



Strategic Place Planning

Report of Handling by Development Management Manager

Site Address:	Loirston House, 102 Wellington Road, Aberdeen AB12 3BH
Application Description:	Change of use of from Class 4 (Business) to form 24no. affordable flats, including formation/replacement of doors, formation of windows: installation of cladding, and alterations to the car park and garden ground with associated works including boundary treatments, bin store and landscaping
Application Ref:	250202/DPP
Application Type:	Detailed Planning Permission
Application Date:	4 March 2025
Applicant:	CTL Estates
Ward:	Kincorth/Nigg/Cove
Community Council:	Cove and Altens

DECISION

Refuse

APPLICATION BACKGROUND

Site Description

The application site comprises the building and curtilage of Loirston House, a two-storey late 20th century, pitch-roofed office building with an approximately 'T'-shaped footprint, situated within a c. 3,200sqm plot of land c. 50 m to the south of the junction between Wellington Road and Hareness Road. The building has largely lain vacant since its previous long-term occupier, Total, vacated it in 2016, although it was used by a local charity, Somebody Cares, between approximately 2021 and 2023. The building has been actively marketed for both office use and alternative uses since 2016. The site lies at the western edge of the Altens Industrial Estate, adjacent to its main vehicular entry point on Hareness Road. It is bound to the north by an area of scrubland, to the east by a vacant, hard-landscaped plot of business and industrial land (formerly in use as a car storage area and as a motel prior to that), to the south-east by Altens Lorry Park, and to the south by the curtilage of a detached residential dwelling. The Loirston House building sits towards the back (east) of its curtilage, with the front curtilage predominantly comprising a tarmacked car park area, including under-croft parking beneath the front wing of the building. The site is accessed by car via a left-in, left-out junction onto Wellington Road on its western boundary. Established tree belts run along, but just outwith, the site's southern and eastern boundaries.

Relevant Planning History

- P101502 – Planning permission was approved in 2010 for the erection of a perimeter fence and gate, the installation of CCTV cameras, a smoking shelter and cycle stands.

APPLICATION DESCRIPTION

Description of Proposal

Detailed planning permission is sought to change the use of the former office building to form 24 residential flats, with associated alterations to the external appearance of the building, car parking, bin store, boundary treatments and landscaping.

The physical works to the existing building and its curtilage would involve the following:

- Recladding of the existing building's external walls and the installation of new windows and doors;
- Infilling of the ground floor level of the front wing (currently under-croft car parking) with three flats;
- Reduction and alteration of the existing car parking area in the front curtilage to provide a total of 26 parking spaces, including two disabled bays;
- Installation of new boundary treatments, including timber fencing to delineate private garden areas and a 2m high close-boarded timber fence along the southern boundary;
- Removal of two trees and the planting of fifteen new trees, alongside other soft and hard landscaping, including private and communal garden areas; and
- Formation of a bin store.

Proposed tenure of flats

Permission is sought for 24 affordable flats, to be operated by a Registered Social Landlord. Although reference is made in the applicant's supporting statements and floor plans to the proposed use of the nine ground floor level flats as specialist 'bariatric care' accommodation, such accommodation, where a significant element of care is provided, along with the potential provision of specialist internal equipment, would fall into Class 8 (Residential Institutions) of The Town and Country Planning (Use Classes) (Scotland) Order 1997, rather than as mainstream affordable flats (*sui generis*). The applicant's Planning Statement advises that any element of care would be *'relatively ad-hoc, as opposed to being round-the-clock provision'* and that the care element would thus be ancillary to the primary use as affordable flats, the ground floor units of which would be wheelchair accessible and capable of accommodating bariatric patients who would generally live independently. On this basis, bariatric care is not specifically referenced in the development description.

Amendments

In agreement with the applicant, the following amendments were made to the application –

- Additional information submitted including changes to layout, boundary treatments and landscaping.

Supporting Documents

All drawings and supporting documents listed below can be viewed on the Council's website at –

<https://publicaccess.aberdeencity.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=SSE9GWBZGJZ00>

- Supporting Planning Statement
- Design & Access Statement
- Marketing Statement
- Noise Impact Assessment
- Tree Survey
- Travel Plan Framework

CONSULTATIONS

Aberdeen City Council (ACC) Internal Consultees

- **ACC - Contaminated Land Team** – No objection. The current use is commercial rather than industrial, therefore there is unlikely to be any significant contamination of the land, although some contamination may be possible from adjacent industrial uses. As such, an advisory note is recommended, advising the applicant that should any ground contamination be discovered during the development, the Planning Authority should be notified immediately and a suitable scheme for mitigating any risks from the contamination should be agreed with the Planning Authority and thereafter implemented.
- **ACC - Developer Obligations** – Financial contributions are required to mitigate against the impact the development would have on the following local infrastructure and facilities:
 - Core Path Network - £9,505
 - Healthcare Facilities - £13,041
 - Open Space – £3,241
 - Community Facilities – £27,401

Given the development comprises predominantly one-bedroom flats it is not expected that these would accommodate school children, therefore no contributions are sought for either primary or secondary education. In line with Policy H5 (Affordable Housing) of the ALDP, a minimum of 25% of the development requires to be provided as affordable housing. That equates to 6 units, although it is proposed to provide 100% affordable housing in this instance. A legal agreement is required to secure the financial contributions and potentially to also secure the 25% affordable housing in perpetuity.

- **ACC - Environmental Health** – No objection. The applicant's noise impact assessment (NIA) proposes a closed windows approach with alternative means of ventilation (trickle vents) to address road traffic noise impacts and ensure acceptable noise levels inside habitable rooms. The Environmental Health Service are satisfied that a suitable internal living environment can be achieved with this approach, provided the windows and trickle vents meet the specifications detailed in Sections 6.1.1 and 6.1.2 of the NIA.

Daytime noise levels within external amenity areas were found to range from 51.1 to 58.5 dB (LAeq). The World Health Organisation Guidelines for Community Noise (1999) states that outdoor sound levels should not generally exceed 50 dB (LAeq), to protect the majority of people from being moderately annoyed during the daytime. To address this, the applicant's NIA recommend that acoustic barriers are provided around garden areas (Section 5.11).

- **ACC - Housing Strategy** – The application description refers to conversion to 24

affordable flats, however the drawings refer to 'specialist provision social housing'. The provision of specialist provision accommodation, including bariatric accommodation, is needed in the city, as evidenced in the latest housing need and demand assessment and the Aberdeen City Health and Social Care Partnership's specialist provision market position statements.

At the moment, there is not a Registered Social Landlord (RSL) who can proceed with the development, unless planning permission is granted for general needs housing, as RSLs need certainty that the development will be "future proofed", should there no longer be a requirement for specialist provision homes in the future. From an RSL perspective, unless planning permission is granted for general needs housing, this development will not be able to proceed as affordable housing.

