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TOMMY



CULTS BIELDSIDE AND MILLTIMBER COMMUNITY COUNCIL

290 North Deeside Road,
Cults, Aberdeen
AB15 9SB

30th March 2012

Mr Tommy Hart
Enterprise, Planning and Infrastructure
Aberdeen City Council
Business Hub 4, Marischal College
Broad Street
Aberdeen
AB10 1AB

05 APR 2012			
Imp	Strategy	Construction	Admin
Action			

Dear Mr Hart,

120340: Land to North of Friarsfield Road, Cults (Part of OP51) - Proposed residential development of 81 units (including affordable housing), public open space, SUDS and access works

I am writing on behalf of Cults, Bieldside and Milltimber Community Council (CBMCC) to comment on the above planning application.

CBMCC wish to see the proposed new link road in place before construction of houses on the Friarsfield site begins. Without it there would be considerable disruption to residents and users of Friarsfield Road, especially during construction. The junctions of Kirk Brae/North Deeside Road and Friarsfield Road/Kirk Brae will be under particular stress at peak times without the new link road. This is borne out in estimates in Table 7.5.1 and Appendix C of the Transport Assessment by Fairhurst dated January 2012.

In addition it is anticipated that simultaneous development of the Oldfold Farm site will add further traffic stress to the area particularly without the AWPR being in place. CBMCC also asks for it to be noted that it does not support the maximum allowable Degree of Saturation being set at 90% for signalised junctions. This we understand is a *local* standard proposed by Aberdeen City. There is no evidence that the margin of error in the calculations for these junctions is better than 15%. We request that both these conditions be taken into consideration when this application is being reviewed.

The roads in the vicinity of the Friarsfield site, in particular Friarsfield Road, Kirkbrae, Craigton Road, Abbotshall Road and Westerton Road, should be classified and upgraded to the standard of Christine McKay, Planning Coordinator. 290 North Deeside Road, Cults, AB15 9SB

☎ [REDACTED] ☐ [REDACTED]

"local distributor roads" since proposed developments will result in a total or more than 300 dwellings in the area. We understand that the standard width of carriageway for a local distributor road is 6.5 metres with a foot way at least on one side that is 3.0 metres wide.

CBMCC also wish to see planning gain in the form of upgrade of the junction of Kirk Brae /Friarsfield Road and a pedestrian crossing in the vicinity.

CBMCC remains concerned that the drainage issues of the Friarsfield site will be adequately addressed. Currently there are a number of plastic pipes which are draining into the burn that do not seem to have been taken account of in the Fairhurst flooding statement. It also does not appear to consider the Friarsfield site as a whole, only the area contained in the CALA application.

CBMCC has considerable concern over the impact on the local school roll calls. Certain years at the academy are already reported to be over subscribed. The developer should provide documented evidence of the predicted impact on the academy and primary school roll calls and the necessary steps being taken to ensure sufficient capacity is provided at these schools when the Friarsfield site is developed.

Similarly CBMCC has concern over the impact on the local health centre. There is already considerable demand on the health centre and access can be challenging. The developer should provide documented evidence of the predicted impact on the demand for health services in Cults and how this will be met satisfactorily when the Friarsfield site is developed.

CBMCC requests that all of the above concerns be addressed before approval is granted for this application.

Yours faithfully,

Christine McKay

Planning Coordinator

Christine McKay, Planning Coordinator, 290 North Deeside Road, Cults, AB15 9SB



29 Abbotshall Road
Cults
Aberdeen
AB15 9JX

28th March 2012
Aberdeen City Council
Planning and Sustainable Development
Marischal College
Broad Street
Aberdeen
AB10 1AB

Dear Sirs

**Planning Application : Land North of Friarsfield Road Cults Ref
120340**

I wish to object to the above planning application for the following reasons.

1. The north link road should be built first to give good safe access to the site during construction when there is the most activity with heavy vehicles. It would greatly reduce the congestion on the already busy neighbouring roads. It is completely unacceptable that the developers state it will be phased towards the end of development due to the need for revenue generation from sales. The infrastructure should be built and adopted by the council before any house building is commenced. In this way they will have to build proper roads. If the infrastructure building is left to end the developers will build a shoddy road as cheap as possible to get out of their obligation. The infrastructure for the large development to the west of Portlethen was all built before the houses.
2. There should be a pavement on at least one side of the new north link road. It links to Craigton Road which has a pavement its entire length. A cycle track should be provided leading to the east and Aberdeen as this development will destroy the existing recreational facility.
3. There should be a new pavement along the entire length of the north side of Friarsfield Road.
4. I object to the density of the housing. It is not in keeping with this part of Cults. This topic came up in the consultation exercise. Developers have completely ignored this point, as well as every other point that was raised.
5. The affordable housing element of this development is only 10%. The justification in the Supporting Statement document is very weak and should not be allowed. In fact the entire affordable housing should be removed as the cheapest apartment will be over 250,000 pounds.
6. The design of the affordable housing in the form of 2 blocks of flats crammed into the corner of the site is outwith of keeping with this part of Cults. Height will be excessive on the highest part of the site furthest from public transport and other services. The affordable housing if absolutely required should be free standing houses like the rest of the development.
8. The emergency link road will be difficult to control. It is close to a blind summit on Friarsfield Road. It looks like that this is a road to ease the construction phase and they want to sell as an improvement, but it is not. It will be a hazard. Please put in place a condition to stop this from happening.
10. There seems to be little by way of planning gain on this development. There was a suggestion to tidy up the path by the burn between Friarsfield Road and Cults Hotel and bus stop. Only small improvement suggestions to clear the path and to make it clean underfoot. Street lighting for safety. Again this has been ignored.
11. There is a need for the older children or teenagers. A good example would be to build a facility for skateboarders or bikers. What has not been recorded is that the local children have constructed a very

impressive facility as squatters within the buildings at the former nursery. This will be lost for them. The very least would be to build a new one to as good a standard if not better. Please note there is an element of seclusion at the moment and it would be useful to involve the teenagers in the design and layout of the new facility.

12. I am a little concerned by the carelessness and lack of attention to detail in this application. Examples include getting existing street names wrong. Abbotshall Drive has been shown as Abbotshall Crescent and Abbotshall Road as Abbotswell Road. So much for having things checked and signed off by senior members of staff. If they can't get simple details like this right will they be able to get the construction right, or will we end up with 110 houses as opposed to 80 houses. Or is this an application for approximately 80 houses.

13. Somewhere it is stated that the unsightly sub-station will be screened to hide the site. However nowhere is the issue of the constant hum of the transformers addressed. I think the constant background noise will be unhealthy for the houses within earshot.

14. Has an environmental check been made in the field for toxic substances in the soil? I have been told by my neighbours that by-products from the paper industry were spread on the field. Please have the top soils checked by an independent authority.

15. I still have not seen a study of damage caused to the aquifers running beneath this land. The pollution and construction will damage change the course of the aquifers. Once again I would recommend an independent environmental carry out this study and not paid for by the developer.

I am disappointed to see that the developer has made no attempt to use the latest energy saving devices such as solar panels, wind turbine, district or under soil heating systems in a brand new development. If Aberdeen City Council wants to be seen as a progressive council then it should force the developer to deploy modern systems in order cut green house gas and reduce the carbon footprint of a development of this size. At present it seems the council is redesignating green belt land in order to raise revenue from council tax.

It is also most disappointing that despite the fact that the developers held two local engagement sessions they have chosen to ignore every point that was raised by the residents during those sessions. Which proves that the developers only care about their profit.

All environmental studies should be carried independently and not be paid for by the developer. It is obvious that if the developer is paying for a study then they have the influence to change the outcome of the study to their advantage. Surely the planning officer can not be so naïve to accept reports sponsored by the developer. This once again point to preferential treatment to this development by the council with total disregard to the public concern and opinion.

I want to state that I am not against development. I accept that there is a constant need for new houses but there are some many inner city areas, council properties, run down estates and disused industrial sites that can be regenerated and improve the city as a whole and for all the residents. Development should be done in a way which enhances Aberdeen and not in a way that profits developers, their directors and shareholders. I'm afraid that this development is only about profit and it is a sham and a disgrace the way it is being allowed to go through by your planning officer Botchel.

