



PLANNING APPLICATION REFERENCE 230969/DPP SUPPLEMENTARY STATEMENT

1 Introduction

- 1.1 In the process of assessing planning application reference 230969/DPP (for the erection of 4 houses and associated infrastructure on the site of the former Walker Technical Resources facility at Scotstown Muir, Shielhill), the planning service has raised potential concerns about its compliance with a number of policy requirements, as communicated by email on 11 September 2023. This Statement responds to each point raised in turn (using the numbering/headings used in the email of 11 September 2023 for ease of reference).
- 1.2 The Statement is accompanied by:
- a revised version of the Proposed Site Plan and Sections (Dwg: P-02 Rev D);
 - revised floor plans and elevations (Dwgs: P-03 Rev A, P-04 Rev A, and P-05 Rev A);
 - a plan of the wider context of the Scotstown Moor path network (Dwg P-06);
 - a Safe Routes to Schools Assessment;
 - a Speed Survey Report;
 - swept path analysis drawings of (i) a Fire Service vehicle accessing all sections of the site, and (ii) a waste vehicle entering and exiting the site;
 - a revised Drainage Assessment (DA);
 - an Ecological Report; and
 - a Tree Report (including Arboricultural Assessment and Tree Protection Plans).
- 1.3 These documents have either been specifically requested by the case officer or have been submitted to demonstrate compliance with policy.
- 1.4 In addition, there are a number of references in this Statement to the Planning and Design Statements originally submitted with the application, and this Statement should be read together with those.
- 1.5 In light of the responses below, it is considered that all points raised by the planning service have been addressed, and there is no reason for the application to be refused. Rather, for the reasons given below and in the Planning Statement, it is clear that the proposed development complies with the Development Plan as a whole (with the Development Plan comprising the Aberdeen Local Development Plan 2023 (ALDP) and the Fourth National Planning Framework (NPF4)), and the application should thus be approved.



2 Principle of development (in terms of the extent of the application site boundary)

- 2.1 It is accepted by the planning service that the principle of housing on the main part of the application site complies with the OP6 designation of the site in the ALDP. At the same time, concerns have however been raised about the proposed development/associated garden ground extending onto unallocated land that forms part of both the green belt and the green space network. However, all elements of built development/private garden areas would be located on previously developed land within the OP6 allocation. And, insofar as the application site boundary extends beyond site OP6, any additional land is used solely for the planting of meadow grass around the proposed development, as shown on both the original proposed site plan, and the revised version of this submitted now. The revised proposed site plan has though been marked up to show clear delineation between proposed private garden areas (within site OP6) and proposed meadow grass areas, with the latter being public spaces dedicated to the enhancement of biodiversity, as also annotated on the revised proposed site plan.
- 2.2 Importantly in this regard, the proposed use of this land as public space for the delivery of biodiversity enhancements complies with the relevant policies in respect of both the green belt and the green space network, in terms of which it should be noted that:
- **Policy NE1 – Green belt** of the ALDP and **Policy 8 Green belts** of NPF4 both generally allow green belt land to be used for all types of horticulture, as well as for leisure or recreational uses compatible with an agricultural or natural setting, with agriculture defined in the Town and Country Planning (Scotland) Act 1997 as including the use of land as meadow land; and
 - **Policy NE2 – Green and blue infrastructure** of the ALDP makes it clear that the Council seeks not just to protect the city's green space network, but to enhance it, with this encompassing all elements of the network's value including, of particular relevance in this case, its biodiversity, recreational, and landscape and townscape values – all of which would be significantly enhanced as a result of what is proposed.
- 2.3 Taking this into account, along with the extent to which the proposed development accords with the OP6 allocation, and the benefits this delivers in terms of redeveloping a brownfield site (both as set out in the Planning Statement), the application should be considered acceptable in principle.