- **ACC - Roads Development Management Team** – No objection. The comments made are summarised as follows:
 - The site has existing pedestrian access which connects to the adopted footway, and can also be accessed by bicycle on the adopted, shared-use paths which link to several core paths and other cycle infrastructure;
 - There are several well-served public transport (bus) stops nearby on Wellington Road;
 - ACC parking guidelines for affordable housing in the outer city boundary is 0.8 spaces per unit. One space per unit is proposed, plus two further accessible bays, which is acceptable;
 - A minimum of 24 long-stay (secure and covered) cycle parking spaces are required and can be conditioned;
 - The existing left-in, left-out vehicular access to the site is acceptable given the dual carriageway and cars travelling northbound can turn at the Souter Head roundabout;
 - The swept path analysis (SPA) provided is acceptable, although it shows that a modification will be required to the splitter island. This will require roads construction consent;
 - The SPA shows that refuse lorries would be able to enter and exit the site in a forward gear;
 - The site proposes a reduced level of car parking than exists at present, which would ensure no adverse impact on the running of the road network;
 - The draft travel plan is acceptable but a final copy should be agreed with the Roads Development Management team before occupation, and should contain site-specific information; and
 - As it is a brownfield site, it is assumed the existing drainage measures would be utilised.
- **ACC - Schools Estates Team** – No objection. Given that the proposed development is made up of predominantly one-bedroom flats, it would not be expected that these would accommodate children, therefore the development is unlikely to have any discernible impact on pupil numbers within local schools.
- **ACC - Waste and Recycling** – No objection. The development will be provided with 5 x 1280l general waste bins, 5 x 1280l mixed recycling bins and one food waste container. The costs of the bins and their delivery will be charged to the developer. The Council's Waste & Recycling team will monitor the collections and any problems raised by the crews. Should any issues occur and persist, collections may be suspended until such time as they are resolved.

External Consultees

- **Cove and Altens Community Council** – No comments received.
- **Police Scotland** – Police Scotland recommend that the architects and design team liaise with the Police Scotland Architectural Liaison service at each stage of the development, for more detailed advice and for the purposes of designing out crime using the principles of Crime Prevention Through Environmental Design. Due consideration should also be given to crime reduction measures during the construction phase. The area is a medium crime area, affected by theft and vandalism.
- **Scottish Water** – No objection. The proposed development is within the Invercarnie Water Treatment Works catchment. To allow Scottish Water to fully appraise the proposals, the applicant should complete a Pre-Development Enquiry (PDE) form and submit it to Scottish Water. There is currently sufficient capacity for a foul only connection in the Nigg Waste Water Treatment works to service the development.

REPRESENTATIONS

Seven representations have been received, all objecting to the application. The matters raised can be summarised as follows –

1. There is too much housing in Aberdeen. The site should remain in commercial use;
2. The development could negatively impact on local road traffic;
3. The site is located in a commercial area, adjacent to a major roundabout. It does not have sufficient amenity compared with other housing nearby and is not suitable for residential development because of a lack of infrastructure and safety concerns which can affect vulnerable people;
4. The access to the site is not suitable, and could have road safety implications; and
5. There are other sites elsewhere that are more suited to affordable housing.

MATERIAL CONSIDERATIONS

Legislative Requirements

Sections 25 and 37(2) of the Town and Country Planning (Scotland) Act 1997 require that where making any determination under the planning acts, regard is to be had to the provisions of the Development Plan; and, that any determination shall be made in accordance with the plan, so far as material to the application, unless material considerations indicate otherwise.

Development Plan

National Planning Framework 4

National Planning Framework 4 (NPF4) is the long-term spatial strategy for Scotland and contains a comprehensive set of national planning policies that form part of the statutory development plan.

- Policy 1 (Tackling the Climate and Nature Crises)
- Policy 2 (Climate Mitigation and Adaptation)
- Policy 3 (Biodiversity)

- Policy 6 (Forestry, Woodland and Trees)
- Policy 9 (Brownfield, Vacant and Derelict Land and Empty Buildings)
- Policy 12 (Zero Waste)
- Policy 13 (Sustainable Transport)
- Policy 14 (Design, Quality and Place)
- Policy 15 (Local Living and 20 Minute Neighbourhoods)
- Policy 16 (Quality Homes)
- Policy 18 (Infrastructure First)
- Policy 22 (Flood Risk and Water Management)
- Policy 23 (Health and Safety)
- Policy 26 (Business and Industry)

Aberdeen Local Development Plan 2023

- Policy B1 (Business and Industrial Land)
- Policy C11 (Digital Infrastructure)
- Policy D1 (Quality Placemaking)
- Policy D2 (Amenity)
- Policy D5 (Landscape Design)
- Policy H3 (Density)
- Policy H4 (Housing Mix and Need)
- Policy H5 (Affordable Housing)
- Policy I1 (Infrastructure Delivery and Planning Obligations)
- Policy NE2 (Green and Blue Infrastructure)
- Policy NE4 (Our Water Environment)
- Policy NE5 (Trees and Woodland)
- Policy R2 (Degraded and Contaminated Land)
- Policy R5 (Waste Management Requirements for New Developments)
- Policy R6 (Low and Zero Carbon Buildings and Water Efficiency)
- Policy R8 (Heat Networks)
- Policy T2 (Sustainable Transport)
- Policy T3 (Parking)
- Policy WB1 (Healthy Developments)
- Policy WB2 (Air Quality)
- Policy WB3 (Noise)

Aberdeen Planning Guidance

- Affordable & Specialist Housing
- Amenity & Space Standards
- Harmony of Uses
- Health and Wellbeing
- Landscape
- Noise
- Open Space & Green Infrastructure
- Planning Obligations
- Resources for New Development
- Transport & Accessibility
- Trees & Woodlands

National guidance

- Planning Advice Note 1/2011 (Planning and Noise)

EVALUATION

Key determining factors

The key determining factors in the assessment of this application are whether the proposed development would:

- Result in the loss of valuable business and industrial land, or adversely affect the viability of neighbouring business and industrial land uses;
- Be a suitable location for residential development, and provide a sufficient quality of residential amenity for the occupants;
- Benefit from suitable, sustainable and active travel connectivity to public transport and local facilities and amenities;
- Impact upon the amenity of the area, including the residential amenity of immediately neighbouring properties.

Business and industrial land use zoning

The application site lies within a Business and Industrial Area, as zoned in the Aberdeen Local Development Plan 2023 (ALDP). Policy 26 (Business and Industry) of National Planning Framework 4 (NPF4) is supportive of business and industry uses where they are compatible with the primary business function of the area, and of other employment uses where they will not prejudice the primary function of the area, and are compatible with the business and industrial character of the area.

Policy B1 (Business and Industrial Land) of the ALDP states:

'Land zoned for business and industrial uses on the Proposals Map, including already developed land, shall be retained for Class 4 (Business), Class 5 (General Industrial) and Class 6 (Storage and Distribution) uses and safeguarded from other conflicting development types. Other uses which may be suited to a business and industrial location, such as car showrooms and bus depots, shall be treated on their own merits. The expansion of existing uses within these locations will be permitted in principle.'

'Where business and industrial areas are located beside residential areas, we will restrict new planning permissions to Class 4 (Business). Buffer zones, which are appropriately sized and landscaped, may be required to separate these uses and safeguard residential amenity. Low amenity 'bad neighbour' uses must have regard to surrounding uses and their potential impact on the environment and existing amenity. In all cases, conditions may be imposed restricting levels of noise, hours of operation and external storage'

Although Policy 26 of NPF4 does not explicitly preclude alternative uses such as residential in business and industrial areas, it notes the importance of alternative uses in such areas not prejudicing the primary function of the area, and being compatible with the character of the area. The site does lie at the western edge of the Altens Industrial Estate, and is accessed separately

from Wellington Road, rather than from Hareness Road. As such, the application site's character is less business and industrial than the neighbouring uses to the east and south-east. Nevertheless, the vacant site is authorised for office use and directly neighbours existing business and industrial uses, and the proposal therefore presents some tension with the aims of Policy 26.