Yours faithfully

H. Jamshidian

cc local Councillors

City Development Services Letters of Representation	
Application Number:	120340
RECEIVED	30 MAR 2012
Dev: ()	
Cases Officer initials:	RFF
Date Acknowledged:	02/04/12

TOH

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2 Kirkbrae View
Cults
Aberdeen
AB15 9RU

Planning and Sustainable Development
Enterprise, Planning and Infrastructure
Aberdeen City Council
Marischal College
Broad Street
Aberdeen
AB10 1AB

26th March 2012

Dear Sirs

Objection to Friarsfield Development: Planning Application No. 120340

I object to the proposed Friarsfield development because it does not comply with Section 38 of the Scottish Planning Policy (SPP), published in February 2010:

Section 38: Decisions on the location of new development should:

- promote regeneration and the re-use of previously developed land,
- reduce the need to travel and prioritise sustainable travel and transport opportunities,
- promote the development of mixed communities,
- take account of the capacity of existing infrastructure,
- promote rural development and regeneration, and
- prevent further development which would be at risk from flooding or coastal erosion

New development should promote regeneration and the re-use of previously developed land

The site comprises greenfield agricultural land that, apart from the former nursery buildings off Friarsfield Road, has not previously been developed. The Friarsfield proposal does not promote regeneration and the re-use of previously developed land. The Friarsfield site has previously been designated as green belt and then as strategic reserve.

SPP Section 80 also requires that planning authorities and developers should consider the reuse of previously developed land before development on greenfield sites.

New development should promote the development of mixed communities

SPP Section 78 also requires the design to create places with a distinct character and identity, promoting a well integrated mix of land uses including well designed homes of different types and tenures.

The planning application submitted by Cala Homes is for 73 large detached homes, and 8 "affordable apartments". This does not promote the development of mixed communities, as there is little or no provision for smaller starter homes or for properties with different tenures.

Almost all recent residential development in the Cults area (Woodlands, Loirsbank, Earlswells House) has comprised large 4 or 5 bedroom houses or luxury flats which command premium prices. The 10 unit Morkeu

development adjacent to the Friarsfield site which has already been granted planning permission will also comprise large detached houses. The result of this planning / building policy has been to consolidate Cults as an exclusive and unaffordable suburb.

SPP Section 86 outlines the definition of affordable housing and Section 88 states that the benchmark figure is that each site should contribute 25% of the total number of housing units as affordable housing.

In the supporting documents to its planning application, Cala proposes to provide only 10% affordable housing component, as the company has based its decision to develop the site using a figure of 10%. This is unacceptable, as Cala is attempting to evade its obligations under the planning regime for commercial gain. It should not be acceptable for Cala to offer a financial settlement to the Council instead of fulfilling its 25% affordable housing obligation as there is an acute shortage of affordable housing in Cults. Cala state that for the Council to impose the 25% requirement would "confuse the local community" – this is unfair to the local community, who understand that a mixed development would be more sustainable for Cults than the 90% "unaffordable" homes which would be vastly more profitable for Cala.

Cala has been attempting to develop Friarsfield for more than a decade – Cala submitted an outline application for residential development in the Friarsfield site on 6th August 2001 – and so commercial negotiations must have been on-going for a number of years, not just in relation to the 2008 Local Plan.

New development should take account of the capacity of existing infrastructure

The Friarsfield proposal does not take account of the capacity of the existing roads infrastructure. In 2005, the Council rejected an outline planning application to develop the site as a new secondary school on the basis that "the surrounding road infrastructure is well below standards in terms of width, gradient and the provision of footways". The Transportation Statement by the Council's transportation officer referred to the roads around Friarsfield as being "well below standards" with the junction of Kirk Brae and North Deeside Road "running to capacity" and "Craigton Road below the standard width for this type of road".

Cala and Stewart Milne have commissioned Fairhurst to produce a Transport Assessment (TA) for the site. This TA assumes that 420 units will be constructed on the Friarsfield site, although the Aberdeen Local Development Plan has allocated 280 units to the site.

The TA states that the Link Road, which connects Craigton Road to Kirk Brae and will form the main access to the Friarsfield development, will be constructed incrementally in phases to parallel the development. This means that the link road will not be complete until the third and final stage of the development (120 houses), although 160 houses will have already been constructed by this time. This will result in unacceptable increases in traffic arising from the initial 160 houses on the inadequate local road network without the link road to relieve the additional traffic generated.

The TA also states that there has only been modest traffic growth on local roads between surveys in 2005 and 2011. The two recent traffic surveys were carried out at times when local road conditions were not representative. The first survey was carried out on 23rd August 2011, when state schools had returned but private schools in the City were still on holiday, and the second survey was carried out on 22nd November 2011, immediately after Jacob's Ladder had been closed for a week for resurfacing (*Council Notice dated 10/11/2011: Friarsfield Road and Craigton Road will be partially closed for up to a week from Monday [14 November] while resurfacing work is carried out; Friarsfield Road will be closed from its junction with Craigton Road to a point 30 metres west of its junction with Abbotshall Road*). The August survey would not reflect normal traffic conditions, as school run and commuter traffic would have been reduced as families were still on holiday; the November survey may not have been representative as commuters may have still been avoiding the area as a result of the immediately preceding road closure.

The TA traffic figures are not in agreement with the report "AWPR Model Support : Strategic Modelling Appraisal of the AWPR Milltimber Brae and Stonehaven Fastlink Scheme", by the MVA Consultancy for the AWPR Managing Agent, dated June 2008. This report predicts a general 10-15% increase in traffic over the

2005 – 2012 period, with the exception of the "Rural Routes" category to the west of Aberdeen where the growth in traffic exceeds the average growth reflecting the heightening levels of congestion associated with central Aberdeen and suggesting that a greater amount of traffic will opt to travel via the local rural road network to the West of the city. This specific growth also reflects the growth in the number of residential and business developments expected to come online around the periphery of Aberdeen over this period. The report predicts a 33% increase on the Kirk Brae / Kingswells C class road between 2005 and 2012, and predicts a further 10% increase even after the construction of the AWPR due to the proposed Countesswells development and other developments in the Kingswells area.

The AWPR Model Support report, which reflects the figures derived from the AWPR strategic traffic modelling and has been used to examine the cost benefit of the AWPR, appears to be at significant variance with the minimal traffic growth figures suggested in the TA. Official traffic figures reported in the local press also indicate a 9% increase of traffic at Kingswells between 2006 and 2011, which would reflect the considerable office developments that have taken place at Kingswells and Westhill over the last five years, and which can be accessed from the North Deeside Road and Craigton Road / Friarsfield Road using Kirk Brae, and are in line with the MVA predictions.

As the two traffic surveys upon which the TA is based were conducted at times when traffic could be considered non-representative, and as such the conclusion drawn by the TA that there has been only a minimal increase in traffic since 2005 may be considered invalid. A significant amount of business development has taken place in Westhill since 2005, including the Arnhall Business Park which has recently had to apply to build both a multi-storey car park and a temporary car park to alleviate congestion. Both Friarsfield Road and Kirk Brae provide a direct route from the south and west of the City out to Kingswells and Westhill, and it is difficult to see how the TA can conclude that traffic growth has been minimal on commuter routes which lead to such large new developments that are already experiencing significant traffic congestion.

The TA has also taken into account forecast traffic changes arising from the construction of the AWPR. Table 7.3.9 in the TA indicates that there will still be significant increases in local traffic after construction of the AWPR – up to 68% increase on Kirk Brae north of the A93 and on Abbotshall Road, and 35% on Pitfodells Station Road in the afternoon/evening rush hour. This is at variance with the statement in 7.3.5 of the TA that the AWPR will relieve the road network through Cults, but reflects the predicted increase in traffic in the AWPR Model Support report as a result of additional development at Countesswells.

The TA has not, however, taken into account additional traffic generated by the proposed Kingswells Prime 4 Business Park development, even though the same company (Fairhurst) has undertaken traffic modelling for that scheme and has concluded that there will be sufficient additional traffic generated to require significant infrastructure upgrades at the Kingswells roundabout.

Previous objections to the construction of a new Cults Academy on the Friarsfield site highlighted a number of issues with the local road infrastructure. The outline planning application for the academy was refused, principally on these issues. The Council's transportation officer commented that "the surrounding road infrastructure is well below standards in terms of width, gradient and the provision of footways", roads around Friarsfield as being "well below standards", that the junction of Kirk Brae and North Deeside Road "is at present running to capacity" and that Craigton Road is "below the standard width for this type of road".

The Design and Access Statement prepared for the site states (Para 3.1.2):

"Other junctions continue to perform within Design Capacity with the addition of the Link Road and development traffic from 200 dwellings. Beyond 200 dwellings however, the North Deeside Road/Abbotshall Road/Westerton Road junction would operate marginally above Design Capacity, but below absolute capacity of the junction."

This confirms that the existing infrastructure does not have the capacity to cope with the additional levels of traffic generated by the Friarsfield development and would have to rely on relief being provided by the AWPR. Given that the AWPR was originally to be open by 2011, it seems a little optimistic to be relying on a scheme that has such a history of delays.