3 Pedestrian/cycle connectivity and other roads related matters

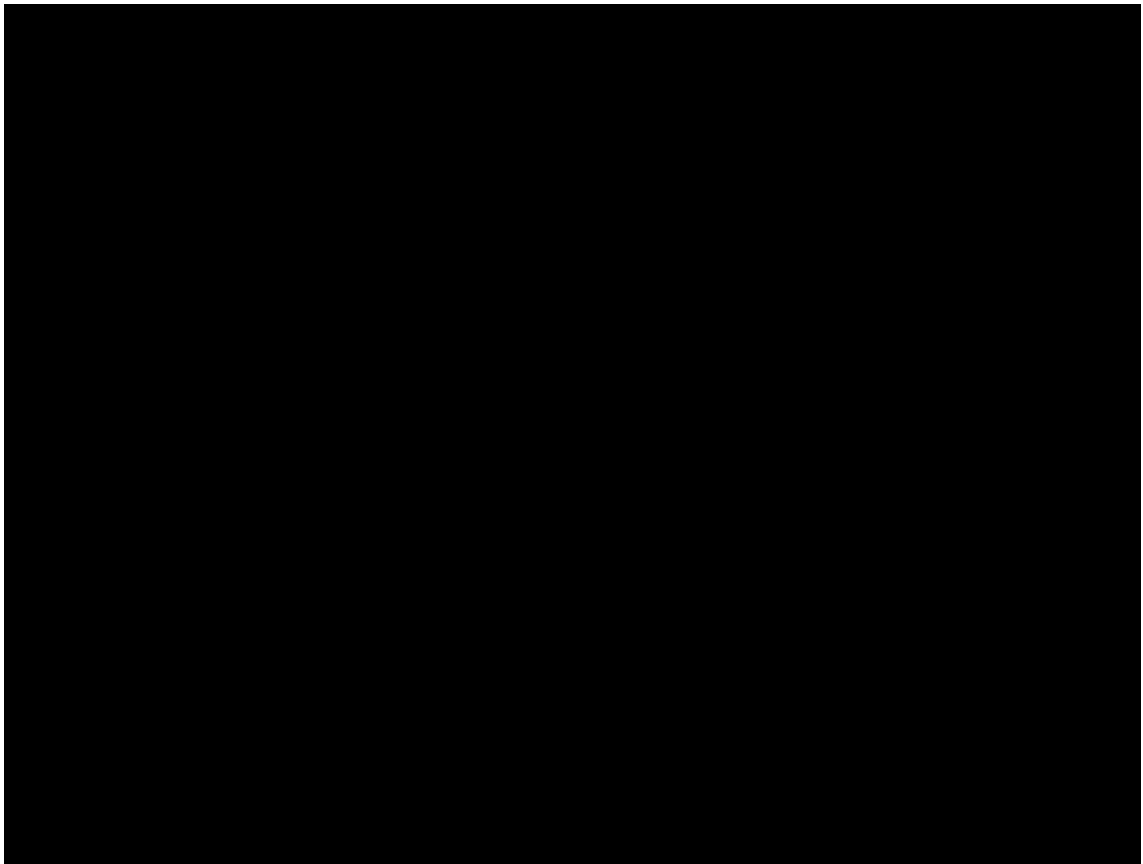
3.1 In the feedback received from the planning service, it is stated that no connectivity to the adopted public path network is proposed. The site layout does though provide links between the proposed development and the Scotia development to the east, and adopted paths within that.

3.2 Specifically, the proposed site plan originally submitted with the application showed both:

- a direct link from the south-eastern corner of the site to the existing path within the Scotia development directly to the east of this; and
- a link from the south-western corner of the site to the Scotstown Moor path network to the south, with this not only providing residents with access to the Moor for recreational purposes, but also providing an alternative walking/cycling route between the proposed development, the Scotia development to the east, and the wider area.

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3.5 Related to this, as noted above, the documents submitted with this Statement include:

- **a plan showing the site in the wider context of the Scotstown Moor path network**
 - in terms of which it should be noted that the network of paths which can be accessed from the south-western corner of the site extend across the Moor, with these in turn tying into:
 - the more formal paths along the western and southern boundaries of the Dubford development to the east, and
 - core paths 14 and 16, which extend into the southern part of the Moor too, thus providing a link to the core path network as well.
- **a Safe Routes to School Assessment** – with regards to which it should be noted that:
 - Greenbrae Primary School is within a 20 minute walking distance of the site and can be accessed via the Dubford development to the east (within which there is a 20mph speed limit, 2m wide pavements, and dropped kerbs at all road crossings), with the route from the Dubford development to the school being as per the identified safe route to the school for children from there (which was clearly considered acceptable when that application was approved), and
 - Oldmacar Academy is within a 25 minute walking distance of the site and can also be accessed via the Dubford development to the east, with the remainder of the route being as per the identified safe route between the Dubford development and Forehill Primary School except that, rather than continuing all the way along Jesmond Drive, children can turn onto core path 13 part way along this, and use this to access the Academy.