The proposed residential use of the application site is contrary to Policy B1 of the ALDP, being neither a use falling within Classes 4, 5 or 6, nor an alternative use that would otherwise be suited to a business and industrial location. Although the applicant's noise impact assessment (NIA) concludes that, subject to mitigation, an acceptable level of residential amenity could be achieved for the occupants of the proposed development in relation to protection from existing external sources of noise, thus the proposed development would not likely conflict with any existing business and industrial uses, Policy B1 also seeks to safeguard business and industrial land (developed or undeveloped) from '*other conflicting development types*'. Given the clear potential for conflict and issues that can arise between business and industrial uses and noise-sensitive residential uses, as alluded to in the second paragraph of Policy B1 quoted above, the redevelopment of the application site for residential use as proposed would likely preclude the neighbouring, currently vacant land to the north and east from being used for uses in either Classes 5 or 6 in the future.

Therefore, as the proposed development would result in the loss of an existing, authorised Class 4 use, would not be a use suitable for the character of the area, and would not safeguard adjacent land for potential future uses within Classes 4, 5 or 6, the proposal is contrary to Policy B1 of the ALDP, and would represent a departure from the development plan, if approved.

However, there are various other material considerations which are relevant to the assessment of this application, in respect of the non-compliance of the proposed residential use with Policy B1 of the ALDP, as follows:

- Lack of demand for continued business/industrial use

Paragraph 12.1 of the ALDP states: '*Maintaining a ready supply of employment land in the right places is vital to Aberdeen retaining its position as a competitive and sustainable business location. To accord with this, a phased, large allocation of employment land has been identified, to meet the diverse needs of different types and sizes of businesses.*'

Therefore, given the aim of Policy B1 of the ALDP appears to be the protection of employment land supply, it is pertinent to assess whether there is sufficient employment land across the city, and to consider what impact the loss of the existing office building would have on that supply.

The applicant has provided a marketing statement, prepared by their property consultants, which outlines that marketing of the building for continued Class 4 office use commenced in 2016, 6 months prior to the expiry of the lease to Total. The expiry of the lease coincided with the downturn in the Aberdeen market for office space as a result of the fall in the price of oil in late 2014 / early 2015. Despite active marketing, there has been no feasible interest in the building, aside from a short-term, nil-rental lease to a local charity between c. 2021 and 2023.

Whilst lack of demand for the occupation of the building for its current authorised use is not directly a material planning consideration, it is indirectly relevant as it demonstrates the wider situation in respect of the oversupply of office space in Aberdeen, predominantly due to the downturn in the oil & gas industry in recent years, combined with the rise in home

working post-Covid 19 pandemic. The readily available supply of newer grade 'A' office space in a range of locations across the city and particularly within the City Centre has exacerbated the situation in that locations such as Loirston House are not attractive to tenants.

- Employment land supply

The Aberdeen City and Shire Employment Land Audit (ELA) is prepared annually, with the aim of providing up-to-date and accurate information on the supply and availability of employment land in the region. The most recently prepared audit (with a base date of 1st April 2023) was published in February 2024. The ELA identifies an established employment land supply of 254ha in Aberdeen City, of which 192ha is identified as marketable and 42 ha immediately available. Furthermore, paragraph 3.14 of the ALDP highlights the healthy position in relation to the supply of employment land, which meant that no new employment land allocations were included in the 2023 ALDP.

The application site covers just c. 0.3ha. This indicates that the redevelopment of the site for an alternative use would not result in a shortage of available employment land.

- Context and location of the site within the business and industrial area

Although the site is located within a Business and Industrial area, it lies on the periphery of the Altens Industrial Estate, to the south of the main vehicular entry point to the wider estate on Hareness Road. As such, whilst bound to the south-east by Altens Lorry Park, the site is not surrounded by industrial uses that would be incompatible with proposed residential use, as could be the case further into the estate. The site is bound to the south by an existing residential property, with a wider suburban residential area (Redmoss) beyond the Wellington Road dual carriageway to the west. Existing established tree belts run along both the southern and eastern edges of the site which help to partially separate it visually from the neighbouring industrial uses to the south-east. It is therefore appropriate to acknowledge that the context and character of the site differs from that of a more typical industrial estate environment that is found farther to the east.

Landscaping and amenity

Policy B1 also requires new development to be appropriately landscaped and to ensure no adverse impacts on the amenity of any neighbouring uses. New soft landscaping would be planted and the majority of trees within and neighbouring the site are to be retained. The proposed residential use would be compatible with the existing residential use of the neighbouring detached dwellinghouse to the south and, with a new close-boarded timber boundary fence proposed to be erected along the mutual boundary, the privacy of the existing dwelling would not be affected by the new use and its current level of amenity would be largely unaffected.

Summary

To summarise, whilst there is an oversupply of business and industrial land in the city and the building has been marketed unsuccessfully for continued/resumed office use, therefore the loss of the existing office use is acceptable, the new, noise-sensitive residential use, would likely preclude the future Class 5 or 6 use of the neighbouring sites to the north and east (currently vacant). As such, the development would not comprise a Class 4, 5 or 6 use, nor would it sufficiently safeguard adjacent land, zoned for business and industrial use, for that purpose. The proposed development is thus contrary, in principle, to the aims and requirements of Policy B1 of the ALDP,

and presents some tension with Policy 26 of NPF4, despite the aforementioned material considerations.

Housing on land not allocated for housing in the LDP

Paragraph c) of Policy 16 (Quality Homes) of NPF4 is supportive, in principle, of proposals for new homes that improve affordability and choice by being adaptable to changing and diverse needs, and which address identified gaps in provision, including affordable homes and adaptable and wheelchair accessible homes.

The proposed development, which would provide eight wheelchair accessible homes on the ground floor level, and a further sixteen mainstream affordable homes on the first floor, is thus compliant, in principle, with Policy 16 c).

However, paragraph f) of Policy 16 states:

Development proposals for new homes on land not allocated for housing in the LDP will only be supported in limited circumstances where:

- i. the proposal is supported by an agreed timescale for build-out; and*
- ii. the proposal is otherwise consistent with the plan spatial strategy and other relevant policies including local living and 20 minute neighbourhoods;*
- iii. and either:*
 - delivery of sites is happening earlier than identified in the deliverable housing land pipeline. This will be determined by reference to two consecutive years of the Housing Land Audit evidencing substantial delivery earlier than pipeline timescales and that general trend being sustained; or*
 - the proposal is consistent with policy on rural homes; or*
 - the proposal is for smaller scale opportunities within an existing settlement boundary; or*
 - the proposal is for the delivery of less than 50 affordable homes as part of a local authority supported affordable housing plan.*

In relation to criterion (i), the applicant has advised that, should planning permission be granted, the intention is to commence development immediately, with completion envisaged towards the end of 2026.

In relation to criterion (ii), as noted above the site lies within a business and industrial area, as zoned in the ALDP, and the proposed development is contrary to Policy B1. Although it is noted that the site lies in a relatively accessible location, nearby to bus stops and within 20 minutes' walking distance of local employment, amenities and shops (including food retailer Aldi on the opposite side of Hareness Road), the surrounding pedestrian environment is not particularly safe or welcoming, with no signalised crossings over Hareness Road between the site and Aldi, or safely accessible from the nearest signalised crossing over Wellington Road for northbound bus stops (see the 'Transport & accessibility, and 20-minute neighbourhoods' section below for further detail). As such, the application site is not considered to be otherwise consistent with the plan spatial strategy. Whilst it is compliant with some other relevant policies, such as those in relation to the sustainable reuse of brownfield land and vacant buildings, it presents tension with other policies such as Policy 15 (Local living and 20 minute neighbourhoods).

