing developments. Obviously the level of detail and the factors are different for an industrial site but the basic principles of place making still apply.

##### Applying the Policy

363, 510 The Local Development Plan identifies sites requiring a masterplan, or a development framework, this does include most of the large Masterplan zones included on page 19 of the Proposed Plan. The Aberdeen City Masterplanning process Supplementary Guidance 3.2 (RD63) must be followed when producing a Development Framework or masterplan, which includes extensive community engagement. Policy D1 and the Masterplanning Process will ensure developments provide a mix of house types that are built to fit the local context.

##### Tall Buildings

513, 1285 The tall building supplementary guidance is currently being prepared and will be reported to committee later in the year prior to a consultation exercise. The guidance responds to one of the key issues identified in the Aberdeen Local Development Plan Main Issues Report (CD14); addressing the impact of tall buildings on views, vistas and main gateways. It will set out guidelines on how best to assess tall buildings and where they should be avoided. This guidance will help to avoid the negative impact that many of the tower blocks built previously had on the skyline.

##### Design Quality

1414 Problems and poor design in the past have resulted from the lack of guidance and advice on design. The Scottish Government policies 'Designing Places (RD14)',

'Designing Streets (CD6)' and 'A Policy on Architecture for Scotland (RD15)' have all been published with the aim of raising design quality and form the basis for this architecture and placemaking policy. There is a push towards an improvement in design and placemaking across Scotland and we need to ensure we have policies in place to achieve this.

**Reporter's conclusions:****Reporter's recommendations:**

<b>Issue (ref and heading):</b>	<b>POLICY D2: DESIGN AND AMENITY</b>	<b>97</b>
<b>Development Plan reference:</b>	Policy D2 - Design and Amenity	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Mr Andy Verreydt of Grampian Police (16), Ms Chrstine Burgess of Old Aberdeen Community Council (869), Ms Emelda Maclean of Emac on behalf of Scotia Homes (1189).		
<b>Provision of the Development Plan to which the issue relates:</b>	Seeks to ensure that developments provide sufficient and well-designed amenities	
<b>Summary of the representation(s):</b>		
<p>General</p> <p>869 Support for the policy</p> <p>Designing out Crime</p> <p>16 Point 6 relating to designing out crime should be more robust in terms of specific commitment. The policy falls below that of the previous plan.</p> <p>Provision of Outdoor Space</p> <p>1189 Criteria 3 - balconies are not always compatible with the North East weather. The wording implies that balconies are the preferred option. The use if balconies can impact on amenity value dependant on location. Less weight should be given to the use of balconies and the reference should be deleted from this policy or Supplementary guidance prepared.</p> <p>Provision of Car Parking</p> <p>1189 Criteria 4 - Overly prescriptive on the amount of parking space to be provided in the rear court. A figure of 50% is suggested as a maximum area for car parking. In design terms it is difficult to achieve this while at the same time meeting other Local Development Plan requirements. The 50% derives from older council guidance. Concern is also raised that the expectation of underground or decked parking is too prescriptive and parking provision should be a matter for the site and its characteristics rather.</p>		
<b>Modifications sought by those submitting representations:</b>		
<p>Designing out Crime</p> <p>16 Make a more robust policy to allow the ALO to have a more integral role in the planning system more in line with the previous plans policies.</p> <p>Provision of Outdoor Space</p> <p>1189 Prepare Supplementary Guidance on the siting and design of balconies.</p> <p>Provision of Car Parking</p>		

1189 Delete criteria 4 of policy D2 relating to car parking provision.

**Summary of response (including reasons) by planning authority:**

General

869 Support is noted and welcomed

Designing out Crime

16 The police Architectural Liaison Officer is actively involved within the planning system and is consulted on planning applications, masterplans and other relevant planning matters. The modernisation of the planning system has resulted in a slimmed down Local Development Plan. There is up to date guidance and advice from Scottish Government such as PAN 77 - Designing Safer Places (RD12), repeating this advice is unnecessary.

Provision of Outdoor Space

1189 The mention of balconies within criterion 3 does not state that they are the preferred option, it states that sitting out areas 'CAN be provided by' and then lists options. It is important for residents to have outdoor space. Compatibility with weather is not an issue it is unclear how a balcony is any different in terms of weather than a garden. Some higher density city centre locations do not have the capacity to provide much outdoor space and access to space is important. Issues relating to the balcony location and overlooking would be assessed as part of a Planning Application.

Provision of Car Parking

1189 Criterion 4 clearly states that the figure is guideline and each case will be considered by the planning authority on its own merits. 50% is a maximum to avoid all outdoor space being given over to parking and balance of amenity. It is important to mention the underground and decked parking because in high density developments there is no other option and car parking will likely still be required.

If the Reporter is so minded reword point 4 from: "When it is necessary to accommodate car parking within a private court, the parking must not dominate the space: no more than 50% of any court should be taken up by parking spaces and access roads. This figure is a guideline and the planning authority reserve the right to consider each case on its particular planning merits. Underground or decked parking will be expected in high density schemes."

to read:

"When it is necessary to accommodate car parking within a private court, the parking must not dominate the space: no more than 50% of any court should be taken up by parking spaces and access roads. This figure is a guideline. Underground or decked parking will be expected in high density schemes. The planning authority reserves the right to consider each case on its particular planning merits."

**Reporter's conclusions:**

<b>Reporter's recommendations:</b>

<b>Issue (ref and heading):</b>	<b>POLICY D3: SUSTAINABLE AND ACTIVE TRAVEL</b>	<b>98</b>
<b>Development Plan reference:</b>	Policy D3 - Sustainable and Active Travel	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Dr Maggie Keegan of Scottish Wildlife Trust (363), Ms Fiona McInally of Paths For All (472), Ms Chrstine Burgess of Old Aberdeen Community Council (869), Mr Derek Selbie (1473), Mr A. W. Findlayson of Cove and Altens Community Council (1537), Ms Susan Lai (1546), Mr Ben Freeman of Bancon Developments Ltd (1561), Mr David Henderson (1576).		
<b>Provision of the Development Plan to which the issue relates:</b>	To ensure that new development is designed to maximise opportunities for active travel	
<b>Summary of the representation(s):</b>		
<p>Purpose and Effectiveness of Policy</p> <p>869 Supports Policy D3: Sustainable and Active Travel</p> <p>1537 Not possible to minimise the traffic generated due to limitations in public transport, topography and weather in Aberdeen as well as the dispersed industrial and shopping estates.</p> <p>1546 Reducing commuting is a very wise proposal, essential in today's society which now faces the severe impacts of climate change. There are many gains in pushing Aberdeen to become Transition Aberdeen the northern most city and oil capital of Europe leading the way in green transport.</p> <p>Prioritisation of Sustainable Modes</p> <p>472 Focus on sustainable travel is very positive.</p> <p>1473 Need to adjust the policy to take into account the transport hierarchy.</p> <p>Walk and Cycle Network</p> <p>363 Core paths, walk ways and cycle ways could be incorporated into the multi-functional green network, this would allow people and wildlife to move freely within the City.</p> <p>Stakeholder Involvement</p> <p>1576 The Access forum (after consultation with it) should be considered for direct and/or indirect involvement in planning access and sustainable and active travel proposals for developments , as a matter of course, and they could also consider how these link with wider city networks, provisions and the best thought out solutions to provide the above.</p> <p>Standards for Street Design</p>		



1561 Object to the reference to street layouts reflecting the principles of Designing Streets. There may remain conflict between the council's roads standards and the principles of Designing Streets. Concern that roads standards will not be met and applications will be refused on the grounds of non conformation to D3. Supportive of the principles of Designing Streets and anticipate that if it is implemented effectively these principles will contribute to better places to live and work. However, the objection is that it is inappropriate to require this through planning policy in a manner that could provide conflict.

#### **Modifications sought by those submitting representations:**

##### Purpose and Effectiveness of Policy

1537 A practical and sensible approach based on the realities of Aberdeen must be adopted. 1546 The following are suggestions - road tax, higher fuel tax locally where tax-income can go towards developing greener alternatives/energy-saving knowledge base; educating the public via various methods, inc media, schools, colleges & universities, community hubs, through the workplace and so on. More emphasis on alternative/active methods of travel - more railway stations and space for bikes; particularly better cycle networks (within the city centre and connecting outer areas to centre; communities to schools and other education settings & community hubs). I stress the need for raised cycle paths, such as that where the ring road meets the Lang Stracht - this is by far the safest option, simply painting a line at the edge of a busy road IS NOT SAFE.

##### Prioritisation of Sustainable Modes

472 Policy should include new infrastructures to encourage as many people as possible of all abilities to choose sustainable travel options.

##### Standards for Street Design

1561 Policy should be amended to exclude the direct reference to Designing Streets. Roads department need to provide a definitive position on roads standards.

#### **Summary of response (including reasons) by planning authority:**

##### Purpose and Effectiveness of Policy

869, 1537, 1546: The Council welcome supporting comments for this policy. The Transport Framework (see CD22), undertaken in support of the Local Development Plan, has helped to steer development towards the most appropriate locations. New development will need to be supported by a comprehensive transport network which offers new and existing residents the ability to use sustainable modes of travel. The Proposed Plan includes a number of employment land allocations across the City, and new development will need to be supported by new shops, services and infrastructure which can be accessed by sustainable modes of travel. Whilst the car will still have an important role for some journeys, the Plan seeks to ensure that sustainable modes provide an attractive and viable alternative to the car, thereby reducing the number of car journeys, and the impact of transport on the environment.

The Proposed Plan contains several policies and proposals for dealing with transport issues in the City. Walking, cycling and public transport, including Park & Ride services, are an integral part of the City Council's Local Transport Strategy (RD34), the Regional Transport Strategy (RD30) and the Scottish Government's National Transport Strategy

(RD97) and Strategic Transport Projects Review (RD96). All of these documents provide a strategic direction for dealing with congestion reduction, managing travel behaviour and reducing the impact of transport on the environment. Nevertheless, a number of road-based schemes are still considered necessary to enable the safe and effective movement of all traffic around the transport network. The Council will continue to review its own budgets and explore opportunities for external funding and alternative delivery models to secure the delivery of priority projects.

#### Prioritisation of Sustainable Modes

472, 1473: The positive responses to this policy are noted, including the focus on sustainable travel. Policy D3 reflects the modal hierarchy set out in Scottish Planning Policy (CD3). Sustainable travel will be maximised through careful attention to the design and layout of development, giving priority to those on foot, cycling or using public transport ahead of car user requirements, and measures to improve infrastructure and services to encourage sustainable travel within the catchment area of the development. Policy T1 and T2 of the Plan will help to deliver new transport infrastructure including the promotion of sustainable modes of travel over the private car. Appendix 4 of the Proposed Plan lists areas where new and improved walking and cycling infrastructure will be required to support new development although this list is not exhaustive and details will need to be agreed with the Council at masterplanning and planning application stages. Policy D3 reflects the criteria against which planning applications affecting access can be assessed.

#### Walk and Cycle Network

363: The Proposals Map which accompanies the Proposed Plan shows the areas designated as Green Space Network and the network of core paths and aspirational core paths across the City. The Green Space Network designation includes woodland and other habitats, active travel and recreation routes, green space links, watercourses and waterways, providing an enhanced setting for development and other land uses and improved opportunities for outdoor recreation, nature conservation and landscape enhancement. There are certain areas of Green Space Network which serve as movement corridors for both people and wildlife.

#### Stakeholder Involvement

1576: The Access Forum has been directly consulted on the Local Development Plan which has been included as an agenda item at their meeting throughout the course of the preparation process. The Access Forum formed a sub-group to prepare a representation on the Proposed Plan although it is understood that this was not submitted. Where a planning application has implications for access, these are often highlighted to the Forum for comment.

#### Standards for Street Design

1561: New development will need to reflect the principles of Scottish Government's policy guidance Designing Streets (CD6). The Council is currently preparing Supplementary Guidance in accordance with the principles of Designing Streets which will, when published, supersede the Council's adopted Guidelines and Specifications for Roads within Residential and Industrial Developments. This will include a breakdown of categories for different types of roads and streets, depending on their purpose and

function, taking account of the criteria set out in Designing Streets (CD6). This document is not yet available but the Council's roads department are generally using Design Streets to assess the suitability of roads in new residential developments.

**Reporter's conclusions:****Reporter's recommendations:**

<b>Issue (ref and heading):</b>	<b>POLICY D4: ABERDEEN'S GRANITE HERITAGE</b>	<b>99</b>
<b>Development Plan reference:</b>	Policy D4 - Aberdeen's Granite Heritage	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Mr Robin McIntosh (272), Ms Moira Murrison (283), Sir/Madam K. J. C. McIntosh (284), Mr Paul Thomson (285), Mr Mike Shepherd of Friends of Union Terrace Gardens (345), Dr Richard Pelling (435), Mr Michael Nieman (820), Ms Chrstine Burgess of Old Aberdeen Community Council (869), Mr David Henderson (1576).		
<b>Provision of the Development Plan to which the issue relates:</b>	To support the retention of Aberdeen's granite heritage	
<b>Summary of the representation(s):</b>		
<p>Principle and Application of Policy</p> <p>272, 283, 284, 285, 345 The use of granite goes beyond those listed within the policy and some of these other uses are just as important as those listed. 435, 820, 869 Strongly support the notion of protecting Aberdeen's Granite Heritage.</p> <p>Granite Cleaning</p> <p>1576 Consideration should be given to cleaning existing granite buildings as an infrastructure requirement or a requirement that could stimulate investment, making them sustainable as commercial or civic centres meeting the aims of city centre policies and general sustainability. The popularity of this action is apparent from Marischal College.</p>		
<b>Modifications sought by those submitting representations:</b>		
<p>Principle and Application of Policy</p> <p>272, 283, 285, 345 Suggest changing the word "building" to "structures" in 3.22 and first paragraph of D4. 435 Suggest changing the word "building" to "structures" in first paragraph of D4.</p>		
<b>Summary of response (including reasons) by planning authority:</b>		
<p>Principle and Application of Policy</p> <p>435,820, 869, 272, 283, 284, 285, 345 The support for this policy is noted and welcomed</p> <p>This policy is largely about the retention of granite buildings. It is recognised that there are some granite structures worthy of retention however it is unnecessary to include them within this policy because these are already covered by a listing and as such are already covered by a designation of greater weight.</p> <p>Granite Cleaning</p> <p>1576 Granite cleaning is not an infrastructure requirement or covered by the Infrastructure and Developer Contributions Manual Supplementary Guidance (CD25), it would not be a reasonable request for a developer. Stone cleaning is not covered by the permitted development regulation and requires planning permission. There is Supplementary Guidance on Stone Cleaning (RD67) associated with this Local</p>		

Development Plan which highlights the process, procedures, methodology etc. Stone cleaning is acceptable in the right places subject to the Supplementary Guidance.

**Reporter's conclusions:****Reporter's recommendations:**

<b>Issue (ref and heading):</b>	<b>POLICY D5: BUILT HERITAGE</b>	<b>100</b>
<b>Development Plan reference:</b>	Policy D5 - Built Heritage	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Mr Robin McIntosh (272), Ms Moira Murrison (283), Sir/Madam K. J. C. McIntosh (284), Mr Paul Thomson (285), Mr Mike Shepherd of Friends of Union Terrace Gardens (345), Ms Jane Cromar (540), Mr Iain Richardson (547), Mr Paul Taylor (589), Mr David Liddell of Scottish Government (665), Ms Christine Burgess of Old Aberdeen Community Council (869), Mr Robert Stearn (890).		
<b>Provision of the Development Plan to which the issue relates:</b>	To ensure that structures with statutory listings are adequately protected	
<b>Summary of the representation(s):</b>		
<p>Principles of Policy</p> <p>272, 283, 284, 285, 345 It is false to regard the protection of the environmental, cultural and historic assets as something that can be traded for economic advantage. Sustainability requires economic advantage to be allied to the conservation, protection and enhancement of our assets.</p> <p>540 Support that this policy is about not interfering with the built heritage unless the benefits are of national importance.</p> <p>547 Strongly object to the policy that allows development that will have a significant adverse effect on a Conservation Area or Listed Building for social, economic and strategic benefits. These benefits are not quantifiable and this is a get out clause to justify irresponsible developments.</p> <p>589 Object to point 1 and 2 of the policy.</p> <p>869 Old Aberdeen Community Council support the policies D1-D6 but feel that points 1 and 2 in D5 are too vague to offer robust support.</p> <p>890 The principles outlined in the policy would seem to allow for a redefinition of the essential characteristics.</p> <p>Supplementary Guidance</p> <p>665 The Supplementary Guidance on Archaeology and Planning does not have policy basis within the plan in terms of Regulation 27(2) of The Town and Country Planning (Development Planning) (Scotland) Regulations 2008.</p> <p>869 Support the production of Conservation Area Appraisals and would hope that the Community councils and other local bodies will be fully involved.</p>		
<b>Modifications sought by those submitting representations:</b>		
<p>Principles of Policy</p> <p>272, 283, 284, 285, 345 Suggest adding word 'and' after 'will not be compromised'.</p>		

Suggest replacing 'are clearly outweighed' with 'provide overwhelming other benefits'.

540 No modification sought

547 Remove points 1 and 2.

589 Remove point 1 and 2 of the policy and in particular apply this to Union Terrace Gardens.

890 In order to remove the inconsistency, suggest replacing 'or' after 'will not be compromised' with 'and', and replacing 'In both cases' with 'In all cases'.

Supplementary Guidance

665 Need to express the councils intended policy in relation to Archaeological resources in the plan. Perhaps by widening the scope of policy D5 Built heritage as that it states the intention and refers to supplementary guidance for more detail. Renaming this policy Historic Environment may be beneficial as it better describes the content.

### **Summary of response (including reasons) by planning authority:**

Principles of Policy

272, 283, 284, 285, 345, 890, 540, 547, 589, 869, Acknowledge support for the policy Point 2 of Policy D5 which states that only schemes of national importance would be considered.

The last paragraph of the policy states mitigation and measures should be taken to conserve and enhance sites listed in Inventory of Gardens and Designed Landscapes (RD99) if development is proposed in these sites. The environment, cultural and historic asset would not be traded for economic benefit. This is a strong policy which either shows there is no impact or dictates impact must be of national importance. "Or" is the only word that can be used here. To add further strength to the policy the term "area clearly outweighed" should also be kept. It is not necessary to change the wording to say 'in all cases'.

The two bullet points outlined in this policy relate to sites listed in the Inventory of Gardens and Designed Landscapes (RD99) and not to Listed Buildings or Conservation Areas. Listed Buildings and Conservation Areas are covered by legislation and policy from the Scottish Government. Duthie Park is the only site in Aberdeen listed in the Inventory of Gardens and Designed Landscapes (RD99). Historic Scotland is responsible for the identification and selection of appropriate sites to be included in the Inventory of Gardens and Designed Landscapes (RD99). It is felt that the policy is strong, clear and robust.

Supplementary Guidance

665, 869 It is acknowledged that the Local Development Plan does not provide a clear link to the Supplementary Guidance on Archaeology and Planning (RD64). If the Reporter is so minded, the Council would agree to rename the section heading to "Historic Environment" and to add a sentence under 3.26 mentioning Supplementary Guidance 3.3 Archaeology and Planning (RD64).

<b>Reporter's conclusions:</b>
<b>Reporter's recommendations:</b>



<b>Issue (ref and heading):</b>	<b>POLICY D6: LANDSCAPE</b>	<b>101</b>
<b>Development Plan reference:</b>	Policy D6 - Landscape	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Ms Jane Cromar (540), Ms Chrsitine Burgess of Old Aberdeen Community Council (869), Ms Emelda Maclean of Emac on behalf of Scotia Homes (1189), Mr Stuart Winter of Jones Lang LaSalle (1556), Mr Ben Freeman of Bancon Developments Ltd (1561), Mr David Henderson (1576).		
<b>Provision of the Development Plan to which the issue relates:</b>	To ensure that Aberdeen's landscape setting is maintained	
<b>Summary of the representation(s):</b>		
<p>Principle of Policy</p> <p>540 Respondent supports Policy D6.</p> <p>869 Support the policy.</p> <p>1561 Respondent objects to Policy D6 as it is seen as negative and restrictive.</p> <p>1576 Respondent supports policy D6. Yet suggests a Landscape, Wildlife and Green space Master planning approach should be considered on all levels, from individual communities and areas to larger areas and the city and region as a whole.</p> <p>Application of Policy</p> <p>1189 Respondent states that landscape considerations should not be the overriding factor in urban design. Shouldn't forget about good examples of development on horizons. This issue should be considered against a range of other material considerations and the particular merits of a case, supported by a Design Statement, where appropriate. The Policy is too prescriptive and could result in the lack of support for a proposal which could be acceptable overall and contribute to the environment in other ways.</p> <p>1556 The policy presumes against development adversely affecting landscape character from publicly accessible vantage points. Respondent recommends the policy should seek to protect landscape character and views from development. This would be more in line with the Scottish Planning Policy and allow a more subjective assessment of both positive and negative impacts.</p> <p>Supplementary Guidance</p> <p>1189 The policy refers to Supplementary Guidance: Landscape Strategy Part 2 - Landscape Guidelines. This Supplementary Guidance is now old. Policy D6 should also mention that this policy will be reviewed to ensure it remains current and consistent with other national policies.</p>		
<b>Modifications sought by those submitting representations:</b>		

### Principle of Policy

540 No modification sought.

1561 Delete policy D6 and replace with a more positively worded one that allows development provided landscape impacts are within acceptable bounds.

### Application of Policy

1189 Amend policy to allow flexibility and review landscape strategy.

1556 Reword the policy to the following: - 'Development will be found to be acceptable if it avoids unacceptable significant adverse effects on the following receptors: 1. Landscape character and elements which contribute to, or provide, a distinct 'sense of place' which point to being either in or around Aberdeen or a particular part of it; 2. Views of the City's townscape, landmarks and features when seen from publicly accessible vantage points such as roads, railways, recreation areas and pathways and particularly from the main city approaches; 3. Recreation, wildlife or woodland resources or to the physical links between them; 4. Green spaces or buffers between places or communities with individual identities and those which can provide opportunities for countryside activities.

Development should avoid significant adverse impacts upon existing landscape elements, including linear and boundary features or other components, which contribute to local amenity, and provide opportunities for conserving, restoring or enhancing them.

Any landscape design scheme will be expected to conform to our Supplementary Guidance: Landscape Strategy Part 2 - Landscape Guidelines.'

### **Summary of response (including reasons) by planning authority:**

#### Principle of Policy

540, 869, 1561, 1561, 1576 Supporting comments are welcome The policy sets the criteria that have to be followed to ensure development is acceptable and is deemed to be concise. There is no need to word it more positively. A masterplanning approach is already adopted by the Council. Masterplans are expected to consider landscape, wildlife and green space along with a raft of other issues to ensure sustainable places are developed.

#### Application of Policy

1556, 1189 The policy is concise, as required by Planning Circular 1/09 (CD4), paragraph 39. Changing to the suggested wording may make the policy vague and unclear.

The policy is flexible enough to accommodate good design that avoids adverse impacts on existing landscape elements.

#### Supplementary Guidance

1189 The Landscape Character Assessment (CD27) is considered to be relevant at this time. As for any Supplementary Guidance, this can be reviewed at any time, and the

Landscape Strategy will be updated when it is felt necessary to do so.
<b>Reporter's conclusions:</b>
<b>Reporter's recommendations:</b>

<b>Issue (ref and heading):</b>	<b>POLICY BI1: BUSINESS AND INDUSTRIAL LAND</b>	<b>102</b>
<b>Development Plan reference:</b>	Policy BI1 - Business and Industrial Land and shown on Proposals Map	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Mr Malcolm Campbell of Knight Frank LLP on behalf of Scottish Enterprise (1182), Mr George Niblock of Niblock Environmental Ltd (1238), Mr David Henderson (1576).		
<b>Provision of the Development Plan to which the issue relates:</b>	Policy to support Business and Industrial Development and provide means to assess the suitability of new development proposals for business and industrial development.	
<b>Summary of the representation(s):</b>		
<p>Strategy</p> <p>1182 The respondent highlights that many of the proposed employment land allocations are dependent on the benefits arising from the Aberdeen Western Peripheral Route and the allocations at Dyce Drive and Berryhill should therefore be brought forward by developers, the Local Authority and other stakeholders at an early date. These two sites are important to the provision of jobs and the delivery of Energetica. Where possible some land at these locations should be released prior to the Aberdeen Western Peripheral Route being in place.</p> <p>Type of Employment Land</p> <p>1182 The respondent would like clarification to be provided regarding which employment policies, either BI1 Business and Industrial Land or BI2 Specialist Employment Areas, apply to the new employment land releases identified in Table 4 Greenfield Development Allowances and allocations. It is thought that this is not clear in the Plan. They are currently identified as falling under Land Release Policy (LR1) which is listed in the Housing Section of the Local Development Plan Proposals Map Key.</p> <p>1182 The Plan should highlight which of the new employment land allocations would be suitable for accommodating company headquarters. The Structure Plan states that least 20 hectares of employment land must be made available to businesses in the strategic growth areas. The respondent would particularly support allocations at Aberdeen Gateway and the Energetica area, particularly Dyce Drive in the Airport Development Zone.</p> <p>Waste</p> <p>1238 The existing and proposed policies in respect of business and industrial land are too restrictive in respect of waste resource management future requirements. The policy as written drives such facilities to be 'within buildings'. Waste resource operations are no different from many other industrial processes which operate in the open air or which require open air storage and handling facilities.</p> <p>Neighbouring Uses</p> <p>1576 The respondent is of the opinion that planning permission should only be granted</p>		

for 'Bad Neighbour' developments that minimise the adverse affects created by these uses. It is the belief of the respondent that this should be a material consideration above costs and other less substantial issues, except in exceptional circumstances. The respondent continues to write that consideration could also be given to the other factors in the surrounding area, such as the existing, and cumulative burden of 'Bad Neighbour' in the vicinity, and the level or adverse affected, the vulnerability of those affected i.e. elderly or disabled etc, and the importance and breadth of adverse effects i.e. locally or city wide wildlife site or green space or sensitive business or service use.

#### **Modifications sought by those submitting representations:**

##### Policy Wording

1182 The respondent would like a reference in the wording of Policies BI1 and BI2 to mention hotel and conference facilities as one of the ancillary facilities that may be permitted on employment land.

##### Type of Employment Land

1182 The respondent asks that clarification is provided in terms of which if the employment policies (BI1 and BI2) apply to the new employment land releases identified in Table 4 Greenfield Development Allowances and Allocations.

1182 The respondent would like reference to be made in the Plan as to which sites would be suitable for accommodating company headquarters in accordance with the Structure Plan target. The respondent requests that part of Dyce Drive employment allocation is highlighted in this respect. This could be in the Section on Directions for Growth under the appropriate area or the section on Supporting Business and Industrial Development. Mention could also be made in the Action Programme.

##### Waste

1238 The policy should be rewritten to recognise that many waste resource treatment operations can operate within industrial estates without requiring 'special' restrictions.

#### **Summary of response (including reasons) by planning authority:**

##### Policy Wording

1182 Paragraph 3.30 recognises that ancillary facilities such as hotels and conference facilities can make an important contribution to the City's employment areas. As such it is not necessary to reference the acceptable use, where appropriate, of hotel and conference facilities within Policy BI1 and BI2.

##### Type of Employment Land

1182 The Aberdeen City and Shire Structure Plan (CD8) requires for there to be at least 20 hectares of employment land available in the strategic growth areas to be of a standard which will attract high-quality businesses or be suitable for company headquarters. Sites suitable for attracting high quality business or that are suitable for company headquarters have been identified within the Aberdeen Local Development Plan Proposed Plan. Appendix 2 Opportunity Sites notes that OP40 West Hatton and Home Farm is an 'opportunity for a 50ha development of business land which will attract high quality business or be suitable for company headquarters'. The Dyce Drive Planning

Brief (RD76) approved in 2004 envisages that the land at Dyce Drive is developed as a high quality Business Park. This would restrict development generally to uses that fall within class 4 or the use classes order, but that other uses (such as 5 and 6 for example) would be permitted where 'they are necessary and maintain the required high quality environment'. Consequently this would allow the development of company headquarters on this site. This is consistent with the Specialist Employment Area designation.

The comment in respect of the type of employment land envisaged for each area is acknowledged. Although the Proposed Plan does not specify what class of employment land is required, a degree of common sense would suggest that the large sites which have been identified for a mixture of uses should be Class 4 type uses. Given the context of these sites having a largely residential setting, the use should be one that can be carried out in any residential area without detriment to the amenity of that area. The employment land allocations at Kingswells and Aberdeen Gateway are set out in Appendix 2 of the Proposed Plan as being areas capable of attracting high quality businesses or be suitable for company headquarters, whilst Findlay Farm and Dyce Drive are identified as Specialist Employment Areas. The resulting other business land allocations are available for development of Use Class 4, 5, and 6.

#### Waste

1238 The comment in relation to the Policy BI1 Business and Industrial Land being rewritten to recognise that many waste treatment operations can operate within industrial estates without requiring 'special restrictions' is noted. Restricting waste management facilities to those "in buildings" in Business and Industrial areas is there to protect the amenity of these areas. However, neither Scottish Planning Policy nor the Zero Waste Plan mentions this issue. Although we do not recommend making any prescribed modifications to this policy, reporters may wish to consider the merits of removing the reference to waste management facilities "that are located in a building" from the policy, given the national context.

#### Neighbouring Uses

1576 The comment in relation to bad neighbour uses is noted by the Council. Policy BI1 Business and Industrial Land makes provision for business and industrial areas that are located beside residential areas to be restricted to Class 4 Business. Policy BI1 seeks to ensure that adequate safeguards are in place for potentially incompatible and bad neighbour uses.

#### **Reporter's conclusions:**

#### **Reporter's recommendations:**

<b>Issue (ref and heading):</b>	<b>POLICY BI2: SPECIALIST EMPLOYMENT AREA</b>	<b>103</b>
<b>Development Plan reference:</b>	Policy BI2 Specialist Employment Area and shown on Proposals Map	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Mr Colin Graham of Miller Developments (209), Ms Rita Stephen of Aberdeen City and Shire Economic Future (760), Mr Malcolm Campbell of Knight Frank LLP on behalf of Scottish Enterprise (1182), Mr Jonathan Russell (1196).		
<b>Provision of the Development Plan to which the issue relates:</b>	Policy to support Specialist Employment Areas and provide means to assess the suitability of new development proposals in these areas	
<b>Summary of the representation(s):</b>		
<p>Policy Wording</p> <p>209 The respondent is concerned that the wording of Policy BI2 in the Proposed Plan is too restrictive and would be a significant departure from the approved Planning Brief for Dyce Drive. The policy BI2 Specialist Employment Areas states that only Class 4 Business uses shall be permitted, however this is a significant departure from the approved Planning Brief which allocates Dyce Drive for a Class 4 Business Park with associated Class 5 &amp; 6 uses. This is vital as companies want to integrate their office functions with covered storage and yard areas. The respondent comments that to remove the 'and ancillary Class 5 and 6 uses' presents a serious threat to the viability of business parks.</p> <p>General Support</p> <p>760 The respondent fully endorses the need to maintain a ready supply of accessible employment land of a high standard and would encourage the Local Development Plan to give consideration to the provision of additional specialist industrial parks to encourage company growth, particularly in those sectors deemed to be pivotal to the city's future economic prosperity, namely, Energy, Life Sciences and Food technology.</p> <p>1182: The respondent would like to emphasise their support for the continued allocation of the Aberdeen Science and Energy Park and the Aberdeen Science and Technology Park at Bridge of Don as well as the proposed allocation at Rowett North. These allocations support Scottish Enterprise's objective of supporting growth around the City's Universities and Research Hubs.</p> <p>1196: The respondent feels the Specialist Employment Area policy is a great idea but it should not be linked to the Aberdeen Western Peripheral Route.</p>		
<b>Modifications sought by those submitting representations:</b>		
<p>Policy Wording</p> <p>209 The respondent requests a rewording of the policy that allows Class 5 and 6 uses in areas of Specialist Employment.</p> <p>1182 The respondent would like a reference in the wording of Policies BI1 and BI2 to</p>		

mention hotel and conference facilities as one of the ancillary facilities that may be permitted on employment land.