The phasing of the link road development is clearly not acceptable. There is no reason for the access to the site from Kirk Brae to be included in Phase 1, as it does not connect to any other part of the Phase 1 development on Friarsfield. It should be included as Phase 2, together with the easternmost section of the link road that connects to Craigton Road. This would relieve the significant levels of additional traffic generated by Phases 1 and 2 to the lower section of Kirk Brae and Friarsfield Road and allow the provision of public transport services to the site when 160 houses are in place. Waiting until the end of the development to complete the link road to Craigton Road could result in the failure of developers to complete their infrastructure obligations should it be decided that market conditions are such that Phase 3 is not required.

Section 80 of SPP also states that planning authorities should promote the efficient use of land and buildings, directing development towards sites within existing settlements where possible to make effective use of existing infrastructure and service capacity and to reduce energy consumption.

The Friarsfield proposal also does not take account of the existing schooling infrastructure. 280 homes will generate 140 primary school pupils, using the pupil/household factor of 0.5 supplied by the Council, and 56 secondary school pupils, using the pupil/household factor of 0.2 supplied by the Council.

The Friarsfield Development Framework states: "Education : Sufficient capacity is likely to be available to accommodate pupils". However, the 2010 Based School Roll Forecasts, Aberdeen City, published by the Council in October 2011, indicates that there will not be sufficient capacity for local schools to accommodate the primary and secondary school pupils generated by this development.

The most recent (2010) ACC school roll forecasts have been adjusted to reflect the actual school entrance numbers in August 2011. The forecast shows that Cults Primary had 456 pupils for entry in 2011, forecast to rise to 660 pupils by 2016, although the school capacity is 540. This means that the school would be at 122% capacity, with a surplus of 120 pupils over capacity.

In a response to a Freedom of Information request, the Council has stated:

"There are a number of options open to the City Council to address the potential situation where demand for school places exceed the capacity of the zoned school. These include:

- Roll-capping, or limiting the intake of pupils from outwith the school catchment area.
- Reviewing school catchment areas, and re-zoning schools, to move catchment boundaries to try to utilise spare capacity in other adjacent schools.
- Extending or redeveloping the school to provide additional classroom and other accommodation, in order to meet the requirements from the increased number of potential pupils. In the case of Cults Primary however, from an educational point of view, the school is already considered to be a fairly large primary school, so the City Council would be unlikely to want to extend this to being an even larger school.
- In the case of increased demand which results from new housing development, wherever possible, the City Council would aim to seek financial contributions from housing developers to cover the cost of providing additional school facilities to meet this demand. This would normally be formalised in a Section 75 Agreement, which would be linked to the planning permission for the development."

From the Council response reproduced above, roll-capping would be unlikely to reduce the number of pupils sufficiently (by 120 places) and the school is unlikely to be extended to accommodate the additional pupils generated by Friarsfield. The only practicable options to reduce the school roll would be to rezone the school catchment area such that children that would currently be eligible to attend Cults Primary would become zoned to adjacent schools (Milltimber, Culter, Kingswells, Airyhall and Kaimhill) or require a Section 75 agreement. However, the 2010 school roll forecasts indicate that Kaimhill and Kingswells will also be over capacity and Milltimber and Airyhall will also be close to capacity, with only Peterculter having any significant

spare capacity. It is unclear how a Section 75 agreement could provide the additional 120 school places required given that the Council has already stated that extending Cults Primary would be educationally undesirable.

Given that the development will generate 140 pupils and by 2016 Cults Primary would be just 20 pupils below capacity, this suggests that without the Friarsfield development the school will be virtually at capacity by 2016.

The most recent (2010) ACC school roll forecasts show that Cults Academy had 1060 pupils for entry in 2011, forecast to rise to 1195 pupils by 2016, although the school capacity is 1141. This means that the school would be at 105% capacity, with a surplus of 54 pupils over capacity.

In a response to a Freedom of Information request, the Council has stated:

"However, in the case of Cults Academy, consideration would also need to be given to the fact that the Academy was provided as part of the City Council's 3Rs approach to Private Public Partnerships, and as such there may be different factors which need to be considered, particularly in relation to whether it is feasible to physically extend the school building."

This would again mean that the only practicable options to ensure that the school remains within its capacity would be roll-capping or rezoning. Cults Academy was roll-capped in 2010/11 to 180 pupils, and again in 2011/12 to 210 pupils allowing 8 spare places for families moving into the zone and will be roll-capped in 2012/13 to 180 to allow 10 spare places for families moving into the zone. Given that roll-capping is already having to be used it is difficult to see how this could produce the 56 additional places generated by the proposed development. Rezoning would require shifting pupils to Hazlehead Academy or Harlaw Academy within the City, as other adjacent school catchments are located within the Shire. Again it is unclear how a Section 75 agreement could provide the additional school places required given that the Council has already stated that given that Cults Academy is a 3Rs project extending the school may not be feasible.

Given that the development will generate 56 pupils and by 2016 Cults Academy would be 54 pupils over capacity, this suggests that without the Friarsfield development the school will reach capacity by 2016.

New development should reduce the need to travel and prioritise sustainable travel and transport opportunities.

The TA identifies that the closest bus route is the North Deeside Road, which lies some 800m from the site (TA 5.4.1). This is considerably outwith the 400m maximum walking distance to public transport identified in SPP Section 168. A bus route within the 400m maximum walking distance would not be available until completion of the development when the proposed link road would be completed. This would still rely on FirstBus extending the existing No 16 Airyhall bus route, which would either need to be economically sustainable or funded from developer contributions, which would not be sustainable in the long term. Also, given that the Council has previously acknowledged that Craigton Road is "below the standard width for this type of road" there remains the question of whether this section of road would be suitable as a bus route without significant improvement. The Council also stated that Kirk Brae is unsuitable as a main pedestrian route.

The TA identifies that currently 8% of Cults residents who live both within 400m or further than 400m from a public transport route currently use public transport. This would translate to only 22 of the proposed 280 households using public transport, and it is difficult to see how this could be economically viable.

The TA also refers to the 93 bus service, which was supported by ACC using developer contributions and was withdrawn on 9th March 2012 as the developer funding had expired and the service was unsustainable.

Section 79 of the SPP also requires that new housing developments should be integrated with public transport and active travel networks, such as footpaths and cycle routes, rather than encouraging dependence on the car. The TA anticipates that particular attractions for walk and cycle trips will comprise movements to Cults Primary School and Cults Academy, as it considers that both of these are within convenient walking distance of

the site. However, whilst senior school children may walk from the site to the Academy it is highly unlikely that primary children will walk to Cults Primary school based on the current travel patterns in the area. 280 houses will generate 140 additional primary pupils, using the pupil/household factor of 0.5 supplied by the Council, the majority of which are highly unlikely to walk to school.

Cults Primary school, with a current roll of 456 (from ACC 2010 school roll forecasts) already suffers from significant traffic congestion at peak hours, with City Wardens having to be employed to patrol the perimeter road and adjacent residential streets. With the school roll (which includes the Friarsfield development) forecast to increase to 660 by 2016 (ACC 2010 forecasts) this would lead to unacceptable and unsafe levels of traffic at the school.

Section 38: New development should prevent further development which would be at risk from flooding or coastal erosion

Section 196: Flooding is a natural process which cannot be prevented entirely, but it can be managed to reduce its social and economic consequences and to safeguard the continued functioning of services and infrastructure. Some locations are already susceptible to intermittent flooding and climate change is expected to worsen the situation. Inadequate drainage infrastructure also increases the risk of flooding. Planning authorities must take the probability of flooding from all sources - (coastal, fluvial (water course), pluvial (surface water), groundwater, sewers and blocked culverts) and the risks involved into account when preparing development plans and determining planning applications.

Section 197: Development which would have a significant probability of being affected by flooding or would increase the probability of flooding elsewhere should not be permitted. Alterations and small scale extensions are generally outwith the scope of this policy, provided they are unlikely to have a significant effect on the storage capacity of the functional flood plain or affect local flooding problems. The area of impermeable surface should be kept to a minimum in all new developments.

The Scottish Environment Protection Agency (SEPA) has identified the Cults Burn as a flood risk, as documented on the SEPA flood risk maps.

The Cults Burn floods on a regular basis, and has at times generated sufficient levels of flooding to make Kirk Brae impassable, most recently on 1st November 2009.

Development of the Friarsfield site will be at significant probability of being affected by flooding, and is likely to increase the probability of flooding elsewhere as greenfield areas will be replaced by hard landscaping leading to decreased infiltration and increased run-off.