In relation to criterion (iii) of Policy 16, the proposal is both for a small-scale opportunity within an existing settlement boundary and would also deliver less than 50 affordable homes. However,

whilst the development is an identified key project within the Council's Aberdeen Strategic Housing Investment Plan 2025-2030 (SHIP), it is identified as being for 'specialist provision', rather than mainstream affordable housing. The supporting information submitted by the applicant advises that the ground floor flats would accommodate bariatric independent living, with ad-hoc care provision. The Council's Housing Strategy team have advised that specialist provision accommodation, including bariatric accommodation, is needed in the city, as evidenced in the latest housing need and demand assessment and the Aberdeen City Health and Social Care Partnership's specialist provision marketing statement. The Housing Strategy team advise that, at the moment, there is no Registered Social Landlord (RSL) that will develop the building for specialist accommodation unless planning permission is first granted for general needs affordable housing.

Whilst the provision of affordable homes, and accessible homes for in-demand, specialist independent living accommodation in particular, is acceptable in principle, the intent of Policy 16 is to: *'encourage promote and facilitate the delivery of more high quality, affordable and sustainable homes, in the right locations...'*. The first policy outcome goes on to seek good quality homes *'at the heart of great places'*.

Summary

Further details are set out in the following sections of the evaluation but, to summarise, the site is considered to be an unsuitable location for housing, both on business and industrial land but also immediately adjacent to a busy dual carriageway, somewhat disconnected from the nearest residential communities and poorly connected in terms of safe, welcoming pedestrian infrastructure to the nearest amenities. As such, despite the policy support, in principle, for affordable and wheelchair accessible housing, the proposed development is therefore considered to be contrary to the requirements of Policy 16(f)(ii) of NPF4.

Climate change, climate mitigation, and the reuse of brownfield land and empty buildings

Policy 1 (Tackling the Climate and Nature Crises) of NPF4 requires significant weight to be given to the global climate and nature crises in the consideration of all development proposals. Policy 2 (Climate mitigation and adaptation) requires development proposals to be designed and sited to minimise lifecycle greenhouse gas emissions as far as possible, and to adapt to current and future risks from climate change.

Policy 9 (Brownfield, Vacant and Derelict Land and Empty Buildings) of NPF4 is fully supportive of development proposals that will result in the sustainable reuse of brownfield land, including vacant buildings, taking into account their suitability for conversion to other uses. Given the need to conserve embodied energy, demolition is the least preferred option. Policy 12 (Zero Waste) of NPF4 states that development proposals will be supported where they reuse existing buildings and infrastructure.

The proposed development is relatively small-scale such that it would not, in itself, make any significant direct difference to the global climate and nature crises, nor to climate mitigation and adaptation. However, the proposed development would repurpose an existing, long-term vacant building in an accessible location within the existing Aberdeen settlement boundary for a reasonable number of affordable residential flats, which would make a contribution towards addressing housing need in the city and reducing future pressure on the release of further greenfield land elsewhere within the city for housing in less sustainable locations. Furthermore, the existing building's walls and roof would be upgraded to meet current building regulations in terms of energy efficiency and it is therefore considered that the development would be inherently

sustainable and could indirectly help to tackle the climate crisis and present opportunities to minimise greenhouse gas emissions. The proposals are therefore compliant, in principle, with the aims and requirements of Policies 1, 2, 9 and 12 of NPF4.

Amenity for residents

Policy D2 (Amenity) of the ALDP sets out various criteria which new residential development should meet, in order to ensure that its occupants would benefit from a satisfactory quality of residential amenity. These criteria include: adequate levels of privacy, minimum space standards for internal floor space and private external amenity space, minimal shading of external spaces, and satisfactory levels of daylight receipt and outlook.

Policy WB1 (Healthy Developments) of the ALDP states that: *'Developments are required to provide healthy environments, reduce environmental stresses, facilitate physical activity and promote physical and mental wellbeing.'*

Space standards, outlook, daylight receipt and privacy

The Council's Aberdeen Planning Guidance (APG) on Amenity & Space Standards seeks a minimum internal floor area of 52sqm for a one-bedroom dwelling and 66 sqm for a two-bedroom dwelling. However, the APG also notes that reusing and converting existing building stock is encouraged, as a more sustainable approach than demolition and rebuild, and advises that the Council may need to take a flexible approach to space standards due to the often constrained nature of converting existing buildings. The nine, one-bedroom ground floor flats would all be wheelchair accessible and would exceed the minimum space standard expected by the APG, with unit sizes ranging between 67 sqm and 93 sqm. On the first floor level however, the majority of the flats would be smaller than the guideline minimum space standard, with most of the flats ranging between 45 sqm and 50 sqm in size, with just two of the one-bed flats exceeding 52 sqm (53.2 sqm and 55.8 sqm respectively). The one two-bedroom unit at first floor level would have a floor area of 57.7 sqm, which is below the 66 sqm minimum space standard sought in the APG.

Albeit lower than the guideline minimum floor sizes, it is acknowledged that the first floor level flats would not be significantly smaller than the guideline minimum and their size is dictated, to an extent, by the existing floorplates and position of stairwells in the building. The number of units could, however, be reduced in order to increase the size of the flats and achieve a greater level of internal amenity.

The Amenity & Space Standards APG seeks dual aspect outlooks for dwellings wherever possible, noting the multiple amenity benefits for properties with more than one aspect, including better daylight and sunlight receipt, enhanced outlook, natural ventilation and the ability to position bedrooms towards a quieter aspect if the development is on a busy road.

Although nine of the flats would benefit from a dual aspect outlook, the majority would have a single-aspect. Whilst desirable for all residential units to be dual aspect, it is acknowledged that the single aspect layout for the majority of the units is largely dictated by the existing floorplates and the position of stairwells. The provision of access to multiple stairwells for all first floor flats for escape purposes, combined with the limited width of the building, necessitates a single-aspect layout, with a communal corridor running centrally throughout the building at first floor level.

The flats would all generally benefit from sufficient glazing, including full height windows and Juliet balconies for first floor level living rooms, and glazed doors into garden areas at ground floor level. The outlook for the majority of the flats would be reasonable given the context of the wider area,

with views out onto a mix of private or communal garden areas for most of the ground floor flats, and similar views from the first floor flats, from an elevated position. The retention of the existing, established tree belts along the southern and eastern boundaries would partially obscure views of the neighbouring industrial estate to the east and would provide a relatively attractive outlook for residents in those directions. The trees would, however, cast some shadow, particularly when in leaf in the summer months, that would partially restrict daylight receipt for windows on the building's rear (north-east) elevation, at ground floor level in particular. The trees would also cast some shade onto the private and communal garden areas to the rear and side (south) of the building, although the removal of two trees in the rear curtilage would help to increase daylight receipt for some flats.

In terms of privacy, privacy buffer planting strips would be placed in front of all front elevation windows onto communally accessible areas, in order to maximise privacy for occupants, whilst four of the ground floor units would also have access to, and overlook, their own private garden areas to the rear. None of the flats would be overlooked to any significant degree by each other, nor from any neighbouring properties, including the adjacent dwelling to the south, as a 2 m high close-boarded timber fence and hedge are proposed to be installed/planted along the southern boundary.