**Summary of response (including reasons) by planning authority:**

General Support

760, 1182, 1196 The support received for Policy BI2 Specialist Employment Area which aims to maintain a ready supply of accessible employment land of a high standard is welcomed. Policy BI2 Specialist Employment Area aims to create the 'Industrial Parks' that the respondent would like to see developed. As supported by the Aberdeen City and Shire Structure Plan (CD8) the Proposed Plan identifies a number of locations at Bridge of Don, Dyce Drive, Anderson Drive and Poynerook. In addition to this business land suitable for attracting high quality businesses or suitable for company headquarters has also been identified at OP40 West Hatton and Home Farm. This will help to support the economic growth of the City and North East region.

Policy BI2 Specialist Employment Area is not linked to, or does not make any reference to the Aberdeen Western Peripheral Route.

Policy Wording

209 The view of the planning authority is that the Dyce Drive Planning Brief (RD76) of 2004 is broadly consistent with the zoning of the Dyce Drive site (OP32) as a 'specialist employment area'. The Development Brief, which is proposed to be carried forward with the Proposed Plan, indicates that development will generally be restricted those falling within Class 4 of the Use Classes Order, but that other uses (such as Classes 5 and 6, for example) would be permitted where 'they are necessary and maintain the required high quality environment'. The 'specialist employment' designation under Policy BI2 expresses a similar position, but instead has an emphasis on Class 4 uses, with an acknowledgement that ancillary facilities may be permitted where it can be demonstrated that they would enhance the attraction and sustainability of the area for business investment. The 'specialist employment area' within Dyce Drive (OP32) has been subject to the scrutiny of Scottish Government Reporters through the public inquiry process, and has been carried forward from the extant plan. The wording of Policy BI2 is therefore considered to be acceptable and no changes are accepted by the Council.

1182 Paragraph 3.30 recognises that ancillary facilities such as hotels and conference facilities can make an important contribution to the City's employment areas. Consequently it is not necessary to reference the acceptable use, where appropriate, of hotel and conference facilities within Policy BI1 and BI2.

**Reporter's conclusions:**

**Reporter's recommendations:**



<b>Issue (ref and heading):</b>	<b>POLICY BI4: ABERDEEN AIRPORT AND ABERDEEN HARBOUR</b>	<b>104</b>
<b>Development Plan reference:</b>	Policy BI4 - Aberdeen Airport and Aberdeen Harbour and shown on Proposals Map	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Mr Gordon Thomson of Barton Wilmore LLP on behalf of Aberdeen Harbour Board (373), Ms Maire Daly of Scottish Natural Heritage (662), Mr David Halliday of Aberdeen Bid Development Company Ltd (782), Mr Jonathan Russell (1196).		
<b>Provision of the Development Plan to which the issue relates:</b>	To support the future of Aberdeen Airport and Aberdeen Harbour and provide means to assess development proposals which affect these areas	
<b>Summary of the representation(s):</b>		
<p>General</p> <p>373 The respondent welcomes the opening paragraph of Policy BI4 Aberdeen Airport and Aberdeen Harbour that states there will be a presumption in favour of uses associated with the airport and harbour.</p> <p>782 Supports major infrastructure projects such as the Airport extension to the runway.</p> <p>1196 The respondent believes that greater emphasis should be given to Aberdeen Harbour and less priority to Aberdeen Airport.</p> <p>Operation Needs of the Harbour</p> <p>373 Whilst there is a need to protect amenity and ensure safety with regard to new development, given the important role of the Harbour for the economy, there is also a need to protect the existing and future operational needs of the Harbour and this should not be hindered by new development. The policy, in its present wording, implies that the level of amenity which can be achieved on sites within the vicinity of the Harbour will be a consideration when new development proposals. The policy fails to confirm that new neighbouring uses, which could jeopardise the existing and future operations of the Harbour, should be resisted. The Harbour can be a source of significant noise generation and its existing operations have the potential to conflict with future noise sensitive developments that may occur outwith but adjacent to its operational area.</p> <p>373 Welcome the recognition of the Harbour's importance in relation to the economy, however, it is considered that this recognition has not been adequately translated into appropriate terms and policies within the Proposed Local Development Plan.</p> <p>Boundary/Proposals Map</p> <p>373 The boundary on the proposed plan map does not correspond with the Aberdeen Harbour boundary.</p> <p>Environmental Designations</p>		

662 The respondent notes that development in the harbour area could have an impact on the qualifying interests of the River Dee SAC and particularly Salmon. It is also thought that development could have an adverse effect upon the Bottlenose Dolphin which is a qualifying interest of the Moray Firth SAC and a European Protected Species.

#### **Modifications sought by those submitting representations:**

##### Boundary/Proposals Map

373 The respondent would like the Proposals Map updated so the grey shading denoting policy BI4 is extended to cover all land within the orange Harbour Boundary.

The respondent would like the Additional Proposals Map to be adjusted to show the area of land at the eastern edge of the Harbour Boundary to be designated Developed Coast instead of Undeveloped Coast.

##### Policy Wording

662 The respondent suggests some additional text to paragraph 3.37 of the Local Development Plan. "The Masterplan will also include guidance on how to avoid adverse effects upon qualifying interests of the River Dee SAC which runs through the harbour, and also upon Bottlenose dolphins, which frequently occur in the outer harbour and mouth, and are a qualifying feature of the Moray Firth SAC and a European Protected Species."

662 The respondent would like a similar policy to H8 Housing and Aberdeen Airport to be drafted relating to Aberdeen Harbour. Either that or text added to Policy H8 or H2 Mixed Use Areas to take account of applications for residential development in close proximity to the Harbour which will be refused due to the inability to create an appropriate level of residential amenity and to safeguard the future operation of Aberdeen Harbour.

##### General

1196 The respondent would like Aberdeen Harbour to be given greater priority and the airport less.

#### **Summary of response (including reasons) by planning authority:**

##### General

782 The support for major infrastructure projects such as the Airport extension to the runway are noted and welcomed.

1196 Aberdeen Airport and Aberdeen Harbour are both vital hubs which provide a service for the region as a whole. Policy BI4 Aberdeen Airport and Aberdeen Harbour recognises this and aims to protect and enhance both for their respective related activities. As both hubs are viewed as essential to the future growth and development of Aberdeen, one operation will not be given priority over the other and both are viewed as vital to the future growth of Aberdeen.

##### Boundary/Proposals Map

373 Policy NE7 Coastal Planning is intended to protect the undeveloped coastal zone from development unless the need for it has a very strong justification, while being more

permissive towards development on the developed coastal zone.

The inner breakwater marks a significant change between waters and shoreline dominated by the activities and structures of the thriving harbour, and more open waters and open ground at the headland of Girdle Ness. The foreshore between the breakwaters is neither developed nor closely dominated by development. It is also important to wildlife. As such, to designate it as developed coast would not be representative of this area's characteristics. The lighthouse and associated lower structures are no more than a small group within a stretch of mostly open coastal landscape. Nothing useful would be gained, and an overcomplicated zoning would result, if it were attempted to distinguish such small groups of buildings on maps covering long stretches of coastline. Classifying an area as undeveloped does not place an indefinite halt on development; it simply recognises that, from a national perspective, an area is essentially undeveloped in character and is likely to remain so.

It would not be appropriate to update the City Wide Proposals Map to include all areas within the orange Harbour Boundary as land designated as Policy BI4 Aberdeen Airport and Harbour. Areas within this boundary are designated as Specialist Employment Areas, City Centre Business Zone, Urban Green Space, Business and Industrial Land, and Green Space Network. These various land uses and businesses within the Harbour Boundary are not related to the harbour, thus reserving the whole area for port-related activities would deny the regional economy a flexible asset. Areas such as Poynerook no longer have strong functional connections with the harbour and are physically isolated from the harbour by Market Street, which is a major arterial route through the city. Although closeness to the harbour is one of the features which may attract firms to Poynerook, there are other features, particularly closeness to the city centre, the emergence of Union Square and passenger transport hubs, which make it eminently suitable for commercial office uses that need more than a suite in a traditional building but are not of such a large scale that they demand a campus setting.

#### Policy Wording

662 If the Reporter is so minded, the suggested additional text by the respondent should be added to paragraph 3.37 of the Local Development Plan.

662 A similar policy to H8 Housing and Aberdeen Airport is not thought necessary in relation to Housing and Aberdeen Harbour. It is also not thought to be appropriate to add text to Policy H8 Housing and Aberdeen Airport or H2 Mixed Use Areas to take account of planning applications for residential development in close proximity to the Harbour. Policy BI4 Aberdeen Airport and Aberdeen Harbour ensures that due regard will be paid to the safety, amenity impacts on and efficiency of uses in the vicinity of the Airport and Harbour. This policy should be sufficient in respecting the operational viability of the Harbour and the residential uses in close proximity. Furthermore it is thought that the Harbour is different to the Airport in terms of noise, where the same noise levels are not experienced of an aircraft during take-off or landing. The City Centre location of the Harbour also means that that there is always going to be a mixture of uses in the vicinity. Both the Harbour and the other uses in the vicinity of the Harbour must both take account of their location and expectation that neighbouring uses will create a certain level of noise pollution. It will be up to the Planning Officers to decide whether this level of noise will preserve the amenity of the surrounding area when assessing a planning application.

<b>Reporter's conclusions:</b>
<b>Reporter's recommendations:</b>

<b>Issue (ref and heading):</b>	<b>POLICY BI5: PIPELINES AND MAJOR ACCIDENT HAZARDS</b>	<b>105</b>
<b>Development Plan reference:</b>	Policy BI5 - Pipelines and Controls of Major Accident Hazards Pipelines and Pipeline Notification Zones shown on Proposals Map	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Ms Lorraine Davison of DPP on behalf of Shell (UK) Ltd (554), Mr Damien Holdstock of Entec UK Ltd on behalf of National Grid (891).		
<b>Provision of the Development Plan to which the issue relates:</b>	Provides the means to assess development proposals which may affect Pipelines and Major Accident Hazards.	
<b>Summary of the representation(s):</b>		
<p>General Support</p> <p>554, 891 Support the inclusion of this policy in the Local Development Plan and feels that it is a means of ensuring that consideration of the presence of high pressure gas transmission pipelines and appropriate consultation take place.</p> <p>Policy Wording</p> <p>554 The respondent would like to provide their general support for the inclusion of Policy BI5.</p> <p>However request that the wording of the policy should be amended to reflect the need to consult with operators of these pipelines.</p> <p>Development proposals within consultation zones for hazardous installations should be determined in consultation with the Health and Safety Executive.</p> <p>This is to enable Pipeline operators to be aware of any proposals which may impact upon the pipeline system. In turn this will ensure that any proposed development is in accordance with the HSE Planning Advice for Developments near Hazardous Installations (PADHI) Guidelines.</p>		
<b>Modifications sought by those submitting representations:</b>		
<p>Policy Wording</p> <p>554 The respondent would like the policy text amended as follows: "In determining planning applications for development within consultation zones for hazardous installations, the City Council will take full account of the advice from the Health and Safety Executive and the facility's operators and owners and will seek to ensure that any risk to people's safety is not increased".</p> <p>Proposals Map</p> <p>891 The respondent would like the notification areas for the pipelines, but not the detailed routes of the pipelines themselves, to be added to the Proposals Map.</p>		
<b>Summary of response (including reasons) by planning authority:</b>		

**Policy Wording**

554 The Council recognises the importance of pipelines and the need to ensure that appropriate development takes place in the vicinity. The Council also recognises the important role of the Health and Safety Executive in helping to determine the nature and extent of where development is appropriate. The Council consults the Health and Safety Executive if a planning application for a development is within the pipeline notification zones. In addition to this, the Council carries out best practice recommended by the Health and Safety Executive and consults the pipeline operators and owners on each planning application that is received which seeks to ensure that any risk to people's safety is not increased. When a planning application for a development within the pipeline notification zone is outwith the standards set to consult with the Health and Safety Executive, the Council still consults with the pipeline operators and owners. The Council will continue to operate this best practice when determining planning applications within the pipeline notification zones. As such it is not appropriate to amend the text within Policy BI5 Pipelines and Major Accident Hazards.

**Proposals Map**

891 The pipeline notification zones are displayed on the Additional City Wide Proposals Map. It is therefore not appropriate to also display the notification zones on the City Wide Proposals Map.

**Reporter's conclusions:****Reporter's recommendations:**

<b>Issue (ref and heading):</b>	<b>NEW POLICY: ECONOMIC BENEFIT OF DEVELOPMENT</b>	<b>106</b>
<b>Development Plan reference:</b>	Proposal for New Policy	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Ms Judith Munro of Aberdeen and Grampian Chamber of Commerce (510).		
<b>Provision of the Development Plan to which the issue relates:</b>	No provision in the Proposed Plan	
<b>Summary of the representation(s):</b>		
510: A further useful addition to the process would be a requirement for the Planning committees to more frequently receive an economic development assessment for each non-domestic proposal. Some proposals have the propensity to better link with others and generate a boost to the economy. This would confirm the pro-active purpose of planning to support economic development and cement culture change. The Chamber will continue to encourage its members to provide such information as best practice.		
<b>Modifications sought by those submitting representations:</b>		
Requirement for economic development assessments.		
<b>Summary of response (including reasons) by planning authority:</b>		
<p>One of the main aims of the Aberdeen City and Shire Structure Plan (CD8) is to grow and diversify the regional economy. In the first instance the plan seeks to support the development that supports the economy and the Proposed Plan provides a plentiful supply of employment land to ensure that the planning system does not act as a constraint to economic development. For non residential developments that meet the requirements of the Proposed Plan it would be seen as an unnecessary burden to require an economic development assessment, and could in fact slow down the process.</p> <p>For other developments that support the economy, but are a departure from the development plan there would be additional considerations. Scottish Planning Policy (CD4) paragraph 33 states that "Planning authorities should take a positive approach to development, recognising and responding to economic and financial conditions in considering proposals that could contribute to economic growth." In the consideration of developments that are contrary to the Proposed Plan, but do provide economic benefit, the economic benefit would be a material consideration in the assessment of the planning application, and this should be justified by the applicant using some form of economic development assessment. The judgement of this against other factors is not one that can be prescribed, and it would be for the planning authority to reach a decision on a case by case basis.</p>		
<b>Reporter's conclusions:</b>		
<b>Reporter's recommendations:</b>		

<b>Issue (ref and heading):</b>	<b>NEW POLICY: ENABLING DEVELOPMENT</b>	<b>107</b>
<b>Development Plan reference:</b>	Proposal for New Policy	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Miss Christine Dalziel of Halliday Fraser Munro Planning on behalf of Deeside Golf Club (1525).		
<b>Provision of the Development Plan to which the issue relates:</b>	No provision in the Proposed Plan	
<b>Summary of the representation(s):</b>		
<p>1525: The Proposed Plan does not contain any reference to an enabling development policy. This policy is used in a number of local authorities (including Aberdeenshire) to allow for appropriate development to occur to release capital in order to restore a listed building or economic development opportunity. Such a policy framework is set out in Government Guidance in Scottish Planning Policy. Paragraph 114 sets out the principle of enabling development regarding historic buildings, however, other local authorities have used this with regard to economic development.</p> <p>1525: The inclusion of a policy to allow for small scale development to occur in order to provide financial contribution to a community facility (such as Deeside Golf Club) should be included within the Local Development Plan. Such a policy would be of wider applicability in Aberdeen.</p>		
<b>Modifications sought by those submitting representations:</b>		
1525: Inclusion of an Enabling Development Policy in the Local Development Plan to allow development to occur in order to support development of community facilities.		
<b>Summary of response (including reasons) by planning authority:</b>		
<p>There is no specific policy relating to enabling in the adopted Local Plan 2008 (CD12) and it was not identified as a main issue for the Main Issues Report (CD14). The geographic context in Aberdeen is significantly different than for Aberdeenshire and other more rural planning authorities. The non-inclusion of a policy on enabling development does not act as a barrier for the restoration of listed buildings in Aberdeen, as it would mostly involve the redevelopment of brownfield sites that would be supported, in principle, by policy. Areas not supported for development are identified as Green Belt, which has a specific purpose in land use terms, as defined by Scottish Planning Policy paragraph 159-164 (CD3). The Green Belt review (CD19) and allocations made in the Proposed Plan have been used to direct development to suitable locations and make provision for a long term settlement strategy. These suitable locations have been identified as LR1 and the purpose of these allocations, alongside meeting housing allowances set by the Structure Plan, is to provide clarity and certainty on where development will and will not take place.</p> <p>All land in the local authority area has a specific land use zoning, and a specific purpose and development, in principle, is either suitable or unsuitable. Therefore, there is no purpose for an enabling development policy. A policy to allow for inappropriate development in the Green Belt to support existing businesses is not supported by Scottish Planning Policy and the incorporation of such a policy would override the Green Belt policy and could significantly compromise the aims of the Green Belt. Information on</p>		



viability or economic benefit would be a consideration in the determination of any planning applications, and it is more appropriate to deal with this on a case by case basis.

The development proposed by respondent 1565 has been dealt with in detail within the response to Issue 53 (Alternative Sites in Cults, Bieldside and Milltimber).

**Reporter's conclusions:****Reporter's recommendations:**

<b>Issue (ref and heading):</b>	<b>POLICY H1: RESIDENTIAL AREAS</b>	<b>108</b>
<b>Development Plan reference:</b>	Policy H1 - Residential Areas and shown on Proposals Map	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Mr Ben Freeman of Bancon Developments Ltd (1561).		
<b>Provision of the Development Plan to which the issue relates:</b>	Provides criteria to assess development proposals in existing residential areas	
<b>Summary of the representation(s):</b>		
1561: object to Policy H1 on the grounds that it introduces a new element into the assessment of open space by including the word 'valuable'		
<b>Modifications sought by those submitting representations:</b>		
1561: Policy H1 should be reworded to remove ambiguity about what open space is sought to be protected by the Policy. In particular, the word 'valuable' must be removed, and replaced with 'valued and functional', with specific reference to the Aberdeen Open Space Audit 2010.		
<b>Summary of response (including reasons) by planning authority:</b>		
<p>The term valuable is less specific than valued and functional, but it allows for consideration of the distribution of quality and quantity of open space in the area as identified by the open space audit. By considering quality and quantity of open space in an area we can take into account future value rather than just the current value and functionality.</p> <p>Some areas where there is a lack of open space identified may allow for improvement of existing areas which may not currently provide a specific function.</p> <p>For these reasons it is our view that the current wording is more suitable to deal with the wide range and variety of open spaces that would be covered by Policy H1.</p>		
<b>Reporter's conclusions:</b>		
<b>Reporter's recommendations:</b>		

<b>Issue (ref and heading):</b>	<b>POLICY H3 AND H4: HOUSING DENSITY AND MIX</b>	<b>109</b>
<b>Development Plan reference:</b>	Policy H3 – Density Policy H4 – Housing Mix	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Mr Hormoz Jamshidian (464), Mr Bob Salter of Geddes Consulting on behalf of Lynch Homes (833), Ms Emelda Maclean of Emac on behalf of Scotia Homes (1189), Mr Scott Leitch of Halliday Fraser Munro Planning on behalf of Aberdeen Football Club (1203), Mr Richard Bush of Richard Bush Chartered Town Planner on behalf of Mrs Nicola Hutcheon (1205), Mrs Nicola Barclay of Homes for Scotland on behalf of Grampian House Builders Committee (1442), Miss Shelley Thomson of Stewart Milne Homes (1464), Mr Ben Freeman of Bancon Developments Ltd (1561), Mr David Henderson (1576).		
<b>Provision of the Development Plan to which the issue relates:</b>	Policies setting out requirements for the mix and density of new housing development	
<b>Summary of the representation(s):</b>		
<p>Policy H3 Housing Density</p> <p>833, 1205, 1442, 1464, 1561, 1576: object to a net housing density</p> <p>833: Requiring net actually equates to a gross density of 43 homes per hectare, whilst most suburban development in Aberdeen will be between 20 to 35 homes per hectare (gross). This would not create desirable residential neighbourhoods.</p> <p>1205, 1464, 1576: The density and form of development requires taking account of its built and natural surroundings and how proposed uses add and interact with that existing community. This policy is inconsistent with Structure Plan for developments to generally have an average density of 30 dwellings per hectare.</p> <p>1205, 1442, 1561: Development density varies from site to site and is dependent upon factors such as topography, technical, design, relationship to adjacent buildings, and housing market needs and demands. Applying an arbitrary minimum would remove the flexibility required to create successful places, respond to site specific factors, and achieve quality residential environments.</p> <p>1205: The minimum density will be easy to achieve for larger sites, but will be more difficult to achieve for smaller sites, which have to work with greater proximities to boundary features, neighbouring uses and access. As a result smaller sustainably located sites will be wasted. In the current financial climate, these small developments are likely to be more viable than larger schemes.</p> <p>1189, 1203, 1442: support minimum densities in generating vital and viable communities. It is appropriate in some instances to achieve higher densities in some areas, but we are mindful that this would not be appropriate across all sites.</p> <p>Policy H4 Housing Mix</p> <p>464: Do not provide a mix of housing, keep expensive and cheap housing separate.</p>		

1442, 1464: Policy H4 on housing mix should not interfere with the ability of housing providers/developers to deliver an appropriate range of housing to respond to prevailing market conditions.

During the economic downturn flexibility within housing developments and cooperation with planning departments for layout changes and tenure changes on existing planning consents has been paramount to the success of the housing industry in an ever changing market. This level of flexibility has to remain in order that developers can continue to be competitive and provide the types of housing currently in demand.

#### **Modifications sought by those submitting representations:**

##### Policy H3 Housing Density

833, 1189, 1442: Remove net density and replace with gross, and should refer to units rather than dwellings.

1205: Apply density to Strategic Growth Areas as a whole rather than on a site by site basis.

1464, 1561: Policy H3 should refer to a general density of 30 dwellings per hectare rather than a minimum.

##### Policy H4 – Housing Mix

464, 1442, 1464: Remove Policy H4

1554: Raise the threshold of this policy to 100 dwellings, and acknowledge that affordable housing may be provided off site or through a commuted sum.

#### **Summary of response (including reasons) by planning authority:**

##### Policy H3 – Housing Density

Purpose and Benefit of Density Policy - Policy H3 requires developments to achieve an appropriate density for the site and location, but across the site (for those greater than 1 hectare) there is a minimum density of 30 dwellings per hectare, this is in the interests of making the most efficient use of land and to be consistent with the Structure Plan for all housing development over one hectare in Strategic Growth Areas to generally have no less than 30 dwellings per hectare. The whole area covered by the Proposed Aberdeen Local Development Plan is covered by the Strategic Growth Area shown in the Aberdeen City and Shire Structure Plan (CD8).

Higher densities have clear social, economic, transport, and environmental benefits. Higher densities: make efficient use of land, improve access to and viability of services, provide economies of infrastructure, reduce travel distances and make public transport more viable, increase energy efficiency, create less pollution and reduce the area of land required. For smaller sites, but still over 1 hectare, in sustainable locations it will be especially important to achieve the required density. These sites are close to existing services and facilities and will play a key role in supporting existing services and facilities.

Lead to Undesirable Neighbourhoods - Higher density development does not have to mean a poorer environment, and there are many examples of desirable higher density

areas within Aberdeen, where there are large numbers of terraced properties. It will be for each masterplan to identify the most suitable way in which this minimum density can be achieved without compromising the quality of the environment. The development should respond to the individual site characteristics in order to meet the required density. There may be some areas where higher than 30 dwellings per hectare is appropriate and areas of lower density are appropriate. It is the Council's view that rather than reduce the ability to accommodate sustainable transport the policy will in fact increase the ability. Higher densities around public transport nodes will increase the viability of bus services. Walkable neighbourhoods, for example a larger number of people being close to services, shops, facilities and employment opportunities will help to increase walking and cycling.

Site Constraints - The policy requires a net density to be met rather than a gross density, this acknowledges that there will be constraints within a site and land uses that will have large land takes, for example secondary schools. The net density is the density of development after deductions, and in this policy the uses that are included are clearly identified. Therefore, all developments, whether there are significant areas that are required for infrastructure or to mitigate an environmental impact will be able to achieve the minimum density. The density calculation would be:  $\text{Dwellings per hectare} = \frac{\text{Number of dwellings}}{(\text{Site area} - (\text{community facilities} + \text{open space} + \text{strategic roads}))}$ .

#### Policy H4 – Housing Mix

Housing Mix - Policy H4 does not set a defined mix for developments larger than 50 units, but requires that there is a mix across the site to cater for a range of housing requirements. It is accepted that market conditions will change over the life of the plan, but through planning or the masterplan for a site the appropriate mix must be considered. The policy does not set a prescribed housing mix and it is the Council's view that this policy is flexible to deal with changes in market conditions. One of the Main aims of the Structure Plan is to create sustainable communities and the vision of the Structure Plan seeks to create a more inclusive society, to this end it is important that new developments do provide a mix of house sizes to support varied community needs.

#### **Reporter's conclusions:**

#### **Reporter's recommendations:**

<b>Issue (ref and heading):</b>	<b>POLICY H5: AFFORDABLE HOUSING</b>	<b>110</b>
<b>Development Plan reference:</b>	Policy H5 - Affordable Housing	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
<p>Ms Michelle Wyllie (24), Mr Alan Drugan (225), Mr Guus Glass of Cults, Bieldside and Milltimber Community Council (398), Mrs Catherine Thornhill of Ryden LLP on behalf of NHS Grampian (640), Mr Malcolm Campbell of Knight Frank LLP on behalf of Stewart Milne Group Limited, Manse (Aberdeen) Limited, Westhouse Estates Limited and Manse (Aberdeen Project Management) Limited (728), Ms Naomi Cunningham of The Scottish Property Federation (800), Mr Bob Salter of Geddes Consulting on behalf of Lynch Homes (833), Ms Emelda Maclean of Emac on behalf of Scotia Homes (1189), Mr Jonathan Russell (1196), Councillor Marie Boulton (1436), Mrs Nicola Barclay of Homes for Scotland on behalf of Grampian House Builders Committee (1442), Miss Shelley Thomson of Stewart Milne Homes (1464), Mr A. W. Findlayson of Cove and Altens Community Council (1537), Councillor James Farquharson (1539), Mrs Catherine Thornhill of Ryden LLP on behalf of Mr Gordon McWilliam (1554), Mr Ben Freeman of Bancon Developments Ltd (1561), Mr David Henderson (1576).</p>		
<b>Provision of the Development Plan to which the issue relates:</b>	Requirement for new development to provide affordable housing	
<b>Summary of the representation(s):</b>		
<p>Requirements for Affordable Housing</p> <p>24, 255, 398, 1196, 1537, 1539: Support policy approach, but feel there is a need to provide more than the minimum amount of affordable housing, especially on greenfield sites and in the city centre.</p> <p>225: Agree with proposal for additional housing but would like to see a higher proportion of affordable housing, particularly in greenfield areas.</p> <p>398: Recognise that affordable housing is a significant issue. Although the supplementary guidelines recommend quotas and mechanisms to make housing affordable there are no forecasts on the number of new affordable homes that are likely to be provided in the first phase of the plan. The consequence is that instead of promoting a proper debate on the overall provision of affordable housing the issue is hidden because the likely shortfall between the demand and supply is not properly quantified.</p> <p>1436: Ensure that the price is truly affordable</p> <p>What Should be Included in Affordable Housing Policy</p> <p>728: Support 25% but should not apply to sites allocated in 2008 plan.</p> <p>1554: The threshold for affordable housing contributions should be increased to 100 units.</p> <p>1561: Object to policy, Scottish Planning Policy notes that 25% be used as a benchmark figure, and that actual contributions should be based on the findings of the Housing</p>		

## Needs and Demands Assessment.

### Implementation of Affordable Housing Policy

800, 833, 1189, 1442, 1464: Should not affect viability of development. Consideration of development viability. Policy H5 should reflect the requirement of Scottish Planning Policy to take into account considerations such as overall development viability of the project and the availability of investment funding for the overall development if the required rates of investment return such as gross margin are not achieved for the project.

1464: The recognition of the role of negotiation and the impact of other costs in Paragraph 1.2 of the SG is supported and provides a further justification to the above suggested changes to Policy H5.

1442: Object to the detail of policy being contained in supplementary guidance.

### Key Worker Accommodation

640: The Policy should make allowance for key worker accommodation.

## **Modifications sought by those submitting representations:**

### Requirement of Affordable Housing Policy

225: Seek to increase the requirement for and delivery of affordable housing, 40-45% would be suitable.

728, 833, 1189, 1442, 1464: Request that the policy is revised in line with Planning Advice Note 2/2010 and provide greater flexibility so as not to negatively affect the viability of development.

398, 1196: A city wide delivery plan is required for affordable housing over the next 5 years. Prioritise delivery of affordable housing.

728: Would wish to see the Affordable Housing section amended by the addition of the following text at the end of Paragraph 3.46. "The affordable housing requirement for sites identified in the adopted 2008 Aberdeen Local Plan for residential development (Figure 8a), sites safeguarded for residential development (Figure 8b), brownfield housing sites (Figure 10) and housing sites identified as proposals and opportunities (Appendix 5) will continue to be assessed against Policy 42 Affordable Housing. The adoption of the new Local Development Plan and Policy H5 Affordable Housing will not take precedence over any agreements for sites that are already in place between applicants and the Planning Authority."

1554: Raise threshold to 100 houses.

1561: submit that the policy should read 'contribute up to 25% of the total number of units as affordable housing', with an additional reference to the Housing Needs and Demands Assessment being used appropriately to identify the necessary contribution on a site by site basis.

### Key Worker Accommodation

640: Changes to both the proposed plan and 'Affordable Housing' supplementary guidance to require that the redevelopment of former healthcare sites for mainstream residential development either makes provision for key worker accommodation within that site or those affordable housing contributions are ring fenced for the provision of key-worker accommodation elsewhere.

### Use of Supplementary Guidance

1442: Include contents of Supplementary Guidance 2010/5.1 within the Local Development Plan.

## Summary of response (including reasons) by planning authority:

### Requirements for Affordable Housing

The Aberdeen City and Shire Housing Need and Demand Assessment 2010 (CD9) makes an assessment of the future housing requirements and levels of housing need, and on 15 June 2010 the Centre for Housing Market Analysis issued its Final Appraisal (CD33), determining the Aberdeen City and Shire Housing Need and Demand Assessment to be 'robust and credible'.