Section 139: International and national designations can be complemented by local designations which protect, enhance and encourage the enjoyment and understanding of locally important landscapes and natural heritage. Local designations should be clearly identified and protected through the development plan. The reasons for designation should be clearly explained and the on-going relevance and function of local designations should be considered when development plans are prepared. Some local designations, such as Local Nature Reserves, are a statutory designation. Other local designations are non-statutory. Planning authorities are encouraged to limit non-statutory designations to two types - local landscape areas and local nature conservation sites. Both statutory and non-statutory local designations should be identified and protected in the development plan and the factors which will be taken into account in development management decision making should be set out. The level of protection given to local designations through the development plan should not be as high as the level of protection given to international or national designations.

The Ecological Survey for the site identifies the Cults Den Local Nature Conservation Site (LNCS) (formerly District Wildlife Site) that extends from the River Dee up the Cults Burn nearly to the driveway entrance to Sunnyside Livery Stables on Kirk Brae. It is designated because of its status as a tributary of the River Dee and its function as a corridor through the urban landscape.

The Cults Burn is part of the larger River Dee Special Area of Conservation, which is of international value. Although only a small tributary of the Dee, the water quality in the burn has been identified as being of importance to the downstream river.

The Ecological Survey for the site identifies that surface water runoff from the development has the potential to affect the wetland habitats and the burn through sedimentation and hydrocarbon pollution. The Survey report also states that the development could result in the loss of the springs that currently feed the wetland habitat. The fen is partly fed by a spring that flows down the adjacent slope, while the marsh is partly fed by a spring arising in the habitat. The wetland will also be fed by general surface water flow from the adjacent slopes. Loss or decrease of inflow from whatever source could result in drying of the habitat.

In summary, I object to the Friarsfield Development as it does not comply with the Scottish Planning Policy (Feb 2010) because:

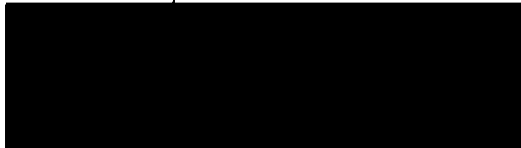
- The site is a Greenfield site, and therefore does not promote regeneration and the re-use of previously developed land
- The proposed mix of predominantly large 4 and 5 bedroom houses with very limited (10%) affordable apartments does not promote the development of mixed communities
- The development does not take account of the capacity of existing infrastructure:
 - The Traffic Assessment reports that there have been reductions in local traffic over the last 6 years, which is significantly at variance with figures used to develop the AWPR cost benefit model which predicted at least a 10 – 15% increase over the same period and predicted a further increase after construction of the AWPR, and also at variance with official figures published in the local press which also show a 10% increase in traffic across the City; this variance could be explained by the traffic surveys being conducted during periods when traffic flows could be considered non-representative
 - The Traffic Assessment does not take into consideration additional traffic generated by proposed large developments at Kingswells which will require significant infrastructure improvements
 - The Friarsfield development is outwith the 400m maximum walking distance to public transport, and as only 8% of households may be expected to use public transport this will result in significant additional car usage; as the link road will not be complete until the final phase of the development there will be no public transport within 400m of the development until completion, and even then if usage remains at only 8% this may be economically unsustainable, as the recently discontinued 93 bus service has proved; Craigton Road has previously been described as below standard width by the Council, and would require significant improvements for it to be suitable as a bus route; the Council has already commented that Kirk Brae is unsuitable as a pedestrian route
 - The site is too distant from Cults Primary to be within practical walking distance, which will lead to significant adverse traffic impacts at the primary school
 - School roll forecasts produced by the Council indicate that both Cults Primary and Cults Academy will be at or near capacity by 2016 without the additional pupils generated by the Friarsfield development; the Friarsfield development will place both schools significantly

over capacity with little or no mitigation available other than roll-capping (which is already in use at the Academy) or rezoning

- The Friarsfield site is identified on the SEPA flood risk maps as being at risk of flooding and therefore development on the site will be at risk from flooding
- There will be a significant adverse impact on the Cults Den Local Nature Conservation Site and the River Dee Special Area of Conservation

I would finally ask that the Council consider the Reporter's recommendation that "if it were to be determined that Friarsfield is not required for new housing and should not be designated as strategic housing land reserve (FNC), it should be designated green belt."

Yours faithfully

A large black rectangular redaction box covering the signature of Nick Gibson.

Nick Gibson

HALLIDAY-FRASER MUNRO
PLANNING

Our Ref: P1324/004/JW/lc
Your Ref: 120340

28 March 2012

Planning and Infrastructure
Strategic Leadership
Aberdeen City Council
St Nicholas House
Broad Street
Aberdeen
AB10 1BW

FAO Tommy Hart

Dear Sirs

**PROPOSED RESIDENTIAL DEVELOPMENT OF 81 UNITS (INCLUDING AFFORDABLE HOUSING), PUBLIC OPEN SPACE, SUDS AND ACCESS WORKS
LAND TO NORTH OF FRIARSFIELD ROAD, CULTS (PART OF OP51)
ABERDEEN**

We write on behalf of the Grant Family who own land directly adjacent to the above application site. The Grant land encompasses a significant part of the wider OP51 allocation and is identified on the enclosed map, which also accompanied a Proposal of Application Notice (PoAN) submitted under ref: 120019.

We have reviewed the planning application submitted on the adjacent land with our client and are concerned at the proposed site plan shows vehicular linkages stopping well short of the common boundary and being landscaped. Our concern relates to the wider delivery of the OP51 allocation and the permeability of the site.

The land immediately to the west of the application site is also phase 1 development, set out in the approved development framework for the OP51 allocation. The land owner is concerned that they by not taking the vehicular linkages up to the boundary will potentially create a ransom situation, which would have a knock on effect for the delivery of the whole Friarsfield allocation beyond the initial 81 homes.

We respectfully request that Aberdeen City Council as planning and roads authority ensure that the granting of permissions for this site do not create ransom situations that will put the wider delivery of the OP51 allocation in question.

1 duplicate

26533

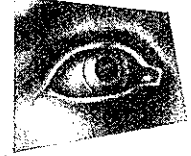
RECEIVED	30 MAR 2012	ASSIST. DIR.
TH	Imp	Admin
Action		

CARDEN CHURCH
6 CARDEN PLACE
ABERDEEN AB10 1UR

TELEPHONE

FACSIMILE

EMAIL



OFFICES IN BELFAST,
DUNDEE, EDINBURGH
AND GLASGOW

CHARTERED
ARCHITECTS

CHARTERED PLANNING
CONSULTANTS

LAND USE
CONSULTANTS

URBAN DESIGNERS

SPACE PLANNERS

PROJECT MANAGERS

PARTNERS

JOHN HALLIDAY
DIP ARCH (ABDN)
ARIBA ARIAS

IAN G FRASER
B ARCH (HONS)
RIBA ARIAS

HANISH B MUNRO
DIP ARCH (ABDN)
RIBA ARIAS

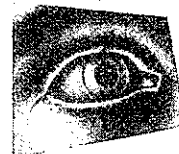
DIRECTOR OF
PLANNING

BOB G REID
BA(HONS) MCD ARIPI

REGIONAL
DIRECTOR

STEVE CRAWFORD
BSC (HONS) ARIPI

We reserve the right to supplement this representation as and when further information in relation to this matter is made available. In the meantime, if you have any comments or queries please don't hesitate to get in touch.