3.6 It is thus clearly possible for pupils to access both schools conveniently and safely, with the routes used being the same as/very similar to those which were considered acceptable for children from the Dubford development, and there being no reason not to consider these to be equally acceptable now.

3.7 In addition, if there are any concerns about the materials to be used for either of the footpath links shown on the proposed site plan, planning permission could be granted subject to a condition requiring final details of proposed materials to be submitted and approved prior to development commencing.



3.8 It should also be noted that the Council's own assessment of the site at the time of deciding to include it in the ALDP highlights that the Perwinnes Moss Core Path leads to the site, with this also adjoining the Scotstown Moor Core Path located further to the south. Thus, the site was considered to score well in terms of the availability of direct footpath connections to community and recreation facilities and resources (see the Development Options Assessment document in the ALDP archive, and the assessment of the site in that), and there is no reason to reach a different conclusion now.

3.9 Lastly in this regard, it is recognised that a number of other connectivity/roads related comments are made in the consultee response from the Council's Roads Development Team (alongside parking related comments, which are addressed separately in section 7 below), in respect of which it should be noted that:

- while the proposed link from the eastern side of the site would include steps, step free access between the site and surrounding path network is provided via the link in the south-eastern corner of the site, which cyclists can use to access the surrounding core path network, the Dubford development to the east, and the wider area;
- whereas the Roads Development Team response refers to the nearest public transport stops being approximately 900m from the site, the nearest bus stop would in fact be significantly closer than this, within the Dubford development to the east, with the proposed houses being a similar distance from this as the northernmost houses in the Dubford development are. And, as the response confirms that it is not unusual for sites on the edge of the city boundary to be more than 900m from public transport, this significantly closer distance should be welcomed and supported;
- consideration has been given to the request to redesign the access – however, this should not be necessary as –
 - having carried out a speed survey, the 85th percentile speed is just 29.6mph for northbound vehicles, and 41.8mph for southbound vehicles, such that it is considered appropriate to provide visibility splays of 2.4m x 90m, and these can be provided without any redesign being carried out, as shown on the Proposed Site Plan & Sections (DWG: P-02 Rev D),
 - as set out in the context of points raised in respect of drainage below, no water would discharge from the site onto the public road, with no need to install additional drainage infrastructure in the vicinity of the junction, and



- while the layby is an existing feature, and there should thus be no need for this to be removed, this has been removed from the revised site plan; and
 - as noted above, the documents submitted with this Statement include swept path analysis drawings of (i) a Fire Service vehicle accessing all sections of the site, and (ii) a waste vehicle entering and exiting the site, with a 250mm buffer between all objects (kerbs etc.) to account for variability in driver ability.
- 3.10 All points relating to pedestrian/cycle connectivity and other roads related matters, as raised both by the Council's Roads Development Management Team and the case officer have thus been addressed in full, with the proposed development complying with all relevant access related policy requirements for the reasons set out in the Planning Statement, as read in conjunction with the above.

4 Foul drainage connectivity

- 4.1 As noted above, this Statement is accompanied by a revised DA, which addresses points raised in this respect. Specifically, the revised DA no longer proposes the use of a private foul drainage system, with the proposed development to now connect to the existing foul sewer within the Dubford development instead (and there thus also being no potential pollution risk associated with this).
- 4.2 In addition, whereas the response from the planning service refers to the use of existing surface water ditches to the west of the site, it should be noted that these do not form part of the foul drainage proposals, and so are not relevant in this context (with the use of these for surface water addressed separately in the context of points raised in respect of SUDS below).

5 Flood risk

- 5.1 In response to points raised in respect of the need to address flood risk, section 7 of the DA confirms that:
- the SEPA flood maps show that the site is not at risk of flooding from adjacent watercourses or overland flows; and
 - all surface water discharges, including the attenuation, will be managed within the site and limited to agreed discharge rates, with this including the 1 in 200 year rainfall event plus climate change.