There are severe affordability pressures in Aberdeen and the Aberdeen Housing Market Area and there are chronic levels of housing need, as identified by the Aberdeen City and Shire Housing Need and Demand Assessment (HNDA). The HNDA considered future supply and identified that the Council and Registered Social Landlords will not be able to meet the need for affordable housing and given the affordability pressures of housing in the Aberdeen Housing Market Area, market housing will be unable to meet the needs of those that cannot currently afford market housing. Therefore, through the use of planning policy there is a need to deliver housing below market value. The policy in the Local Development Plan requires that all residential developments greater than 5 units provide a 25% affordable housing contribution. Alongside this policy Supplementary Guidance on Affordable Housing (RD68) has been consulted upon to provide more detail on the type of affordable housing, how the requirements are delivered, and more detailed information about the legal agreements that the Council will expect to enter into with developers.

There are a range of affordable housing options available, including: social rented, shared ownership, shared equity, discounted low cost sale, housing without subsidy and mid-market rented accommodation. Each of these has a role to play in meeting housing need. The preference of the Council in the majority of cases will be to deliver social rented accommodation. However, this relies on public subsidy and is not always deliverable. Where public subsidy is not available, or will only meet part of the requirement, affordable homes built without public subsidy will have a role to play.

The Housing Need and Demand Assessment provides an analysis of those people in housing need that could afford intermediate housing. Generally, the analysis indicates that there is considerable potential for intermediate housing, under current housing market conditions. The ability to afford intermediate housing is not the same as demand for such products, and this proportion is based on current assumptions about the future housing market. Guidance contained within the Affordable Housing Supplementary Guidance (RD68) is included to outline the potential contribution of intermediate housing,



but no specific requirements are included in policy.

### Implementation of Affordable Housing Policy and Use of Supplementary Guidance

By the inclusion of an affordable housing policy in the Proposed Plan, and the level of contribution sought, the Proposed Plan gives recognition to the magnitude of the levels of housing need. It is, however, important not to constrain development through the implementation of this policy and providing no housing at all will not improve the situation either, as recognised by paragraph 3.46 of the Proposed Plan. Policy H5 sets the target for delivering affordable housing and it refers to Supplementary Guidance on Affordable Housing (RD68) to provide more detail on the implementation of the policy.

Supplementary Guidance 5.1 - Affordable Housing (RD68) promotes the approach recommended by Planning Advice Note 2/2010 (RD9) and allows flexibility in the type of provision, and identifies a process of negotiation and the consideration of any exceptional servicing costs for the development. The impact of the requirement on the viability of the development will be considered in these negotiations. The starting point for negotiations will be a 25% requirement, and it will only be in circumstances where the viability of development is affected that this contribution may be reduced. Circular 1/2010 (CD5) expects that matters that should be included in the Local Development Plan and not in supplementary guidance include items for which financial contributions, including affordable housing will be sought, and the circumstances where they will be sought. Policy H5 clearly sets out these parameters, and provides clarity and allows developers to incorporate this requirement into land valuations.

### What Should be Included in Affordable Housing Policy

The 25% requirement contained in Policy H5 will apply to all housing developments of five units or more, which includes existing allocations and brownfield sites. However, if there are constraints on-site, or the requirement affects the viability of development it will be addressed through the individual planning application, the policy approach is flexible in order to deal with these situations as discussed in the previous paragraph. A blanket approach to retain a 10% requirement for all existing sites and brownfield allocations would not take into account any future land deals, or changes in market conditions that may allow delivery of greater than 10%. Applying a 10% target for some developments is not supported by the plan and is not appropriate.

A 5 house threshold has been set, although within Affordable Housing Supplementary Guidance it is accepted that for developments smaller than 20 units a commuted payment may be acceptable in certain circumstances. This would deliver, on-site, 5 units (25% of 20), which would allow for effective management of any form of affordable housing.

PAN 2/2010 clearly sets out the type of housing that should be considered to meet the requirements of policy. There is a wide spectrum of people in housing need, from those that will require socially rented housing to those that, with assistance, could purchase a house. With the number of homes made provision for in the Proposed Plan we have to be realistic about how much socially rented accommodation can be provided and we will be open to alternatives that meet the needs of those that cannot afford open market housing.

### Key Worker Accommodation

The issue of key worker accommodation is one that that affects labour mobility in an area and, to improve the situation, there is a need for a more flexible supply of housing that is more affordable and provides more short-term housing options. The HNDA has not identified a specific allowance for key worker accommodation and there is no evidence provided by respondent to justify a specific requirement within the Local Development Plan. It is the Council's consideration that by increasing the supply of a range of house types and sizes in Aberdeen will assist in improving labour mobility in the area. There would be no policy preventing housing proposals for key workers. The contribution towards affordable housing would be considered with any application. Supplementary Guidance 2.3 (3) identifies that there may be other options for meeting housing need, and a proposal for key worker housing could be considered for meeting housing need. It is not practical to include an allowance in the policy for the requirement of affordable housing for all possible housing applications.

**Reporter's conclusions:****Reporter's recommendations:**

<b>Issue (ref and heading):</b>	<b>POLICY H6 AND H7: GYPSY TRAVELLER SITES PROPOSALS</b>	<b>111</b>
<b>Development Plan reference:</b>	Policy H6 - Gypsy and Traveller Caravan Sites Policy H7 - Gypsy Traveller Requirements for New Residential Developments	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
<p>Mr Eric Jensen (54), Ms Gayle Morrice (63), Mr Brian Morgan (68), Mr Peter Wilson (69), Ms Catriona McWilliam (70), Mr Frederick Milne (71), Mr Philip Morrice (72), Mr Keir Willox (73), Ms Fyfe Hepburn (83), Mr Kenneth Sandison (84), Mr Richard Binnie (88), Ms Angela Cameron (90), Mrs June V. Shirriffs (92), Sir/Madam H. Brown (93), Dr George G. Shirriffs (94), Ms Elizabeth Binnie (95), Ms Ann Perrott (106), Mr David W. Metcalfe (112), Ms Oonagh Grassie (113), Sir/Madam I. Middleton (119), Mr Colin McKay (126), Dr Steven Yule (127), Mrs Susan Yule (128), Mr Graham MacPherson (142), Mr Stuart Wilkie (143), Mr Richard Murray (144), Ms Kimberley Murison (146), Mr Simon Merrilees (147), Mr Norman Hunter (150), Mr Colin Morsley (168), Ms Helen Wood Barron (183), Ms Jane Watt (184), Mr Michael Alexander Barron (185), Ms Angela M. Gibb (196), Ms Jane Troup (198), Mr John Bedford (199), Mr Gary M. Aylmer (201), Ms Louise Wood (207), Mr Charles Hall (217), Ms Dorothy Hall (220), Ms Betty Johnston (221), Ms Valerie Sinclair (222), Mr &amp; Mrs G. B. Peddie (224), Mr Michael J. M. Reid (237), Mr Allan Davidson (238), Mr R. Hainey (239), Mrs R. Hainey (240), Ms Barbara Steffensen (241), Ms Karen Hughes (245), Mr David S. M. Campbell (246), Ms Arlene Wilson (247), Dr J. Kenneth McAlpine (248), Ms Judith Farquhar (249), Mr Rod Buchan (294), Ms Michelle McDonald (296), Ms Susan Beard (297), Mr John Beard (298), Mrs Barrie Buchan (299), Mr Stephen Jack (300), Ms Pamela Anne Jack (301), Mr Steve Burnett (312), Mr Matthew Dunning (313), Mr P.E. Johnston (314), Ms Shauna Gowans (354), Mr William McDonald (356), Ms Pamela Gatt (357), Mr Colin McKenna (399), Mr Robert G Simpson (401), Mr Steve Delaney of Mastrick, Sheddocksley and Summerhill Community Council (543), Mrs Wendy Campbell (583), Mr Colin Campbell (584), Mr Alexander Kilgour (935), Mr William Simpson (936), Ms Anna Simpson (937), Miss Emma Wright (938), Mrs Eziz Robertson (939), Mr Matthew Wright (941), Mrs Florence Pirie (942), Mrs H.B Oakes (944), Mr Terence Oakes (945), Mrs Margaret Park (947), Ms Hilary Davern (950), Mr N Craig (952), Mrs Alison Murison (954), Mr Alexander Murison (956), Mr Douglas Park (957), Mr Derek W Martin (959), Mrs Pamela Wright (961), Ms Lydia A W Martin (962), Mr David Wright (963), Mr James Grant (968), Mr William P Weir (969), Mrs Agnes Watson (973), Mr Stephen King (974), Mr L Watson (975), Mr William Miller (976), Ms Margaret Miller (979), Ms Sheila Irvine (983), Mr B J Carey (984), Mr William Irvine (985), Sir/Madam A Carey (987), Mr Alexander May (997), Sir/Madam R W Wilkie (998), Ms Margaret McEwan (999), Ms Fiona Wilkie (1000), Mrs GB Anthony (1003), Mr Stuart Lamond (1005), Mr William Smith (1006), Ms Helen Davidson (1007), Ms Rosemary Walker (1008), Mr Iain Laidlaw (1010), Sir/Madam Tom Straiton (1011), Ms Florence Gunn-Folmer (1012), Ms Kaye Smith (1013), Mr Alexander Gunn (1014), Sir/Madam George Ian Gibson (1015), Mr Stephen Anthony (1017), Mr Brian Yeats (1018), Ms Julie McLulich (1021), Ms Suzanne Walker (1022), Mr Hamish McLulich (1023), Mr Brain Folan (1026), Mr William Skidmore (1027), Mrs Wendy Skidmore (1030), Mr James Wilson (1037), Mr Derek Walker (1038), Ms Christina M Wilson (1042), Mr Samuel Stafrace (1044), Ms Sheena Lamond (1054), Dr Iain Greig (1058), Mr Noelle Straton (1062), Sir/Madam Bernese Kamel (1063), Ms Helen Ireland (1065), Mr Angus Morrison (1069), Mr Mike Hume (1071), Ms Catriona Morrison (1072), Mr Martin Mackay (1076), Mr David Cornet (1077), Mr Ian Sim (1078), Ms Dorothy Higgins (1081), Mr &amp; Mrs J &amp; K Massie (1084), Mrs Grace M Hepburn (1086), Mrs Ewa Gainska (1088), Mr Mirosław Gainski (1090), Mrs Pat Duncan (1091), Mr David Bruce (1092), Ms</p>		

Jennifer Bruce (1094), Mr William Robertson (1098), Mr Alan Stott (1101), Ms Muriel Wyness (1103), Mr W R Hepburn (1105), Mr Stuart Higgins (1115), Mr Barclay J Massie (1116), Ms Carol Buchan (1118), Sir/Madam E Cooper (1119), Mrs Nicola Barclay of Homes for Scotland on behalf of Grampian House Builders Committee (1442), Miss Shelley Thomson of Stewart Milne Homes (1464), Mrs Charlotte Goodbody (1484), Professor Ivan Goodbody (1486), Mr A. W. Findlayson of Cove and Altens Community Council (1537), Mr Brian Adam MSP of Aberdeen North (1581), Ms Helen Gibson (1585).

**Provision of the Development Plan to which the issue relates:**

Policies make provision for existing and new Gypsy and Traveller sites.

**Summary of the representation(s):**

#### Council Responsibility

54, 63, 84, 106, 112, 198, 294, 296, 299, 300, 301, 314, 356, 399, 941, 952, 961, 962, 975, 1008, 1018, 1027, 1030, 1038, 1058, 1063, 1065, 1076, 1077, 1092, 1094, 1103, 1442, 1464, 1484, 1486: Disagree with proposals for developers to provide Gypsy and Traveller sites. The Council need to take responsibility for this, those making the decisions should be publicly accountable.

88, 95: The Council must develop a site to resolve the problem of unauthorised encampments.

1442: The members of Homes for Scotland's Grampian House Builders Committee are unclear why Policy H7 requires the private development industry to make land available for gypsy and traveller sites. This should be the responsibility of the local authority.

#### No Additional Need

68, 71, 90, 92, 93, 94, 196, 936, 937, 956, 969, 976, 997, 1464: There is an adequate supply at Clinterty. If new sites are provided they would not be used. The Council will be required to move on Gypsy Travellers if they continue to use unauthorised sites.

#### Do Not Support the Development of Gypsy Traveller Sites

69, 72, 73, 126, 183, 185, 207, 222, 245, 246, 294, 299, 312, 357, 543, 583, 938, 939, 941, 950, 963, 968, 983, 985, 998, 999, 1003, 1005, 1007, 1010, 1012, 1014, 1017, 1022, 1026, 1027, 1054, 1086, 1088, 1094, 1098, 1537, 1585: Generally do not support the provision of Gypsy Traveller sites and they should not be located anywhere near the settled community.

83, 113, 119, 127, 128, 142, 143, 144, 146, 147, 150, 201, 217, 237, 238, 239, 240, 241, 247, 249, 313, 583, 584, 935, 942, 945, 954, 959, 974, 979, 984, 987, 1000, 1003, 1006, 1015, 1021, 1037, 1071, 1081, 1094, 1101, 1105, 1115, 1119: Gypsy Travellers do not pay taxes and the provision of these sites should levy charges for use and this payment should cover the servicing and keeping the site clean and tidy.

#### Policy Approach

1581: Disagree that this is an appropriate distribution across the area.

1084: Sites should be at a higher density.

1072: Development of Gypsy Traveller sites will have an impact on school capacities.

248, 1464: Must involve the Gypsy Traveller community in location of sites.

1044: Sites should be free of charge.

#### Proposed Sites

70,199, 220, 221, 224, 246, 297, 298, 314, 354, 401, 944, 947, 957, 973, 1011, 1013, 1042, 1062, 1069, 1078, 1084, 1091, 1103, 1116, 1118: Feel that Kingswells is not a suitable location for Gypsy Traveller sites, especially the Park and Ride.

1088, 1090: Newhills is not a suitable location.

#### **Modifications sought by those submitting representations:**

##### Policy Approach

543: Locate sites close to, but outwith residential areas at no charge.

##### Do Not Support the Development of Gypsy Traveller Sites

1442, 1464: Remove policy H7.

##### Proposed Sites

168: Policies H6/H7 needs to be strengthened to ensure that the envisaged small residential style developments for a few travellers are strictly regulated to prevent overcrowding.

#### **Summary of response (including reasons) by planning authority:**

##### No Additional Need

It is widely accepted that there is a national shortage of authorised sites for Gypsies and Travellers. This has led to an increasing incidence of unauthorised encampments and has sometimes created tensions between Gypsies and Travellers and the settled community. The supply of authorised sites, in appropriate locations, will help address the cycle of eviction that can be costly, and does not address the underlying need for a home. While they have yet to be legally recognised as a separate racial group, the Scottish Government formulates policy around the idea that Gypsies and Travellers are a racial/ethnic group in their own right. The term 'Gypsies and Travellers' includes Scottish Travellers, Irish Travellers, Roma/Romany, English or Welsh Travellers and those who identify as Gypsy Travellers/Scottish Gypsy Travellers. It excludes Occupational Travellers (Travelling Show People/Show Travellers or Circus People) and New Age/New Travellers. Scottish Planning Policy also recognises that Gypsies and Travellers have specific housing needs, often requiring sites for caravans and mobile homes. The needs of all Gypsies and Travellers for appropriate accommodation have been considered through the Housing Need and Demand Assessment (CD33). Given the typically transitory nature of Gypsies and Travellers, provision should be made for those communities which are in an area already and those who may arrive at a later

date.

Aberdeen City Council, Aberdeenshire Council and Moray Council jointly appointed Craigforth Research to undertake a Gypsy and Traveller Accommodation Needs Assessment for Grampian (RD31). The research found that pitch provision in Aberdeen was adequate, but recommended providing alternative permanent site provision in Aberdeen, halting sites for high pressure areas, to be provided between Aberdeen and Aberdeenshire, and an allowance for the development of private sites. The findings of this study were incorporated into the Aberdeen City and Shire Housing Need and Demand Assessment (HNDA) (CD9), which was assessed as 'robust and credible' by the Centre for Housing Market Analysis (see CD33).

### Policy Approach

The Proposed Plan makes use of two policies to address the needs of Gypsies and Travellers. 1). Policy H6 sets criteria to assess applications for the development of Gypsy and Traveller sites against. 2). Policy H7 identifies new large mixed used developments to accommodate small sites for Gypsy Travellers. The locations of these areas would be defined through the masterplanning process and would involve the Gypsy Traveller community, settled community and the Council in identifying the most suitable location. It would then be the responsibility of the Council, Registered Social Landlord or Gypsy Traveller community to purchase the site, develop and then run the site. There would be no planning requirement to charge rent or otherwise and this would be an issue for the ongoing management of the site. Housing is provided to the settled community that cannot afford, or receive benefits, providing sites for Gypsies and Travellers this policy promotes equality in line with Scottish Government Policy. Gypsies and Travellers have the same requirement to access services and facilities, and it is a key role of the Local Development Plan to locate development in sustainable, accessible locations as set out in Scottish Planning Policy paragraph 37 (CD3). Integrating sites for Gypsies and Travellers within new communities will help promote social inclusion and reduce prejudices that the settled community have. It is not thought that the development of a small Gypsy and Traveller site will have a significant impact on school capacities, but this would be considered through any planning application.

Policy H7 seeks to address a specific housing need that has been identified by the HNDA. The HNDA identifies and need and requirement mainstream housing and also for specific household groups, which includes Gypsies and Travellers. For three large sites identified in Policy H7 the affordable housing requirement has been reduced and a requirement for an equivalent area of land for small Gypsy and Traveller site. The requirement to develop and run the site will not be on the developer, this will be the Council's responsibility to purchase the site at an agreed value and run it as a Gypsy and Traveller site. Draft Supplementary Guidance (RD69) on the approach has been prepared which provides more information.

### Council Responsibility

The Council have not identified specific areas for the development of Gypsy and Traveller sites, and the Local Development Plan was not provided with any options for Gypsy and Traveller sites. The Council's response to the requirement is that set out in Policies H6 and H7. There is Council owned land in two out of the three locations identified. At present Scottish Planning Policy (CD3) Paragraph 90 states that "Planning authorities should identify suitable locations for meeting the needs of Gypsies and

Travellers and set out policies about small privately owned sites." Therefore, given the findings of the HNDA this is an issue that must be addressed by the Local Development Plan, and this remains, at the time of the Proposed Plan the preferred option. The Council will have responsibility to deliver the development of a site should land be made available.

#### Proposed Sites

The number of pitches per hectare can not be directly related to dwellings per hectare. A single Gypsy Traveller pitch would have the potential to hold multiple caravans depending on family size.

Apart from the areas identified in Policy H7 no other sites have been identified, and the sites in Policy H7 do not include Kingswells. For determining applications for Gypsy Traveller sites alternative proposals may come forward and would be assessed against the set criteria, it would not be appropriate to single out Kingswells as an area that is not suitable for the development of Gypsy Traveller sites.

In order to identify the most suitable areas for Gypsy and Traveller sites an assessment of alternatives was undertaken (RD86) in which the new development areas were assessed in terms of their suitability to provide a Gypsy and Traveller site. This concluded that the sites at Newhills, Grandhome and Loirston would be the three strategically located sites to accommodate Gypsy and Traveller sites.

#### **Reporter's conclusions:**

#### **Reporter's recommendations:**

<b>Issue (ref and heading):</b>	<b>POLICY H8: HOUSING AND ABERDEEN AIRPORT</b>	<b>112</b>
<b>Development Plan reference:</b>	Policy H8 - Housing and Aberdeen Airport	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Mr Graeme Stewart (214), Mr Gordon Thomson of Barton Wilmore LLP on behalf of Aberdeen Harbour Board (373), Mr Richard Johnson (1414).		
<b>Provision of the Development Plan to which the issue relates:</b>	Restricts housing development that would conflict with the effective operation of the airport	
<b>Summary of the representation(s):</b>		
<p>Noise and Aberdeen Airport</p> <p>1414: Aberdeen City Council should revise this policy to take proper account of helicopter noise. Not appropriate to assess it with 60DB LEQ because that noise unit averages the irregular nature of helicopter noise and discounts noise below 200HZ. The abbreviation 60LEQ is imprecise and is not a proper noise unit. The choice of 60LEQ appears arbitrary. Does not include noise from ground running. Double glazing may not be a panacea. Aircraft noise and health people may be affected at night.</p> <p>214, 1414: No information relating to noise from rotary winged aircraft through plan process. Noise from helicopters is not expected to reduce as significantly as noise from jet aircraft through technological advances. Due to flexible flight path of helicopters, these will always be a source of noise and risk. Flight path shown in Proposed Plan proposals map reflects fixed-wing aircraft only.</p> <p>Noise and Aberdeen Harbour</p> <p>373: There is no mention of noise mitigation at the Harbour in the plan.</p>		
<b>Modifications sought by those submitting representations:</b>		
<p>Noise and Aberdeen Airport</p> <p>373: The airport and the harbour are noisy neighbours. To avoid conflict with neighbouring uses residential and in some instances hotel development within close proximity to their boundaries will not be acceptable.</p> <p>1414: Revise this policy and reconsider the level of 60dB as this is not consistent with the World Health Organisation's level of 55dB.</p> <p>Noise and Aberdeen Harbour</p> <p>373: Given the importance of the Harbour to the economy it is considered that noise mitigation requires specific attention, being either addressed in its own policy or within Policy H8. Policy should be reworded as 'Applications for residential development under or in the vicinity of aircraft flight paths, where night time (23:00 to 07:00) noise levels in excess of 57dB LEQ or day-time noise levels in excess of 60dB LEQ are experienced, will be refused due to the inability to create an appropriate level of residential amenity,</p>		



and to safeguard the future operation of Aberdeen Airport. Similarly, applications for residential or hotel development in the vicinity of the operational area of Aberdeen Harbour will be refused where there is a likelihood of an inability to create an appropriate level of amenity, and to safeguard the present and future operation of Aberdeen Harbour.'

#### **Summary of response (including reasons) by planning authority:**

##### Noise and Aberdeen Airport

It is accepted that LAeqT is the common measurement of noise over a period of time, but for aircraft noise values are sometimes written using the alternative expression dB(A) Leq, as previously contained in Planning Advice Note 56: Planning and Noise (RD10). It should be acknowledged that this has been replaced by Planning Advice Note 1/2011 Planning and Noise (PAN 1/2011) (RD90).

The English equivalent of PAN56 is Planning Policy Guidance 24 (PPG24), (RD8) which provides some more detailed information about the use of noise exposure categories (NECs). They range from A to D, and are used to help local authorities in their consideration of applications for residential development near transport related noise sources. For B and C noise will be a consideration, but mitigation may make development acceptable. This is a large range and makes it difficult to provide a clear policy position. Annexe 3 paragraph 8 of PPG24 identifies a desirable upper limit for major new noise sensitive development of 60 Leq dB(A). The night time figure is based on the upper end of category B for night time air traffic noise. PAN 1/2011 now refers to Noise Action Plans when determining applications for development rather than setting ranges of noise levels that would be appropriate. If the Reporter is so minded the policy could be updated to refer to Noise Management Areas and the guidance contained in PAN 1/2011.

It is accepted that helicopter noise has different characteristics from that of fixed wing aircraft and is often regarded as more intrusive and annoying by the public, especially when helicopters spend time hovering overhead. However, the planning authority has no control over the number of and the flight paths of helicopters and planning conditions relating to flight routes are inappropriate. This is controlled by the Civil Aviation Authority and National Air Traffic Services (NATS). In addition there are no specific noise exposure categories identified specifically for helicopters, and it would be inappropriate for the Plan to make a judgement on this. In reaching a judgement on planning applications for housing the Council's Environmental Health service and the Civil Aviation Authority will always be consulted and would make recommendations on the requirements for a noise impact assessment.

##### Noise and Aberdeen Harbour

There is no specific guidance on noise impacts of Harbours contained in PAN 1/2011. PAN1/2011 does refer to the variability of the character of industrial noise and that it is difficult to assess and for this reason it will usually be for a Noise Impact Assessment to assess the acceptability of noise levels. This is a planning consideration and the Council's Environmental Health service would always be consulted and would make recommendations on requirements for Noise Impact Assessment and mitigation required. In addition Policy B14 states that "due regard will be paid to the safety, amenity impacts on and efficiency of uses in the vicinity of the Airport and Harbour." It is our view that these measures will ensure that inappropriate residential environments are not

created and that they do not have a negative impact on the operation of Aberdeen Harbour.

**Reporter's conclusions:****Reporter's recommendations:**

<b>Issue (ref and heading):</b>	<b>POLICY CF1: EXISTING COMMUNITY SITES AND FACILITIES</b>	<b>113</b>
<b>Development Plan reference:</b>	Policy CF1 - Existing Community Sites and Facilities and shown on Proposals Map	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Mrs Catherine Thornhill of Ryden LLP on behalf of NHS Grampian (640), Ms Lorraine Jones of Sport Scotland (1244), Mr David Henderson (1576).		
<b>Provision of the Development Plan to which the issue relates:</b>	Policy sets out the use and type of development appropriate in areas designated as community sites and facilities.	
<b>Summary of the representation(s):</b>		
<p>640 For the avoidance of doubt, a broad definition of 'community facilities' should be added to the glossary in section 5. This should include Health Centres, Dental Surgeries, Community Pharmacies, educational and community facilities.</p> <p>1244 Support policy CF1: Existing community sites and facilities, however, as Community Sites and Facilities are not defined in the Glossary, it is not possible to know the intended extent of this policy.</p> <p>Paragraph 5 of policy CF1 refers to situations where land or buildings are surplus to requirements and sets out a context for their redevelopment. Schools can have playing fields/outdoor areas associated with them and specific national policy applies where the redevelopment of these is proposed (see in particular para 156 of Scottish Planning Policy). It is considered that by not defining what is intended to be covered by the policy, the context of it could create a situation where the redevelopment of school pitches could be supported by this policy in situations where there could be a conflict with the Scottish Planning Policy.</p> <p>1576 Policy CF1- Where a potential change of use in a site, or disposal leading to change of use, from existing community sites, there should be exceptions to always keeping the same use, where local provision (and city wide) is not effected, although this needs explored further as local and community amenity should not be sacrificed.</p> <p>However when change of use, or disposal for change of use would otherwise be permitted, it should be considered not just for alternative community use, but also for use which would meet other land use objectives or shortfalls to these objectives, and should be discouraged for other use changes when these options exist and are viable (all other factors taken into account.</p>		
<b>Modifications sought by those submitting representations:</b>		
640, 1244 Definition of 'community facilities' to be added to section 5 glossary.		
<b>Summary of response (including reasons) by planning authority:</b>		
640, 1244 Community facilities could cover an extremely wide range of uses. The problem with providing a definition of specific uses in the glossary (and of using those definitions to say what should be considered in Policy CF1) is that that we may omit to cover some specific uses. We consider that the broad definition provided in the first		

paragraph of Policy CF1 is an adequate catch all for community facilities.

1244 The comment that paragraph 5 of the policy could lead to the loss of playing fields could only be valid if the policy is read in isolation. However, the local development plan should be read as a whole when determining planning applications. Policy NE3 Urban Green Space is valid against any proposal to develop any playing field, sports pitch or other type of open space, regardless of the actual zoning on the proposals map. This policy seeks the retention of urban green spaces and is considered to comply with the terms of Scottish Planning Policy (CD3).

1576 Policy CF1 safeguards existing community uses and permits their extension in the 5th paragraph of the policy. Where these uses are shown to be surplus to requirements, the policy does permit alternative uses, providing that they are compatible with adjoining uses and any remaining community uses. Consideration of whether a site or facility is surplus to requirements (i.e. not needed), both now and in the future, should be taken into account when dealing with planning applications. The level at which this occurs (neighbourhood or city wide) is dependent of the scale of facilities under consideration.

Alternative uses do not have to be alternative community uses and this is also stated in paragraph 5 of the policy. In many cases, they can encompass residential, commercial or employment uses depending on neighbouring zonings and the character of the area. In terms of discouraging uses which could affect the viability of existing uses, the policy states that proposals which result in the significant erosion of the character of the area or the vitality of the local community will be opposed. In these respects we consider that the policy meets the concerns expressed by the respondent.

**Reporter's conclusions:****Reporter's recommendations:**

<b>Issue (ref and heading):</b>	<b>POLICY CF2: NEW COMMUNITY FACILITIES</b>	<b>114</b>
<b>Development Plan reference:</b>	Policy CF2 - New Community Facilities and shown on Proposals Map	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Mrs Rhonda Reekie of Scottish Green Party (611), Mr John Findlay of Ryden LLP on behalf of The University of Aberdeen (619), Mrs Catherine Thornhill of Ryden LLP on behalf of NHS Grampian (640), Ms Lorraine Jones of Sport Scotland (1244), Mr Ian Cox of Kingswells Community Council (1579).		
<b>Provision of the Development Plan to which the issue relates:</b>	Provides criteria to assess development proposals for new community facilities.	
<b>Summary of the representation(s):</b>		
<p>611 In general citywide there is a huge waiting time for allotments and the council should be encouraging developers to allocate some green space to community allotments in their planning application requirements .</p> <p>619 Policy CF2 states that "city centre sites are preferred for new further education and research institutions". This is considered to be highly restrictive and potentially unrealistic. City centre sites cannot always offer the same flexibility that larger sites away from the town centre can offer. City Centre locations can be constrained and the extent to which they can accommodate the needs and requirements of further education/research institutions can be limited. To protect the interests of the University, it is therefore contended that this statement should be retracted from the adopted Plan.</p> <p>640 It was previously highlighted that a site for a medical centre had been identified in the Woodside area to serve both Woodside and Tillydrone communities. The site, located between Marquis Road and Great Northern Road, has not been allocated for community facilities under policy CF2 in the Proposed Plan.</p> <p>1244 Support the section of the policy that states that land for community facilities should be reserved in large developments. Community Facilities are not, however, defined in the Glossary which leads to uncertainty in relation to what exactly the policy is seeking to deliver.</p> <p>It is confusing that Policy CF1 refers to 'Community Sites and Facilities' and policy CF2 refers to 'New Community Facilities'</p> <p>1579 It is essential that developments include the provision of community facilities and that these are provided as part of the infrastructure required by the development. The plan should not be about delivering new houses but about delivering communities.</p> <p>Currently there are no community facilities included in the list of infrastructure requirements for the provision of the new communities. These lists must be identified, and developers must provide these facilities at appropriate times through the development of the sites not at the end as an after thought. If the developer cannot afford to provide a quality development including the infrastructure, then the development should not be approved.</p>		
<b>Modifications sought by those submitting representations:</b>		

619 Policy CF2 should be amended with the paragraph regarding City centre sites removed.

640 It is requested that the plan is amended to incorporate a site for a medical centre in Woodside.

1244 A coherent approach to the protection of existing facilities and the development of new ones is required. This should be contained in the policy. The Supplementary Guidance (Children's Nurseries and Sports Facilities) in relation to sports facilities referred to in the Policy also refers to development of existing sports facilities, and this is not considered to be the appropriate place for setting out Local Development Plan policy on outdoor sports area redevelopment, which should be considered as part of Local Development Plan policy itself, eg in Policy NE3.

1579 Lists of community facilities must be identified in the list of infrastructure requirements for the provision of the new communities.

**Summary of response (including reasons) by planning authority:**

611 - We would agree that allotments are important need to be considered. This issue will be dealt with in the Open Space Supplementary Guidance (RD82). This states that developments that are likely to cause a demand for small-scale, local food production, such as high density housing or flats will require to include the provision of allotments as part of their open space provision. Figure 5 of the Supplementary Guidance outlines the quantitative and accessibility standards for allotments which we would expect to be provided.