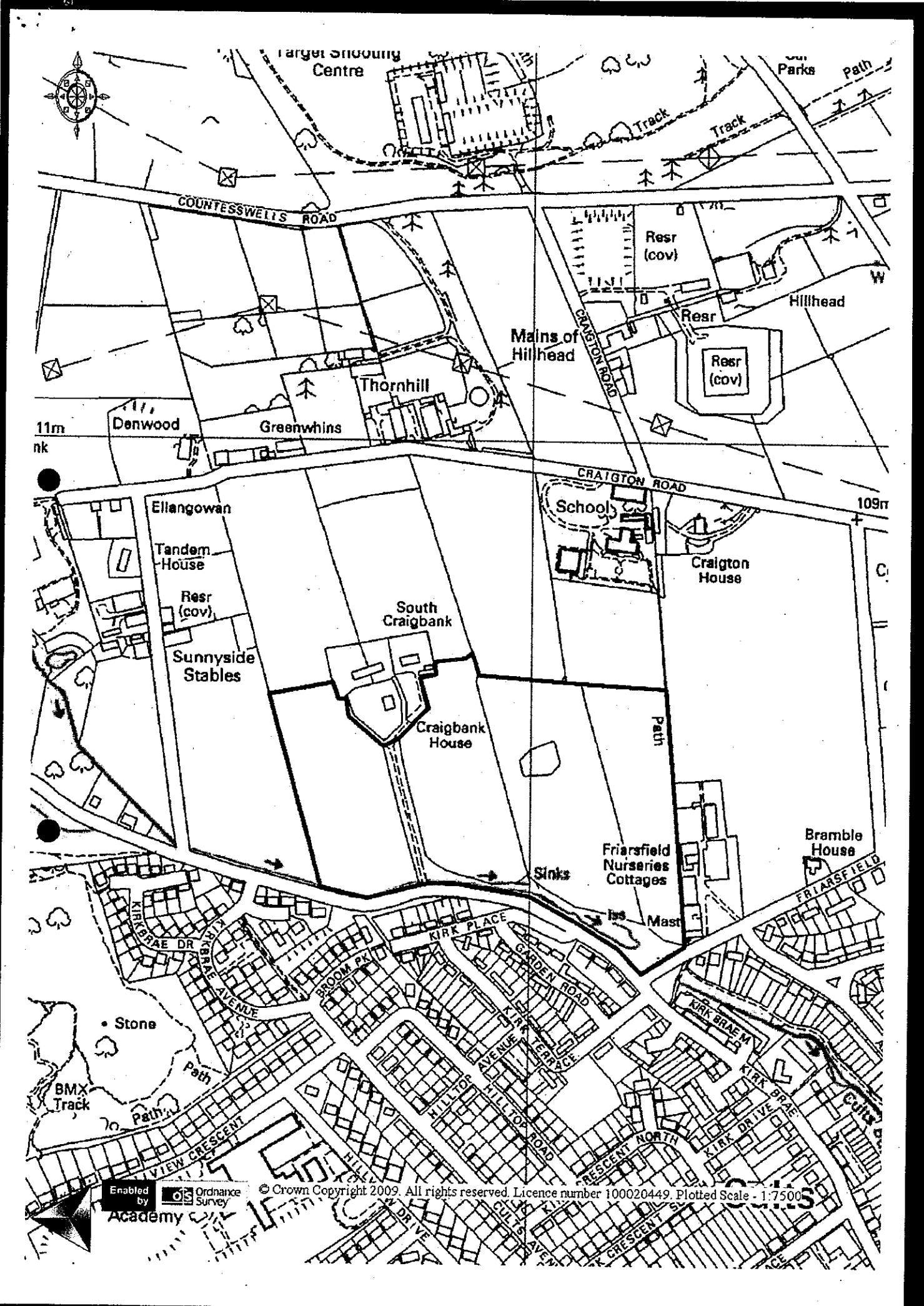


Yours faithfully,



James Welsh
Senior Planning Consultant
For Halliday Fraser Munro

Enc.



Target Shooting Centre

Parks Path

COUNTESSEWELLS ROAD

Track

Track

Resr (cov)

Hillhead

Mains of Hillhead

Resr (cov)

11m nk

Denwood

Greenwhins

Thornhill

CRAIGTON ROAD

School

Craigton House

109m

Ellangowan

Tandem House

Resr (cov)

South Craigbank

Sunnyside Stables

Craigbank House

Friarsfield Nurseries Cottages

Bramble House

Sinks

Mast

Stone

BMX Track

VIEW CRESCENT

KIRK PLACE

GARDEN ROAD

FRIARSFIELD

Enabled by Ordnance Survey Academy

© Crown Copyright 2009. All rights reserved. Licence number 100020449. Plotted Scale - 1:7500

duplicate

31 Abbotshall Road
Cults
Aberdeen
AB15 9JX
28 March 2012

Aberdeen City Council
Planning and Sustainable Development
Marischal College
Broad Street
Aberdeen
AB10 1AB

Dear Sirs

Planning Application : Land North of Friarsfield Road Cults Ref 120340

I wish to object to the above planning application on the following aspects.

1. The north link road should be built first to give good safe access to the site during construction when there is the most activity with heavy vehicles. It would greatly reduce the congestion on the already busy neighbouring roads. It is weak to state that it will be phased due to the need for revenue from sales in phase one. The infrastructure for the large development to the west of Portlethen was all built before the houses. This development will be a success and the funds could be easily borrowed to build the road in advance.
2. There should be a pavement on at least one side of the new north link road. It links to Craigton Road which has a pavement its entire length. A cycle track should be provided leading to the east and Aberdeen but preferably away from the new road its self.
3. There should be a new pavement along the entire length of the north side of Friarsfield Road.
4. I object to the density of the housing. It is not in keeping with this part of Cults. This topic came up in the consultation exercise. Developers have ignored the request.
5. The affordable housing element of this development is only 10%. The justification in the Supporting Statement document is very weak and should not be allowed. This application is being made in March 2012 and current rules should apply.
6. The design of the affordable housing in the form of 2 blocks of flats shoehorned into the corner of the site is not in keeping with this part of Cults. Height will be excessive on the highest part of the site furthest from public transport and other services. The affordable housing should be free standing houses like the rest of the development.
7. The emergency link road will be difficult to control. It is close to a blind summit on Friarsfield Road. It looks to me like an disguised access road for the construction phase. Please put in place a condition to stop this happening.
8. Houses numbers 1, 2 and 3 should not access directly onto Friarsfield Road for safety reasons. There have already been accidents on Friarsfield Road due to residents reversing onto a busy commuter road. They could very easily be accessed via houses 4, 5 and 6 by moving No 4 slightly.

9. There seems to be little by way of planning gain on this development. There was a suggestion to tidy up the path by the burn between Friarsfield Road and Cults Hotel and bus stop. Nothing major...just improve the path to make it clean underfoot with street lighting for safety. Again this has been ignored.

10. There is a need for the older children or teenagers. A good example would be to build a facility for skateboarders or bikers. What has not been recorded is that the local children have constructed a very impressive facility as squatters within the buildings at the former nursery. This will be lost for them. The very least would be to build a new one to as good a standard if not better. Please note there is an element of seclusion at the moment and it would be useful to involve the teenagers in the design and layout of the new facility.

11. I am a little concerned by the carelessness and lack of attention to detail in this application. Examples include getting existing street names wrong. Abbotshall Drive has been shown as Abbotshall Crescent and Abbotshall Road as Abbotswell Road. So much for having things signed off by senior members of staff!

12. Somewhere it states that the unsightly sub-station will be screened to hide the site...but nowhere is the issue of the constant hum of the transformers addressed. I think the constant background noise will be unhealthy for the houses within earshot. I suggest no houses within this range.

13. Has an environmental check been made in the field for toxic substances in the soil? I have photographic evidence of by-products from the paper industry being spread on the field with the knock on effect on crops grown the following year. Please have the top soils checked by an independent authority such as The James Hutton Institute.

I am disappointed to see that no effort has been made to have the latest energy saving systems or district heating systems in a brand new development. If Aberdeen City Council has adopted these heating systems for its own properties then why not use them here?

I want to state that I am not against development. I accept that there is a constant need for new houses but they must be done in a way which is an asset to Aberdeen and not in a way which is motivated by the profits of the developers.

Yours faithfully



Douglas G Scott

cc local Councillors

From: Nick James <[REDACTED]>
To: "pi@aberdeencity.gov.uk" <pi@aberdeencity.gov.uk>
CC: "Aileen Falconer" <[REDACTED]>
Date: 26/03/2012 12:37
Subject: Land to North of Friarsfield Road ref 120340
Attachments: Camphill Communities Submissionre Cala Applic120340 Friarsfield Final 16. 03. 2012.pdf

Dear Sir or Madam

Please find attached a submission on behalf of the Camphill Communities with respect to the application to develop 81 dwellings on land north of Friarsfield Road, Cults, Aberdeen.

Yours

Nick James

Nick James BA MPhil MRTPI
Principal Environmental Planner

[REDACTED]
[Description: Description: Description: LUC logo_rgb1]

37 Otago Street
Glasgow G12 8JJ

T. + [REDACTED]
M. + [REDACTED]
F. + [REDACTED]

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LUC (Land Use Consultants) is a private limited company registered in England (Registered Number [REDACTED]), having its Registered Office at 43 Chalton Street, London NW1 1JD.