- 5.2 At the same time, section 7 of the DA also highlights that the proposed redevelopment of the site allows for a proportion of the existing hardstanding to be replaced by soft landscaping, and for the incorporation of green roofs, as shown on the revised site plan and set out in more detail below, which should be welcomed in terms of increasing natural drainage and reducing flood risk as a result.

6 SUDS

6.1 Lastly with regards to drainage related matters, consideration has been given to points raised in respect of SUDS, in response to which it should be noted that there is no policy reason not to use below ground engineered solution for SUDS, as is proposed in this instance – in particular, whereas it is recognised that Policy 22 of NPF4 indicates that SUDS should for part of and integrate with proposed and existing blue-green infrastructure, this needs to be read in the context of the Plan as a whole, and applied in a way that is proportionate to the development proposed. In terms of which:

- there is only limited green infrastructure on the site at present (this being predominantly hard standing), and no blue infrastructure, such that integrating with existing infrastructure is not an option;
- taking into account the fact that the site is predominantly hard standing at present, the proposed development strongly aligns with paragraph c) iii of Policy 22 in that it would significantly reduce the area of impermeable surface across the site as a whole;
- in doing this, the proposed site layout incorporates significantly more green infrastructure than the site does at present, with this designed to integrate the site into the surrounding context through the planting of a combination shortgrass lawns and meadow grass areas, both of which would increase natural drainage, and represent nature-positive drainage solutions; and
- the proposed below ground engineered solution is then only required for proposed areas from which there would still be surface water run off (albeit this would be less than that associated with the site at present, given that the area of impermeable surface would be reduced as highlighted above), and integrates into the proposed green infrastructure by maximising the extent of land above ground that can be used for garden and green open space to integrate the site into the surrounding context, as also set out above.



- 6.2 It should also be noted that Policy 22 of NPF4 needs to be read alongside Policy NE4 Our Water Environment of the ALDP, which only requires SUDS to be retrofitted into redevelopment opportunities when appropriate to do so – i.e. there is no outright requirement for SUDS to be provided at all, and the fact that the proposed development incorporates any form of SUDS should be welcomed and supported.
- 6.3 The above notwithstanding, the revised proposed site plan incorporates a number of changes to further increase the use natural drainage across the site, and to provide further information in this respect, including:
- reducing the extent of hard standing required for the new internal circulation areas, allowing for more green infrastructure to be provided in its place;
 - confirming how much of internal circulation areas would need to be tarred and how much would be free draining gravel surface (the latter being all but the first 5m); and
 - incorporating additional natural drainage in the form of green roofs on flat roof areas.
- 6.4 It should also be noted that, with regards to the proposed discharge of surface water to ditches to the west of the site, this would be via the existing discharge point as set out in the DA, with no new development involved in this respect. However, whereas the majority of the site is currently impermeable, with this draining directly to the existing water environment via the existing drains/watercourses as set out in the DA, the proposed development would reduce the extent of impermeable hardstanding as set out above, thus also reducing the run-off from this, with the run-off that would be to discharge at a restricted rate, via a combination of porous paving (on the access road/driveways) and stone filter trenches, as also set out in the DA.
- 6.5 Taking the above into account, the proposed site layout represents a significant improvement on the status quo in natural drainage terms, with all new drainage infrastructure contained within the site, and the proposed SUDS arrangements designed to be appropriate to the site (including green infrastructure proposed for this), in accordance with Policy 22 of NPF4 and Policy NE4 of the ALDP.

7 Parking

- 7.1 With regards to parking provision, the consultee response from the Council's Roads Development Management Team confirms that garages meeting their standards will only be counted as one parking space, and concludes that:



“...there only appears to be 12 dedicated spaces on the site then, which is in line with our guidelines. I would also note there appears to be adequate room to accommodate more parking for guests etc.”

7.2 Thus, there is no basis for concluding that there is any overprovision of parking on the site, and no changes to the overall number of parking spaces provided on the site should be required.