Open space

Policy NE2 (Green and Blue Infrastructure) of the ALDP notes that biodiverse, useable and appropriate open space will be required in new developments, including on brownfield sites, although the potentially constrained nature of brownfield sites will be taken into consideration if it is not possible to meet the on-site open space standards set out in the Council's Aberdeen Planning Guidance on Open Space & Green Infrastructure. The Open Space and Green Infrastructure APG seeks a minimum of 2.8 hectares of open space per 1,000 people in new residential developments. With 23 one-bedroom flats and one two-bedroom flat proposed, the number of people estimated to be likely to live in the development would be 32, equating to an open space requirement of 896 sqm of open space. The useable area of communal open space (amenity lawn and benches) to the south of the building would be approximately 250 sqm in size, with a 50 sqm communal drying green to the rear and further, unusable areas of tree and shrub planting also to be provided within the development. Approximately 300 sqm of private garden ground would also be provided, split between four of the ground floor units. The total provision of communal open space would thus be approximately 300 sqm, a deficit of nearly 600 sqm compared with the minimum amount sought in the Open Space and Green Infrastructure APG. As noted above, the areas of external amenity space within the development (both private and communal) would also be shaded for large parts of the day, via a combination of existing trees and, for the rear curtilage private gardens, by the building itself.

A financial contribution is sought in order to mitigate the potential impacts of the development on existing public open spaces nearby, but it is noted that, aside from Tullos Wood and Kincorth Hill, the nearest formal areas of open space (playing fields) are not in particularly close proximity to the site, being approximately 1 km and 1.5 km away in Cove and Kincorth respectively.

Whilst the development would have an open space deficit as per the Council's APG, on balance, taking into consideration the constrained nature of the brownfield site, it is considered that the proposed development would provide a sufficient amount of open space. However, the quality and useability of the open space to be provided would be compromised somewhat by shading cast by existing trees outwith the site, and by the building itself. As such, the open space to be provided is not fully compliant with the aspirations and requirements of Policy NE2 of the ALDP and the associated interim APG.

Noise

Policy 23 (Health and Safety), paragraph (e) of NPF4 and Policy WB3 (Noise) of the ALDP both seek to ensure that noise-sensitive developments, such as new housing, would be adequately protected from noise emissions generated by neighbouring noisy uses or other background noise, with paragraph (e) of Policy 23 noting that the 'agent of change' principle applies to noise-sensitive development. The applicant submitted a noise impact assessment, undertaken by a qualified acoustician, which finds that, without any mitigation, the noise emissions from vehicles on the adjacent, heavily trafficked Wellington Road dual carriageway would be of a 'large/very large' level of significance during both the daytime and night time. The impact of noise emissions from nearby industrial units and associated mechanical plant within the neighbouring Altens Lorry Park was found to be negligible however, and no other noise sources were identified that could have the potential to disturb residents.

The NIA recommends, however, that subject to the implementation of various mitigation measures, including: the provision of double glazed windows with a 'closed-window' scenario and acoustic trickle vents, the internal noise levels would be sufficiently reduced to meet the World Health Organisation guidelines for both daytime and night time maximum noise levels. The NIA also recommends that 2 metre high close-boarded timber fencing is installed in order to provide an acoustic barrier to protect the outdoor amenity spaces within the proposed development from road traffic and other ambient background noise. The recommended noise mitigation measures have been incorporated into the design of the proposed development.

The Council's Environmental Health Service have reviewed, and accept, the findings of the applicant's NIA. Therefore, if the application were to be approved, a condition could be attached requiring all of the noise mitigation measures to be implemented prior to the occupation of any units, which would ensure the proposed flats would all benefit from a satisfactory level of amenity in terms of protection from external sources of noise, generally in accordance with the requirements of Policies 23 of NPF4 and WB3 of the ALDP.

As per the Council's Noise APG and the Scottish Government's Planning Advice Note 1/2011 (Planning and Noise) however, it is preferable if satisfactory internal noise levels can be achieved for residents within dwellings without the need for a closed-window strategy. The proposal thus presents some tension with Policies 23 and WB3, and the associated APG.

Summary

To summarise, it is considered that the siting and layout of the proposed development would pose several challenges in relation to achieving a satisfactory level of residential amenity for the future occupants, due to its surrounding context, neighbouring a heavily trafficked dual carriageway and industrial uses, and the constrained floor areas, outlook and daylight receipt for several of the proposed flats. The amount and quality of the open space to be provided also fails to meet the minimum standards generally sought in the relevant policies and APG.

Whilst the constraints involved in converting an existing building for residential use are acknowledged, it is considered that, on balance, an insufficient quality of residential amenity would be created for future occupants of the proposed development (issue 3 in representations), thus the proposals are contrary to the aims and requirements of Policies D2 and WB1 of the ALDP, and the associated relevant APGs for the aforementioned reasons. The development also presents some tension with the aims and requirements of Policies NE2 and WB3 of the ALDP, and Policy 23 of NPF4, in that the amount and quality of on-site open space would be below that typically sought in

new residential development, and an undesirable closed window strategy would be required in order to achieve satisfactory internal protection from external sources of noise.

Design quality and placemaking

Policy 14 (Design, quality and place) of NPF4 requires development proposals to be designed to improve the quality of an area whether in urban or rural locations and regardless of scale. Policy 14 of NPF4 and Policy D1 (Quality Placemaking) of the ALDP require all new development to comply with the six qualities of successful places. The qualities of successful placemaking differ slightly between NPF4 and the ALDP, therefore as the ALDP was adopted more recently, it takes precedence in the event of any difference in policy between the two documents. The proposed development is therefore be assessed against each of the six qualities of successful placemaking as defined in Policy D1 of the ALDP as follows:

- Distinctive

The proposed development would retain and re-use the existing building, with a modern wall cladding system to be applied to enhance the building's appearance. The absence of any new-build elements, with the exception of infilling the existing undercroft car parking area, would ensure that the development would not have any adverse impacts on the streetscape. Most of the existing trees within and bordering the site would be retained and supplemented with new tree planting and soft landscaping, proportionate to the scale and nature of the development, which would soften and enhance its setting.

- Welcoming

The building would incorporate new windows and doors, including patio doors and Juliet balconies, and it would have a clearly defined entrance, thus giving the building an appropriate frontage, a more welcoming, domestic appearance than the existing situation, and legible wayfinding throughout the site.

- Safe and pleasant

The internal layout of the building has been designed to ensure that all public areas would be sufficiently overlooked, thus maximising natural surveillance and active frontages at ground floor level, and minimising opportunities for crime and anti-social behaviour. Private gardens would be provided for some of the ground floor flats and all residents would have access to a communal lawn area. Whilst private and communal open space is proposed, the size and quality of that open space is limited. The new boundary treatments would all be of a domestic scale and appearance, such that they would not detract from the character or visual amenity of the area. Whilst the development itself would be relatively safe and pleasant, the site's location immediately adjacent to a busy dual carriageway, another busy road (Hareness Road) and neighbouring an industrial estate, would not provide a particularly pleasant residential environment when taking into consideration the wider context.

- Easy to move around

It is noted in the following section of the evaluation that the pedestrian linkages between the site and the nearest northbound bus stops, nearby shops and other amenities to the north in particular, are not ideal, particularly for vulnerable users or those with mobility issues, given the absence of a formal, signalised pedestrian crossing over Hareness Road. In the

event the application was to be approved, however, a condition could be attached requiring the installation of such a crossing, in order to provide enhanced pedestrian connectivity to the wider area. The proposed development itself would be easy to move around, with external pedestrian footpaths and access to both private and communal garden areas.

- Adaptable

The proposed development has been designed so that the ground floor units would all be wheelchair accessible, and capable of accommodating specialist provision accommodation, if required.