619 - The city centre is an important employment, service and civic centre and is seen by the Proposed Plan as being the hub of the region's economy. The Plan seeks to promote the city centre and maintain its regional significance. In addition the city centre is the most accessible location in the city in respect of public transport. Development here can therefore be less car dependent and more sustainable. Policy CF2 supports these aims by stating that it is the preferred location for new further education and research institutions. However, CF2 is also pragmatic enough to consider that the expansion of an existing campus is also acceptable in principle.

640 - It is accepted that brief mention was made to the need to identify a site for a new healthcare facility at Woodside in NHS's response to the Main Issues Report of 11 December 2009. However, no map was provided and it appears that the issue was not followed up. To introduce a new opportunity site and/or rezoning of land at this late stage would delay the whole Local Development Plan in order for neighbour notification to take place.

The site lies in a Policy H1 Residential Area. Policy H1 states that non residential uses will be permitted in these areas if they are considered complimentary to residential uses and that they would cause no conflict with existing residential amenity. We would consider that medical centres, which are there to serve the local communities, would be complimentary to residential areas. Issues of residential amenity would have to be considered in any planning application regardless of the zoning of the site. As a consequence, we do not consider that the Proposed Plan as it stands would present any significant difficulties in terms of securing planning permission for medical centres in residential areas. We therefore do not think it is necessary to rezone this land in order to

deliver the new medical centre.

1244 As discussed under Issue 113 (Policy CF1: Existing Community Sites and Facilities, the definition of community facilities could cover an extremely wide range of uses. The problem with providing a definition of specific uses in the glossary is that that we may omit to cover some specific uses. We consider that the broad definition provided in the first paragraph of Policy CF1 is an adequate catch all for community facilities.

We do not consider the scope of the policies confusing - the titles of the policies say what they cover. CF1 concerns existing community sites and facilities and CF2 covers new community facilities (in other words, proposals for community facilities which do not currently exist). It should be noted that the supplementary guidance 5.2 on Childrens Nurseries and Sports Facilities should, when adopted carry considerable weight when determining planning applications and we do not consider it necessary to repeat the policy within the Local Development Plan.

1579 - We would agree that community facilities should be provided as part of the infrastructure requirement for new development, commensurate with the scale and type of development. This is the basis upon which the Council has identified infrastructure required in support of new development. Policy I1 Infrastructure Delivery and Developer Contributions sets out the requirement for all new development to be supported by the necessary infrastructure. Infrastructure requirements are set out in Appendix 4 of the Proposed Plan and in more detail in the Proposed Action Programme (CD20). This includes new academies, primary schools, nurseries, community facilities, health centres, pharmacies and dentists. These lists of requirements are ascribed to the 11 masterplan zones identified in Figure 1 of the Proposed Plan. More detailed local requirements and the precise locations of facilities will need to be agreed with the Council through the masterplan and planning application process.

No changes to the Plan are recommended as a result of these representations.

**Reporter's conclusions:**

**Reporter's recommendations:**

<b>Issue (ref and heading):</b>	<b>POLICY RT1, RT2, RT3, RT4 AND RT5: SUPPORTING RETAIL CENTRES</b>	<b>115</b>
<b>Development Plan reference:</b>	Policy RT1 - Sequential Approach and Retail Impact Policy RT2 - Out of Centre Proposals Policy RT3 - Town, District and Neighbourhood Centres Policy RT4 - Local Shops Policy RT5 - Retail Development Serving New Development Areas Town, District and Neighbourhood Centres (RT3) and Retail Parks (RP) shown on Proposals Map	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Mr Andrew Woodrow of CBRE - CB Richard Ellis on behalf of John Lewis (235), Ms Lorraine Davison of DPP on behalf of Standard Life Investments (395), Mr David Halliday of Aberdeen Bid Development Company Ltd (782), Ms Naomi Cunningham of The Scottish Property Federation (800), Mr Fraser Littlejohn of Montagu Evans LLP on behalf of Threadneedle Property Limited (843), Ms Emelda Maclean of Emac on behalf of Scotia Homes (1189), Mr Steven Robb of GVA Grimley on behalf of Scottish Retail Property Limited Partnership (1438), Mr Ben Train of Tesco Stores Limited (1472), Ms Katherine Pollock of Turley Associates on behalf of Sainsbury's Supermarkets Ltd (1550), Ms Trudi Craggs of Dundas & Wilson CS LLP on behalf of ASDA Stores Ltd (1558).		
<b>Provision of the Development Plan to which the issue relates:</b>	Policies to support existing retail areas and provide means to assess proposals for new retail development.	
<b>Summary of the representation(s):</b>		
<p>Policy RT1 - Sequential Approach and Retail Impact</p> <p>235, 1483: Respondent supports this policy.</p> <p>782: On the Aberdeen Western Peripheral Route there is a need to restrict retail development on the potential growth nodes which may arise.</p> <p>843: The sequential approach to the assessment of retail proposals, as advocated in Scottish Planning Policy, should be reflected in the proposed plan. Retail parks such as Kittybrewster should be identified as commercial centres acknowledging the preference of developing such allocated sites over isolated out of centre sites.</p> <p>1438: Support the reference to a restriction of comparison goods floorspace outside the city centre or other town centres. Suggest that policy is expended to take account of the cumulative impact of such comparison goods floorspace allowances outwith the City Centre which collectively could lead to unacceptable levels of retail impact.</p> <p>1472: Object to the use of 'retail parks'. Does not comply with Scottish Planning Policy.</p> <p>1550: The hierarchy fails to include Retail Parks. Under Supplementary Guidance 2010/6.1 retail parks are listed lower than neighbourhood centres in the retail hierarchy. Policy RT1 - Sequential Approach and Retail Impact should include retail parks as tier 5 to ensure that the Local Development Plan policy follows supplementary guidance. Policy RT1 - Sequential Approach and Retail Impact is required to acknowledge the</p>		



significance of retail parks in the hierarchy and also to protect their role against development in out of centre locations. This approach accords with Scottish Planning Policy on town centres and retailing and proposed policy RT2 - Out of Centre Proposals.

1558: Policy RT1 - Sequential Approach and Retail Impact, RT2 - Out of Centre Proposals and Supplementary Guidance: City Centre and Retailing - Hierarchy of Centres set out the sequential approach to be adopted for new retail development. These refer to "edge-of-centre" and "out-of-centre" retail locations. The Proposed Plan fails to define these terms and this will result in uncertainty and disagreement as to whether or not a proposed site can be classified as Town Centre, District Centre, edge-of-centre or out-of-centre. The City, Town, District, and Neighbourhood Centres are defined on the proposals maps and therefore do not need further definition. Definitions for edge-of-centre and out-of-centre are not currently available in Scottish Planning Policy but Scottish Planning Policy 8 and National Planning Policy Guidance 8, provided more detail on the national town centre and retail policy framework and did include definitions that are accepted in planning terms. It is, therefore appropriate that similar definitions should be provided in the Proposed Plan.

1558: Certain parts of the City are not well served by shopping facilities for main food shopping located in the centres identified in the retail hierarchy, e.g. areas in the west of the city (north of the River Dee) and east of the city centre, although served by superstores located in retail parks, are not served by stores located in either the City Centre, Town, District or Neighbourhood Centres and there is no realistic prospect sites will be identified within or on the edge of these centres. Further, superstores located at both Garthdee and Links Road/Boulevard provide an important main food shopping function serving these parts of the City. It is considered that regard should be had to this function and the 6th paragraph of Policy RT1 should be extended to give protection in the retail hierarchy to superstores located in the retail parks identified in the Supplementary Guidance provided that these superstores provide an important retail function serving the needs of residents in the City.

#### Policy RT2 - Out of Centre Proposals

235: Respondent feels that the wording of this policy is appropriately strong in requiring out of centre development to be refused unless significant justification is available.

1558: Out-of-centre locations are not defined in Policy RT2 - Out of Centre Proposals and are not included within the glossary of the Proposed Plan or existing Scottish Planning Policy. In order to avoid uncertainty out-of-centre should be defined within the glossary to the Proposed Plan.

1438: Welcome the criteria based assessment of out-of-centre proposals. Suggest that policy is expended to take account of the cumulative impact of such comparison goods floorspace allowances outwith the City Centre which collectively could lead to unacceptable levels of retail impact.

1558: The first criterion of Policy RT2 - Out of Centre Proposals refers to Policy R1 - Minerals. It is assumed that this should refer to Policy RT1 - Sequential Approach and Retail Impact.

#### Policy RT3 - Town, District and Neighbourhood Centres

395: The definition currently set out in the Proposed Plan and Supplementary Guidance is not appropriate and must be amended. As drafted, this fails to recognise the existing and established role the Boulevard Retail Park plays in the City's retail hierarchy.

1189: It should be made clear that it is not only shopping provision that is the key to a successful neighbourhood centre. A combination of other uses, including offices and workshops or even small factories, will be just as important to creating sustainable, vibrant communities as well as having shops. The retail policies should be consistent with the principle of also encouraging a mix of appropriate uses.

#### Policy RT5 - Retail Development Serving New Development Areas

800: Agree with Policy RT5 - Retail Development Serving New Development Areas and the importance of retail allocations being identified in masterplans for residential development. Further, while enhancing town centres is a priority, we believe that the Council should retain a flexible attitude to consider needs, requirements and proposals on their own merit.

1189: It should be made clear that it is not only shopping provision that is the key to a successful neighbourhood centre. A combination of other uses, including offices and workshops or even small factories, will be just as important to creating sustainable, vibrant communities as well as having shops. The retail policies should be consistent with the principle of also encouraging a mix of appropriate uses.

#### Tesco Wellington Road

1472: Object to the zoning of Tesco at Wellington Road as a Mixed Use Area.

### **Modifications sought by those submitting representations:**

#### Policy RT1 - Sequential Approach and Retail Impact

843, 1472: It is considered that the proposed plan should better reflect Scottish Planning Policy. Kittybrewster retail park should be identified (re designated) as a commercial centre in the Local Development Plan.

1438: Suggest that Policy RT1 - Sequential Approach and Retail Impact is expanded to take account of the cumulative impact of comparison goods floorspace outwith the city centre and other town centres.

1550: Request that the Sainsbury's at Garthdee be included within the Local Development Plan as a district centre. If that is not accepted, then the proposed retail park designation acknowledge the convenience and comparison goods role of the Sainsbury's Garthdee store is given higher preference in the preferred order of sequential approach thresholds.

1558: The locations for inclusion in Policy RT1 - Sequential Approach and Retail Impact (first paragraph of the policy) should be extended to include convenience retail provision in appropriate retail park locations (as defined in the Supplementary Guidance: City Centre and Retailing - Hierarchy of Centres) provided that it can be demonstrated that such locations serve an important retail function not addressed by shops in existing centres (i.e. as defined under Tiers 1-4 of the Hierarchy).

1558: Paragraph 6 should be amended: "proposals shall not detract significantly from the vitality or viability of any first, second, third or fourth tier retail location listed in the Supplementary Guidance nor should it detract from the viability of convenience goods retail provision in retail parks identified in the Supplementary Guidance where existing retail provision in these locations provide an important retail function not provided in any Tier 1 to Tier 4 centre".

1558: "Edge-of-Centre" and "Out-of-Centre" locations should be defined in the glossary in accordance with the definitions provided in current and recent Scottish Planning Policy. This is addressed in a separate response form to the Glossary.

#### Policy RT2 - Out of Centre Proposals

1438: Cumulative impact should form part of Policy RT2 - Out of Centre Proposals criteria requirements.

1558: Criterion 1 of Policy RT2 - Out of Centre Proposals should be amended to read "...is acceptable in terms of Policy RT1..."

1558: Criterion 2 of Policy RT2 - Out of Centre Proposals should be amended to read "...on the vitality or viability of any retail location (including the retail parks) listed in Figure 1 in Supplementary Guidance..."

#### Policy RT3 - Town, District and Neighbourhood Centres

395: The Boulevard Retail Park should be identified as Policy RT3 - Town, District and Neighbourhood Centres on the Proposals Map, and listed under "District Centres" in Figure 1 of the Supplementary Guidance. This amendment would reflect the existing (and potential) uses of this established retail location.

395: Policy RT3 - Town, District and Neighbourhood Centres should be amended to provide a direct link to Policy RT1 - Sequential Approach and Retail Impact and the hierarchy of centres listed in the Supplementary Guidance. This would ensure that appropriate recognition is given to these established retail centres, and that the sequential approach is correctly followed. Such an amendment would also be in-line with the treatment of the retail areas at Danestone; Dyce; Middleton Park and Upper Berryden which have all been identified as Policy RT3 - Town, District and Neighbourhood Centres on the Proposals Map, and listed under District Centres in Figure 1 of the Supplementary Guidance.

#### Policy RT5 - Retail development Serving New Development Areas

1189: The following modification to paragraph 3.59 is suggested: Local shops and other places of work are to be provided in all new major development areas to encourage more sustainable travel patterns. Sites will be identified through the masterplanning process.

1189: A modification is suggested to Policy RT 5 - Retail Development Serving New Development Areas to make it clear that it is not only land for retail that needs to be identified, but that other work spaces also need to be integrated in order to form part of the mix.

Tesco Wellington Road

1472: The Tesco Wellington store and surrounding retail uses should be changed to a Commercial Centre.

**Summary of response (including reasons) by planning authority:**

Policy RT1 - Sequential Approach and Retail Impact

235, 1483: The Council welcome all comments expressing support for Policy RT1. The Local Development Plan will continue to focus new retail, commercial, leisure and other appropriate uses in accordance to the sequential approach.

782 It is widely accepted by the City Council and its partners that the primary role of the Aberdeen Western Peripheral Route is to act both as a bypass and a distributor road. The Council continues to support the sequential approach for retail development and any proposals would need to be assessed against Policy RT1 and all other policies in the Plan.

1438: One representation stated that Policy RT1 fails to take account of the cumulative impact of comparison goods floorspace outwith the city centre and other town centres. It is our contention that point two of Policy RT2 makes it clear that any planning application would have to consider the impact of new provision on existing locations. The scope of any Retail Impact Assessment is encouraged to look at the cumulative impact.

843, 1558, 1438, 1472, 1550, 1558: With regards to Policies RT1 and RT2, one respondent wished the policies to be expanded to take account of the cumulative impact of comparison goods floorspace outwith the city centre and other town centres. We believe that Policy RT1 sufficiently addresses the cumulative impact of comparison goods floorspace outwith retail centres. Therefore Retail Impact Assessments will look at the cumulative impact of comparison goods floorspace when development is proposed.

We accept that there is a difference in terminology with regards to retail parks and commercial centres. Scottish Planning Policy makes it clear that retail parks are included within their definition of commercial centres. However, we are of the view that "retail park" more clearly defines the role of these centres in Aberdeen.

The role of Retail Parks in the retail hierarchy is defined in Figure 1 of Supplementary Guidance 6.1 - Hierarchy of Centres, which shows that the vitality and viability of these retail locations are not protected. Therefore, Retail Parks are not included in Policy RT1 - Sequential Approach and Retail Impact.

There are a number of superstores across the City that are zoned within a District Centre. These superstores are zoned in such a way because of their proximity to residential areas and the presence of smaller shops and services adjacent to the store. It is our contention that Retail Parks are out of centre retail locations and are therefore not protected in Policy RT1 - Sequential Approach and Retail Impact. If a convenience superstore is within the Retail Park zoning then it is not afforded the same level of protection as a superstore located in a district centre zoning. The criteria for a centre being classed as a district centre are set down in Supplementary Guidance 6.1 – City Centre and Retailing - Hierarchy of Centres (RD70).

We are of the opinion that the Beach Boulevard Retail Park and Sainsbury's at Garthdee

fit the definition of 'Retail Park' in the Local Development Plan as it is a grouping of three or more retail warehouses with associated car parking. This reflects the designation in the extant Aberdeen Local Plan. The Beach Boulevard Retail Park does not fit the definition of 'District Centre' in the Local Development Plan as it primarily offers a retail function with only one unit (DW Sports Fitness) offering a mixed Class 1 and Class 11 Use. With regards to Sainsbury's at Garthdee this store and others adjacent to it offer primarily a retail function which does not fit the 'District Centre' definition. Therefore, both retail locations, Beach Boulevard Retail Park and Sainsbury's at Garthdee, do not reflect a mix of uses expected in a District Centre.

#### Policy RT2 - Out of Centre Proposals

235, 1438: The Council welcome comments expressing support for Policy RT2.

1438: One representation states that Policy RT2 fails to take account of the cumulative impact of comparison goods floorspace outwith the city centre and other town centres. It is our contention that point two of the policy makes it clear that any planning application would have to consider the impact of new provision on existing locations. The scope of any Retail Impact Assessment is encouraged to look at the cumulative impact.

1558 If the Reporter is so minded we could add in the definition of 'edge of centre' and 'out of centre' into the Glossary - Part 5 of the Local Development Plan. We will use the definitions agreed in the 2008 Aberdeen Local Plan (CD12).

1558 It has been noted that there is a minor drafting error in referencing in Policy RT2. In order to correct this point, if the Reporter is so minded the Council would accept a reference to Policy RT1 rather than R1.

#### Policy RT3 - Town, District and Neighbourhood Centres

395: One respondent has asked for Policy RT3 - Town, District and Neighbourhood Centres to be amended to provide a direct link to Policy RT1 - Sequential Approach and Retail Impact and Supplementary Guidance - Hierarchy of Centres to ensure that appropriate recognition is given to established retail centres and that the sequential approach is correctly followed. We are of the opinion that RT1 - Sequential Approach and Retail Impact is sufficiently robust that no link is required to RT3 - Town, District and Neighbourhood Centres.

1189: Policy RT3 sets out the criteria that will be used to assess any development proposal for change of use from retail to non-retail. The Council considers that the Policy need not stipulate what type of use will be permissible for any development proposal. As such, the Council does not think the suggested change of wording to Policy RT3 is appropriate. However, if the Reporter is so minded the Council would accept the suggested wording in paragraph 3.59 but not in Policy RT3 itself.

#### Policy RT5 - Retail Development Serving New Development Areas

800: Support for the policy is noted.

1189: Similar to the above comment the same respondent wished that Policy RT5 should be clearer with regards to other suitable uses being provided as well as retail in new developments. We contend that Policy RT5 makes it clear that it is not only land for retail

that needs to be identified.

1558: It has been noted that there is a minor drafting error in referencing in Policy RT5. In order to correct this point, if the Reporter is so minded the Council would accept a reference to Policy RT1 rather than R1.

Tesco, Wellington Road

1472: One respondent commented on the mixed use zoning of Tesco on Wellington Road, to the south of the city. We think that the current use of this site and the adjacent retail units are acceptable. We do not believe it appropriate to zone the site as a retail park due to the severance that Wellington Road causes. Tesco and Lidl to the west of Wellington Road are very much separate from the units to the east. Therefore, we do not support the re-zoning of this site from mixed use to Retail Park.

**Reporter's conclusions:**

**Reporter's recommendations:**

<b>Issue (ref and heading):</b>	<b>POLICY NE1: GREEN SPACE NETWORK</b>	<b>116</b>
<b>Development Plan reference:</b>	Policy NE1 - Green Space Network and shown on Proposals Map	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
<p>Ms Karen Hughes (245), Mrs Shiela Young of Bridge of Don Community Council (256), Mr Robin McIntosh (272), Ms Moira Murrison (283), Sir/Madam K. J. C. McIntosh (284), Mr Paul Thomson (285), Mr Mike Shepherd of Friends of Union Terrace Gardens (345), Councillor Debra Storr of Aberdeen and Aberdeenshire Green Party (353), Dr Maggie Keegan of Scottish Wildlife Trust (363), Ms Nicola Abrams of Scottish Environmental Protection Agency (408), Dr Richard Pelling (435), Ms Fiona McNally of Paths For All (472), Ms Claire Fowler of Keppie Planning and Development on behalf of Drum Property Group Ltd (479), Mr Mike Miller (520), Mrs Catherine Thornhill of Ryden LLP on behalf of NHS Grampian (640), Ms Maire Daly of Scottish Natural Heritage (662), Mr James Welsh of Halliday Fraser Munro Planning on behalf of Mr. Malcolm Hay (766), Mr Robert Stearn (890), Mr Ian Francis of RSPB Scotland (919), Mr Richard Bush of Richard Bush Chartered Town Planner on behalf of Mrs Nicola Hutcheon (1205), Ms Lorraine Jones of Sport Scotland (1244), Mr Angus Yarwood of The Woodland Trust Scotland (1432), Mrs Nicola Barclay of Homes for Scotland on behalf of Grampian House Builders Committee (1442), Miss Shelley Thomson of Stewart Milne Homes (1464), Mrs Charlotte Goodbody (1484), Professor Ivan Goodbody (1486), Mr Ben Freeman of Bancon Developments Ltd (1561), Mr Ian Cox of Kingswells Community Council (1579).</p>		
<b>Provision of the Development Plan to which the issue relates:</b>	Policy provides protection for areas of Green Space Network and a mechanism for incorporating Green Space within new developments.	
<b>Summary of the representation(s):</b>		
<p>Support for Policy</p> <p>245, 256, 363, 662, 1244, 1432 Support for policy. 408 Support for identification of the waterbodies and watercourses network on the proposals map and the inclusion of a Policy to protect and enhance it. 1432 Support for habitat network approach and it is important that this be taken into account when development is considered.</p> <p>Appendix 2</p> <p>662 Particular support for references to Green Space Network against specific allocations in Appendix 2. This approach could, over time, bring significant improvements for wildlife and for the people of the city. This strategic approach provides the basis for engagement with developers on how they can take account of, and deliver improvements to, the network as part of making good places for people to live.</p> <p>Protection of Greenspace</p> <p>272, 283, 284, 285, 345, 353, 435, 520, 890 Where provision of Green Space is currently inadequate, mere replacement and mitigation of green space loss is not sufficient.</p> <p>Green Space Network Enhancement:</p>		

363 Respondent advocates that developers take the opportunity to enhance the green network through the design layout of the development. If it is not possible to incorporate the network within the development, then habitat offsetting through developer contributions could add value to the green network elsewhere.

#### Health and Active Travel

472 Pleased that active travel is mentioned and that the access value of greenspace is highlighted.

#### Nature Conservation

919 Refer to Aberdeen City Council's statutory duty for biodiversity conservation under the Nature Conservation (Scotland) Act 2004, along with closer reference to the recent Aberdeen City Nature Conservation Strategy. The Policy's weak compensation provisions should be strengthened.

#### Green Space Network Selection and Justification

1205 The wording of this policy is inappropriate. It is both unduly restrictive and too general, lacking in specification. It is also overlong and repetitive. It is not clear whether reference is being made to the Green Space Network as a whole or rather, to any part of it. The policy fails to recognise potential cases where the scope for an overall net equivalent replacement or upgrading of the character and function of the Green Space Network would result from a development proposal. Policy fails to recognise that there should normally be scope for development not just to cross but to take place within the Green Space Network itself. It is important that only land identified and justified as having significant and substantial value is covered by Policy NE1 Green Space Network and that the value is identified in the Local Development Plan or supporting documents. The extent of the Green Space Network designation is inappropriate. It is spread too extensively and does not identify the contribution that particular parts of Green Space Network will make to the provision, protection enhancement or connectivity of open space or habitats. Green Space Network should be narrow, linear features. No open space strategy has been prepared to inform the Local Development Plan. Only a recent open space audit has so far been carried out. District Wildlife Sites have not been reviewed since the 1980s and may not meet the standards required to convert them to Local Nature Conservation Sites. The extent of designation should be restricted to features of proven, significant value

1442 Respondent's members believe that there is no reason for the Green Space Network to go through allocated sites. It will be part of the masterplan process to determine the route and position of the Green Space Network and the Local Development Plan proposals map should not be prescriptive.

Policy NE1 Green Space Network states that 'Masterplanning of new developments should determine the location and extent of the Green Space Network within these areas' however the City Wide proposals already show Green Space Network areas. The inclusion of NE1 areas within Land Release areas conflicts with the intention of Policy NE1 to determine the extent of these areas through a Masterplanning approach. The deletion of these areas from the Proposals Maps would allow this policy to be applied as it intended rather than pre-determining the outcome.



1464, 1561 Objects to Green Space Network shown on proposals map and on development / opportunity sites. Conflicts with masterplanning process, Local Development Plan identifies that, "masterplanning for new developments should determine the location and extent of the Green Space Network within these areas" and therefore there is no requirement to show them on the proposals plan particularly as they are listed in the Infrastructure Requirement of the plan.

#### Mitigation and Developer Contributions:

1432 With regard to the policy's statement on the need for impacts on its features (such as habitat) to be mitigated by enhancing Green Space Network, it must be recognised that the loss of many habitats cannot be mitigated for. Ancient trees and woodland for example are irreplaceable.

#### Links to Green Belt

1244 The Scottish Planning Policy also looks for greenspace networks to be linked to the green belt, stating (para 164) that where possible these should extend into the greenbelt. 1579 The relative status of Green Belt and Green Space Network needs much clearer explanation in terms of protecting land from inappropriate development. Local people were not sufficiently consulted about the choice of areas to be designated as Green Space Network.

#### Site Specific

Union Terrace Gardens - 272, 283, 284, 285, 345, 520 Outlines the wide variety and high level of use of Union Terrace Gardens. States that this range of uses would be difficult to see naturally occurring in an artificially constructed plaza rather than the gardens. Union Terrace Gardens is the community garden for many city centre residents. 890 Note that Union Terrace Gardens currently provides a varied resource for recreation this is an intrinsic part of its 'character' and 'function'. This would not be true of a City Square.

NHS Grampian Sites - 640 Objects to land under NHS Grampian's control, which is required for future expansion of healthcare facilities being identified as Green Space Network without any regard to the function of these sites. States that the inclusion of these CF1 sites as part of the Green Space Network does not meet criteria set out in Scottish Planning Policy for the designation of green networks.

Land Near OP27 - 766 Land designated as Green Space Network at Newton Croft, to the south of Bucksburn School and east of site OP27, does not contribute to the objectives of the network as set out in the proposed Local Development Plan. Two areas of open space to the north-east of site OP27 in the proposed plan do not connect to the wider Bucks Burn valley network and question justification for the inclusion of these sites.

Gillahill - 1484, 1486 The area previously identified in the Main Issues Report at Gillahill (reference 3/05) should be designated as Green Space Network.

#### **Modifications sought by those submitting representations:**

##### Protection of Greenspace

272, 283, 284, 285, 345, 353, 435, 520, 890 Add 'Where the audit of Open Space shows

that provision is inadequate, then the strong presumption must be against the loss of Green Space and mitigation is unlikely to be sufficient.'

#### Health and Active Travel

472 Policy should mention the health benefits of greenspace.

#### Appendix 2

662 All the allocations listed in Appendix 2 should be re-checked in terms of their proximity to the green space network. We have identified a site (OP134) where the network will be an important consideration for any proposal, but where this was not highlighted under 'other factors'. There may be other such sites where a reference to the network under 'other factors' would appropriate.

#### Nature Conservation

919 Refer to Aberdeen City Council's statutory duty for biodiversity conservation under the Nature Conservation (Scotland) Act 2004, along with closer reference to the recent Aberdeen City Nature Conservation Strategy.

#### Mitigation and Developer Contributions

919 Strengthen the compensation provisions within the policy.

#### GREEN SPACE NETWORK Selection and Justification

1205 Reword para 1 of Policy NE1 Green Space Network to read: 'To the extent that a particular , significant and substantial value for wildlife, recreation, landscape or access has been identified and justified within it, the City Council will promote the Green Space Network and protect or enhance its overall value, whether as part of development proposal or otherwise.'

Para 3 delete purpose included in proposed rewording of para 1.

Restrict the Green Space Network designation on proposals map.

#### Links to Green Belt

1244 Reference to the fact that the Council will seek to ensure these green networks extend into the greenbelt, and that the masterplan sites take this into consideration in the design process is required.

#### Green Space Network Selection and Justification

1432 In paragraph 3.64 add the Aberdeen City Native Woodland Survey for Scotland report 2 to the list that comprises Aberdeen's Green Space Network.

1442 The city wide-proposals maps should be amended with the deletion of NE1 Green Space Network zonings within Land Release Areas.

1464 Alter policy to read: "Proposals for development that are likely to destroy or erode

the character or function of the Green Space Network will not be permitted, unless essential for the realisation of the spatial strategy and subject to their impact being suitably mitigated through alternative provision." Also, remove Green Space Network annotation on the Local Development Plan proposals map (opportunity sites).

1561 Remove allocated development land from Green Space Network.

Site Specific:

NHS Grampian Sites - 640 Remove land designated CF1 at Foresterhill, Royal Cornhill Hospital and Woodend Hospital from Green Space Network.

Land Near OP27 - 766 Land at Newton Croft and the two areas of open space to the north east of site OP27 should be removed from Green Space Network.

Gillahill - 1484, 1486 Designate Gillahill area as Green Space Network.

### **Summary of response (including reasons) by planning authority:**

Support for Policy

245, 256, 363, 408, 662, 1244, 1432 Support for policy is noted.

Open Space Supplementary Guidance

272, 283, 284, 285, 345, 353, 435, 520, 890, 472, 1205, 1442, 1464, 1484, 1486, 1561, 919, 1205, 1244 Further information available in the Open Space Supplementary Guidance, which was approved by the Enterprise, Planning and Infrastructure Committee on 15th March 2011 is referenced in response to several of the points covered in the following response, particularly with regard to the response numbers listed above. Therefore, if the Reporter is so minded, the links with Supplementary Guidance could be clarified by adding the following text to the end of paragraph 3.64 of Policy NE1 Green Space Network, "See Supplementary Guidance on Open Space for further information on Green Space Network."

Protection of Greenspace

272, 283, 284, 285, 345, 353, 435, 520, 890 The protection of green space is covered by Policy NE3 Urban Green Space so there is no need to add reference to a presumption against development where existing provision is inadequate within policy NE1. The point being made by the respondents may however have arisen due to the inclusion of 'open space' in the features listed in the last paragraph of the policy. The reference to open space here is unnecessary and, if the Reporter is so minded, could be removed in order to avoid any confusion. On and off-site open space provision is covered by Open Space Supplementary Guidance (RD82). Specific reference to Union Terrace Gardens is covered under Issue 69 (Allocated Site: Denburn Valley/Belmont Street/Union Street).

Green Space Network Enhancement

363 The respondent's support for the enhancement of Green Space Network either directly within developments or through developer contributions is noted. This is an aim of the policy and guidance on this is provided within Open Space Supplementary

Guidance (RD82).

#### Health and Active Travel

472 It is not necessary to mention the health benefits of greenspace within Policy NE1 Green Space Network as its benefits, including encouraging healthier lifestyles, are mentioned in para 3.62. They are also outlined further in Open Space Supplementary Guidance (RD82).

#### Nature Conservation

919 The Council does not consider it to be necessary to amend the policy or supporting text, to repeat Scottish Government guidance or legislation in the Local Development Plan as the policies should themselves be in line with legislative requirements. The Nature Conservation Strategy (CD26) is referenced in Policy NE8 Natural Heritage and, while there are clear links, as there are with various other strategies, it is not necessary to make reference within Policy NE1 Green Space Network.