7.3 However, consideration has been given to whether the proposed parking could be configured in a way that results in this being less dominant, and the revised proposed site plan includes a number of changes to achieve this accordingly. Specifically:

- parking in front of the garages for plots 1 and 2 has been relocated to reduce the extent of hardstanding in this area, with this replaced by additional soft landscaping; and
- the extent of hardstanding in front of the house on plot 4 has also been reduced, with additional soft landscaping introduced here as well.

7.4 With these changes incorporated, it is considered that the proposed parking provides a sensitive solution to delivering an appropriate number of parking spaces in convenient locations without being visually dominant, in accordance with all relevant policy requirements as set out in the Planning Statement.

7.5 In addition, in response to other parking related comments in the Council’s Roads Development Management Team response, it is noted that:

- all parking bays would meet ACC standards in terms of being 2.5m x 5m in size, and the garages all satisfy the requirement of having internal dimensions of no less than 5.7m x 2.7m;
- access to the shared garages would be from the south-west elevation, and would thus not be impeded by the bin store location;
- EV infrastructure will be provided in accordance with building standards requirements, and it is proposed that planning permission is granted subject to a condition requiring final details of that provision to be submitted prior to development commencing.



8 Ecological impact

- 8.1 As noted above, the documents submitted with this Statement include an Ecological Report by Astell Associates, the terms of which confirm that the overall ecological value of the site is currently low due to the substantial amount of hardstanding within this. [REDACTED] have been identified in the dense gorse scrubland in the south-east corner of the site, the layout shown on the revised proposed site plan ensures that these would not be affected by the proposed development, while the Report sets out a number of measures to be implemented during construction to avoid [REDACTED] being disturbed by this in any way.
- 8.2 With these measures in place, the proposed development would comply with **Policy NE3 – Our Natural Heritage** of the ALDP and **Policy 4 Natural Places** of NPF4, in that a full assessment of natural heritage assets has been carried out; and the proposal will have no detrimental effect on any relevant sites, habitats, ecosystems or species.
- 8.3 Indeed, the Ecological Report confirms that proposed enhancements to biodiversity will improve the foraging value of the area for [REDACTED] which should be welcomed and supported, with the proposed biodiversity enhancements also meaning that the application complies with **Policy 3 Biodiversity** and **Policy 1 Tackling the climate and nature crises** of NPF4.

9 Tree impact

- 9.1 As also noted above, the documents submitted with this Statement include a Tree Report, the terms of which confirm that:
- all identified trees on the site are young specimens growing within the escallonia hedgerow along the western edge of the site, with only 8 of these having a diameter of larger than 12cm;
 - of the 8 trees with a diameter of larger than 12cm, 3 were in poor condition, leaving only 5 in a good condition;
 - all of the trees with a diameter of less than 12cm (12 in total), these were either dead (6 trees) or poor quality (6 trees); and
 - none of the trees surveyed were identified as having bat roosting potential.



9.2 It should also be noted that the proposed site plan shows at least 20 trees being planted across the site as part of the proposed development, with it envisaged that full details of proposed species, planting schedule, and maintenance measures could be conditioned.

9.3 Thus, the proposed development would fully comply with **Policy NE5 – Trees and Woodland** of the ALDP and **Policy 6 Forestry woodland and trees** of NPF4, in that the proposed development would increase both the quantity and quality of living trees on the site, with:

- Policy NE5 allowing tree removal when replacement planting delivers an overall net gain, and encouraging proposals which increase tree cover, both of which this proposal does; and
- Policy 6 only precluding the loss of ancient or veteran trees and areas of woodland, and there being nothing in the Policy which would preclude the removal of the trees such as those proposed to be removed in this case, particularly when both the quantity and quality of living trees on the site would be increased as a result of the development, as highlighted above.

10 Design/layout

10.1 While the benefits of redeveloping the site are recognised, the planning service has indicated that a layout which is more reflective of a traditional rural steading or farmhouse cluster would be preferred. However, this ignores the fact that the immediate site context is not a purely rural one, but rather is characterised by the site's proximity to Dubford development to the east. Notably:

- as recognised in the Report of Handling for planning application reference P141506 (in terms of which planning permission was granted for that part of the Dubford development directly to the east of the development proposed in this case), the layout of the Dubford development is suburban in nature, with relatively generic housing types, which were considered appropriate in this context; and
- the development proposed in terms of this application has been designed to represent a continuation of the development to the east, but with a vernacular approach taken to the design of the proposed houses, as set out in the Design Statement, such that these represent a sensitive transition between the suburban development at Dubford and the wider countryside beyond.