- Resource efficient

The proposed development would sustainably convert and re-use an existing, vacant building and brownfield site to provide new affordable housing.

To summarise, the proposed development would re-purpose an existing vacant building to provide affordable housing. The existing building is not of any particular architectural merit and the refurbishment and recladding of the building would represent a visual enhancement to the localised streetscape, without harming any key views in the wider surrounding area. Whilst the proposed development is generally compatible with the majority of the six qualities of successful placemaking, it is considered that the wider context of the surrounding area is not particularly pleasant or easy to move around, therefore the proposals present some tension with the aims and aspirations of Policy D1 of the ALDP and Policy 14 of NPF4.

Transport & accessibility, and 20-minute neighbourhoods

Policies 13 (Sustainable Transport) of NPF4 and T2 (Sustainable Transport) of the ALDP require developments to demonstrate that sufficient measures have been taken to minimise traffic generated and to maximise opportunities for sustainable and active travel. Policy 13, paragraph (b), also places an emphasis on the provision of *‘easy, segregated and safe links to local facilities via walking, wheeling and cycling networks’*, and requires developments to *‘incorporate safety measures including safe crossings for walking and wheeling’*.

Policy T3 (Parking) states that low and zero car developments will be supported in suitable locations where there is adequate access to sustainable and active travel. Where this is not possible, development shall be required to comply with the parking standards set out in Aberdeen Planning Guidance: Transport and Accessibility.

Policy 15 (Local Living and 20 Minute Neighbourhoods) of NPF4 requires development proposals to contribute to local living including, where relevant to 20-minute neighbourhoods. Facilities and amenities outlined in Policy 15 as contributing towards successful 20-minute neighbourhoods include: public transport and safe, high-quality walking, wheeling and cycling networks, employment, shopping, health facilities, schools, open space and affordable housing.

Public transport, pedestrian safety and accessibility

The application site lies approximately 200m from the nearest bus stops (to the south) on both sides of Wellington Road. These bus stops are served by multiple regular bus services to and from the city centre and the south of the city. In this regard, the site is well connected in terms of public transport. However, although there are bus stops in close proximity to the site, the northbound bus stops are situated on the opposite side of Wellington Road, which is a heavily trafficked dual

carriageway at the section adjacent to the application site. Although there are some dropped kerbs which provide an informal crossing point over the dual carriageway (with a rest point in the central reservation) linking the northbound and southbound bus stops, the nearest safe (signalled) pedestrian crossings over Wellington Road are either 165 m to the north, on the opposite side of Hareness Road which itself does not incorporate any signalised crossing points, or 480 m to the south, towards the Souter Head roundabout.

As such, although the site does lie in close proximity to bus stops, the pedestrian accessibility to the northbound bus stops, which would provide public transport access to the city centre, would involve crossing either Wellington Road or Hareness Road via non-signalised crossing points. This is not ideal from a pedestrian safety perspective, particularly for those less mobile such as wheelchair users.

In terms of the aspiration for all new development to comply with the 20-minute neighbourhoods principle set out in Policy 15 of NPF4, the site lies within 20 minutes' walking distance of some shops (including food retailers: Aldi and Lidl), a pub/restaurant (The Wellington), areas of open space and other facilities and amenities on Wellington Circle, in Kincorth and towards Cove (including Altens Community Centre). There is also a significant amount of employment land nearby where residents of the development could potentially work. However, as with the nearest northbound bus stops, the main pedestrian routes connecting the site with the nearest local facilities and amenities would largely involve the need to use non-signalised crossing points over heavily trafficked roads, some of which (Hareness Road in particular) see a significant amount of heavy goods vehicles. It is thus considered that whilst the site does lie within 20 minutes' walk of various facilities, amenities and public transport stops, the pedestrian networks surrounding the site are not particularly safe or high quality, when factoring in the requirement to cross nearby, busy roads (issue 3 in representations). The proposed development therefore fails to comply fully with the aims and aspirations of Policies 13 and 15 of NPF4, and presents some tension with Policy T2 of the ALDP.

More than 100% cycle parking (26 spaces) is proposed, to be appropriately located internally at ground floor level, which is acceptable in accordance with the relevant policies and guidance.

Car parking

The application site lies in an Outer City Area, as defined in the Council's Transport & Accessibility Aberdeen Planning Guidance. Although the site lies within walking distance of public transport services and various facilities and amenities, it is acknowledged that residents of the proposed development may be likely to own cars and the provision of dedicated off-street parking is thus desirable. The Transport & Accessibility APG incorporates a guideline figure of 0.8 car parking spaces per unit for housing association / social rented housing developments in the Outer City. The car parking requirement for the 24 housing association flats therefore equates to 20 spaces (rounded up from 19.2). The proposed development would incorporate 26 car parking spaces, including two disabled bays and one EV charging point. As such there would be a slight overprovision as per the Interim APG guidance but the small amount of additional spaces is minimal and would facilitate one space per unit. It is thus considered that sufficient car parking would be provided for the proposed development and the proposals are therefore compliant with Policy T3 (Parking) of the ALDP.

Road traffic and road safety

The existing site incorporates approximately twice the amount of car parking spaces that are proposed for the new development. The proposal would thus result in a net decrease in private

vehicle trips compared with the authorised use (were it to be re-occupied for Class 4 use), and would not have any significant impact on the local road network (issue 2 in representations).

The existing left-in, left-out vehicular entrance to the site would be retained, and would thus avoid any potential for road safety issues on Wellington Road. Within the site, sufficient aisle widths would be achieved, allowing for emergency vehicles and bin lorries to enter and exit the site in a forward gear, and minimising the potential for any road or pedestrian safety issues within the site itself.

Affordable housing

Policy 16 (Quality Homes) of NPF4 and Policy H5 (Affordable Housing) of the ALDP require 25% of all housing developments of 5 or more units to be provided as affordable housing. The proposed development would comprise 100% affordable housing (social housing to be operated by a Registered Social Landlord). The proposal is in the Council's Strategic Housing Investment Plan (SHIP), earmarked for specialist accommodation, and would significantly exceed the minimum 25% affordable housing requirement as set out in Policies 16 and H5. Due to the housing mix of the development being predominantly one-bed flats, and thus not fully in accordance with the requirements of Policy H3 (Housing Mix) of the ALDP (see below), were the application to be approved, all of the units could be secured as affordable housing in perpetuity, via either a condition or Section 75 legal agreement.

Density

Policy H3 (Density) of the ALDP seeks an appropriate net density of development on all housing allocations and windfall sites. Whilst the policy doesn't specify a minimum density for residential developments on sites under one hectare in size, it notes that sites over one hectare in size should have a minimum density of 50 dwellings per hectare, with higher densities expected within the city centre, on public transport nodes and on brownfield sites.

The site is approximately 3,200sqm in size and with 24 flats proposed, that equates to a density of approximately 75 dwellings per hectare. Such a density is considered to be compatible with the Policy H3 minimum density sought for larger sites and would represent the efficient and sustainable re-use of the existing building on an accessible brownfield site. The proposals are thus considered to be of a satisfactory density considering the context of the site and the surrounding area, in accordance with Policy H3.

Housing mix

Policy 16 (Quality Homes) of NPF4 is supportive of proposals for new homes that improve affordability and choice, and which address identified gaps in provision, including wheelchair accessible homes, affordable homes, supported accommodation, care homes and sheltered housing.