#### Green Space Network Selection and Justification

1205, 1442, 1464, 1484, 1486, 1561 The Green Space Network has been identified by overlaying a number of other policies and the rationale for this has been explained in Open Space Supplementary Guidance. This rationale sought to ensure that Green Space Network only applies to land that offers significant value to Green Space Network features, (habitat, landscape, recreation etc), or land that offers opportunities to link these areas, and therefore enhance their value further. It is important to maintain the integrity of the Green Space Network by applying a strong and consistent rationale, and this required a review of the designation contained in the Adopted Aberdeen Local Plan. It is not necessary to remove or restrict the NE1 zonings from the proposals map as Policy NE1 states that the masterplanning of new developments should determine the location and extent of the Green Space Network within these areas. The Council does not feel it is appropriate therefore to add a caveat that allows for the character or function of the Green Space Network to be destroyed or eroded if it is necessary for the realisation of the spatial strategy.

1432 The Aberdeen City Native Woodland Survey for Scotland Report 2 (RD35) cannot be added to the list in paragraph 3.64 as it was not one of the datasets used to identify Aberdeen's Green Space Network. The Scottish Natural Heritage Ancient Woodland Inventory (RD24) and the Open Space Audit, which used aerial photography and site assessment to identify all woodland, were used to identify woodland for inclusion in Green Space Network.

#### Mitigation and Developer Contributions

919, 1205 The listing of the features or purpose of Green Space Network in paragraph three should remain as they make clear the instances where mitigation measures may be required. It is not clear how the compensation provisions can be strengthened further within the policy, however, Open Space Supplementary Guidance includes further information on Green Space Network and on developer contributions.

#### Links to Green Belt

1244, 1579 See response to NE2 Green Belt. It is clear from the Proposals Map that Green Space Network extends into the greenbelt, as is supported by Scottish Planning Policy. It is not therefore necessary to make direct reference in Policy NE1 to the fact that the Council will seek to ensure green networks extend into the greenbelt. Open Space Supplementary Guidance explains that masterplanning and design will take Green Space Network (which in turn extends into Green Belt) into consideration. The Supplementary Guidance also explains how Green Space Network will be enhanced and the links it has with the Open Space Strategy, on which local people were consulted throughout its development. During that consultation views on important green space and ideas for improvement were collected and have been incorporated into the Geographic Information System (GIS) tool referred to in the Supplementary Guidance, which will assist in enhancing Green Space Network.

## Appendix 2

662 Appendix 2 provides an indication of some of the factors to be considered for the development of these sites. It is not a conclusive or comprehensive list. The Proposals Map clearly states where Policy NE1 applies, so it is not necessary to review the 'other factors' listed in the appendix.

### Site Specific:

NHS Grampian Sites - 640 Land designated CF1 at Woodend Hospital is covered by Policy NE1 on the proposals map because of the need to safeguard a buffer along the North Burn of Rubislaw and because it forms part of the Open Space Audit. Similarly, CF1 land at Foresterhill was designated Green Space Network because it forms part of the Open Space Audit, having biodiversity and access value. The site was also identified as a 'stepping stone', as explained in the Supplementary Guidance on Open Space and could offer a greenspace resource for the rest of the site. CF1 land designated Green Space Network at Royal Cornhill Hospital formed part of the Open Space Audit and is within the Rosemount and Westburn Conservation area, the purpose of which being to preserve the parkland setting of the Cornhill Estate. For the above reasons and as the masterplanning process can include determining the extent and location of the Green Space Network there is no need to remove this land from NE1.

Land Near OP27 - 766 The two areas of land to the north east of site OP27 should remain as Green Space Network as they form part of the Open Space Audit and include play facilities and playing fields. The land at Newton Croft is designated Green Space Network in order to maintain and enhance a green link between the Bucks Burn and Auchmill Golf Course, Community Woodland and surrounding communities.

Gillahill - 1484, 1486 The land at Gillahill was not designated as Green Space Network in the Proposed Plan as it did not meet the criteria included in the rationale, as referred to in the response titled 'Green Space Network Selection and Justification' above.

### Reporter's conclusions:

### Reporter's recommendations:



<b>Issue (ref and heading):</b>	<b>POLICY NE2: GREEN BELT</b>	<b>117</b>
<b>Development Plan reference:</b>	Policy NE2 - Green Belt and shown on Proposals Map	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Mr David S. M. Campbell (246), Mrs Shiela Young of Bridge of Don Community Council (256), Dr Maggie Keegan of Scottish Wildlife Trust (363), Mr Guus Glass of Cults, Bieldside and Milltimber Community Council (398), Ms Claire Fowler of Keppie Planning and Development on behalf of Drum Property Group Ltd (479), Mr Scott Leitch of Halliday Fraser Munro Planning on behalf of Mr I. Lakin (771), Mr Scott Leitch of Halliday Fraser Munro Planning on behalf of Mr N. MacRae (772), Ms Lorraine Jones of Sport Scotland (1244), Ms Annemarie Wishaw of SITA UK (1288), Mr James Brownhill (1475), Mrs Elaine Farquharson-Black of Paul & Williamsons LLP on behalf of Waterwheel Inn Limited (1481), Miss Christine Dalziel of Halliday Fraser Munro Planning on behalf of Mr and Mrs Alexander Stephen (1524), Miss Christine Dalziel of Halliday Fraser Munro Planning on behalf of Deeside Golf Club (1525), Mr Bob Reid of Halliday Fraser Munro Planning on behalf of Mr Charles Mitchell (1531), Mr Ben Freeman of Bancon Developments Ltd (1561), Mr Ian Cox of Kingswells Community Council (1579).		
<b>Provision of the Development Plan to which the issue relates:</b>	Policy sets out what development will be considered acceptable in the Green Belt.	
<b>Summary of the representation(s):</b>		
<p>Support for policy</p> <p>246, 256 Support the preservation and protection of green belt.</p> <p>Small scale developments</p> <p>363 Green belt, under section 1b) - multiple 'small-scale' developments can add up to large-scale encroachment of the green belt.</p> <p>Related policies and strategies</p> <p>398 The Local Development Plan refers to a number of land designations and strategies, greenbelt, green space network, urban green spaces, landscape strategy, open space strategy. Instead of providing clarity the plethora of designations and strategies create confusion. The public see the erosion of the greenbelt and want to understand what will be protected to maintain a green environment. In our view the green belt policy was one of the most imaginative and successful pieces of town and country planning instrumentation over the last 60 years. At the moment there seems to be a void as greenbelt land gets swallowed up.</p> <p>Development in feus</p> <p>771, 772, 1531 The wording of the policy should be amended to permit the sub division of existing residential curtilages in the Green Belt.</p> <p>Part 1 and Part 1d of the policy creates a conflict, as an additional house would represent the creation of a separate 'planning unit' that would not be ancillary to the existing activity or use. The policy should not unduly restrict development of the same</p>		

use within existing residential curtilages. The subdivision of appropriate feus does not in anyway compromise the aims and objectives of the Green Belt especially if it is designed to tie in with the related SG.

#### Outdoor recreation

1244 It is appreciated that a policy is required which seeks to preserve the aims of green belt policy. However, the Scottish Planning Policy (see paragraph 164) also outlines the resource that the green belt presents in relation to enabling access to the countryside with a variety of resources for outdoor recreation.

#### Economic development

1288 Part two of this policy lists essential infrastructure which may be permitted in green belt and includes '.roads planned through the masterplanning of new housing and employment allocations, which cannot be accommodated other than in the green belt.' We would suggest that this should be reworded to say '.roads planned through the masterplanning of new housing and economic allocations, which cannot be accommodated other than in the green belt.' There is no reason to restrict the exceptions to employment designations rather than economic development designations.

#### Regeneration

1475 The Green Belt Review is not dated or authored and appears to be an 'uncontrolled' document. Appears to progress with a misinterpretation of the Scottish Planning Policy word 'regeneration' in order to justify development on Green Belt. Regeneration is not a term that should be applied changing Green Belt to housing, stadium and employment land.

#### Development on brownfield sites

1481 Green belt policy should allow for the conversion or change of use of all land and buildings used by existing activities, subject to criteria, which includes demonstrating that the redevelopment will not impact on the aims and objectives of green belt. Conversions should not be limited to private residential use.

1524, 1525 The redevelopment of brownfield land is supported by national and strategic guidance, however, there is no reference to derelict land within the Green Belt policy. Small scale development on sites of this nature does not in any way compromise the aims and objectives of the Green Belt. Therefore, we request that Policy NE2 Green Belt is amended to permit such development on previously developed land.

#### Green Belt Review

1561 Aberdeen City Council were honest in stating at an early stage that Green Belt Review could not be carried out independently from the assessment of development option sites, due to the necessity to identify land for 21,000 houses on greenfield sites between 2007 and 2030. Bancon accept that the two issues had to be addressed together, but equally object to the fact that the Green Belt Review is apparently a retrofit following assessment of development option sites, rather than having formed part of the consideration.



### Restrictive nature of Policy NE2

1561 Bancon object to Policy NE2 on the grounds that it is unnecessarily restrictive, and that it relates to a green belt established as a retrofit following the selection of development sites, rather than through a comprehensive green belt review. The combination of these two factors leads to a green belt that severely and unduly constrains development outwith the allocated sites.

### Green Space Network

1579 The relative status of Green Belt and Green Space Network needs much clearer explanation in terms of protecting land from inappropriate development. Local people were not sufficiently consulted about the choice of areas to be designated as GREEN SPACE NETWORK.

### **Modifications sought by those submitting representations:**

398 We want to see these land designations and strategies integrated into more simple and transparent policy that can be readily understood and which is focussed on the protection of Green areas rather than on possible ways to use them for development. In the meantime we look to the City Council to protect the greenbelt by trying to avoid the rezoning of land for development and putting land back to greenbelt wherever possible.

771, 772, 1531 Reword section 1 of the policy as follows; 1. Proposals for development associated with existing uses and activities in the green belt (including sub-division of residential curtilages) will be permitted but only if the following criteria are met:

a) the development is within the boundary of the existing activity. b) the development is small scale c) the intensity of activity is not significantly increased.

Criteria D deleted.

1244 A reflection in the policy of the positive resource that the green belt is in relation to providing a resource for outdoor recreation.

1288 Change policy wording in part 2 of this policy to read 'roads planned through the masterplanning of new housing and economic allocations, which cannot be accommodated other than in the green belt.'

1475 The Green Belt Review should be removed from the Local Development Plan planning process.

1481 Green belt policy should allow for the conversion or change of use of all land and buildings used by existing activities, subject to criteria, which includes demonstrating that the redevelopment will not impact on the aims and objectives of green belt. Conversions should not be limited to private residential use.

1524 Policy should include the following additional policy exception:

“The following exceptions apply to this policy:

5. Previously used land or buildings in the green belt, which are redundant or obsolete and offer no contribution to the landscape setting of the city will be permitted to be

redeveloped for uses appropriate to their context.”

Supporting text should state that small-scale residential development will be accepted where appropriate.

1525, 1561 Amend the wording of policy NE2: Green Belt, to permit development on previously developed land located in the Green Belt.

The Green Belt policy should be relaxed, in light of it not having been designed to provide a specific function other than encompass left over land after allocations have been made, to allow for specific brownfield development opportunities, including the re-use of non-residential buildings for residential use, reuse of non-residential brownfield land, and reasonable expansion of existing uses

1561 The spatial strategy should better reflect the importance of the green belt, and that the established pattern (and subsequently the only sustainable continued pattern) of green belt dictates that the Countesswells development proposal is inappropriate. The green belt review should be contained within the Local Development Plan or supplementary guidance in a clear manner in order that Development Management decisions can be informed effectively as to the value and function of the green belt in a specific location, and not simply as land left over after development land is identified.

#### **Summary of response (including reasons) by planning authority:**

Support for policy

245, 256 - support noted and welcomed.

Small scale developments

363 Point 1b of Policy NE2 should not be read in isolation. The application of green belt policy needs to be read as a whole and includes all of the criteria in Point 1 and the requirement for appropriate siting, materials and design in Point 4. We consider that the objectives and character of the green belt can be maintained through this and other Local Development Plan policies.

Related policies and strategies

398 Green belts are generally permanent but their boundaries are not static. Each new Local Plan or Local Development Plan has changed green belt boundaries in order to accommodate the greenfield development requirements of the time. The Aberdeen City and Shire Structure Plan (CD8) says in paragraph 4.23 that the green belt around Aberdeen will continue to play a vital role in protecting the character and landscape setting of the City. However, it will need to change to meet the growth this plan seeks to achieve. It must guide development to appropriate places while protecting the most important areas. The Proposed Plan changes green belt boundaries in order to accommodate the housing and employment land allocations that the Structure Plan requires to take place. The advantage of identifying ample greenfield housing and employment land to take us through to 2030, and possibly beyond, is that it should reduce the need to make large scale changes to the green belt for the foreseeable future. This will help to promote a feeling of permanence. Those areas which continue to play a vital role in protecting landscape setting and providing open space for recreation are zoned as green belt. Our approach to deciding which areas should be released and

which should remain as green belt is explained in the Aberdeen Green Belt Review (CD19).

Development in feus, development of brownfield land and restrictive nature of Policy NE2

771, 772, 1531 and 1481, 1524, 1525, 1561 Scottish Planning Policy (CD3) paragraph 163 is clear on the type and scale of development that may be appropriate within the green belt. New build residential development is not considered appropriate. Some residential curtilages or land that may be considered to be brownfield sites in the green belt are large and could accommodate more than just small scale development. Even a single house in the wrong location can have a significant impact in a largely rural setting. The Scottish Planning Policy does allow for the conversion and re-use of traditional agricultural buildings. It also allows for the intensification of existing uses. However, the Scottish Planning Policy does not suggest that conversions to any use would be acceptable, only those outlined in paragraph 163. The Scottish Planning Policy also points out that the cumulative erosion of a green belt's integrity through the granting of individual planning permissions should be avoided. We would agree and Policy NE2 complies with this stance.

Outdoor recreation

1244 Paragraph 3.66 of the Proposed Plan mentions the green belt aim of providing access to open space in line with the Scottish Planning Policy. The first paragraph of Policy NE2 allows for recreational uses which are compatible with an agricultural or natural setting. In making the allocations we have sought to avoid recreation areas, parks, playing fields and assets such as golf courses. However, green belt is essentially a restrictive policy covering a large area and not all of it is necessarily suited for recreational purposes. Those areas which we think have the greatest potential for recreation have been identified as NE1 Green Space Network on the proposals map. This policy has a more positive elements, i.e. this is where we think resources should be prioritised in terms of seeking enhancements.

Economic development

1288 The Proposed Plan refers to 'employment land' allocations throughout, not 'economic' allocations - a term that is unclear and unhelpful. Furthermore, Structure Plan Figure 3 shows the 'employment land allocations' which this plan has to identify. For clarity and consistency, we would intend to stick with the same terminology.

Regeneration

1475 The Green Belt Review (CD19) is a background paper that informs the decision making behind the Proposed Plan. In respect of the misuse of the word 'regeneration' the Green Belt Review is merely quoting one of the purposes of green belt as set out in Scottish Planning Policy. What is meant by this is that green belts should be used to direct planned growth to the most appropriate locations. Planned growth should go to the allocated sites (greenfield, brownfield and regeneration areas). Green belts ensure that unplanned speculative growth does not happen in inappropriate (i.e. green belt) areas. Without this control and direction, regeneration is less likely to happen as developers will instead concentrate on easier to develop and more lucrative sites elsewhere.

### Green Belt Review

1561 Green belt should not be regarded as land left over after the allocations were made. It is an essential part of the settlement strategy in that it directs development towards the most appropriate locations (a primary objective of green belt) by preventing development happening in inappropriate locations. The policy is therefore necessarily restrictive and in line with the type of development considered appropriate in Scottish Planning Policy paragraph 163. The Green Belt Review (CD19) does not ignore the wider green belt. It explains how the allocations were made and considers their detailed boundaries. In doing so it explains why land outside the boundaries of the allocations should remain as green belt and gives a general overview of some of the key features in each area of the city. The wider landscape function of green belt is also explained in the Landscape Strategy Part 1 - Maintenance of Aberdeen's Landscape Setting (CD28) which is part of the Proposed Plan's Technical Appendices. The Green Belt Review (CD19) is a background paper that informs the decision making behind the Proposed Plan which is why it is included in the Technical Appendix and not the Supplementary Guidance. Development management decisions for proposals in the green belt will be informed by Policy NE2 and other plan policies, the Landscape Strategy Part 1, Scottish Planning Policy and relevant Supplementary Guidance such as Conversion of Steadings (Supplementary Guidance 3.4). These are considered to provide a clear framework for decision making.

### Green Space Network

1579 The roles of the green space network and green belt are explained in the preamble to Proposed Plan Policies NE1 and NE2 respectively. Essentially green belt is a protective policy which provides clarity and certainty on where development will and will not take place. Green belt direct development to allocated sites and prevents it from happening in inappropriate locations - in other words, locations in the green belt. Paragraph 164 of Scottish Planning Policy explains that green belt is not a designation designed to safeguard natural heritage resources. It says that wherever possible, green networks within settlements should extend into the green belt. This is the role of the green space network. This overlays other policies - not just green belt - so that it identifies the network where we would like to see the protection and enhancement of the wildlife, landscape and access resources that are identified and the linkages between them. Any proposal in the green space network would have to satisfy both that policy, and whichever policy lies underneath. We consider that paragraphs 3.61 to 3.64 of the Proposed Plan clearly explain this role. The opportunity for people to comment on the extent of the green space network was provided by the release and consultation period of the Proposed Plan.

### Reporter's conclusions:

### Reporter's recommendations:

<b>Issue (ref and heading):</b>	<b>POLICY NE3: URBAN GREEN SPACE</b>	<b>118</b>
<b>Development Plan reference:</b>	Policy NE3 - Urban Green Space and shown on Proposals Map	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Mrs Shiela Young of Bridge of Don Community Council (256), Mr Robin McIntosh (272), Ms Moira Murrison (283), Sir/Madam K. J. C. McIntosh (284), Mr Paul Thomson (285), Mr Mike Shepherd of Friends of Union Terrace Gardens (345), Councillor Debra Storr of Aberdeen and Aberdeenshire Green Party (353), Ms Nicola Abrams of Scottish Environmental Protection Agency (408), Mr Mike Miller (520), Ms Lorraine Jones of Sport Scotland (1244), Mr Angus Yarwood of The Woodland Trust Scotland (1432), Mr Neale Bothwell (1540).		
<b>Provision of the Development Plan to which the issue relates:</b>	Policy provides protection for existing areas of Urban Green Space	
<b>Summary of the representation(s):</b>		
<p>Support for policy</p> <p>256, 272, 283, 284, 285, 345, 520 Support for policy</p> <p>Union Terrace Gardens</p> <p>272, 283, 284, 285, 345, 520 In the context of Union Terrace Gardens we would contend that this policy should rule out the City Square proposals as: 1. there would be significant loss to the landscape character and amenity of the site and adjoining areas 3. the site is of wildlife and significant heritage value 4. there are established mature trees including the remnant of Corbie Wood. 5. And replacement green space is unlikely to provide similar or improved benefits. Accessibility can be improved without the wholesale destruction of the gardens.</p> <p>Protection of Urban Green Space</p> <p>353 Support retention of public open space other than in exceptional circumstances, which should not include external financial inducements. 1540 Respondent seeks an amendment to the policy, adding 'Mitigation of loss of high quality green spaces is likely to be difficult and the presumption should be against their loss'.</p> <p>Water Environment</p> <p>408 Notes omission of a specific reference to the water environment. In some cases water features such as watercourses, ponds etc are located in or adjacent to existing urban green space. Local Development Plans have an important role in the implementation of the Water Framework Directive (RD100) to protect and improve the water environment, and to support the delivery of the River Basin Management Plan and the Area Management Plan.</p> <p>Identification of Playing Fields</p> <p>1244 Supports the fact that this policy relates to all areas of urban greenspace, and not only those identified in the Plan but encourages all playing fields to be identified in the</p>		

Local Development Plan - refers to paragraph 156 of Scottish Planning Policy.

#### Scottish Planning Policy

1244 Highlights that Scottish Planning Policy sets out specific criteria relating to the redevelopment of playing fields. Policy NE3's criteria for assessing development affecting all urban greenspace differs from Scottish Planning Policy's criteria relating to playing fields and as such does not accurately reflect national policy.

#### Intent of Policy

1244 Considers that the 2 sections of the policy (the second section commencing 'In all cases') sit somewhat uneasily together. For example, is the second section of the policy intended to apply to proposals involving development of and in the sites themselves or development affecting them?

#### Definition of Urban Green Space

1244 Notes that there is no definition of urban green space in the Policy, which would have been helpful.

#### Opportunity Sites

1244 Seeks information on any pitch sites affected by Opportunity Sites that may have been missed within the respondent's submission.

#### Reference to Woods

1432 Add woods to the list of green space that will not be granted planning permission (first paragraph) to make the policy consistent with the Scottish Government's Policy on the Control of Woodland Removal.

### **Modifications sought by those submitting representations:**

#### Support for Policy

256 No change required

#### Protection of Urban Green Space / Union Terrace Gardens

272, 283, 284, 285, 345, 353, 520, 1540 Add 'Mitigation of loss high quality green spaces is likely to be difficult and the presumption should be to against their loss.'

#### Water Environment

408 In order to support the implementation of the Water Framework Directive (RD100) to protect and improve the water environment, and to support the delivery of the River Basin Management Plan (RD56) and the Area Management Plan, re-word policy to include the following additional criteria:- "6. they do not impact detrimentally on lochs, ponds, watercourses and wetlands within the vicinity of the development."

#### Identification of Playing Fields

1244 All playing fields/sports pitches should be identified in the Local Development Plan, not only the larger sites.

#### Scottish Planning Policy

1244 Amendment to the policy which makes clear the specific national policy requirements applying where pitch redevelopment is proposed. This to be either a specific policy, or section within policy NE3, following the criteria set out in paragraph 156 of the Scottish Planning Policy.

#### Intent of Policy

1244 Clarification of the intent of the policy, i.e. does it apply to development of/in the sites themselves or development which may affect them also?

#### Definition of Urban Green Space

1244 Inclusion of definition of 'Urban Green Space' is required in the Glossary.

#### Opportunity Sites

1244 None, the comment is seeking further information.

#### Reference to Woods

1432 In Policy NE3, first paragraph, add woods to the list of green space that will not be granted planning permission.

### **Summary of response (including reasons) by planning authority:**

#### Support for Policy

256, 272, 283, 284, 285, 345, 520 Support for policy is noted.

#### Protection of Urban Green Space / Union Terrace Gardens

272, 283, 284, 285, 345, 353, 520, 1540 Eight respondents have requested that a sentence be added to Policy NE3 stating that mitigation for the loss of high quality green spaces is likely to be difficult and should not be supported. The Council's view is that this modification is not necessary as the policy's criterion number 5 deals with this point, by ensuring that greenspace offering similar or improved benefits is provided nearby. If the Reporter is so minded, the point could however be clarified within the policy by adding "of similar or better quality" so that criterion 5 reads:

"Replacement green space of similar or better quality is located in or immediately adjacent to the same community, providing similar or improved benefits to the replaced area and is as accessible to that community, taking into account public transport, walking and cycling networks and barriers such as major roads."

Issues raised that relate specifically to Union Terrace Gardens are covered by Issue 69 (Allocated Site: Denburn Valley / Belmont Street / Union Terrace OP98).

## Water Environment

408 The Council's view is that it is not necessary to add a sixth criterion to Policy NE3 relating to impacts on waterbodies, as this is covered by Policy NE8, Natural Heritage.

## Identification of Playing Fields

1244 Policy NE3 notes that only larger areas of Urban Green Space are zoned as NE3 on the Proposals Map but clearly identifies all parks, playing fields, sports pitches and other areas of urban green spaces not marked on the map as being included within the Policy. The Council does not therefore consider it necessary to zone all urban green spaces on the Proposals Map in addition to identifying them within the Policy.

## Scottish Planning Policy

1244 The Council takes the view that Scottish Planning Policy will be considered alongside local policy and that Policy NE3 does broadly reflect the criteria relating to the redevelopment of playing fields as set out in Scottish Planning Policy. Specifically, where paragraph 156 of Scottish Planning Policy says that sites should not be redeveloped except where the proposed development is ancillary to the use of the site as a playing field, Policy NE3 states that permission will not be granted for any use other than recreation or sport. In relation to Scottish Planning Policy's second criterion, Policy NE3 goes further than Scottish Planning Policy in protecting pitches by not specifying that minor parts of pitches may be redeveloped. This is appropriate in Policy NE3 because it applies to other types of green space, not just pitches and therefore such minor parts of pitches may serve other green space functions that should be protected. Scottish Planning Policy's third criterion, requiring replacement of pitches, is covered by Policy NE3's criterion number five. In relation to Scottish Planning Policy's final criterion of paragraph 156, the Council agrees that Aberdeen's Pitch Strategy is out of date and needs to be reviewed and updated. We welcome offers of assistance from SportScotland on this and have initiated discussions on taking this forward. Once completed, the Strategy will be taken into consideration as local policy alongside Scottish Planning Policy. For the above reasons the Council considers it unnecessary to amend Policy NE3 or add a specific policy in relation to outdoor sports area redevelopment.

## Intent of Policy

1244 In response to a request for clarification of the intent of the policy with regard to whether it applies to development of/in the sites themselves or development which may affect them, the policy applies to the urban green spaces themselves, as listed in the first sentence of Policy NE3. The Council considers it unnecessary to include this clarification within Policy NE3. For information, Open Space Supplementary Guidance includes a mechanism for assessing the impact of development on open space in the local area, for example, increasing demand on nearby facilities. This mechanism can highlight for example any measures that may be required to mitigate such impacts, through for example developer contributions towards improving the quality of a nearby open space in order to improve its capacity.

## Definition of Urban Green Space

1244 The Council does not consider it necessary to include a definition of Urban Green Space in the Glossary as the types of land covered by Urban Green Space are included



within Policy NE3. These are explained further in the draft Open Space Strategy, approved for consultation by the Enterprise, Planning and Infrastructure Committee in March 2011, and are based on PAN65 - Planning and Open Space.

#### Opportunity Sites

1244 SportScotland seeks further information on any pitch sites affected by Opportunity Sites that may have been missed within their submission. This point does not require any modification to the Plan, however SportScotland would be consulted on any development affecting pitch sites as part of the planning process.

#### Reference to Woods

1432 There is a request to add "woods" to the list of green space types covered by Policy NE3. Although the list ends with "or all other areas of urban green space", if the Reporter is so minded, it may be helpful to include one of the more natural types of open space, such as "woods" as one of the examples listed in the first sentence of the Policy.

#### **Reporter's conclusions:**

#### **Reporter's recommendations:**

<b>Issue (ref and heading):</b>	<b>POLICY NE4: OPEN SPACE PROVISION IN NEW DEVELOPMENT</b>	<b>119</b>
<b>Development Plan reference:</b>	Policy NE4 - Open Space Provision in New Development	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Mr Graeme Stewart (214), Mrs Shiela Young of Bridge of Don Community Council (256), Mr Robin McIntosh (272), Ms Moira Murrison (283), Sir/Madam K. J. C. McIntosh (284), Mr Paul Thomson (285), Mr Mike Shepherd of Friends of Union Terrace Gardens (345), Councillor Debra Storr of Aberdeen and Aberdeenshire Green Party (353), Mr Gordon Thomson of Barton Wilmore LLP on behalf of Aberdeen Harbour Board (373), Mr Colin McKenna (399), Mr Mike Miller (520), Ms Maire Daly of Scottish Natural Heritage (662), Ms Emelda Maclean of Emac on behalf of Scotia Homes (1189), Ms Lorraine Jones of Sport Scotland (1244), Mrs Nicola Barclay of Homes for Scotland on behalf of Grampian House Builders Committee (1442), Miss Shelley Thomson of Stewart Milne Homes (1464).		
<b>Provision of the Development Plan to which the issue relates:</b>	Policy sets minimum standards for the provision of open space.	
<b>Summary of the representation(s):</b>		
<p>Support for Policy</p> <p>256, 1244 Support policies to protect and enhance the natural environment in Bridge of Don and across the City.</p> <p>373 Support for policy.</p> <p>1442, 1464 Support for new approach to the provision of new open space (i.e. including quality and accessibility considerations in determining provision, rather than just quantity).</p> <p>272, 283, 284, 285, 345, 353, 520 The provision of 2.8 hectares per 1000 people is already low for city centre residents, particularly around the centre. Quality of space is also important: the space needs to be attractive - and people prefer gardens to plazas at least in our environment. Strongly support, noting that in central locations provision is below this level.</p> <p>Open Space Supplementary Guidance - Clarification on Application of Policy:</p> <p>214 What is the required proximity of these open spaces to residential areas, including existing dwellings?</p> <p>399 Developers must be liable for the upkeep of the green areas within their developments and not left in the future to residents associations.</p> <p>662 Para 3.69 refers to supplementary guidance on Open Space, but it isn't clear where this guidance is or whether it will be adopted with the plan.</p> <p>1189 There is no reference to Supplementary Guidance on Open Space in Appendix 6 (on page 71 of the proposed plan) and it has not been published as part of the Local</p>		

Development Plan Proposed Plan consultation.

1189 Reference to potential requirements for developer contributions towards enhanced open space provision should be deleted from the policy given the absence of Open Space Supplementary Guidance explaining the nature and level of these contributions.

1244 SportScotland would be interested in working with the Council to develop the approach to outdoor sports areas within this figure. It is noted that the policy refers to Supplementary Guidance on Open Space, but this does not appear to be available at present.

1442 Disappointed that the Supplementary Guidance has not yet been published so unable to comment on the policy in its entirety.

Consideration of Quality and Accessibility in Determining Necessary Provision:

1442, 1464 Concerned that reference to the quantitative standard in the policy (2.8 hectares per 1,000 people) contradicts the previous statement about not providing minimum standards based on quantity. Greater emphasis needs to be made to the quality of design and the justification of the provision of open space through a design statement, improving existing open space rather than creation of new where there is adequate provision already in the area of development.

Density

1189 Highlights challenge to meet Design and Density policies as well as open space requirements. Suggests that as Open Space Supplementary Guidance is out of date, priority should be given to achieving density requirements.

#### **Modifications sought by those submitting representations:**

Open Space Supplementary Guidance - Clarification on Application of Policy

214 Clarify in the policy.

1189 The reference to the Supplementary Guidance should be removed, or preferably published for consultation at the earliest opportunity.

1244 Clear information in relation to how outdoor sports areas are to be delivered as part of this open space requirement.

Consideration of Quality and Accessibility in Determining Necessary Provision

1442 The words 'at least' should be removed, and the following sentence inserted: 'This figure may be reduced where it is clearly demonstrated through the masterplanning and design process that a sufficient level of quality open space will be provided.'

1464 Change the wording of Policy NE4 to: "The City Council will seek the provision of 2.8ha of open space per 1,000 people in new residential development. A reduction on standards will be acceptable where it is justified through a design statement that that sufficient quality open space has been provided"

## Density

1189 Add a further criterion to identify that where open space requirements conflict with the ability to meet the standards for minimum densities a Design Statement should be submitted to support the scale and nature of the development proposed.

**Summary of response (including reasons) by planning authority:**

## Support for Policy

256, 272, 283, 284, 285, 345, 353, 373, 520, 1244, 1442, 1464 Support for policy noted.