For more information, visit our website at [REDACTED] [http://\[REDACTED\]](http://[REDACTED])

Application Ref 120340 Cala Homes for 81 units (including affordable housing), public open space, SUDS and access works at Friarsfield, Cults.
Submission by Camphill Communities with respect to impacts on the Aberdeen Waldorf School. March 2012

1. Introduction

- 1.1 This written submission has been prepared on behalf of the Camphill Communities (Aberdeen City & Shire), including Aberdeen Waldorf School in response to an application (ref 120340) by Cala Homes for 81 units (including affordable housing), public open space, SUDS and access works at Friarsfield, Cults. The proposed site lies south of the Camphill Communities [Aberdeen Waldorf School.
- 1.2 This submission also follows a number of submissions by Camphill Communities with respect to potential development sites identified in the Aberdeen Local Development Plan Main Issues Report and the finalised plan itself.
- 1.3 The rest of this submission comprises the following sections:
- An introduction to the Camphill Communities and a description of the Aberdeen Waldorf School;
 - An overview of the Camphill Communities' previous submissions including during preparation of the Aberdeen City Local Development Plan;
 - A description of the Camphill Communities' key concerns about the Cala Homes planning application;
 - Conclusions.

2. The Camphill Communities

- 2.1 The Camphill Communities (Aberdeen City & Shire) are all charities and have an historical relationship within the Dee Valley spanning some 70 years (www.camphillaberdeen.org.uk). They serve a wide range of individuals of all ages (estimated in excess of 1800). Currently more than 700 people live and work within the communities. Camphill is particularly valued as a resource for people with complex special needs¹. The Camphill communities provide a range of high-quality innovative and personalised services and facilities for such vulnerable children, young people, adults and the elderly across a number of sites
- 2.2 The Aberdeen Waldorf School, Craigton Road, Cults is an independent school that provides Steiner Waldorf education for around 90 children (3-16years) from across the City and the Shire, who do not have special needs.
- The school runs a parent and toddler group (0-3 years, with 22 places) and provides after school care on weekday evenings until 5.30pm (4.00pm on Fridays). The school also accommodates a range of local groups who use its halls and sports facilities in the evenings.
- 2.3 The school is located on an eight acre wooded campus on Craigton Road to the north of Cults. The school currently enjoys a rural location a short distance from

¹ In this context the term special needs is used to encompass individuals who have learning disabilities, including those with Autistic Spectrum Disorder, and /or other additional support needs including, social emotional behavioural problems, mental health issues, learning difficulties.

the urban edge. From its elevated location, the school enjoys open and extensive views south over the Lower Dee Valley. The school currently leases playing fields (3.56 acres) from Aberdeen City Council immediately to the south.

- 3. Previous relevant submissions /Aberdeen City Local Development Plan**
- 3.1 The Camphill Communities have engaged with the Aberdeen City Local Development Plan process over the past two years to ensure that the interests of the Camphill communities/Enterprises on Deeside are not adversely affected by development. This included:
- A submission in response to development option sites (September 2009)
 - A submission in response to the Aberdeen City Main Issues Report (December 2009)
 - A submission in response to the Aberdeen City Proposed Local Development Plan (November 2010)
- 3.2 These submissions included consideration of development options put forward for the Friarsfield site (Proposals of Application Notices ACC Application References 111179 and 111168). The plans accompanying these POANs suggested that proposed development would extend to the north of areas identified in the existing Local Plan and confirmed for development in the finalised Local Development Plan. This implied a significantly greater scale of development than endorsed by the Local Development Plan and would have brought development much closer to the Aberdeen Waldorf School. We are therefore somewhat reassured to see the planning application which indicates that the scheme will not extend beyond the area allocated in the Local Development Plan.
- 3.3 The Camphill Communities previously raised concerns about development at Friarsfield (see appendix1). A number of these concerns apply to the current application and are detailed , along with others, below.
- 4 Concerns and Comments**
- 4.1 The Camphill Communities have a number of concerns regarding the proposed development and it is hoped that these can be considered and addressed in the detailed design of the proposed development at Friarsfield.
- 4.2 One of the key issues relates to the increase in traffic that is likely to occur on local roads, particularly those used for access to the school, as a consequence of this development. This could have a serious negative impact on the safety of pupils, staff and the general public accessing the Aberdeen Waldorf School by foot, cycle or car. Careful design of new roads and junctions, including the implementation of speed reduction measures on these and existing roads and junctions will be of particular importance. The entrance to the Aberdeen Waldorf School is located at a bend and junction on Craigton Road, so any increase in traffic could affect access into the school as well as raising road safety issues.
- 4.3 It would also be of concern if plans were to be developed to close Friarsfield Road at any point along its length (e.g. where it meets Craigton Road running east) due to

the new distributor road as this would serve to increase traffic on those roads remaining open, with a potentially detrimental impact on safety issues.

- 4.4 There are specific issues associated with a footpath which is well used by pupils, staff and the general public walking and cycling to school from residential areas to the south, and from bus services on North Deeside Road. This will be severed by the new distributor road which is shown running along the northern edge of the proposed development. It will be essential to consider how continued safe use of this footpath by pedestrians and cyclists is ensured. This could be achieved by providing a separated pedestrian /cyclist footbridge over the distributor road, or, less satisfactorily, by an at-grade signal controlled pedestrian/cyclist crossing.
- 4.5 We are note that the footpath is shown lying outwith the redline boundary for the development proposal and would be concerned if it also lay outside the boundary of subsequent proposals to the west. It should be planned and treated as an integral part of the development, and any improvements funded by it.
- 4.6 We would also wish to explore the potential to provide bus stops and laybys to allow pupils to be dropped off close to the southern end of the footpath serving the school, and the provision of cycle paths along the distributor road. 20mph speed limits should also be considered throughout the development and along the distributor road.

5 Conclusions

- 5.1 The proposed development at Friarsfield is located close to the Camphill Communities Aberdeen Waldorf School. While we welcome the fact that this proposal is in line with allocation identified in the Local Development Plan, we have a number of concerns that we hope can be addressed through the detailed planning and design process:
- Ensuring that the development is assessed in terms of the potential impact on road safety, particularly for pupils, staff and the general public accessing the school by foot, cycle or car;
 - Ensuring that Friarsfield Road is not closed, with implications for traffic levels elsewhere on the road network;
 - Ensuring that the existing footpath link to the school is maintained and that safe crossing facilities are provided where it crosses the distributor road;
 - Considering provision of bus stops and laybys close to point where the footpath crosses the distributor road;
 - Considering a 20mph speed limit throughout the development and the distributor road.
- 5.2 We would welcome the opportunity to discuss these issues with the applicant and the council as the scheme is progressed.

Camphill Aberdeen City & Shire Communities
16 March 2012

Camphill Communities submission to Applic. No 120340 Cala Homes Friars

Address:
St Devenick's,
Murtle Estate,
Bieldside,
Aberdeen
AB15 9EP

of 6

Contact: Dr Aileen Primrose

email: [REDACTED]

tel: [REDACTED]

Appendix 1

Friarsfield, Cults: Development Framework Public Consultation Submission by Camphill Communities with respect to impacts on the Aberdeen Waldorf School. November 2011.

Introduction

1. This written submission has been prepared on behalf of the Camphill Communities (Aberdeen City & Shire), including Aberdeen Waldorf School. The Camphill Communities (Aberdeen City & Shire) have an historical relationship within the Dee Valley spanning some 70 years, serving a wide range of users of all ages (estimated in excess of 1800). Currently more than 700 people live and work within the communities. Camphill is particularly valued as a resource for people with special needs. The Camphill Communities provide a range of services and facilities for vulnerable children, young people and adults with special needs.
2. The Aberdeen Waldorf School, Craigton Road, Cults provides Steiner Waldorf education for around 90 children (3-16years) who do not have special needs. The school runs a parent and toddler group (0-3 years, with 22 places) and provides after school care on weekday evenings until 5.30pm (4.00pm on Fridays). The school also accommodates a range of local groups who use its halls and sports facilities in the evenings.
3. The school is located on an eight acre wooded campus on Craigton Road to the north of Cults. The school currently enjoys a rural location a short distance from the urban edge. From its elevated location, the school enjoys open and extensive views south over the Lower Dee Valley. The school currently leases playing fields (3.56 acres) from Aberdeen City Council immediately to the south.

Context

4. This submission has been prepared following the Cala Homes and Stewart Milne Homes public consultation on the development framework for Friarsfield, Cults in Aberdeen. It also follows a number of submissions by Camphill Communities with respect to potential development sites identified in the Aberdeen Local Development Plan Main Issues Report and the finalised plan itself.

Concerns and Comments

5. The Camphill Communities were concerned to see recent Proposals of Application Notices (Aberdeen City Council Application References 111179 and 111168) for parts of the Friarsfield area. The plans accompanying these POANs suggested that proposed development would extend to the north of areas identified in the existing Local Plan and confirmed for development in the finalised Local Development Plan. This implied a significantly greater scale of development than endorsed by the Local Development Plan and would have brought development much closer to the Aberdeen Waldorf School. We are therefore somewhat reassured to see the development framework which indicates that the scheme will not extend beyond the area allocated in the Local Development Plan.