Policy H4 (Housing Mix and Need) of the ALDP seeks an appropriate housing mix in housing developments to reflect diverse housing need, including homes for older and disabled people. The policy also requires housing to be designed with accessibility and future adaptability in mind, and requires a suitable mix of dwelling types to be provided in smaller developments, in the interests of placemaking and local housing need and demand.

Although the flats would be predominantly one-bedroom units, they would include eight wheelchair accessible units and the proposed development would comprise 100% affordable flats, to be

operated by Registered Social Landlord. The proposed development is included within the Council's SHIP and there is demand for one-bed affordable flats in the city, with two and three-bed flats in low demand for social rent. Therefore, based on the current need for one-bed social-rented flats in the city, and wheelchair accessible accommodation, the lack of a mix of dwelling types and tenure for the proposed development is considered to be acceptable in the instance, in accordance with Policy 16 of NPF4 and despite some minor conflict with the aims of Policy H4 of the ALDP.

Trees, landscaping and biodiversity

Policy 6 (Forestry, Woodland and Trees) of NPF4 and Policy NE5 (Trees and Woodland) of the ALDP both seek the retention of existing trees wherever possible, and Policy NE5 requires appropriate replacement planting where any trees require to be felled for development.

Policy D5 (Landscape Design) of the ALDP requires development proposals to be designed with an effective, functional and attractive landscape framework supported by clear design objectives, with the level of detail appropriate to the scale of development.

Policy 3 (Biodiversity) of NPF4 requires proposals for local development *'to include appropriate measures to conserve, restore and enhance biodiversity, in accordance with national and local guidance. Measures should be proportionate to the nature and scale of development.'*

An established tree belt runs along the site's southern and eastern boundaries, although the majority of those trees are situated outwith the site boundary. A cluster of smaller trees is positioned at the front of the site, adjacent to the site access, whilst three trees are positioned within the rear (east) curtilage. With the exception of two Norway Maple trees in the rear curtilage, all of the existing trees both within, and adjacent to, the site are proposed to be retained. Although some works are proposed within the root protection areas of the southern and eastern tree belts, the works in those areas would be limited to the replacement of areas of hardstanding with soft landscaping, thus likely enhancing the long-term health of those trees by providing better access to water and nutrients for the roots, where they are present within the site boundary.

The two Norway Maple trees in the rear curtilage are proposed to be felled in order to reduce shading of external amenity space and windows. As part of the development, it is proposed to plant a total of fifteen new trees of varying species and sizes, alongside a number of shrubs, boundary hedges, plants and a mixture of wildflower and amenity grass. The loss of the two existing trees is justified and would be outweighed by the net gain in tree cover on the site, in accordance with Policies 6 and NE5, whilst the wider soft-landscaping scheme would soften and enhance the visual amenity of the site, compared with the existing situation.

Given the relatively constrained, brownfield nature of the site, and the need for useable areas of private and communal open space, it is not possible to incorporate a significant amount of new landscaping but nevertheless, the development would be appropriately landscaped, in accordance with the requirements of Policy D5 of the ALDP. The proposals would also provide a small-scale, localised biodiversity gain for the site compared to the existing situation and it is therefore considered that the proposals are acceptable in accordance with Policy 3 of NPF4.

Planning obligations

Policy 18 (Infrastructure First) of NPF4 and Policy I1 (Infrastructure Delivery and Planning Obligations) of the ALDP both require any deficiencies in local public facilities or infrastructure that would arise as a result of a proposed new development to be addressed via the payment of

financial contributions, where necessary. The Council's Developer Obligations team has reviewed the proposals in line with the Council's Planning Obligations Supplementary Guidance and in consultation with various stakeholders, and they advise that financial contributions are required in order to offset the impact of the proposed development on the local core path network, healthcare facilities, open space and community facilities.

In terms of impacts on local schools, the Council's Schools Estates team advise that, on the basis that the proposed development would comprise predominantly one-bedroom units, it would not be expected that these would accommodate children, therefore the development is unlikely to have any discernible impact on pupil numbers within local schools. Therefore no education contribution is sought in this instance.

The applicant advised that they are agreeable to paying the required contributions, which would be secured via a Section 75 legal agreement, had the application been approved. Therefore, had the application been approved, a legal agreement could have been agreed to secure the planning obligations, thus the proposed development is acceptable in accordance with the requirements of Policies 18 of NPF4 and I1 of the ALDP.

Flooding and drainage

Policy 22 (Flood Risk and Water Management) of NPF4 and Policy NE4 (Our Water Environment) of the ALDP both require new development to not be at risk of flooding and be adequately drained, thereby not increasing the risk of flooding to any neighbouring properties. The policies also require new developments to connect to the public sewer for foul drainage and for surface water to be drained sustainably on-site, without any new connections into the public combined sewer network.

No changes to the existing drainage arrangements are proposed and given the nature of the proposed development, with no new built elements outwith the footprint of the existing building, and a net reduction in the amount of hardstanding due to the formation of new soft landscaped garden ground, the development would be adequately drained and would not pose a flood risk to any neighbouring properties, nor would it be at risk of flooding itself.

Scottish Water have confirmed that there is sufficient capacity in Nigg Waste Water Treatment Works to service the proposed development and they have requested that the developer submits a direct enquiry to Scottish Water to ascertain whether there is sufficient capacity in the Invercarnie Water Treatment Works to accommodate the development.

The proposed development would not be at risk of flooding and would be adequately drained, ensuring no increased risk of flooding to any neighbouring uses and no new connections to the public sewer network – all in accordance with Policy 22 of NPF4 and NE4 of the ALDP.

Waste management

Policies 12 (Zero Waste) of NPF4 and R5 (Waste Management Requirements for New Development) of the ALDP require all new developments to have sufficient space for the storage of general waste, recyclable materials and compostable wastes where appropriate.

The Council's Waste Strategy team advised that the development would require to accommodate five general waste bins, five general waste bins (all 1280l) and one food waste container. A bin store large enough to accommodate the aforementioned bins is proposed to be erected towards the front of the site and a swept path analysis drawing demonstrates that a bin lorry would be able to enter and exit the site in a forward gear. As such, the proposals are compliant with Policies 12

and R5.

Low & zero carbon buildings, and water efficiency

Policy R6 (Low and Zero Carbon Buildings and Water Efficiency) of the ALDP requires new buildings to demonstrate that a proportion of the carbon emissions reduction target set by Scottish Building Standards is met through the installation and operation of low and zero carbon generating technologies and to reduce pressure on water abstraction from the River Dee through the incorporation of water saving technologies. These requirements are not applicable to changes of use or the conversion of existing buildings however, thus the proposed development does not conflict with Policy R6.

Policy R8 (Heat Networks) of the ALDP requires developments (including conversions exceeding 1,000sqm floorspace) within the city centre and/or within an identified heat network zone to connect to an existing heat network provide an alternative form of on-site sustainable heating or cooling. Although the building exceeds 1,000sqm in floor area, the site does not lie within the city centre and at the time of writing no Aberdeen Planning Guidance has yet been produced in relation to Heat Networks, therefore Policy R8 is not applicable to the proposed development.

Digital infrastructure

Policy CI1 (Digital Infrastructure) of the ALDP requires all new residential and commercial development to have access to modern, up-to-date high-speed communications infrastructure. The application site lies in an area of the city where high-speed broadband is known to be readily available, thus the proposals are acceptable in accordance with Policy CI1.

Suicide risk

Policy 23 (Health and Safety), paragraph (f) of NPF4 requires development proposals to be designed to take into account suicide risk. The proposed development would not incorporate any particular features that would increase the risk of suicide, being a low-rise residential development with appropriate associated landscaping and boundary treatments. The proposals are thus considered to be generally acceptable and in accordance with Policy 23(f) of NPF4.