## Open Space Supplementary Guidance - Clarification on Application of Policy

214, 399, 662, 1189, 1244, 1442 Supplementary Guidance on Open Space provides more information on the application of Policy NE4 and was approved as a draft for consultation by the Enterprise, Planning and Infrastructure Committee on 15th March 2011. It is not necessary to list the required proximity of these open spaces to residential areas within the policy, as these accessibility thresholds are provided in the Supplementary Guidance. The Supplementary Guidance also includes further information on the application of the standards relating to Outdoor Sports Areas, and the Council welcomes the opportunity to work with SportScotland on this. The maintenance of public open space is discussed in the Supplementary Guidance, with a preferred approach explained along with a mechanism for calculating maintenance costs. The Guidance also explains how the nature and level of developer contributions will be established. The delay in publishing the guidance has been due to the need to develop it in parallel with the Open Space Strategy, a draft of which was also approved by the 15th March Enterprise, Planning and Infrastructure Committee.

## Consideration of Quality and Accessibility in Determining Necessary Provision

1442, 1464 Now that Supplementary Guidance on Open Space has been published, which contains further information on Policy NE4, if the Reporter is so minded, greater consistency and clarification may be achieved by re-wording Policy NE4 to reflect more clearly the expectation that minimum standards for open space will take into consideration access to existing open space and its quality. If the Reporter is so minded, the first paragraph of the policy could be changed to "The City Council will require the provision of at least 2.8 hectares per 1000 people of meaningful and useful public open space in residential development. Where the Open Space Audit demonstrates that the minimum quantity and accessibility standards outlined in the Supplementary Guidance on Open Space are being met by existing provision, then raising the quality of that provision may be required instead of, or as well as new provision." As Open Space Supplementary Guidance covers and expands on paragraphs 2, 3 and 4 of Policy NE4, if the Reporter is so minded, these could be removed. The Supplementary Guidance also includes more information on design of open spaces. Therefore the Council does not feel it is necessary to emphasise this within Policy NE4, as is sought by one respondent.

## Density

1189 There is not likely to be any conflict with Policy H3, Density, as often where density is high, public open space is even more important in order to provide outdoor, recreational space for communities. This will be a consideration in the masterplanning process. Supplementary Guidance on Open Space makes reference to the need to

consider the scale and nature of the development, at the same time as providing meaningful open space and allowing for off-site provision where appropriate.

**Reporter's conclusions:****Reporter's recommendations:**

<b>Issue (ref and heading):</b>	<b>POLICY NE5: TREES AND WOODLANDS</b>	<b>120</b>
<b>Development Plan reference:</b>	Policy NE5 - Trees and Woodlands	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Mr Matthew Young of Forestry Commission Scotland - Grampian Conservancy (23), Mrs Shiela Young of Bridge of Don Community Council (256), Mr Robin McIntosh (272), Ms Moira Murrison (283), Sir/Madam K. J. C. McIntosh (284), Mr Paul Thomson (285), Mr Mike Shepherd of Friends of Union Terrace Gardens (345), Dr Maggie Keegan of Scottish Wildlife Trust (363), Mr Mike Paterson (515), Mr Mike Miller (520), Mr Sarah McGregor (594), Ms Maire Daly of Scottish Natural Heritage (662), Mr Ian Francis of RSPB Scotland (919), Mr Angus Yarwood of The Woodland Trust Scotland (1432), Mr Neale Bothwell (1540).		
<b>Provision of the Development Plan to which the issue relates:</b>	Policy to provide protection to trees and woodlands	
<b>Summary of the representation(s):</b>		
<p>Support for Policy</p> <p>256, 515, 272, 283, 284, 285, 345, 520, 1540 1432 Strongly supports the inclusion of a target to double the existing tree cover of the city, in the Local Development Plan. Outlines climate change, habitat, flood management, air quality, green infrastructure, health and recreation and sense of place benefits that native woodland creation and individual tree planting delivers.</p> <p>Trees and Woodland Strategy</p> <p>23 Aberdeen City Indicative Forestry Strategy should be mentioned within the Plan.</p> <p>594, 1432 There should be associated supplementary guidance that gives effect to a Tree and Woodland Strategy for Aberdeen City. Provides various arguments, including reference to national policy, in support of the need for a Trees and Woodland Strategy for Aberdeen City.</p> <p>919 The policy should make active provision for measures to achieve the "doubling" of tree and woodland cover that is desired. The current policy wording is predominantly defensive. Only one of the five bullet points relates to woodland expansion and it has no targets.</p> <p>Scottish Government Control of Woodland Removal Policy</p> <p>23, 1432 Policy should reference the Scottish Government's policy on the Control of Woodland Removal.</p> <p>662 Highlights requirement to comply with the criteria set out in Scottish Government Policy on Control of Woodland Removal.</p> <p>Scottish Planning Policy</p> <p>662 The policy does not provide an adequate level of protection as envisaged by</p>		

### Scottish Planning Policy.

1432 Policy should reference paragraphs 146-148 in the Scottish Planning Policy 2010, which make particular reference to the importance of trees and woodland, including ancient and semi-natural woodland which is irreplaceable.

### Accessibility Standards

1432 Highlights The Woodland Trust Access Standard and states that it has been accepted and set out in the Scottish Forestry Strategy. Seeks the adoption of this standard in the Local Development Plan.

### Woodland Buffers

363 This policy should also state that where existing wooded areas are to be maintained within a development there should be an agreed buffer zone between the development and the wooded area- otherwise new residents may perceive nearby trees as a threat to their property and call for them to be cut down.

### **Modifications sought by those submitting representations:**

#### Trees and Woodland Strategy

23 Address the question of an updated Indicative Forestry Strategy in line with Scottish Government advice.

594, 1432 There should be associated supplementary guidance that gives effect to a Tree and Woodland Strategy for Aberdeen City.

#### Scottish Government Control of Woodland Removal Policy

23, 662, 1432 Make reference to the Scottish Government Control of Woodland Removal policy

#### Scottish Planning Policy

662 Policy wording should be changed to better align with Scottish Planning Policy (greater level of protection of trees and woodland).

1432 Policy should give regard to and name Scottish Planning Policy paragraphs 146-148.

#### Accessibility Standards

1432 Adopt the Woodland Trust Access Standard in the Local Development Plan.

### **Summary of response (including reasons) by planning authority:**

#### Support for Policy

256, 515, 272, 283, 284, 285, 345, 520, 1432, 1540 Support for policy is noted.

#### Trees and Woodland Strategy

23, 594, 919, 1432 The Council recognises the need for a Trees and Woodlands Strategy for Aberdeen and are currently preparing this for approval for public consultation in 2011. This will take the form of Supplementary Guidance to the Local Development Plan and will supersede the Indicative Forestry Strategy for Aberdeen City and Aberdeenshire 2005 (RD32). In order to clarify the current status of this work, if the Reporter is so minded, a sentence could be added to the end of the policy as follows: "See Supplementary Guidance on Protecting Trees and Woodlands and forthcoming Trees and Woodland Strategy for Aberdeen for more information." Measures to achieve woodland expansion are to form a core part of the Trees and Woodlands Strategy currently under preparation. The Council does not therefore think it necessary to add this to the Policy.

#### Scottish Government Control of Woodland Removal Policy

23, 662, 1432 The Council does not consider it to be necessary to amend the policy to repeat Scottish Government guidance in the Local Development Plan or, in particular, to include reference to reference to the Control of Woodland Removal policy. It is referred to however in the draft Aberdeen Trees and Woodlands Strategy currently being developed as Supplementary Guidance.

#### Scottish Planning Policy

662, 1432 The Council accepts that Policy NE5 could be re-worded to better align with Scottish Planning Policy ((CD3), although does not consider it necessary to name the document in the Local Development Plan. If the Reporter is so minded, the first paragraph of the policy could be changed to: "There is a presumption against all activities and development that will result in the loss of or damage to established trees and woodlands that contribute significantly to nature conservation, landscape character or local amenity, including ancient and semi-natural woodland which is irreplaceable."

#### Accessibility Standards

1432 The draft Supplementary Guidance on Open Space (RD82) contains an accessibility standard for Natural Greenspace and Green Corridors. This open space category includes woodland, and the standard has been developed using local community engagement and benchmarking with other local authorities and national guidance. The Council therefore propose that it is not necessary for the Local Development Plan to adopt the Woodland Trust's Access Standard in addition to this.

#### Woodland Buffers

363 The Council does not think it necessary to add to Policy NE5 a requirement for buffers between woodland and development as this will be taken into consideration on a site by site basis. Woodland can offer context and setting for development, as well as various other benefits, such as shelter and recreational opportunities and these will be considered, alongside any possible or likely perceived negative attributes, such as shading in relation to particular sites, for example after taking into consideration prevailing winds, aspect, etc.

#### **Reporter's conclusions:**

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<b>Reporter's recommendations:</b>

<b>Issue (ref and heading):</b>	<b>POLICY NE6: FLOODING AND DRAINAGE</b>	<b>121</b>
<b>Development Plan reference:</b>	Policy NE6 - Flooding and Drainage	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Ms Nicola Abrams of Scottish Environmental Protection Agency (408), Mr Ian Francis of RSPB Scotland (919), Ms Emelda Maclean of Emac on behalf of Scotia Homes (1189), Mrs Nicola Barclay of Homes for Scotland on behalf of Grampian House Builders Committee (1442).		
<b>Provision of the Development Plan to which the issue relates:</b>	Policy to protect development from the risk of flooding and the incorporation of sustainable urban drainage	
<b>Summary of the representation(s):</b>		
<p>General</p> <p>408 Supports policy NE6 - Flooding and Drainage. The Flood Map has been developed as a strategic tool to aid planning. Scottish Environment Protection Agency is not the lead authority for flood risk management.</p> <p>Implementation of Policy</p> <p>408 Paragraph 3.75 addresses flooding, drainage and watercourse engineering and is unclear. The plan does not clearly identify the sites and areas that are possibly constrained by flooding. Further consideration of flood risk to allocated sites needs to be given. Flood risk analysis may reduce the area of the site which can be developed, especially if the site lies within the 1:200 year flood envelope.</p> <p>The Masterplanned areas provide the best opportunities for the protection and improvement of the water environment on a strategic level in order to work towards achieving good status in the water environment in Aberdeen.</p> <p>Foul drainage from all new developments should be directed to the public sewer. This is supported; however they have concerns regarding sufficient capacity in the foul sewerage network serving Aberdeen.</p> <p>919 Policy NE6, Flooding and drainage, should make provision for the restoration or recreation of natural floodplains and wetlands, to achieve biodiversity targets and to assist in flood control. Soft engineering methods should be preferred.</p> <p>1189 Reference in Policy NE6 is made to 10 homes or 100 m<sup>2</sup> of floorspace. This should be 1000 m<sup>2</sup> of floor space.</p> <p>1442 Object to the wording of part 1 of the second paragraph of Policy NE6 stating 'be the best available in terms of SUDS'.</p> <p>The requirement to surface water drainage associated with development being the 'best available' is inappropriate. The surface water solution as proposed by an applicant must meet the required standards. Use of the word 'best' is likely to lead to focus on cost rather than effectiveness and would place an additional financial burden on any</p>		

proposed development.

### **Modifications sought by those submitting representations:**

#### General

408 Wish to see stronger links with the Scottish Planning Policy and emphasis on the avoidance principle as this is the most sustainable form of flood risk management.

Further relevant supplementary guidance in existence not already mentioned should also be referred to in Policy NE6.

Paragraph 3.74 to be amended to: - 'The Indicative River & Coastal Flood Map (Scotland) ([www.sepa.org.uk/flooding](http://www.sepa.org.uk/flooding)) provides an indication of those areas potentially at risk of flooding from rivers and the sea within the Council's area. Flooding from all watercourses, coastal flooding from rising sea levels and storm surges, and flooding of urban areas from a combination of rainfall and inadequate drainage all need to be considered within development proposals.' Reference to this Map should refer to the Indicative River & Coastal Flood Map (Scotland) in the first instance. Any other subsequent references may refer to Scottish Environment Protection Agency's Flood Map.

Suggest that an overall introductory paragraph to this policy prior to paragraph 3.73 would better introduce the twin themes of flooding and drainage including the linkages between these two areas.

Paragraph 3.73 should be amended to read: 'Development proposals should avoid areas susceptible to flooding and promote sustainable flood risk management. We will consider development proposals in consultation and with advice from other key stakeholders such as the Scottish Environment Protection Agency particularly in relation to proposals for new development in areas of medium to high risk as outlined in the Risk Framework of Scottish Planning Policy. We will safeguard the storage capacity of functional floodplains, and development in the functional floodplain will only be permitted where a specific location is essential for operational reasons. All development proposals should take proper account of possible climatic change and consider coastal protection, flood defence and land drainage issues on potential development locations. The ultimate responsibility for avoiding or managing flood risk lies with land and property owners.'

#### Implementation of Policy

408 Request that the text in section 3.76 is moved into the policy itself. This will clearly show that applicants need to undertake Flood Risk Assessments.

Request the introductory text is split (3.75) into three parts - SUDS, culverts and flood risk adaptation - as follows: - 'Flood risk and other environmental damage can be managed by minimising changes in the volume and rate of surface water run off from development sites through the use of Sustainable Urban Drainage Systems (SUDS). SUDS can also free up capacity in water management infrastructure. SUDS should be incorporated into all development, other than alterations or extensions to dwellings or other small scale extensions and should be designed in accordance with CIRIA C697: The SUDS Manual. Developers are required to demonstrate that long term maintenance is in place for SUDS. Further detail is given in the Supplementary Guidance on SUDS

(SG 7.4).

Policy NE 8 Natural Heritage sets out how development proposals should address watercourses, and our position on culverting. Where culverts are unavoidable, they should be designed to maintain existing flow conditions and aquatic life. Any proposals for new culverts should have a demonstrable neutral impact on flood risk and linked to long term maintenance arrangements to ensure they are not the cause of flooding in the future.

In some circumstances developments may be required to adapt to flood risk by incorporating water resistant materials and forms of construction in line with the guidance set out in PAN 69: Planning and Building Standards Advice on Flooding.'

Policy NE6 be amended to include the following statement after point 4 of the first section: Applicants will be required to provide an assessment of flood risk where a development is likely to result in a material increase in the number of buildings at risk of flooding or where it has been indicated in one of the opportunity site schedules that one will be required. Implementation of Policy

Policy NE6 be amended to include the following statement after point 1 of the second section: 1. Be the best available in terms of SUDS and conform to the standards set out in Sewers for Scotland Manual Second Edition (2007) and The SUDS Manual (C697).

919 Soft engineering methods should be preferred.

1189 It is suggested this should be 1000 m2 of floor space.

1442 The word 'best' should be replaced by 'most appropriate'.

#### **Summary of response (including reasons) by planning authority:**

General

The support for the policy is welcomed.

The policy is clear about avoiding development in areas at risk from flooding without the need to mention the 'avoidance principle'.

There is no other relevant supplementary guidance that needs to be referred to under this policy.

The map is already referred to as the 'Indicative River and Coastal Flood Map' with the link to the Scottish Environment Protection Agency website for reference, therefore, no change is required.

While the policy makes reference to the Indicative River and Coastal Flood Risk Map (RD17) and states that it is quite detailed in terms of the information provided, if the Reporter is so minded, the Council would accept that paragraph 3.74 should be amended to the following: - 'The Indicative River and Coastal Flood Map (Scotland) ([www.sepa.org.uk/flooding](http://www.sepa.org.uk/flooding)) provide a picture of areas potentially at risk from flooding. Flooding from all watercourses, coastal areas which are potentially at risk from storm and tidal surges and rising sea levels brought about by climate change, along with other sources such as rising groundwater, surface water and drainage systems will be

considered.'

There is no requirement to add an extra paragraph at the beginning of the supporting text to introduce flooding and drainage.

Paragraph 3.73 does not state or imply that Scottish Environment Protection Agency are the lead authority for flood risk management. Indeed it implies that Scottish Environment Protection Agency are one of a number of key stakeholders that the Council will work with to manage flood risk in the City. The paragraph is also deemed to be clear and concise, as required by Planning Circular 1/09 (CD4) paragraph 39, therefore no further changes are required.

There is no requirement to make reference to flood plains. Flood plains are noted within the policy itself (1b).

#### Implementation of Policy

408 With reference to the plan not clearly identifying the sites and areas possibly constrained by flooding, and linkages to the Scottish Planning Policy it is deemed that the Indicative River and Coastal Flood Risk Map (RD17) does provide the information on sites possibly constrained by flooding. Issues of flooding may also be further addressed through the supplementary guidance for specific sites and masterplanned areas. Scottish Planning Policy (CD3) states in paragraph 199 that by 2015 flood risk management plans will be in place across Scotland which should then be taken into account when development plans are prepared.

Concern regarding flooding at a number of allocated sites will be addressed through flood risk assessments, and would be addressed within the supplementary guidance documents for these sites.

With reference to the sites that fall within the 1:200 year flood envelope, these are addressed under Issue 69 (Allocated Site: Denburn Valley / Belmont Street / Union Terrace OP98) and Issue 17 (Allocated Site: Woodside OP135).

The support for the masterplanned areas is welcomed.

There is no added value in splitting paragraph 3.75 into three separate sections and this is deemed to be clear and concise as required by Planning Circular 1/09, paragraph 39 (CD4), however, while the policy refers to the potential need to adapt to flood risk through incorporating water resistant materials and forms of construction, if the Reporter is minded, the Council would accept the need to make reference to the relevant guidance in the last sentence in 3.75 as per follows: - 'In some circumstances, development may be required to adapt to flood risk by incorporating water resistant materials and forms of construction in line with guidance set out in PAN 69: Planning and Building Standards Advice on Flooding.'

Support for the foul drainage aspect of the policy is welcomed. With reference to the issue of capacity, Scottish Water have been consultees during the Local Development Plan process. Supplementary Guidance 7.4 on Drainage Impact Assessments will give further guidance - it is not required to make reference to Sewers for Scotland Manual Second Editions and The SUDS Manual within the policy.

Section 3.76 is part of the supporting text for the policy that provides further details and/or requests further information that may be required as part of an application. Section 3.76 does not, therefore, need to be included after point 4 in the policy.

There is no requirement to amend part 2 of the policy so that it includes reference to SUDS, as this is already covered in paragraph 3.75. No change is required.

919 Paragraph 3.75 also makes reference to NE8 Natural Heritage in which it states that there will be a presumption against excessive engineering and culverting, restoring existing culverts or canalised water bodies where possible, along with the inclusion of SUDS and natural buffers strips. These are soft engineering methods. No change required.

1189 The amount of 100m<sup>2</sup> is based on the Supplementary Guidance 7.4 Drainage Impact Assessments (RD72) which has been developed by the North East Scotland Flooding Advisory Body. There suggested change to increase this figure to 1000m<sup>2</sup> is not necessary.

1442 The term best available is appropriate in this context as it refers to best available technology for dealing with flooding and drainage, therefore, no change is required.

**Reporter's conclusions:****Reporter's recommendations:**

<b>Issue (ref and heading):</b>	<b>POLICY NE7: COASTAL PLANNING</b>	<b>122</b>
<b>Development Plan reference:</b>	Policy NE7 - Coastal Planning Developed and Undeveloped Coastal Areas shown on Proposals Map	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Ms Nicola Abrams of Scottish Environmental Protection Agency (408), Ms Maire Daly of Scottish Natural Heritage (662), Mr Stuart Winter of Jones Lang LaSalle (1556).		
<b>Provision of the Development Plan to which the issue relates:</b>	Policy to assess development on coastal areas.	
<b>Summary of the representation(s):</b>		
<p>General</p> <p>408 Scottish Environment Protection Agency supports Policy NE7.</p> <p>Implementation of Policy</p> <p>662 Policy is worded that if there is an overriding environmental benefit, the first two criteria would not have to be satisfied.</p> <p>We suggest you reassess this policy to include factors such as noise disturbance on dolphins and provide mitigation to ensure that acoustic assessments are carried out where required to ensure that construction will not affect Bottlenose dolphins.</p> <p>1556 Recommend a revised policy wording to allow for a more flexible policy framework to support transmission infrastructure development associated with major transmission upgrades that require a coastal location as well as development required to support the marine renewables industry. The Local Development Plan does not set an appropriately supportive policy framework to support the marine and onshore renewables industries. In particular, the policy framework for onshore renewables development is found to be overly restrictive and to set unreasonably high policy thresholds. This could be to the detriment of renewables projects coming forward.</p>		
<b>Modifications sought by those submitting representations:</b>		
<p>General</p> <p>408 Make a cross reference to suggested amendment and supporting text relating to Natural Heritage to ensure developers are aware that River Basin Management Planning objectives apply to coastal and transitional water bodies out to 3 nautical miles offshore with regard to maintaining ecological status - section 3.81: - "The objectives of the EU Water Framework Directive and the Scotland River Basin Management Plan of achieving good ecological status for the water environment apply also to coastal and estuarine waters."</p> <p>Implementation of Policy</p> <p>662 Replace 'or' in criteria 2 with 'and'.</p> <p>662 Include a third criteria at the end of Policy NE7 stating; "Development proposals will</p>		

be required to demonstrate through appropriate marine-noise modelling, that adverse impacts on Bottlenose Dolphins and Atlantic Salmon are avoided."

1556 Reword policy to: - 'Development will be permitted in the developed coastal areas only where it is demonstrated that a coastal location is necessary. Development will only be permitted in undeveloped coastal areas if it can be demonstrated that:

1. There is no other suitable site including the re-use of brownfield land; and 2. It respects the character, natural and historic environment, plus, the recreational value in the surrounding area; or 3. There is an overriding environmental benefit.

In all cases:

1. Development will not be permitted in areas at risk from coastal erosion and flooding except for appropriate infrastructure development. 2. Public access to and along the coast will be protected and promoted wherever possible.'

#### **Summary of response (including reasons) by planning authority:**

##### General

408 Support for the policy is welcomed.

Paragraph 3.80 of the Proposed Plan notes terrestrial planning extends to the Mean Low Water Mark of ordinary spring tides. As such the Council fulfils its duty as per the EU Water Framework Directive (RD100) and River Basin Management Plan (RD56). Planning beyond this boundary will be addressed in new powers for regional marine spatial planning as per the Marine (Scotland) Act 2010. This is also noted in paragraph 3.79. Reference to the EU Water Framework Directive (RD100) and River Basin Management Plan (RD56) is already addressed in paragraph 3.84.

##### Implementation of Policy

622 To include criterion 3 as a consideration along with criteria 1 and 2 would make the policy overly restrictive.

Policy NE7 Coastal Planning does permit development in coastal areas in limited circumstances. The wording provided by SNH will provide a safeguard for the qualifying interest of the River Dee SAC that could be affected (the Salmon) and safeguard the qualifying interest of the Moray Firth SAC that could be affected (the dolphin). If the Reporters are so minded, they could include a third criteria at the end of Policy NE7 stating; "Development proposals will be required to demonstrate through appropriate marine-noise modelling, that adverse impacts on Bottlenose Dolphins and Atlantic Salmon are avoided."

1556 Point 1 of 'In all cases' is the main principle that the policy will adopt and is line with Scottish Planning Policy. Where there may be an application for development such as infrastructure for offshore renewables, and in areas potentially at risk from coastal erosion and flooding, these will be considered on a case by case basis.

#### **Reporter's conclusions:**



<b>Reporter's recommendations:</b>

<b>Issue (ref and heading):</b>	<b>POLICY NE8: NATURAL HERITAGE</b>	<b>123</b>
<b>Development Plan reference:</b>	Policy NE8 - Natural Heritage	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Dr Maggie Keegan of Scottish Wildlife Trust (363), Mr Gordon Thomson of Barton Wilmore LLP on behalf of Aberdeen Harbour Board (373), Ms Nicola Abrams of Scottish Environmental Protection Agency (408), Dr Richard Pelling (435), Ms Maire Daly of Scottish Natural Heritage (662), Mr Ian Francis of RSPB Scotland (919), Mr Angus Yarwood of The Woodland Trust Scotland (1432), Ms Susan Lai (1546).		
<b>Provision of the Development Plan to which the issue relates:</b>	Policy to avoid or reduce negative impacts on natural heritage as a result of development.	
<b>Summary of the representation(s):</b>		
<p>Allocated Site: Denburn Valley/Belmont Street/Union Street OP98.</p> <p>272, 283, 284, 285, 345, 353: The Denburn watercourse is lost to sight and the City Square project would do nothing to reverse this. The City Square proposals would involve an enormous engineering project to deck over Denburn valley and cover over the road/railway.</p> <p>1546 This comment also includes NE9, NE5, NE3, CF1 &amp; 2, Union Terrace Gardens. The threat of the closure of community centres, youth clubs, parks and other amenities has created massive uproar and deep upset amongst the people of Aberdeen. This has impacted badly on Aberdeen's reputation. A turn around is needed, especially as Green reputations are becoming increasingly important.</p> <p>General</p> <p>1432 Respondent supports paragraph 3.82 of policy NE8.</p> <p>408 For clarity make reference to the regulatory requirements for works in the water environment in paragraph 3.85 (3.84).</p> <p>435 Fully protect Peregrine Falcons.</p> <p>662 The Plan and HRA do not take account of possible impacts on Bottlenose dolphins frequently found off Aberdeen's shore and mouth of Aberdeen harbour. The dolphins are a qualifying interest of the Moray Firth SAC and a European Protected Species (EPS). Even though the Moray Firth SAC is outside the Aberdeen plan area, competent authorities are required to consider potential impacts upon qualifying interests from plan/proposals/projects located both within and outwith site boundaries. Coastal developments may also have an effect on other protected cetaceans such as porpoises and whales which often pass by Aberdeen, all of which are European Protected Species</p> <p>Applying the Policy</p> <p>363 Supportive of considering ecosystems and impacts of development (on ecological receptors) beyond the confines of the development; in effect taking a 'landscape scale</p>		

approach' to development. This ties in with supporting a green space network and will help ensure that developments are sustainable, in locations that are beneficial to people and, do not have adverse impacts on local wildlife.

373 Support the wording of NE8 which identifies scope for mitigation measures to protect valuable natural heritage resources.

408 Objects to the wording of Policy NE8 as restoration should not be limited to culverted or canalised water bodies. Should also apply to the removal or renovation of impoundments, removal of bed/bank protection, embankments and in stream structures and restoration of riparian vegetation all of which would contribute towards achieving the Water Framework Directive's (RD100) objective of good ecological status.

662 The wording of Policy NE8 is unclear and there is no direct reference to the River Dee SAC.

662 Point 7 of the policy should be amended as Supplementary Guidance on Buffer Strips now exists.

919 It is important to include reference to designated areas for conservation so that it has greater conformity with the Scottish Planning Policy and to better deal with developments that are likely to have an effect on statutory protected sites.

#### **Modifications sought by those submitting representations:**

Allocated Site: Denburn Valley/Belmont Street/Union Street OP98.

272, 283, 284, 285, 345, 353, 1546 No modification received.

General

1432 No modification received.

408 Suggest amending 3.85 (3.84) to the following: - Any engineering, building or other works in, or in the vicinity of inland surface waters and wetlands including landraising, embankment works and culverting will require authorisation by Scottish Environment Protection Agency under The Water Environment (Controlled Activities) (Scotland) Regulations 2005.

The Local Development Plan has a key role in supporting the implementation of the WFD to protect and improve the water environment and the delivery of the RBMP and the Area Management Plan (AMP) and a clear reference in the Policy to the drivers for protection and enhancement of the water environment would improve clarity.

435 Fully protect Peregrine Falcons in the City Centre, including Triple Kirks. Provide for greater public appreciation and celebration for the iconic species.

662 Suggest amending paragraph 3.83 as follows: - 'The River Dee is a Special Area of Conservation (SAC) (an international designation) and includes that part of the harbour through which the river flows. This is the only Natura site within the Plan area. However allocations within the Plan area also have the potential to impact on the Bottlenose dolphin, a qualifying interest for the Moray Firth SAC and European Protected Species. These dolphins are frequently present offshore and at the mouth of the harbour and in

the outer harbour. National designations are also present in the Plan area and include Sites of Special Scientific Interest. Local designations include Local Nature Reserves, District Wildlife Site and Sites of Interest to Natural Science, with the latter two soon to be reclassified as Local Nature Conservation Sites or Landscape Areas. Our Nature Conservation Strategy includes a list of all designations. We suggest the last line of paragraph 3.83 of the Plan is amended (as above) to provide a link to the 'Nature Conservation Strategy'. This should be a useful document for both the public and potential developers, particularly where proposals are likely to affect these sites, as was identified in relation to OP134.'

### Applying the Policy

363 Developer contributions should offset biodiversity losses from development. The 'conservation credit' could then be used to support habitat creation/enhancement, species translocation, urban green spaces, or green space network enhancement. This type of process (habitat banking) is being considered by Defra in England. However, this should not be seen as a 'licence to destroy.'

636 Developer contributions will also be necessary for the long term management (and monitoring) of green space networks, woodland creation, open space and urban green space.

Every opportunity is taken to add value to local biodiversity when creating woodland, urban green space, open space etc.

373 No modification received.

408 amend paragraph 7 to the following: - 'There will be a presumption against excessive engineering or culverting, there will be a requirement to restore waterbodies that have been altered by engineering through the removal or renovation of impoundments, removal of bed/bank protection, embankments and in-stream structures and restoration of riparian vegetation where this is possible; and the inclusion of SUDS. Natural buffer strips will be created for the protection and enhancement of waterbodies, including lochs, ponds, wetlands, rivers, tributaries, estuaries and the sea, in line with the Supplementary Guidance on Buffer Strips.'

662 Suggests the following changes for the policy: - 'Development that... will only be permitted where it fulfils the criteria set out for each level of Nature Conservation designation in Scottish Planning Policy. Namely International Designations, National Designations, Local Designations and European Protected Species and Species protected under the Wildlife and Countryside Act 1981.'

3. No development will be permitted unless steps are taken to mitigate negative development impacts. All proposals that are likely to have a significant effect on the River Dee SAC will require an appropriate assessment which will include the assessment of a detailed construction method statement addressing possible impacts on Atlantic Salmon, Freshwater Pearl Mussel and Otter. Development proposals will only be approved where the appropriate assessment demonstrates that there will be no adverse affect on site integrity, except in situations of overriding public interest.' Change final line in Point 7 of Policy NE8 to say that Supplementary Guidance on Buffer Strips now exists.

919 Amend policy to the following: - 'Development that, taking into account any proposed

mitigation measures, has an adverse effect on a protected species or an area designated because of its natural heritage value will only be permitted where it addresses in full the criteria set out in Scottish Planning Policy (reproduced in Appendix Z). These are International Designations, National Designations, Local Designations and European Protected Species and species protected under the Wildlife and Countryside Act 1981. In all cases of development at any location: - 1. Applicants should submit supporting evidence for any development that may have an adverse effect on a protected species demonstrating both the need for the development and that a full range of possible alternative courses of action have been properly examined and none found to acceptably meet the need identified. 2. An ecological assessment will be required for any development proposals likely to affect a site which is designated or proposed for designation, whether or not the proposal's location is on the site. An ecological assessment will also be required where there is evidence to suggest that a habitat or species of importance (including those identified in the UK and Local Biodiversity Action Plans) exists on the site.'