6. The Camphill Communities have a number of other concerns regarding the proposed development and it is hoped that these can be considered and addressed in the detailed design of the proposed development at Friarsfield.
7. One of the key issues relates to the increase in traffic that is likely to occur on local roads, particularly those used for access to the school, as a consequence of this development. This could have a serious negative impact on the safety of pupils, staff and the general public accessing the Aberdeen Waldorf School by foot, cycle or car. Careful design of new roads and junctions, including the implementation of speed reduction measures on these and existing roads and junctions will be of particular importance. The entrance to the Aberdeen Waldorf School is located at a bend and junction on Craigton Road, so any increase in traffic could affect access into the school as well as raising road safety issues.
8. It would also be of concern if plans were to be developed to close Friarsfield Road at any point along its length (e.g. where it meets Craigton Road running east) due to the new distributor road as this would serve to increase traffic on those roads remaining open, with a potentially detrimental impact on safety issues.
9. There are specific issues associated with a footpath which is well used by pupils, staff and the general public walking and cycling to school from residential areas to the south, and from bus services on North Deeside Road. This will be severed by the new distributor road which is shown running along the northern edge of the proposed development. It will be essential to consider how continued safe use of this footpath by pedestrians and cyclists is ensured. This could be achieved by providing a separated pedestrian /cyclist footbridge over the distributor road, or, less satisfactorily, by an at-grade signal controlled pedestrian/cyclist crossing.
10. We would also wish to explore the potential to provide bus stops and laybys to allow pupils to be dropped off close to the southern end of the footpath serving the school, and the provision of cycle paths along the distributor road. 20mph speed limits should also be considered throughout the development and along the distributor road.

Next steps

11. The Camphill Communities welcome the opportunity to comment on the development framework. We would also welcome an early opportunity to discuss these issues with representatives from Cala Homes / Stewart Milne Homes in order that they can be reflected fully in the planning applications that will be submitted to Aberdeen City Council.

Camphill Aberdeen City & Shire Communities

14 November 2011

Contact:

Dr Aileen Primrose
St Devenick
Murtle Estate
Bieldside
Aberdeen
AB15 9EP

Camphill Communities submission to Applic. No 120340 Cala Homes Friarsfield 16 March 2012

OBJECTIONS TO PLANNING APPLICATION 120340: PROPOSED RESIDENTIAL DEVELOPMENT OF 81 UNITS (INCLUDING AFFORDABLE HOUSING), PUBLIC OPEN SPACE, SUDS AND ACCESS WORKS, ON LAND NORTH OF FRIARFIELD ROAD, CULTS.

Richard J Thompson, Craigton House, Craigton Road, Cults, Aberdeen AB15 9QD

per Alistair G Stark, 195 Deeside Gardens, Aberdeen AB15 7QA

tel: [REDACTED]

My client has serious objections to the proposed development, related to design and character, transport links, affordable housing and carbon footprint.

Design and Character

The proposed development misses a major opportunity to reflect the local character. The Scottish Government's *Designing Places* and *Designing Streets* give many pointers as to how this might be achieved. In the immediate vicinity, Kirk Brae typifies the older parts of Cults and provides cues such as varied building lines and interesting nooks and crannies. It would have been refreshing to see, at the very least, a mixture of modest building heights throughout the site. Instead, with the notable exception of the affordable housing at the north-westerly corner, the proposal offers serried ranks of houses of similar height, bulk and up-market profile.

Variety and character would be much easier to achieve had the proposal met the adopted *Aberdeen Local Development Plan* requirement (Policy H4 - Housing Mix) that housing developments of larger than 50 units must, in addition to affordable housing contributions, achieve an appropriate mix of dwelling types and sizes, reflecting the accommodation requirements of specific groups.

There is an opportunity here to craft a development which is a real asset to Cults. That opportunity is missed, as the proposed layout and house types could be anywhere and tend towards bland repetition.

Transport links

The completion of the spine road across the north of the site is key to reducing overloading of Kirk Brae and Abbotshall Road and to the provision of public transport. Whilst it is understandable that the spine road cannot be provided before any house construction starts, it is completely unacceptable that it is not likely to be completed in its entirety until after the development itself is complete.

Traffic on local roads and junctions both close to the site and southwards towards Bridge of Dee already seriously degrades the safety and amenity of residential streets never designed to cope with such traffic. Further substantial housing development can only make things worse. An ingenious partial solution is offered by the spine road linking Craigton Road east of Jacob's Ladder to Kirk Brae west of its junction with Friarsfield Road, but this will only work if the road is completed in its entirety. Undue delay will allow the traffic situation to slowly deteriorate.

The spine road's effectiveness in attracting traffic from Abbotshall Road and Kirk Brae (south) is lessened by the straight alignment of the new road through the site between it and Friarsfield Road - there is no apparent reason why a more circuitous street pattern cannot be adopted to reduce any temptation towards rat-running. An incidental benefit would be to reduce the potential nuisance of car headlights shining direct towards Craigton House when coming uphill, a particular concern of my client.

Whilst considering the spine road, it is essential that a stockproof barrier is erected on its northern side, to stop the deer and other wildlife which frequent the area running across the carriageway. A wall would be in keeping with local tradition.

The downhill walk to bus services on North Deeside Road may be relatively easy, but it is a very different matter walking back uphill to return home. Therefore a local bus service utilising

the link road would be a great advantage, especially for residents of the affordable houses (assuming that they are relegated to the currently proposed location). If not provided by an early date, the opportunity to encourage healthy and sustainable transport habits from the outset will be lost.

The foot and cycle routes through and linking into the site appear reasonable, but it is difficult to assess its true worth from the information provided. Its usefulness will depend on good detailed design of hard surfaces, attractive landscaping avoiding the creation of secluded areas, good lighting and good maintenance.

Affordable Housing

Planning legislation requires that applications must be determined in accordance with the development plan unless material considerations dictate otherwise. The recently-adopted Local Development Plan requires a minimum 25% affordable housing contribution. The applicant seems to be arguing that the contribution should be reduced to 10% (considering that this site was identified for development in 2008 Local Plan when the affordable housing requirement was 10%, and is a longstanding local community understanding) (*Supporting Statement*, paragraph 3.18). This is a wholly spurious argument.

Firstly, the claim that the date of identification of a site is a material consideration is highly unusual. Many development sites throughout Scotland were identified decades before a planning application was lodged. It would be simply ridiculous to ignore current policy and apply decades-old standards to them purely on that account.

Secondly, the 10% requirement could not have been a (longstanding local community understanding) (whatever that might mean).

- In 2001, affordable housing contributions of around 35% were signalled in the approved structure plan *North East Scotland Together*.
- By 2004, Scottish Government planning guidance set a benchmark of 25% affordable housing provision, confirmed in 2008 by *Scottish Planning Policy 3: Planning for Homes* and again in 2010 by Planning Advice Note 2/2010.
- Also in 2004, the council's Finalised Local Plan *Green Spaces - New Places* was seeking an identical 25% contribution.
- In 2008 this was amended to 10% after a Public Local Inquiry concluded that the supporting survey work was not sufficiently robust.
- In 2009, *Aberdeen City and Shire Structure Plan* reduced the strategic expected affordable housing requirement for both council areas to 20% - 30%.
- In October 2009, the Aberdeen Local Development Plan: Main Issues Report flagged up that the 10% requirement was subject to change.
- Almost a year later, the *Proposed Plan* required a minimum affordable housing contribution of 25%.

Surely no wise developer could have failed make provision for the strong probability that, at some point, the City Council's local plan would require substantially more than a 10% contribution of affordable housing, as it has now done.

It follows from all this that 21 affordable units should be accommodated.

It is also patronising in the extreme to relegate the affordable housing to the top far corner of the site, at almost the furthest possible point from local shops and services. Better to have two or three groups integrated within the general layout of the site, to promote social inclusion and to add variety to the streetscape.

Carbon Footprint

There is no indication of measures to reduce the carbon footprint of the development through reduced car use, careful exploitation of its southerly aspect, or by house design.

Access by private car seems to be encouraged by the layout, exemplified by the directness of the principal access route and the absence of early provision for adjacent bus services.

At least 15 houses have an east-west orientation rather than the more favourable north-south alignment enjoyed by the majority of houses on the site.

No mention is made of the possibilities of ground-source or other low-carbon energy sources, and since every roof seems to be pitched, there is no opportunity for the occasional green roof.