- 10.2 Related to this, it should be noted that all the proposed new houses would be located on previously developed land, with land outwith the footprint of the existing buildings currently being hardstanding associated with those, and all of this being included in the OP6 allocation. Consequently, there is no reason for the footprint of the proposed new buildings to be contained within that of the existing ones, and the proposed development has been designed to make the most efficient use possible of the site as a whole, as well as representing a continuation of the development to the east in terms of its nature, density and layout, as highlighted above.
- 10.3 This notwithstanding, consideration has been given to changes that could be made to tie the proposed development more into the countryside to the west as well as existing development to the east, and this is reflected in the revised proposed site plan. Specifically, as also noted above:
- the layout has been revised to reduce the extent of the hard standing within the proposed development, allowing for the introduction of more soft landscaping; and
 - green roof elements have been introduced where appropriate, including on the bin store and on the flat roof elements of the houses on plots 1 and 2.
- 10.4 Combined, these changes give the site a more natural aspect overall, with the layout befitting of its location between the existing development to the east and the countryside beyond.
- 10.5 At the same time, consideration has also been given to concerns raised with regards to the landscape and visual impact of the proposed noise barrier. However, it is important to assess any potential impact of that against the fallback position of the boundary treatment that would remain in the event of planning permission being refused (any such fallback position being a material consideration to which due weight must be given, per the decision in *Mansell v Tonbridge and Malling Borough Council* ([2016] EWHC 2832 (Admin)) – this being a double layer of chain link fence topped with barbed wire, which is very much industrial in nature and a lot less sympathetic to the surrounding landscape than the proposed noise barrier would be.
- 10.6 In contrast, and while it is envisaged that final details of the proposed noise barrier would be conditioned, this is expected to be a wooden fence, similar to fence type C approved in connection with development pursuant to planning consent reference P141406 to the east. Thus, the proposed fence would be appropriate to the area, as well as being more sympathetic to the surrounding landscape than the existing fence is, and should be considered acceptable as a result (subject to final details being conditioned, as noted above).



11 Amenity

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12 Levels/sections

12.1 While it is recognised that parts of the site are sloping, it should be noted that:

- sections have been included with the revised proposed site plan, showing that only limited cut and fill is required; and
- in response to specific queries raised about the useable extent of the garden of plot 3, the total garden area (excluding driveway) is 484m² and all on level at +52.5 AOD, with sloping land to the south of this being outwith the garden.



13 Construction impact

- 13.1 It is recognised that all development has some impact during construction and, if a Construction Method Statement is sought, the applicant would be happy for planning permission to be granted subject to a condition requiring this to be submitted and approved before development commences, as is standard practice.

14 Public open space provision

- 14.1 In terms of public open space provision, the revised plan clearly distinguishes between private and public spaces, as highlighted above, with it also having been confirmed that no private spaces would extend into land outwith the allocated site boundary.

15 Renewables/water efficiency

- 15.1 With regards to the details of proposed renewables/water efficiency measures to be provided, the applicant would be happy for this to be conditioned, as is also standard practice. In the meantime, though:
- the revised plans submitted with this Statement shows solar panels located on roofs where these would generally have a southerly or westerly orientation for optimum solar gains, along with the addition of water butts on all plots;
 - the incorporation of green roofs on flat roof areas reduces water run-off and provides natural water capture/efficient re-use for watering of those; and
 - the applicant would be happy for further measures such as rainwater butts to be identified and implemented through the submission and approval of a detailed scheme of proposed renewables/water efficiency measures in due course.

16 Conclusion

- 16.1 For the reasons given in this Statement, it is considered that all points raised in the Council's email of 11 September 2023 have been addressed, and there is no reason for the application to be refused. Rather, for the reasons given above and in the originally submitted Planning Statement, it is clear that the proposed development complies with the Development Plan as a whole, and the application should thus be approved.

Aurora Planning Limited

15 June 2024