### **Summary of response (including reasons) by planning authority:**

Allocated Site: Denburn Valley/Belmont Street/Union Street OP98.

272, 283, 284, 285, 345, 353, 1546 Responses to these issues are dealt with in issue 69 (Allocated Site: Denburn Valley/Belmont Street/Union Street OP98).

#### General

1432 Supportive comment is welcomed

408 If the Reporter is so minded the following paragraph can be added to the end of paragraph 3.84 'Any engineering, building or other works in, or in the vicinity of inland surface waters and wetlands including landraising, embankment works and culverting will require authorisation by Scottish Environment Protection Agency under The Water Environment (Controlled Activities) (Scotland) Regulations 2005' This will help to clarify the scope of the policy.

The reference to the Water Framework Directive (RD100), the River Basin Management Plan (RD56) and Area Management Plan this has been covered through paragraph 3.84 of the Proposed Plan which is deemed as clear and concise, as required by Planning Circular 1/09 (CD4) paragraph 39. As the Area Management Plan sits within the River Basin Management Plan there is no need to mention it specifically.

435 Peregrine falcons are fully protected under Schedule 1 of the Wildlife and Countryside Act 1981 (RD5). The policy refers to this Act and adequately covers the need to protect such species through the requirement for ecological assessments and appropriate mitigation measures.

662 The implications of the Plan on the Moray Firth SAC will be dealt with in Aberdeen City Council's finalised Habitats Regulations Appraisal before the Aberdeen Local Plan is adopted. The Council considers that paragraph 3.83 provides an adequate summary of the situation. However, it is acknowledged that further details of our designated areas, together with possible effects on the qualifying interests of the Moray Firth would be helpful. Therefore, if the Reporters are so minded, they may wish to consider replacing paragraph 3.83 with the following; 'The River Dee is a Special Area of Conservation (SAC) (an international designation) and includes that part of the harbour through which

the river flows. This is the only Natura site within the Plan area. However allocations within the Plan area also have the potential to impact on the Bottlenose dolphin, a qualifying interest for the Moray Firth SAC and European Protected Species. These dolphins are frequently present offshore and at the mouth of the harbour and in the outer harbour. National designations are also present in the Plan area and include Sites of Special Scientific Interest. Local designations include Local Nature Reserves, District Wildlife Site and Sites of Interest to Natural Science, with the latter two soon to be reclassified as Local Nature Conservation Sites or Landscape Areas. Our Nature Conservation Strategy includes a list of all designations.'

### Applying the Policy

363, 373 Supportive comment is welcomed

363 Developer contributions for biodiversity losses are being sought through Policy I1. The associated Action Programme also includes measures to mitigate against negative impacts to natural heritage from the future development sites. The Council is also looking to investigate the principle of Habitat Banking as a way of addressing negative impacts to natural heritage from development. This work is a requirement and it is expected to be completed within the next year. In terms of adding value to local biodiversity, this is already addressed through paragraph 6 of the policy which states that 'measures will be taken, in proportion to the opportunities available, to enhance biodiversity through the creation and restoration of habitats and, where possible, incorporating existing habitats.'

408 The Council considers Section 7 of the policy, which clearly addresses the issue of excessive engineering and culverting, plus the need for SUDS is deemed as clear and concise, as required by Planning Circular 1/09 (CD4) paragraph 39.

662 The Council considers the first paragraph of the policy is concise, as required by Planning Circular 1/09 (CD4) paragraph 39. However, it is accepted that further clarity may be added through the suggestion that the words 'addresses the criteria set out in Scottish Planning Policy. These are' with the words 'fulfils the criteria set out for each level of Nature Conservation designation in Scottish Planning Policy (CD3). Namely'. If the Reporter is so minded, they may wish to consider the merits of this possible change.

With regard to developing the wording of point 3 of the policy, an appropriate assessment would be required as part of applications in any case and this is why it was not mentioned. However, the changes suggested may provide further clarification without making any fundamental change to the policy. If the reporters are so minded, they may wish to consider replacing Point 3 of the policy with the following; "3. No development will be permitted unless steps are taken to mitigate negative development impacts. All proposals that are likely to have a significant effect on the River Dee SAC will require an appropriate assessment which will include the assessment of a detailed construction method statement addressing possible impacts on Atlantic Salmon, Freshwater Pearl Mussel and Otter. Development proposals will only be approved where the appropriate assessment demonstrates that there will be no adverse affect on site integrity, except in situations of overriding public interest."

While the policy makes reference to the Supplementary Guidance 7.3 on Buffer Strips (RD71), if the Reporter is so minded, the Council agrees that the Supplementary Guidance is now available, and would agree to amend last sentence in paragraph 7 to 'Further details are available in Supplementary Guidance 7.3 Buffer Strips Adjacent to

Water Bodies.'

919 While the policy has tried to make it clear when supporting evidence is required when there are effects on protected species, if the Reporter is minded, the Council agrees to amend the sentence in paragraph 1 of the policy to: - 'Applicants should submit supporting evidence for any development that may have an adverse effect on a protected species.. ..'

While the policy has tried to make clear when an ecological assessment is required in relation to a designated site, if the Reporter is minded, the Council agrees to amend the sentence in paragraph 2 of the policy to: - 'An ecological assessment will be required for a development proposal on or likely to affect a nearby designated site, or where there is evidence.. ..'

**Reporter's conclusions:**

**Reporter's recommendations:**

<b>Issue (ref and heading):</b>	<b>POLICY NE9: ACCESS AND INFORMAL RECREATION</b>	<b>124</b>
<b>Development Plan reference:</b>	Policy NE9 - Access and Informal Recreation	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Mr Robin McIntosh (272), Ms Moira Murrison (283), Sir/Madam K. J. C. McIntosh (284), Mr Paul Thomson (285), Mr Mike Shepherd of Friends of Union Terrace Gardens (345), Councillor Debra Storr of Aberdeen and Aberdeenshire Green Party (353), Ms Fiona McNally of Paths For All (472), Mr Richard Bush of Richard Bush Chartered Town Planner on behalf of Mrs Nicola Hutcheon (1205), Ms Lorraine Jones of Sport Scotland (1244).		
<b>Provision of the Development Plan to which the issue relates:</b>	Policy to protect and enhance public access.	
<b>Summary of the representation(s):</b>		
<p>Support for Policy</p> <p>472 This policy is well thought out and should be applauded.</p> <p>1244 Welcomes the aim of policy NE9.</p> <p>Union Terrace Gardens</p> <p>272, 283, 284, 285, 345 States that access to UTG can be improved through improvement of existing access (slopes, graded paths) and bridge from Belmont Street, raising and destruction of existing gardens unnecessary and undesirable.</p> <p>Permeability</p> <p>353 Permeability by foot and cycle should be of prime concern and take into account not merely theoretical access but also the attractiveness of routes to people. Direct routes are preferred to diversions e.g. to route around road schemes.</p> <p>Specificity of Policy</p> <p>1205 The wording of the policy needs to be much more specific and less sweeping so that landowners and developers know where they stand. It should refer only to existing or committed recreational opportunities.</p> <p>Identification of Required New Transport Infrastructure</p> <p>1244 Note that the Scottish Planning Policy (paragraph 170) looks for development plans to identify required new transport infrastructure, including cycle and pedestrian routes. It is not clear the extent to which this has been done.</p>		
<b>Modifications sought by those submitting representations:</b>		
<p>Permeability</p> <p>353 Policy should not aim merely for 'not compromising access' but should seek to</p>		



ensure that access is at least as convenient and attractive.

#### Specificity of Policy

1205 Replace wording with: "Development should not substantially prejudice the integrity of existing recreational opportunities or committed recreational proposals, including core paths as shown on the proposals map. Where appropriate, developments should include provision for public access, permeability and/or links to green space for recreation and active travel."

#### Identification of Required New Transport Infrastructure

1244 It is not immediately obvious which policy could contain this Scottish Planning Policy requirement but it is suggested that through the Local Plan process consideration should be given to new cycle and pedestrian routes and that the Plan should include a positive policy outlining this.

### **Summary of response (including reasons) by planning authority:**

#### Support for Policy

472, 1244 Support for policy noted.

#### Union Terrace Gardens

272, 283, 284, 285, 345 Suggestions for ways to improve access to Union Terrace Gardens are noted. Any development proposal affecting access will take account of Policy NE9 Access and Informal Recreation.

#### Specificity of Policy

1205 No change to the policy's wording is necessary as it is in line with the Land Reform (Scotland) Act 2003 and national policy. It is the Council's view that the policy strikes the right balance of protecting and encouraging the enhancement of access, while being flexible enough not to unreasonably restrict development. The access legislation requires that general access rights are upheld, not just committed recreational proposals or core paths.

#### Permeability

353 Policy D3 and Supplementary Guidance 2.2 Transport and Accessibility (RD62) include details on the design of routes, such as the need for them to be convenient and attractive.

#### Identification of Required New Transport Infrastructure

1244 Consideration was given to new cycle and pedestrian routes within the Plan through the Core Paths Planning and Future Infrastructure Requirements for Services processes. The Core Paths Network, as well as Aspirational Paths identified in the Core Paths Plan (CD32), is included in the Proposals Map. Supplementary Guidance publications on Transport and Accessibility, Open Space and the Infrastructure and Developer Contributions Manual (CD25) set down procedures for ensuring this is delivered and expanded further as necessary to facilitate sustainable and active travel

and recreation. Appendix 4 and the Proposed Action Programme (CD20) identify infrastructure requirements, which include walking and cycling facilities.

**Reporter's conclusions:****Reporter's recommendations:**

<b>Issue (ref and heading):</b>	<b>POLICY R1: MINERALS</b>	<b>125</b>
<b>Development Plan reference:</b>	Policy R1 - Minerals	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Ms Maire Daly of Scottish Natural Heritage (662), Mr David Liddell of Scottish Government (665).		
<b>Provision of the Development Plan to which the issue relates:</b>	Policy to safeguard areas for mineral extraction and to assess minerals proposals	
<b>Summary of the representation(s):</b>		
<p>662 We have found it difficult to advise on the possible environmental impacts of this policy because the mineral safeguard areas have not been identified on the proposals map.</p> <p>665 Scottish Planning Policy aims to ensure an adequate supply of minerals to support sustainable economic growth. A key means of achieving this is for planning authorities to ensure a landbank of permitted reserves for construction aggregates of a minimum 10 years extraction is available at all times.</p> <p>The Scottish Government recognises the practical difficulties in safeguarding reserves and identifying areas of search within the city. We also recognize that the effective market for minerals will be larger than city wide - perhaps extending across the city-region or even further afield.</p> <p>Scottish Planning Policy also states that development plans should identify search areas, and safeguard specific sites for certain minerals. But we consider that the plan could do more to respond to the requirements of Scottish Planning Policy in respect of mineral extraction.</p> <p>It identifies only two areas of search for mineral extraction, both of which are for hard rock and largely related to the only two currently operational mineral extraction sites in the city. And Policy R1 states that mineral extraction proposals will only be acceptable within these areas.</p> <p>This does not amount to a clear demonstration that a ten year supply of construction aggregates for the significant development and infrastructure proposals in the city will be secured, nor that the potential for extraction of other minerals has been fully considered.</p>		
<b>Modifications sought by those submitting representations:</b>		
<b>Summary of response (including reasons) by planning authority:</b>		
<p>665</p> <p>We recognise Scottish Planning Policy (CD3) requirements as set out in paragraph 226 in respect of the need to identify a 10 year supply of construction aggregates for the city region market area. Given the small size of Aberdeen City's administrative boundaries, it is likely that this supply would have to be met from a wider area. This is recognised on page 44 of the Proposed Action Programme (CD20). This says that in order to establish</p>		

whether the demand for minerals in the city is being met by quarries in the region, we propose that a forum be established by the Strategic Development Planning Authority, where the two City and Shire Councils and operators in the region can share knowledge and coordinate action at the regional level (before the publication of the Main Issues Report for the Strategic Development Plan).

This approach would be a pragmatic step towards identifying a 10 year supply and in a way which addresses the practical difficulties, recognised by the Scottish Government, which Aberdeen City has with a small area of land available to it.

In the meantime, and given this approach, it is accepted that the Plan itself may be able to do more to address this issue. The respondent has invited the reporters to consider (in the absence of areas of search) removing Test 1 from Policy R1. In addition, they suggest that further tests in R1 may be considered necessary to safeguard amenity, landscape and the natural and cultural heritage.

Our response to these is that the removal of Test 1 would be a pragmatic solution to what could be viewed as an overly restrictive policy in the absence of areas of search (other than the two sites already identified). Essentially, the effect of this would be to make the whole green belt an area of search because all of the land outwith the built up area and allocations around Aberdeen is zoned as green belt. This approach would be very similar to the one taken in the current 2008 Aberdeen Local Plan (CD12). Policy 17 Mineral Extraction allows mineral development in Tier 3 areas such as green belt (there being no Tier 4 areas in Aberdeen outwith the built up area). This is also consistent with Policy 28 Green Belt in the same Plan which allows for mineral extraction in point 1.

Historically, mineral development has always been permissible in the Aberdeen Green Belt, subject to other Local Plan considerations. If the reporters are minded to delete Test 1 from Policy R1, then they would need to remove the reference to Policy R1 from Policy NE2 Green Belt (the words in brackets "on sites identified in Policy R1"). This would make the Local Development Plan consistent with previous Local Plans on the matter.

We do not think it would be necessary to add further safeguards to Policy R1 in terms of amenity, landscape, and the natural and cultural heritage. These issues are already adequately covered in the both Policy R1 and Policy NE2 as well as other plan policies. The two opportunity sites for the quarries at North Lasts (OP56) and Blackhills, Cove (OP71) should remain in the Plan.

662

The minerals safeguarded areas are identified on the proposals map in respect of the two quarries at North Lasts (OP56) and Blackhills, Cove (OP71). However, as intimated in the response to respondent 665 above, this may be considered inadequate in terms of meeting the requirement for a 10 year supply of construction aggregates and reporters may consider an alternative approach which would allow mineral extraction in the wider green belt, subject to other Local Development Plan policies. Such an approach would be very similar to that taken in the 2008 Aberdeen Local Plan so in terms of testing environmental effects, both scenarios have been examined in the SEA Environmental Report (CD21).

We do not consider that Figure 1 or the Table on page 20 that summarises the type(s) of

development within each Masterplan Zone is an appropriate place to consider quarry developments. The opportunity site list in Appendix 2 of the Proposed Plan lists some details of the two sites as does the reference to Policy R1 Minerals in the Proposed Action Programme. There should be no need to reference the Action Programme for every policy or proposal in the Proposed Plan.

It should be noted that the respondent has suggested in a representation on the Environmental Report that the mitigation measures identified there could be identified in the Action Programme. We think this is a good idea and will recommend this course of action in our responses to the Environmental Report. This will at least allow any mitigation measures related to mineral extraction to be highlighted and addressed in the Action Programme.

**Reporter's conclusions:****Reporter's recommendations:**

<b>Issue (ref and heading):</b>	<b>POLICY R2: DEGRADED AND CONTAMINATED LAND</b>	<b>126</b>
<b>Development Plan reference:</b>	Policy R2 - Degraded and Contaminated Land	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Ms Nicola Abrams of Scottish Environmental Protection Agency (408).		
<b>Provision of the Development Plan to which the issue relates:</b>	Policy sets requirements for remediation of contaminated land.	
<b>Summary of the representation(s):</b>		
<p>408 The inclusion of a specific policy relating to degraded and contaminated land is supported, it is however considered that the policy could be further improved and strengthened. The introductory paragraphs set out the Council's role regarding contaminated land however further clarification of roles is requested in order to highlight the lead role played by Local Authorities in the contaminated land regime. It is requested that Policy R2- Degraded and Contaminated Land is amended as it does not address the requirement for site investigations and risk assessments in accordance with Planning Advice Note 33 in order to identify risks to human health and the environment (and the need for liaison with Scottish Environment Protection Agency in relation to risks to the water environment).</p>		
<b>Modifications sought by those submitting representations:</b>		
<p>408 The following amendment is requested:</p> <p>Policy R2 - Degraded and Contaminated Land</p> <p>The City Council will require that all land that is degraded or contaminated, including visually, is either restored, reclaimed or remediated to a level suitable for its proposed use. This may involve undertaking site investigations and risk assessments to identify any actual or possible significant risk to public health or safety, or to the environment, including possible pollution of the water environment, that could arise from the proposals. Where there is potential for pollution of the water environment we will liaise with Scottish Environment Protection Agency.</p>		
<b>Summary of response (including reasons) by planning authority:</b>		
<p>408</p> <p>The policy on degraded and contaminated land was considered at the Public Local Inquiry (CD11) Issue 197 Volume 4, where objections from Scottish Environment Protection Agency were at the time resolved. Accordingly the policy and supporting text in the Proposed Plan is essentially the same as that which appears on the 2008 Aberdeen Local Plan.</p> <p>The amendment sought by Scottish Environment Protection Agency is reasonable. If the reporters are so minded to amend the policy in the way suggested, it would not constitute a change in policy direction. It is an amendment to the policy which clarifies its scope and is in accordance with Paragraph 19 of Planning Advice Note 33 Development of Contaminated Land (RD13).</p>		
<b>Reporter's conclusions:</b>		

<b>Reporter's recommendations:</b>

<b>Issue (ref and heading):</b>	<b>POLICY R3: NEW WASTE MANAGEMENT FACILITIES</b>	<b>127</b>
<b>Development Plan reference:</b>	Policy R3 - New Waste Management Facilities	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Ms Nicola Abrams of Scottish Environmental Protection Agency (408), Mr Allan Rae of Kirkwood Homes Ltd on behalf of Kirkenergy Ltd (808), Mr George Niblock of Niblock Environmental Ltd (1238).		
<b>Provision of the Development Plan to which the issue relates:</b>	Policy provides criteria to assess proposals for waste management facilities.	
<b>Summary of the representation(s):</b>		
<p>408 We support the inclusion of a clear reference in paragraph 3.94 to Scottish Planning Policy and the Zero Waste Plan as drivers for the provision of waste management infrastructure in development plans.</p> <p>The text in paragraph 3.96 refers to municipal waste only. Scottish Planning Policy (paragraph 213) and Zero Waste Plan (Annex B) states that development plans are required to plan for waste management infrastructure to meet all waste needs.</p> <p>We support the clear linkages in paragraph 3.98 to the Aberdeen Waste Management Strategy. This paragraph lists a number of facilities that will be required to implement the Aberdeen Waste Strategy. However, it is not clear if these facilities are required to manage municipal waste only. If the facilities identified in paragraph 3.98 relate only to municipal waste, this must be clearly stated within the paragraph and acknowledged that additional waste management facilities will be required for other waste streams, and that these facilities will be assessed against Policy R3.</p> <p>808 The importance of waste as a resource is not reflected in this policy. R3 suggests that proposals should be in a building, but no provision is made for resource/waste management facilities which require open sites as well as building space. This policy contradicts the aims of BI1 as not all processes can be undertaken under cover.</p> <p>Paper apart provides a strategic context for comments.</p> <p>1238 Elements of the requirements stated within this policy are outwith the Planning land-use remit and fall to Scottish Environment Protection Agency as regulator or the Health &amp; safety Executive eg items 3 and 4 including parts of (a)</p>		
<b>Modifications sought by those submitting representations:</b>		
<p>408 Change of wording in Policy:</p> <p>Inappropriate neighbouring developments that may compromise the operation of existing or proposed waste management facilities (including those highlighted in Policy R4) will not be approved.</p> <p>We request that paragraph 3.96 be updated to refer to all waste.</p> <p>808 Change 'waste management' to 'resource/waste management' throughout section.</p>		



Flexibility should be provided by policy R3 to allow for activities outwith buildings.

1238 The policy should be reworded to restrict the requirements to issues of relevance to planning land-use considerations

**Summary of response (including reasons) by planning authority:**

408 We would accept that paragraph 3.96 refers to municipal waste only. However, paragraph 3.95 refers to the types of facility that are likely to be needed to deal with all wastes and Policy R3 addresses all waste management facilities, not just municipal waste.

The Aberdeen Waste Strategy (RD37), in particular section 7, and the sites safeguarded in Policy R4 address the municipal waste facilities that are known to be required. We would accept that further facilities may be required for non-municipal waste and that this could be mentioned in the text of paragraph 3.98. Non-municipal facilities would be considered against Policy R3 and other relevant policies in the Plan.

At the end of paragraph 3.98, Reporters may consider it appropriate to add that these sites (in Policy R4) will handle municipal waste and that further facilities may be required to deal with non-municipal waste.

808 We agree that waste should be regarded as a resource rather than something to be disposed of. This whole section is titled 'Waste as a Resource' above paragraph 3.94. However, we do not think it is necessary to refer to resource/waste throughout this section. The current terminology is clear and consistent with Annex B of the Zero Waste Plan (CD7). The comment in respect of restricting waste management facilities to those "in buildings" in Business and Industrial areas is there to protect the amenity of these areas. Neither Scottish Planning Policy (CD3) or the Zero Waste Plan (CD7) mention this specific issue and in the absence of such direction, we would wish to maintain our position on this.

1238 We accept Scottish Environment Protection Agency's role in terms of the regulation of waste management operations and we would not wish to duplicate the controls they would apply through licensing. However, we still believe that BPEO and health and safety issues are valid considerations in determining planning applications where appropriate. Examples include emissions from a site to air, water or land, issues in respect of proximity to the airport and general traffic considerations.

**Reporter's conclusions:**

**Reporter's recommendations:**

<b>Issue (ref and heading):</b>	<b>POLICY R4: SITES FOR NEW WASTE MANAGEMENT FACILITIES</b>	<b>128</b>
<b>Development Plan reference:</b>	Policy R4 - Sites for New Waste Management Facilities	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Ms Nicola Abrams of Scottish Environmental Protection Agency (408), Mr Allan Rae of Kirkwood Homes Ltd on behalf of Kirkenergy Ltd (808), Ms Annemarie Wishaw of SITA UK (1288), Mr A. W. Findlayson of Cove and Altens Community Council (1537).		
<b>Provision of the Development Plan to which the issue relates:</b>	Policy identifying and safeguarding sites for waste related uses.	
<b>Summary of the representation(s):</b>		
<p>408 The reference in paragraph 3.31 of industrial sites being suitable locations for waste management facilities is supported.</p> <p>We support the identification of specific sites for waste management facilities in Policy R4- Sites for New Waste Management Facilities and we support the identification of these sites on the proposals map.</p> <p>808 No provision is identified in the plan for the collection, processing and treatment of business and industrial waste, which is acknowledged in the Council's waste strategy as being 4 times the amount of municipal segregated waste being focused on by this policy framework.</p> <p>The volume of business and industrial waste is a key economic development opportunity and a key threat to business viability. Proper direction and guidance is required in spatial terms from the Local Development Plan to guide industry to acceptable and viable locations for this use.</p> <p>Paper apart provides a strategic context for comments.</p> <p>1288 This policy seems currently to be a mix of new sites and existing sites. We believe that existing waste management sites should be safeguarded for their existing uses but also for potential future changes needed to assist movement of waste treatment and handling up the waste hierarchy. Existing waste management sites should therefore be identified as safeguarded in this policy R4 alongside the three new sites listed (OP70, OP5 and OP67). We support the identification of three new sites OP70, OP5 and OP67 in policy R4 but consider that sites for residual waste disposal and/or thermal treatment should also be identified within the plan area.</p> <p>Paragraph 3.98 states that in order to implement the Aberdeen Waste Strategy the waste management facilities required are: a materials recycling facility, an anaerobic digestion or in-vessel composting facility and a new transfer station. This is true but it ignores the third element listed as required for municipal solid waste delivery in section 3 of the Aberdeen Waste Strategy which is residual treatment capacity. We consider that the plan policies should identify specific sites, or at the very least tight areas of search, potentially suitable for residual waste treatment in order to achieve self-sufficiency and compliance with the Aberdeen Waste Strategy.</p>		

Appendix 7: It is our understanding that the land designated as OP70 is land within the ownership of the Local Authority and as such it should be listed in the schedule of land owned by the Local Authority.

1537 Reservations regarding the choice of Altens East/ Doonies site as it would form a bad neighbour with Doonies Farm.

#### **Modifications sought by those submitting representations:**

808 The scale of business waste should be acknowledged in the plan and a commitment given to working with industry to develop a locational framework for new facilities in the city.

1288 Policy R4 should be 'Sites for New Waste Management Facilities and safeguarding of Existing Waste Management sites'. The policy should list the three new sites OP5, OP70 and OP67 as it does now. Sclettie Quarry, East Tullos and other existing waste management sites should all be covered by a second part to Policy R4 providing safeguarding of their continued use as well as potential future changes to them needed to assist movement of waste treatment and handling up the waste hierarchy.

We consider that the plan policies should identify specific sites, or at the very least tight areas of search, potentially suitable for residual waste treatment. Appendix 4 should include consideration of waste and recyclables collection infrastructure in the listed requirements for Masterplan Zones and this should also be an integral part of the Masterplan guidance. Appendix 7: List the land designated as OP70 as land within the ownership of the Local Authority.

#### **Summary of response (including reasons) by planning authority:**

408

Support for this policy is noted and welcomed.

808

We accept that the Proposed Plan does not include sites for business and industrial wastes. We should point out that development options for the Plan were requested in early 2009 and no such sites emerged. Further opportunities were available at both the Main Issues and Proposed Plan representation stages for specific sites to emerge, but none materialised. We would be happy to work with others to identify appropriate sites. Although this would be too late for this Local Development Plan, it would be a useful exercise for future plans. In the meantime, Policy R3 states that waste management proposals will be acceptable on Business and Industrial Land. The Proposed Plan contains a large amount of such land which is well distributed throughout the city. This approach is in line with Scottish Planning Policy (CD3) paragraph 216 and Annex B of the Zero Waste Plan (CD7) paragraph 5.6.

It should also be noted that paragraph 3.99 mentions that the Strategic Development Planning Authority will prepare Supplementary Guidance on regional scale waste facilities which may be able to address business and industrial needs. Examples could include energy from waste and landfill sites and it will look at whole Structure Plan area, not just Aberdeen. We will add a reference to this in our Action Programme under Policy R5 Energy from Waste.

1288

Our response to 808 is also applicable to comments on the need to identify sites for residual waste treatment. Such facilities are directed to Business and Industrial Land by Policy R3. There is an ample supply of this in a choice of locations throughout the city.

Policy R4 clearly safeguards the identified sites for waste use and there is no need to expand on this. The inclusion of East Tullos may have been useful for information purposes but given that it is zoned Business and Industrial Land where there is a presumption in favour of waste facilities, it is not necessary to identify it in Policy R4.

In respect of landfill it should be noted that the Councils current landfill site at Hill of Tramaud north of Bridge of Don is identified as OP1. The southern part of this site has been identified as an extension to the existing landfill site should it be required.

We accept that the omission of OP70 Altens East/Doonies from Appendix 7 is an error and would intend to include it on the Schedule of Land owned by the Local Authority.

1537

Altens East and Doonies was identified as an opportunity site and zoned for Business and Industrial Land in the 2008 Aberdeen Local Plan (CD12) although it was not specifically identified as a site suitable for waste facilities there. It was highlighted for such uses in the Main Issues Report and most respondents to this were positive about this proposal (see Area H in the Main Issues Report Responses to Comments in the Technical Appendices and CD15).

It is understandable that people can be concerned about waste facilities and one of the advantages of the site is that it is located well away from the main residential areas. On balance we feel that this is a more important consideration than possible effects on the amenity of Doonies Farm. We would reiterate that waste facilities are generally considered acceptable uses on Business and Industrial Land (BI68) and that this land is already zoned as such in the adopted Local Plan (CD12). Modern waste facilities have to be licensed by Scottish Environment Protection Agency and operate to a very high standard. They should not have any more adverse effects than other industrial processes that could be considered suitable on the site.

**Reporter's conclusions:**
**Reporter's recommendations:**

<b>Issue (ref and heading):</b>	<b>POLICY R5: ENERGY FROM WASTE</b>	<b>129</b>
<b>Development Plan reference:</b>	Policy R5 - Energy From Waste	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Ms Nicola Abrams of Scottish Environmental Protection Agency (408), Mr Allan Rae of Kirkwood Homes Ltd on behalf of Kirkenergy Ltd (808), Mr George Niblock of Niblock Environmental Ltd (1238), Ms Annemarie Wishaw of SITA UK (1288), Mr A. W. Findlayson of Cove and Altens Community Council (1537).		
<b>Provision of the Development Plan to which the issue relates:</b>	Policy to assess proposals for energy from waste facilities	
<b>Summary of the representation(s):</b>		
<p>408 We support the positive approach taken towards Energy from Waste proposals in Policy R5- Energy from Waste, and support the section which sets out likely locations for such proposals.</p> <p>We support the reference to Scottish Environment Protection Agency's Thermal Treatment of Waste Guidelines, as these provide useful guidance for Energy from Waste proposals. It should be noted that these guidelines will be updated shortly, but still constitute a material planning consideration and should continue to be referred to.</p> <p>808 The waste strategy for Aberdeen predicts a higher level of residual waste than the targets in Scotland's Zero Waste Plan (CD7). Given the projected absence of landfill facilities within Aberdeen City for the disposal of residues from treatment plants it is essential to comply with the proximity principle and sustainable waste management to develop policies which support and encourage those treatment technologies which generate the least amount of residues.</p> <p>Paper apart provides a strategic context for comments.</p> <p>1238 The policy makes modest provision for the development of one treatment and three local collection facilities all for municipal solid waste. It fails markedly to recognise the critical and urgent need for a network of tertiary waste and resource treatment facilities to deal with the vast bulk of the wastes arising in the City area derived from business and requiring treatment in accord with the proposals contained in the Zero Waste Plan The scale of the issue is that there is four times the amount of business waste yet the policy is totally silent about it Reference is made to the Aberdeen Waste Strategy which is almost as void of provision or recognition of the impact and requirements.</p> <p>The Local Development Plan cannot afford to await the development of SDPA and National guidance in respect of the locational requirements for waste treatment facilities. The plan is virtually silent but the need is urgent and cannot await the cascade of advice.</p> <p>1288 The term 'energy from waste' should be defined in the glossary as it is unclear whether Policy R5 is intended to cover technologies such as anaerobic digestion, which generate energy from waste, or just thermal treatment (gasification, pyrolysis and incineration). Policy R5 states that industrial sites with the potential for connection to the grid and with potential heat and power users are likely to be suitable locations for energy from waste. It should be made clear whether this intends all land allocated as B11 to be</p>		

considered potentially suitable. We consider that this policy should identify specific sites, or at the very least tight areas of search, potentially suitable for residual waste treatment in order to achieve self-sufficiency and compliance with the Aberdeen Waste Strategy.

1537 The emissions from any such plant must comply with the highest standards and be located where it will not affect residential areas.

#### **Modifications sought by those submitting representations:**

408 We suggest that additional information could be included, for example other types of Energy from Waste processes, as listed in paragraph 3.99, may be appropriately located close to other types of land uses. Not all Energy from Waste proposals are large scale developments, and smaller scale operations could be beneficial at neighbourhood level (e.g. Combined Heat and Power plants for residential areas).

808 More guidance given on technologies supported and in particular the location of new waste/resource facilities. The Local Development Plan has been prepared in a policy vacuum in respect of strategic guidance. The SDPA is focused on regional facilities when national policy and good practice recognises that smaller local facilities dealing with waste/resource locally is more appropriate. Guidance from SDPA must be incorporated into Local Development Plan policies.