27 March 2012

City Development Services Letters of Representation	
Application Number	120340
RECEIVED 28 MAR 2012	
Dev. (Authority)	(Authority)
Cases Office: Initials	TOH
Date Acknowledged	28/03/12

South

From: <webmaster@aberdeencity.gov.uk>
To: <pi@aberdeencity.gov.uk>
Date: 3/17/2012 11:29 am
Subject: Planning Comment for 120340

Comment for Planning Application 120340
Name : Denise Anderson
Address : 6 Kirkbrae Avenue

Telephone : [REDACTED]
Email : [REDACTED]
type :

Comment : My objections are principally the poor transport links and the width of the existing roads. I have walked along Kirkbrae a number of times, the existing footpath is unmade and vehicles run close to the footpath because the road is too narrow. There are also very poor links to Garthdee. The direct links to walking and cycling that the report refers to are completely wrong. Cycling up Kirkbrae is far too risky. The road Kirkbrae to Counteswells is poorly maintained, subject to flooding and numerous potholes. This is a rat run used by frantic commuters.

I note that the transport assessment presumably paid for by Cala is predicated by continuous reference to the AWPR. If this was paid for by Cala there is an obvious conflict of interest. The traffic forecasts are based on a reduction in traffic on completion of this road.

My view is that the road network should be improved and the AWPR constructed before this development starts. It is highly likely that such a development would be unnecessary on completion of the AWPR.

I would also like to make comment on the developer Cala who constructed the house I live in. The materials they used were not the best of quality, most houses have replaced all windows within twenty years and the floor joists are inadequate to take loadings without excessive movement and noise. Finally the road I live on was not formally handed over by Cala to the council on completion and I believe the footpath from Kirkbrae Avenue to Cults Avenue is still their property and is not adequately maintained.

There is something fundamentally wrong with the planning process which will consider such a development taking place without a construction programme for all the other infrastructure needs.

I also note that there is no assessment for the availability of school places.

From: <webmaster@aberdeencity.gov.uk>
To: <pi@aberdeencity.gov.uk>
Date: 20/03/2012 11:18
Subject: Planning Comment for 120340

Comment for Planning Application 120340
Name : Douglas Anderson
Address : 65 Friarsfield Road
Cults
Aberdeen

Telephone : [REDACTED]

Email : [REDACTED]

type :

Comment : I am concerned that the local infrastructure (educational, medical, roads etc.) will be unable to support a development of this size.

One specific concern relates to the access point shown from the development onto Friarsfield Road. This is shown as some metres to the west of the existing junction with Abbotshall Drive, thus creating two "T" junctions, on opposite sides of the road, within a few metres of each other. The Abbotshall Drive junction is already busy and it is easy to see that this design creates the potential for congestion - for example, if vehicles are attempting to turn right into both junctions. I believe that this will be particularly relevant during the construction of Phase 1, when the Friarsfield Road junction will be the only access to the development. I believe that a much better solution would be to move the access slightly east to form a crossroads junction with Abbotshall Drive, possibly with a mini-roundabout to ease traffic flow in and out of both side roads. There is plenty of room on the north side of Friarsfield Road at this point, to allow some widening of the carriageway to permit such an arrangement.

From: "Alan Watson (sss)" [REDACTED]
To: "pi@aberdeencity.gov.uk" <pi@aberdeencity.gov.uk>
Date: 14/03/2012 15:37
Subject: REf 120340

With ref to the above planning application

The additional traffic flow from the above development ,if Jacobs ladder is closed or reduced, will result in a car rat- run along Rocklands Road, which is a designated cycle way, cars exiting of Abbotshall rd and using the un surfaced cycle way to exit at Bairds Brae onto North Dee side rd.or Braeside. This must be considered very seriously and measures put in place to stop this happening. In addition the existing foul sewer capacity at peak times(as witnessed on numerous occasions the many blockages and raw foul sewage spillage from Woodlands development running down Rocklands rd-a protected conservation area??) cannot cope with any further development never mind one of this scale.??

Alan Watson

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TOMMY

2 Kirkbrae View
Cults
Aberdeen
AB15 9RU

Planning and Sustainable Development
Aberdeen City Council
Business Hub 4 | Ground Floor North
Marischal College
Broad Street
Aberdeen
AB10 1AB

24th February 2012

Dear Sirs

I have just reviewed the Friarsfield Development Framework document prepared by Aberdeen City Council, Ryden, Archial and Fairhurst, and I am very concerned that the cross section of the site just to the east of Craigbank in the central area of the site presented in Figure 18 is not in accordance with the indicative site layouts given in Figures 14, 15, 19, 20, 21, 22 and 23.

The indicative site layouts show a relatively wide green strip along the Cults Burn, whereas the section given in Figure 18 shows the proposed housing for the Friarsfield development to extend to the boundary of the site with Kirk Brae.

I pointed out this inaccuracy to the CALA representative at the November community presentation at the Cults Hotel, who agreed that it was incorrect, and yet this incorrect section has been presented in the Development Framework document.

Given that the developers have had ample to time to correct this section but have chosen not to do so, and furthermore they have presented the section in the Development Framework document, I am concerned that it reflects the developer's intention to minimise the green space along the Cults Burn and to maximise the developable area.

I look forward to your response in this matter.

Yours faithfully



Jo Gibson (Mrs)

Cc: Cults Bieldside Milltimber Community Council

RECEIVED
29 FEB 2012
2620263

From: <webmaster@aberdeencity.gov.uk>
To: <pi@aberdeencity.gov.uk>
Date: 28/03/2012 16:40
Subject: Planning Comment for 120340

Comment for Planning Application 120340

Name : Christopher and Judith Blaiklock

Address : Friarsfield House

Friarsfield Road

Cults

Aberdeen

AB15 9LB

Telephone : [REDACTED]

Email : [REDACTED]

type :

Comment : 1. We note the feature labelled 'Open Space' between houses 25,26,34 to 37. We suggest that this space should be left as completely 'open space' without having any trees planted as featured in the plan. This would allow children (and their parents) to have the opportunity to kick a football around without the danger of running into a tree. This would encourage healthy living and furthermore it would make the mowing of the grass easier without the lawn mower operator having to encircle every tree.

2. We would expect the Emergency Access in the South East corner of the site to be constricted so that ordinary access does not become the norm. The reason for this is that it is close by the brow of a small hill, and we know from experience on the opposite side of the road that this makes exit and entry more dangerous.

3. Although perhaps not part of the plan we do not agree with the possible closure of Jacob's Ladder in the future. The reason for this is that access to and from Town to the present houses to the south of Friarsfield Road will lead either to increased traffic on the North Deeside Road, or alternatively a fairly long detour around the new properties. We would however accept some limitations to the flow of light traffic on Jacob's Ladder.

4. Incidentally and only of comment relates to para 2.31. Granny's Brae is mentioned, but we, who have lived in the area for 23 years, and indeed others who have lived in the area for 40 or 50 years have not heard of Granny's Brae, nor can we find it on any map we have.

From: <webmaster@aberdeencity.gov.uk>
To: <pi@aberdeencity.gov.uk>
Date: 14/03/2012 16:31
Subject: Planning Comment for 120340

Comment for Planning Application 120340
Name : Neil Anderson
Address : 6 Kirkbrae Avenue

Telephone : [REDACTED]

Email : [REDACTED]

type :

Comment : The infrastructure in the area is not capable of supporting this development. Transport access is inadequate; Kirkbrae, in particular, is narrow for its entire length and is in poor condition. The schools are also at maximum capacity.

From: <webmaster@aberdeencity.gov.uk>
To: <pi@aberdeencity.gov.uk>
Date: 10/03/2012 12:19
Subject: Planning Comment for 120340

Comment for Planning Application 120340

Name : David Still
Address : 21 Abbotshall Drive
Cults
Aberdeen
AB15 9JJ

Telephone : [REDACTED]

Email : [REDACTED]

type :

Comment : On the access road it states that the road directly opposite is Abbotshall Crescent when it is in fact Abbotshall Drive, concerns as follows:-

Access is opposite access to Abbotshall Drive - if the planning dept allow the amount of houses to be built on the basis of their own selection criteria whereby they would allow for 3 cars per household, there would be the potential for 243 cars to be using the access at peak times, trying to access Friarsfield Road at peak times in the morning heading eastwards is extremely precarious at the best of times the volume of traffic will further exacerbate the problem, the road surface from Kirk Brae to Craigton Road historically is generally poor the volume of additional traffic will only compound the problem.

It seems the SUDS proposal will only cause more problems for flooding along Friarsfield Road & will drain into existing drains which will cause further drainage issues on Abbotshall area.