Matters raised in representations

Matters 2 and 3 raised in the representations received from third parties are addressed in the foregoing evaluation. The remaining matters not addressed above are addressed, in turn, as follows:

1. *There is too much housing in Aberdeen. The site should remain in commercial use*

Response: The Aberdeen City Council Communities, Housing and Public Protection Committee declared a housing emergency in Aberdeen on 5 September 2024. There is a need for additional housing in Aberdeen and, in particular, there is an identified need for one-bedroom and wheelchair-accessible affordable flats. Nevertheless, even if there were deemed to be sufficient housing in Aberdeen, overprovision of housing (perceived or actual) would not be a material reason to refuse a planning application. As noted in the above evaluation, Policy B1 of the ALDP does state that land zoned for business and industrial use should be retained for uses in Class 4, 5 or 6.

1. *The access to the site is not suitable, and could have road safety implications*

Response: The existing vehicular and pedestrian access from Wellington Road and the associated, adopted footway, would be retained. The vehicular access point is a left-in-left-out arrangement which minimises the risk for road safety issues on Wellington Road. The Council's Roads Development Management team have reviewed the proposed development and do not have any road safety concerns.

2. There are other sites elsewhere that are more suited to affordable housing.

Response: Each planning application is assessed on its own merits and there is no policy requirement for a sequential test to take place in relation to the location of new affordable housing in the city. Nevertheless, as set out in the above evaluation, it is considered that the application site is not suitable for residential use.

Summary

To summarise, the creation of residential accommodation on land zoned for business and industrial use is contrary, in principle, to Policy B1 (Business and Industrial Land) of the ALDP and presents tension with Policy 26 (Business and Industry) of NPF4. The proposed residential use would also not safeguard neighbouring land zoned for business and industrial use (developed or undeveloped) from other, conflicting development types, as required by Policy B1.

Furthermore, the development would not create a satisfactory level of amenity for residential use, partially due to on-site constraints (relatively small floor areas, single aspect outlooks, daylight & sunlight receipt and on-site open space deficits) - contrary to Policy D2 (Amenity) of the ALDP and the Amenity and Space Standards APG and presenting tension with Policy NE2 (Green and Blue Infrastructure) of the ALDP - but also due to the location of the site within the surrounding context, immediately neighbouring a busy dual carriageway to the west and an industrial estate to the east. As a result, the development would be somewhat remote from the nearest residential communities and not sited in a particularly pleasant or easy to move around environment, contrary to a number of the six qualities of successful placemaking as set out in Policy 14 (Design, Quality and Place) of NPF4 and Policy D1 (Quality Placemaking) of the ALDP. Whilst mitigation measures are proposed to ensure adequate protection for residents from external sources of noise, the mitigation measures include a closed-window strategy, which is not a preferred solution as set out in the Council's Noise APG and Planning Advice Note 1/2011, thus the proposal presents some tension with Policies 23 (Health and Safety) of NPF4 and WB3 (Noise) of the ALDP. Overall, it is thus considered that the development would not provide a healthy environment that 'reduces environmental stresses and promotes physical and mental wellbeing', contrary to the aims of Policy WB1 (Healthy Developments) of the ALDP.

Although the development would be connected into the adopted footpath network and would be sited within a 20 minute walk of various shops, amenities, public transport routes and employment land, the surrounding pedestrian network is not of a particularly high quality, especially for those with mobility issues, as accessing the majority of the aforementioned amenities would involve crossing over Hareness Road and/or Wellington Road, with a lack of safe, signalised crossing points in the immediate vicinity of the development. The proposed development therefore fails to comply fully with Policies 13 (Sustainable Transport) and 15 (Local Living and 20 Minute Neighbourhoods) of NPF4 and presents some tension with Policy T2 (Sustainable Travel) of the ALDP. Whilst the provision of a suitable, safe means of crossing Hareness Road could be conditioned were the application to be approved it would not, in itself, address the wider aforementioned concerns and policy conflicts of the proposed development.

The aforementioned issues relating to the safeguarding of land zoned for business and industrial use, quality of residential amenity and pedestrian connectivity are all also likely to be exacerbated by future proposals for the recently approved Energy Transition Zone (which the site and surrounding land fall within the masterplan area for), and the use of Wellington Road and Hareness Road as the main vehicular route (Aberdeen South Harbour Link Road) serving the Aberdeen South Harbour. As such, there is likely to be an increase in the use of the immediately adjacent roads in the future by heavy goods vehicles and other traffic.

As the site is an unsuitable location for housing, both in terms of the land use zoning in the ALDP but also in terms of the conflict with the aforementioned policies relating to amenity and connectivity, the proposed development is therefore also contrary to the requirements of Policy 16 (Quality Homes), paragraph (f)(ii) of NPF4 which sets out the limited circumstances under which proposals for new homes on land not allocated for housing in the LDP can be supported.

It is acknowledged that the proposed development does have some merit and complies with several policies of the development plan, particularly in relation to the proposed provision of specialist, accessible affordable housing and the sustainable re-use of a long-term vacant building and brownfield site, with associated benefits in combating climate change and reducing greenhouse gas emissions at a local level. However, it is considered that the benefits of the proposed development, the compliance with various policies and the associated material considerations noted in the foregoing evaluation are not of a sufficient weight to outweigh the aforementioned issues and conflicts with the other policies as set out above. The proposed development is therefore considered to be unacceptable on balance, is contrary to the development plan, and there are no material considerations that otherwise justify a departure from that conclusion.

DECISION

Refuse

REASON FOR DECISION

1. The provision of residential accommodation on land zoned for business and industrial use is contrary to the aims and requirements of Policy B1 (Business and Industrial Land) of the Aberdeen Local Development Plan 2023 (ALDP), being a use that is not compatible with business and industrial uses and which would not safeguard neighbouring land (developed or undeveloped) from other, conflicting development types.
2. The proposed development would not be a suitable location for residential use, being somewhat remote from existing residential communities and sited immediately adjacent to a busy dual carriageway and industrial estate. It would thus not be particularly pleasant or easy to move around, contrary to Policy 14 (Design, Quality and Place) of National Planning Framework 4 (NPF4) and Policy D1 (Quality Placemaking) of the ALDP. The development itself would also not provide a satisfactory level of residential amenity conducive to the health and wellbeing of future occupants, with deficits in terms of internal floor areas, outlook, daylight & sunlight receipt and the amount and quality of on-site open space, contrary to Policies D2 (Amenity) and WB1 (Healthy Developments) of the ALDP.
3. Although the development would be connected into the adopted footpath network and would be sited within a 20 minute walk of various shops, amenities, public transport routes

and employment land, the surrounding pedestrian network is not of a particularly high quality, especially for those with mobility issues, as accessing the majority of the aforementioned amenities would involve crossing over Hareness Road and/or Wellington Road, with a lack of safe, signalised crossing points in the immediate vicinity of the development. The proposed development therefore fails to comply fully with Policies 13 (Sustainable Transport) and 15 (Local Living and 20 Minute Neighbourhoods) of NPF4.

4. As the site is an unsuitable location for housing, in terms of both the land use zoning in the ALDP and in terms of the substandard quality of amenity and connectivity, the proposed development is also contrary to Policy 16 (Quality Homes), paragraph (f)(ii) of NPF4, which sets out the limited circumstances under which proposals for new homes on land not allocated for housing in the LDP can be supported.