1238 The policy needs to acknowledge the scale and significance of the requirements to treat business wastes in accordance with the developing policies in the Zero waste plan. Failure to address this significant and urgent issue will impact on the competitiveness of business and increase the transportation of resources for treatment outwith the north east at additional financial and environmental cost.

1288 The term 'energy from waste' should be defined in the glossary as to whether it covers technologies such as anaerobic digestion, which generate energy from waste, or just thermal treatment (gasification, pyrolysis and incineration). Policy R5 needs to make clear whether all land allocated as BI1 is to be considered potentially suitable for energy from waste. We consider that this policy should identify specific sites, or at the very least tight areas of search.

#### **Summary of response (including reasons) by planning authority:**

408 General support for the policy is noted and welcomed. In respect of highlighting small scale CHP for residential areas in paragraph 3.99, we would be happy with this suggestion if the reporters considered it appropriate. A number of such facilities have already been developed in Aberdeen - a good example is the CHP plant on the corner of School Road/Golf Road which heats the tower blocks at Seaton. Such facilities would be considered against Policy H1 Residential Areas where we would likely view them as complimentary to a residential use but would have to consider their impact on character and amenity of the local area.

Although we do not recommend making any prescribed modifications to this policy, reporters may wish to consider the merits of adding a reference to the text in paragraph 3.99 stating that small scale CHP plants would be acceptable at a neighbourhood level, subject to other local development plan policies.

808 The response to 408 above is also pertinent to this representation in respect of small CHP facilities. In terms of larger regional facilities, this will be considered in Supplementary Guidance on Regional Waste Facilities which will be prepared by the

Strategic Development Planning Authority. This is referenced in Policy R5 so it can be constituted as Supplementary Guidance when it is prepared.

1238 We accept that the Proposed Plan does not include sites for business and industrial wastes and would repeat what we say in response to a similar point raised in Issue 128 (Policy R4 - Sites for New Waste Management Facilities). Development options for the Plan were requested in early 2009 and no proposals for waste sites or facilities emerged. Further opportunities were available at both the Main Issues and Proposed Plan representation stages for specific sites to emerge, but none materialised. We would be happy to work with others to identify appropriate sites. Although this would be too late for this Local Development Plan, it would be a useful exercise for future plans. In the meantime, Policy R3 states that waste management proposals will be acceptable on Business and Industrial Land. The Proposed Plan contains a large amount of such land which is well distributed throughout the city so there is an ample supply of this in a choice of locations throughout the city. This approach is in line with Scottish Planning Policy (CD3) paragraph 216 and Annex B of the Zero Waste Plan (CD7) paragraph 5.6. It also provides more flexibility than fixing the use to a specific site.

In addition, reporters may wish to consider a change to paragraph 3.98 through another representation on Issue 127 (Policy R3: New Waste Management Facilities). Here we acknowledge that it may be appropriate to say that the sites identified in Policy R4 will handle municipal waste and that further facilities may be required to deal with non-municipal waste.

1288 Policy R5 would apply to anaerobic digestion - this in one of the technologies mentioned in Scottish Environment Protection Agency's Thermal Treatment of Waste Guidelines (RD16) which is mentioned in the policy (albeit that the Guideline only refers to the gas treatment element of anaerobic digestion). Whilst conciseness would suggest we should include a definition of what constitutes 'Energy from Waste', the principle of brevity persuades to rely on the definitions contained in Scottish Environment Protection Agency's Guidance and not to repeat all of them in the local development plan.

The policy does not say that that all business and industrial land is suitable for EFW. Only industrial sites with the potential for connection with the electricity grid and with potential users of heat and power are considered suitable. This is in line with paragraph 219 of Scottish Planning Policy. In respect of the need to identify specific sites, we would reiterate the comments made to 1238 above.

1537 We would agree that such facilities should be located to sites where potential impacts on human health can be minimised. This is likely to be one of the considerations of an Environmental Impact Assessment which would be required for major energy from waste plants. Modern waste facilities have to be licensed by Scottish Environment Protection Agency and operate to a very high standard. In determining whether to permit a license, Scottish Environment Protection Agency will consult the Food Standards Agency, the local authority, the Health Board and other appropriate persons to ensure that any health issues are considered and dealt with. Once a facility is operational, Scottish Environment Protection Agency will monitor and enforce standards as necessary.

**Reporter's conclusions:**

<b>Reporter's recommendations:</b>



<b>Issue (ref and heading):</b>	<b>R6 WASTE MANAGEMENT REQUIREMENTS FOR NEW DEVELOPMENT</b>	<b>130</b>
<b>Development Plan reference:</b>	Policy R6 – Waste Management Requirements for New Development	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Ms Nicola Abrams of Scottish Environmental Protection Agency (408), Ms Susan Lai (1546).		
<b>Provision of the Development Plan to which the issue relates:</b>	Sets criteria for the provision of waste management facilities in new development	
<b>Summary of the representation(s):</b>		
<p>408: Support inclusion of this policy. However, feel that it is not clear within the policy if it applies only to new residential or retail developments or if it applies to all new developments.</p> <p>1546: To really achieve what's needed according to advice on Climate Change as well as for Aberdeen to gain maximum potential in terms of opportunities for tourism, becoming high profile in its lead in transition to a greener city and building a knowledge economy based on transition to sustainable lifestyles, more creativity must be tapped into.</p>		
<b>Modifications sought by those submitting representations:</b>		
<p>408: We request that this is clarified, in order to fulfil the aspirations set out in paragraph 4 of Annex B of Scotland's Zero Waste Plan and in order to ensure that Policy R6 links more closely to the requirements set out in the Supplementary Planning Guidance on Waste Requirements for New Development. It is requested that the wording of Policy R6: Waste Management Requirements in New Development is strengthened to state the following at the beginning of the policy:</p> <p>"All new development will be required to incorporate adequate provision for waste management and recycling facilities."</p> <p>1546: Perthshire and Wales have made radical amendments to their planning policies, which allows for more radical housing development, which are highly desirable in terms of economy, energy efficiency, affordable housing, strengthening communities, food production, waste reduction, creating new businesses and economies. I suggest looking to these policies to develop something similar suited to Aberdeen.</p>		
<b>Summary of response (including reasons) by planning authority:</b>		
<p>408</p> <p>This policy was drawn up specifically with housing development in mind. This was in order to assist our waste collection service collect the maximum amount of segregated waste as efficiently as possible. However, the respondent's point that all new developments should incorporate adequate provision for waste management and recycling facilities is a reasonable one. If the reporters are so minded it may be appropriate to add this comment to policy R6 as outlined by Scottish Environment Protection Agency.</p>		

1548

The Proposed Plan and Supplementary Guidance makes a number of suggestions to the way in which development should be carried out in order to reduce our impact on the environment and the use of resources. These can range from strategic issues such as locating development in locations that can take best advantage of current infrastructure and more sustainable transport alternatives to the car, to more detailed policy guidance on sustainable design and reducing carbon emissions from buildings. All the waste policies are trying to view waste as a resource that can be managed, controlled and used more efficiently, rather than something that should simply be disposed of as cheaply as possible. The Supplementary Guidance on Waste Management is a small part of this. They are there to ensure that new houses and flats are able to accommodate recycling, composting and other waste facilities and that where collection is required, it can be done as easily and efficiently as possible. This is a step change to the way we do things. As we continue to improve our collection services and recycling rates, there may be other things which emerge and which will require us to make further changes to the plan and supplementary guidance. We would propose to deal with these at the time rather than make radical changes now which may be difficult to implement.

**Reporter's conclusions:****Reporter's recommendations:**

<b>Issue (ref and heading):</b>	<b>POLICY R7: LOW AND ZERO CARBON BUILDINGS</b>	<b>131</b>
<b>Development Plan reference:</b>	Policy R7 - Low and Zero Carbon Buildings	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Councillor Debra Storr of Aberdeen and Aberdeenshire Green Party (353), Ms Naomi Cunningham of The Scottish Property Federation (800), Ms Emelda Maclean of Emac on behalf of Scotia Homes (1189), Mrs Nicola Barclay of Homes for Scotland on behalf of Grampian House Builders Committee (1442), Miss Shelley Thomson of Stewart Milne Homes (1464), Mr Ben Train of Tesco Stores Limited (1472), Mrs Catherine Thornhill of Ryden LLP on behalf of Mr Gordon McWilliam (1554), Mr Ben Freeman of Bancon Developments Ltd (1561).		
<b>Provision of the Development Plan to which the issue relates:</b>	Requirement to reduce carbon emissions using low and zero carbon generating technologies.	
<b>Summary of the representation(s):</b>		
<p>Reducing Scale</p> <p>353: Submits that policy R7 does not comply with the requirements of the Climate Change (Scotland) Act 2009, Section 72 as the Plan does not contain policies specifying a reducing scale of climate change emissions from all new buildings.</p> <p>Object to the Policy Requirement</p> <p>800, 1189, 1442, 1464, 1472, 1554, 1561: Object to requirement for the following reasons.</p> <p>800: Policies relating to the requirement for low and zero carbon technologies may be unrealistic and impractical. The council must adopt a pragmatic approach as suggested by Scottish Planning Policy (2010).</p> <p>1189: As written this section will place an overly restrictive and costly overhead on the development industry and the provision of homes in the city area.</p> <p>1189: There appears to be no justification for the arbitrary target of half of the building regulations savings to come from Low or Zero Carbon Technologies, if it is possible to meet the targets as set out in the building regulations in other ways. For example, why insist on a costly mechanism of generating power, if the same result could be achieved, in terms of carbon savings, through increasing insulation or passive solar gain.</p> <p>1442, 1464, 1554, 1561: The costs associated with micro-renewables can severely impact development viabilities, which could potentially affect the affordability of new homes, and ultimately the delivery of the Structure Plan housing requirement. A 30% reduction in CO2 emissions can be largely achieved through improvements to building fabric, and the use of low zero carbon technology is not considered to be the most effective way of reducing emissions in new housing development.</p> <p>1442: The policy also requires flexibility to adapt to changes in Scottish Government</p>		

policy. The Government is currently looking at varying mechanisms for reducing carbon, and it would make sense for Aberdeen City Council to endeavour to future proof this policy.

1472, 1554: 2010 Scottish Technical Standards target a CO2 emissions reduction of 30% relative to the 2007 Scottish Technical Standards and 50% relative to the 2002 Scottish Technical Standards. These standards supersede the requirements previously outlined in the now revoked Scottish Planning Policy 6 and PAN84.

#### **Modifications sought by those submitting representations:**

353: Delete the first paragraph of Policy R7 ('All new buildings...Supplementary Guidance').

353: Insertion of new paragraph as below 'All new buildings must reduce the predicted carbon dioxide emissions by at least 30 per cent beyond the 2007 Building Regulations' carbon dioxide emissions standard. After 2012 the reduction must be at least 60 per cent, after 2014 the reduction must be at least 90 per cent, and after 2016 the reduction must be 100 per cent (no emissions).'

1189, 1442, 1472, 1554, 1561: Reconsider policy, and remove reference to low and zero carbon generating technologies.

#### **Summary of response (including reasons) by planning authority:**

##### General

This policy requires new developments, with some exceptions, to install low and zero carbon generating technologies to reduce the predicted carbon dioxide emissions by at least 15% below the 2007 building standards. The 2007 building standards are the base from which percentage reductions are calculated in the calculation software packages available. The specific requirement for savings to be met by low and zero carbon generating technologies comes from the Climate Change (Scotland) Act 2009 (RD3).

##### Reducing Scale

The specified and rising proportion is included within Supplementary Guidance 8.1 Low and Zero Carbon Buildings (RD73) Table 1. This policy area has been subject to many changes since its original inclusion in Scottish Planning Policy6, and there have also been developments in building standards, with the implementation of the 2010 Technical Handbooks. There are also planned, but not certain, changes to the building standards. It is submitted that it is more appropriate to contain future requirements within supplementary guidance so that they can be reviewed following consultation, and can recognise changes that have taken place. In addition supplementary guidance adopted under the provisions of Section 22 of the Town and Country Planning (Scotland) Act 1997 will form part of the development plan.

##### Requirement for Low and Zero Carbon Generating Technologies

Developers suggest that it will be possible to meet the majority of the 30% saving, now required by building standards through the introduction of the 2010 technical handbooks, without the use of low and zero carbon technologies. This does achieve the overall objective of reducing our carbon emissions. However, if we are to take seriously the objective of achieving net zero carbon by 2016/2017 - as contained in the Sullivan

Report (RD20) and the Aberdeen City and Shire Structure Plan (CD8) - there will be a requirement for a significant saving to be achieved through the use of low and zero carbon generating technologies in the future. A Progress Report on the Low Carbon Building Standards Strategy for Scotland (RD88) was published in February 2011 and continues to work towards the goal of net zero carbon buildings, and if practical and the ambition of total-life zero carbon buildings. In requiring a proportion of the saving to be met through the use of low and zero carbon generating technologies at this stage, it will act as a stimulus for the renewables industry. This will increase understanding of the use and implementation of technologies, and help to drive down the cost of these technologies.

There will be impacts on the overall cost at this stage. However, the legal requirement specifies the saving to be met through the use of low and zero carbon technologies and this must be reflected in the approach adopted by the Local Development Plan.

The 15% saving that was previously adopted by Scottish Planning Policy<sup>6</sup> and PAN84, and reiterated by Aberdeen City Council's adopted Supplementary Guidance Reducing Carbon Emissions in New Developments (RD81) has been implemented and monitoring of the policy has shown that through the use of planning conditions compliance with this requirement has been demonstrated. For future years when requirements are to be increased, further investigation and consultation will be held to determine an appropriate increase.

**Reporter's conclusions:****Reporter's recommendations:**

<b>Issue (ref and heading):</b>	<b>POLICY R8: RENEWABLE AND LOW CARBON ENERGY DEVELOPMENTS</b>	<b>132</b>
<b>Development Plan reference:</b>	Policy R8 - Renewable and Low Carbon Energy Developments	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Ms Nicola Abrams of Scottish Environmental Protection Agency (408), Ms Maire Daly of Scottish Natural Heritage (662), Mr Jonathan Russell (1196), Mr Stuart Winter of Jones Lang LaSalle (1556).		
<b>Provision of the Development Plan to which the issue relates:</b>	Policy to assess applications for renewable and low carbon energy schemes.	
<b>Summary of the representation(s):</b>		
<p>Energy From Waste</p> <p>408: It is recommended that reference be made in Policy R8- Renewable and Low Carbon Energy Developments to the opportunity to maximise the use of surplus heat and power from Energy from Waste facilities.</p> <p>Government Targets</p> <p>662: Paragraph 3.105 makes reference to Scottish Government targets. Due to developments in the sector and changing expectations, particularly for the deployment of offshore wind, the Scottish Government announced a more challenging 2020 target for this indicator - the target is now 80% of gross electricity consumed in Scotland to come from renewable sources by 2020.</p> <p>1196: renewable energy needs to be given greater priority.</p> <p>Restrictive Policy</p> <p>1556: Policy is overly restrictive thresholds for development to meet.</p>		
<b>Modifications sought by those submitting representations:</b>		
<p>Government Targets</p> <p>662: We suggest: "A positive approach to renewable..... target for 80% of Scotland's electricity to be generated from renewable sources by 2020."</p> <p>Restrictive Policy</p> <p>1556: A revised policy wording is recommended:</p> <p>"The development of renewable and low carbon energy schemes is supported and applications will be supported in principle of proposals:</p> <ol style="list-style-type: none"> <li>1. Do not cause unacceptable significant adverse effects to the local environment, including landscape character and the character and appearance of listed buildings and conservation areas</li> <li>2. Do not unacceptably impact on air quality.</li> <li>3. Do not unacceptably impact on tourism.</li> <li>4. Do not have an unacceptable significant adverse impact on the</li> </ol>		

amenity of residents.

For wind energy developments, proposals will also need to meet the following specific requirements and ensure that:

1. Development does not give rise to electro-magnetic interference to aviation communication, other telecommunications installations, or broadcasting installations. Proposed mitigation measures to address adverse impacts will be considered as will suspensive planning conditions to secure such mitigation.
2. Development does not result in unacceptable significant cumulative effects on landscape and natural heritage.
3. Free standing wind turbines set back from the roads and railways at a distance greater than the height of the turbine.
4. Turbines are sites more than 10 motor diameters from residential properties where noise and shadow flicker may be detrimental to residential health.

Appropriate conditions (along with a legal agreement under Section 75, where necessary) will be applied, relating to the removal of wind turbine(s) and associated equipment, and to the restoration of the site, whenever the consent expires or the project ceases to operate for a specific period."

#### **Summary of response (including reasons) by planning authority:**

##### Energy From Waste

Policy R8 is supportive of renewable energy development and sets out the criteria in order to assess applications for renewable and low carbon energy developments. Policy R5 -Energy From Waste requires consideration to be given to the connection to the electricity grid and the ability to provide heat and power to neighbouring uses. Therefore, it is unnecessary to also refer to this in Policy R8.

##### Government Targets

If the Reporter is so minded to accept comments an amendment to Paragraph 3.105 could be made to read "A positive approach to renewable..... target for 80% of Scotland's electricity to be generated from renewable sources by 2020." This will help to provide a more positive approach towards renewable technologies.

##### Restrictive Policy

The policy is supportive to the principle of renewable energy developments. Scottish Planning Policy (CD3) paragraph 187 identifies the criteria to be considered when assessing application. The policy in the Proposed Plan complies with the requirements of Scottish Planning Policy and it is the Council's view that whilst being supportive of renewable energy developments it is important to give consideration to the criteria identified in Policy R8.

#### **Reporter's conclusions:**

#### **Reporter's recommendations:**





<b>Issue (ref and heading):</b>	<b>NEW POLICY: TELECOMS</b>	<b>133</b>
<b>Development Plan reference:</b>	Proposal for New Policy	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Ms Carolyn Wilson of Mono Consultants Ltd on behalf of Mobile Operations Association (813).		
<b>Provision of the Development Plan to which the issue relates:</b>	No provision in the proposed plan	
<b>Summary of the representation(s):</b>		
813: Highlights the importance of including a specific policy in the Local Development Plan in relation to the provision of telecommunications infrastructure, in line with Scottish Planning Policy which requires that "Local development plans and supplementary guidance should give a consistent basis for decisions on communications infrastructure by setting out the matters that will be taken into account in decision making".		
<b>Modifications sought by those submitting representations:</b>		
813: Seeks inclusion of a policy specifically relating to telecommunications infrastructure, with associated preamble/background information.		
<b>Summary of response (including reasons) by planning authority:</b>		
<p>813: Paragraph 248 of Scottish Planning Policy (CD3) states that planning authorities should support the expansion of the electronic communications network, including telecommunications, broadband and digital infrastructure, through the development plan and development management decisions, taking into account the economic and social implications of not having full coverage or capacity in an area.</p> <p>Paragraph 251 of Scottish Planning Policy states that Local Development Plans and supplementary guidance should give a consistent basis for decisions on communications infrastructure by setting out the matters that will be taken into account in decision making. In preparing the proposed plan, it was felt that any development related to telecommunications infrastructure could be adequately assessed without any requirement for a specific telecoms policy. Any such development must take into account policies including, but not limited to, D5: Built Heritage, D6: Landscape, H1: Residential Areas and H2: Mixed Use Areas. It is considered that these policies would provide the necessary context for local decision making on telecommunications-related development, including impact upon the built environment, listed buildings and the amenity of the surrounding area.</p>		
<b>Reporter's conclusions:</b>		
<b>Reporter's recommendations:</b>		

<b>Issue (ref and heading):</b>	<b>USE OF SUPPLEMENTARY GUIDANCE</b>	<b>134</b>
<b>Development Plan reference:</b>	Supplementary Guidance documents listed in Appendix 5 and 6. Various cross-references to Supplementary Guidance throughout the Proposed Plan.	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Mr Brian Wallace of Traverse Ltd on behalf of ACCA (1285).		
<b>Provision of the Development Plan to which the issue relates:</b>	The use of Supplementary Guidance and associated policies in the Proposed Plan.	
<b>Summary of the representation(s):</b>		
<p>1285: We are concerned that Aberdeen City Council has made excessive use of Supplementary Guidance and with regard to the City Centre, has placed matters of policy in the appendices to the Local Development Plan. Our interpretation of Para 94 Circular 1/2009 is that policies and proposals of significance should be in the body of the Local Development Plan. Detail may be in Supplementary Guidance. The majority of Supplementary Guidance is consistent with this. However the City Centre Development Framework is of strategic importance to the City and the region. Its successful delivery is essential to the Structure Plan, the work of ACSEF and NPF2. As such, the key policies and proposals in the CCDF should be in the Local Development Plan.</p>		
<b>Modifications sought by those submitting representations:</b>		
<b>Summary of response (including reasons) by planning authority:</b>		
<p>Section 22 of the Town and Country Planning (Scotland) Act 1997 (the Act) and section 27 of the Town and Country Planning (Development Planning) (Scotland) Regulations 2008 set out the provisions for supplementary guidance. These set clear requirements for the adoption of supplementary guidance in connection with local development plans and what can be classified as supplementary guidance. Circular 1/2009 adds to this by stating that "Any such guidance will form part of the development plan." Therefore, in the decision making process supplementary guidance adopted under section 22(1) of the Act will have the same weight as the Local Development Plan.</p> <p>Supplementary guidance may only deal with the provision of further information or detail in respect of policies or proposals set out in the plan and then only provided that those are matters which are expressly identified in a statement in the plan as matters which are to be dealt with in supplementary guidance. Paragraph 2.9 of the Proposed Plan clearly states that the vision for the city centre will be delivered through the implementation of the policies and a City Centre Development Framework which has been prepared as supplementary guidance.</p>		
<b>Reporter's conclusions:</b>		
<b>Reporter's recommendations:</b>		

<b>Issue (ref and heading):</b>	<b>PROPOSALS MAP AND GLOSSARY</b>	<b>135</b>
<b>Development Plan reference:</b>	City Wide Proposals Map, Additional City Wide Proposals Map (on reverse) and the separate City Centre Detail Map	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Ms Nicola Abrams of Scottish Environmental Protection Agency (408), Ms Fiona McInally of Paths For All (472), Ms Maire Daly of Scottish Natural Heritage (662), Ms Lorraine Jones of Sport Scotland (1244).		
<b>Provision of the Development Plan to which the issue relates:</b>	The maps contain relevant Local Development Plan policy zonings and proposals with additional constraints shown on the reverse of the main Proposals Map.	
<b>Summary of the representation(s):</b>		
<p>408 We support the use of the proposals maps to show settlement allocations, and we welcome the inclusion of previously zoned land from the Aberdeen City Local Plan 2008 being brought forward.</p> <p>472 Proposal Maps are difficult to place together to see any proposed transport links or how the core paths or wider path network will fit into the new master planned zones.</p> <p>662 The River Dee Special Area of Conservation (SAC) is not correctly identified on any of the proposal maps. Making potential developers aware of the location of these sites on maps in the plan is an effective way of drawing attention to the policy approach and level of protection; it will also provide an additional safeguard in relation to the Habitats Regulations Appraisals of the plan.</p> <p>1244 In the Glossary definition of brownfield land it is unclear what is meant by the phrase '...not within the immediate curtilage...'. This is considered to potentially lead to confusion in relation to, for example, school playing fields and to what extent they are or are not 'within the immediate curtilage'. Whilst we welcome the clarification that brownfield land doesn't necessarily apply to greenfield areas within redundant institutions, it is considered that clarification would be helpful.</p>		
<b>Modifications sought by those submitting representations:</b>		
<p>472 Links should be highlighted in the map as well as areas where links should be created.</p> <p>662 The boundary of the River Dee SAC should be shown on the Proposals Map</p> <p>1244 In the Glossary definition of brownfield development delete the section 'are not within the immediate curtilage of buildings and have not been affected by previous development...'</p>		
<b>Summary of response (including reasons) by planning authority:</b>		
<p>408 Support noted and welcomed.</p> <p>472 As it stands, the Proposals Map shows policy designations. On the reverse is the Additional Proposals Map which shows a number of other designations, constraints and core paths. Both maps are city wide. To attempt to combine these into one map would</p>		

make it cluttered and unreadable. It should be noted that the green space network shows a strategic network of open spaces, habitats and links throughout Aberdeen and is partly based on the core path network. It highlights where greenspace enhancement projects, including improved access opportunities, should be focussed.

662 We acknowledge that the River Dee Special Area of Conservation (SAC) is not identified on any of the proposal maps. However, under the Habitats Regulations the need to assess proposals for likely significant impact on an SAC extends outside a site boundary. This means that any development within the Dee catchment with the potential to have a significant impact on the qualifying features of the SAC could be subject to a Habitats Regulations Assessment. In this respect showing the actual boundary of the SAC may even be unhelpful if an applicant believes that their proposal has no effects, simply because it lies outwith the boundary. Making potential developers aware of the location of these sites on maps in the plan is an effective way of drawing attention to the policy approach and level of protection; it will also provide an additional safeguard in relation to the Habitats Regulations Appraisals of the plan.

1244 The change to the glossary definition of brownfield land was made in order to clarify it. However, it would appear that the outcome has not had the desired effect. If the Reporter is so minded they may find that using the definition of brownfield land in the glossary in Appendix 2 of the 2008 Aberdeen Local Plan (CD12) could be more helpful in order to better define this within the Proposed Plan.

**Reporter's conclusions:****Reporter's recommendations:**

<b>Issue (ref and heading):</b>	<b>PUBLIC CONSULTATION</b>	<b>136</b>
<b>Development Plan reference:</b>	No specific reference in Proposed Plan. Participation Statement and Report of Conformity with Participation Statement set out details of consultation undertaken.	
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Mr Nick James of Land Use Consultants on behalf of Camphill Communities (Aberdeen City and Shire) including Aberdeen Waldorf School (259), Mr Andrew Dalziel (291), Ms Judith Munro of Aberdeen and Grampian Chamber of Commerce (510), Mr James Grant (968), Mrs Alison Riley (1421), Mr A. W. Findlayson of Cove and Altens Community Council (1537).		
<b>Provision of the Development Plan to which the issue relates:</b>	The Council's approach to and process of undertaking consultation on the Local Development Plan	
<b>Summary of the representation(s):</b>		
<p>259: The Aberdeen Local Development Plan should be informed by an assessment of the plan's potential impacts on the special needs children and adults served by Camphill, who are identified as a highly vulnerable subset of the wider population, with specific sensitivities and needs.</p> <p>Equalities and Human Rights Impact Assessment appears to have been carried out at a very high level with no specific consideration of the potential effects of plan allocations and policies on the special needs population within Aberdeen.</p> <p>291: Found the process highly frustrating. It is very irritating to have to fill in a separate form for each of the comments one wants to make. Feel that this process is designed to make it difficult to comment and to put people off. The respondent made extensive comments on the Main Issues Report and was dismayed to find that all of the points made were either dismissed as not being important or would be dealt with by mitigation measures. The present consultation is basically a waste of time as the decisions to go ahead with developments have probably been made anyway. The respondent is sure the whole process is developer led and the local electorate are not regarded at all. The really serious issue is that the local councillors who are supposed to represent the local community simply don't.</p> <p>510: Whilst there is no doubt that broad communication of the Local Development Plan has been carried out, including the provision of appropriate opportunities for engagement, the respondent would urge the Development Plan Team to continue to foster an environment that provides effective and on-going dialogue with specific stakeholders and with the general public. This is relevant to all areas of the Local Development Plan as well as appropriate areas of the Supplementary Guidance. Respondent is keen for the process to be kept as simple and as transparent as possible. Expressed doubts that Supplementary Guidance is being over-used, though we accept that you are working to the guidance of the Scottish Government.</p> <p>968: Concerned that Aberdeen City Council has failed to take account of the consultation that took place in 2008. In particular the re-zoning of much of the Green Space Network and reverting it back to Green Belt. This is totally unacceptable and devalues the whole</p>		

purpose of the planning process.

1421: Throughout the Aberdeen Local Development Plan there are repeated statements regarding where details can be found. However when reviewing where directed to little to no details exists? Before presenting a proposal surely some detail and or the principals behind the decision to develop a certain area should be provided.

1537: Consultation was wholly inadequate. Only two hours were available for people in employment to view the Plan.

#### **Modifications sought by those submitting representations:**

259: Request that the finalisation of the Local Development Plan should be informed by an assessment of the potential impacts on children and adults with special needs. Furthermore, major developments, or proposals, close to special needs schools and facilities should be subject to health and equalities impact assessment as part of the planning and design process.

#### **Summary of response (including reasons) by planning authority:**

The Plan was informed by the Council approved Equality and Human Rights Impact Assessment Guide (RD28). The Equality and Human Rights Impact Assessment helps us to assess the impact of our policies, procedures and functions on the diverse groups within Aberdeen City. The Finalised Plan and subsequent Development Plan Schemes will also be assessed by the Equalities and Human Rights Impact Assessment. We looked at the following equality target groups: race, disability, gender, Lesbian Gay Bisexual and Transgender, belief, younger, older and others and within the wider category of 'disability' this included all ages and we also looked at the impact on young people. Young people with special needs live throughout the city and not just within Camphill Communities and the Equalities and Human Rights Impact Assessment has looked at a wide range of issues at a city wide level. Any planning applications received must adhere to the regulations set out in the Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2008 (RD2). Under these regulations there is no statutory requirement for a health and equalities impact assessment as supporting documentation to a planning application.

The Council is disappointed that a respondent found the consultation process frustrating. The process is certainly not designed to be difficult or to put people off commenting. Aberdeen City Council is strongly committed to encouraging interest and wide public involvement in the preparation of the new Local Development Plan. With regards to past comments the respondent had made on the Main Issues Report, we made every effort to answer all points made in representations. We receive many comments about the detail of development such as design and layout which cannot be answered until work begins on a Masterplan, design brief or planning application of the site in question. We also receive comments regarding issues with the site, such as flooding and drainage, which we are unable to answer as we have no definite details as to how these will be mitigated against. Therefore, some comments are unable to get a further answer until the developer submits supporting documents. We hope that the respondent will continue to comment on future planning issues in Aberdeen.

There is no other opportunity for the Local Development Plan team to consult on this Plan. However, we are committed to continue appropriate opportunities for engagement throughout the next Local Development Plan process and we will continue to keep

interested parties informed in the current Local Development Plan process.

Comments regarding the use of Supplementary Guidance are noted. However, as stated in the representation, we are working to Scottish Government guidance - Circular 1/2009: Development Planning (CD4) that states that Local Development Plans set out where most new developments will happen and policies that will guide decision making on planning applications. Whereas, supplementary guidance provides more detailed guidance on specific issues.

With regards to the comment about repeated statements and little further information in the Plan, we have found, without knowing which section of the Aberdeen Local Development Plan this comment is referring to, difficult to respond to. In general, we have tried to give further detail in the Plan's supporting documents and Supplementary Guidance. As this is the first stage in the development process, more specific information will be given when a Masterplan is submitted and a planning application is lodged.

The Council are disappointed that a respondent found the consultation process inadequate. We went beyond the statutory consultation requirements set by the Scottish Government. We held eleven meetings across the city on top of making the plan public on the internet, in the city libraries and The Point as well as St Nicholas House. Therefore there was opportunity for the local community to look at the plan whenever they wished.

**Reporter's conclusions:****Reporter's recommendations:**