

**From:** <webmaster@aberdeencity.gov.uk>  
**To:** <pi@aberdeencity.gov.uk>  
**Date:** 3/13/2012 10:15 pm  
**Subject:** Planning Comment for 111697

Comment for Planning Application 111697

Name : Robert McKinney  
Address : Lakhipara,  
South Cookney,  
Stonehaven,  
AB39 3RX

Telephone : [REDACTED]

Email : [REDACTED]

type :

Comment : I write to you again as Secretary of the North Kincardine Rural Community Council (NKRCC) in view of the recent change in circumstances for this application to re-state NKRCC's position on the matter which is unchanged from our original objection on 15.12.11. Please see details of our objection below.

"I write to you as Secretary of the North Kincardine Rural Community Council (NKRCC). NKRCC would like to take this opportunity to object to this application as it is proposed to take place on a functional flood plain. This is contrary to planning policy, even for a proposed development such as this. The reason for said policies is to protect the functionality of the flood plain which if built upon at all may result in the floodwater which would normally go onto a flood plain being displaced elsewhere. In this particular instance this creates a serious level of uncertainty as to where the floodwater would then go. Only last year the Aspire Golf Center (directly opposite this site on the south bank of the River Dee) suffered many thousands of pounds worth of damage due to the level of flooding; we would argue that this development may aggravate this sort of situation, in similar circumstances, in the future. Policy does not allow building on flood plains as it may interfere with a delicate natural balance which should be left alone.

I would be grateful if you would give this objection due consideration. Many thanks."

**PI - Objectio**

**g application 111697**

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**From:** S Woods Sheila [REDACTED]  
**To:** PI PI <PI@aberdeencity.gov.uk>  
**Date:** 12/21/2011 15:11  
**Subject:** Objection to Planning application 111697  
**Attachments:** Loirsbank flood plain storage objection

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Dear Sirs,

Please receive my objection to the Planning Application 111697 for proposed excavation and ground works to form compensation storage areas in Loirsbank Road. My objections are listed in the attached document.

I thank you for your time

Regards

Sheila Woods

9, Loirsbank Road  
Cults  
Aberdeen  
AB15 9NE

Aberdeen City Planning Department  
[pi@aberdeencity.gov.uk](mailto:pi@aberdeencity.gov.uk)

Reference: Planning application 111697

21<sup>st</sup> December, 2011

To whom it may concern,

I wish to object to planning application 111697 for excavation and ground works to form compensation flood storage areas in Loirsbank Road.

My objections are based on the following reasons:

**1. The land is zoned as green belt.**

The land is currently zoned as green belt and, to my knowledge, has not been removed from greenbelt despite the persistent efforts of the developer.

**2. The land proposed for this work is on the existing functional flood plain.**

The proposal to create additional storage capacity for floodwaters on what is already a fully functional flood plain is fundamentally flawed and does not demonstrate hydro-geological knowledge of flood plains and water tables. The proposals to excavate a large hole in the field to create additional storage will likely create a new 'pond' in the field as the hole will fill from the bottom upwards given the proximity of the existing water table. In addition, such manipulation of the river boundaries is likely to cause the river to swing across the flood plan and establish a new 'cut bank' at that location. Historical swings in the meanders of the River Dee are clearly demonstrated in maps of the area.

It should also be noted that SEPA have strongly objected to the proposal to adjust the flood plain in an attempt to justify the building of houses on it.

**3. The primary function of excavation works proposed is not to alleviate flooding in the area**

The proposed excavation works are not primarily an attempt to create additional flood plain capacity. The proposed excavation works are a thinly disguised attempt to create enough material on site to build up a bank to create standing that does not currently exist for 4 houses that were the subject of a previous planning application (111566). This plan to create elevated land where none previously existed was referred to in planning applications submitted to the council in 2009. I have previously objected to the proposal to create an elevated strip of land on which to build houses.

**4. The proposed area of excavation may make surrounding land unstable.**

The proposed excavation works have the potential to create instability where they border onto existing roads and properties. A significant amount of excavation is proposed immediately beneath number 9 and number 10 Loirsbank Road. Deep excavation of steep hillsides in this area has caused significant stability problems and various other developers have had to engage in extensive piling work to stabilise the hillside. If that were to happen then it is possible, at the very least, that access to some of the houses in Loirsbank road would be cut off whilst repair works were to be carried out.

**5. The proposed area of excavation would potentially move properties at the western end of Loirsbank Road into a flooding zone where insurance would be difficult to obtain**

The proposed excavation works indicate that all elevated land in front of my property (which is currently

owned by the golf course) would be removed causing the river to flood right up to the edge of the road. The properties that are sited in the centre of Loirsbank Road currently have documented difficulties in obtaining home insurance because of this risk.

In summary, I object strongly to this proposed development on the grounds that the land comprises part of the Green Belt; the land is situated on a fully functional flood plain; the proposed works are an attempt to create land suitable for house building rather than to alleviate flooding on what is a river flood plain; the fact that the excavation works have the potential to cause soil instability when fill is removed and the resultant potential for river flooding to move to very close proximity properties at the western end of Loirsbank Road.

I thank you for your time.

Regards

Sheila and John Woods

Aberdeen City Council,  
Planning Reception,  
Planning & Sustainable Development,  
Marischal College  
Broad Street,  
Aberdeen.  
AB10 1AB.

5 Loirsbank Road,  
Cults,  
Aberdeen.  
AB15 9NE.

26 11 2011.


Application Number 111697.

Dear Sirs,

With reference to your communication of 22 11 2011, I wish to register my protest for the following reasons

1. Most of the area is a natural flood plain which can flood several times annually. I have lived here since 1967 when this house was built and have witnessed floods most years since then. It seems ludicrous to build on part of the existing natural flood plain and then to have to construct compensatory areas for the displaced flood water. Please see the recently taken flood photograph sent separately.
2. This would certainly result in more flooding elsewhere.
3. When the original application for development was lodged, both the City Planning Department and the City Traffic Department objected, and there were many written objections from the public as this is a well known attractive area. Such work would irrevocably change the landscape.
4. Despite always having been Green Belt, the Planning Committee chose, inexplicably, to ignore the opinions of both the Planning Department and the Traffic Department. The then Planning Convener used his casting vote to allow the present development. He later resigned from this office.
5. The Developer, in August this year, requested permission for agricultural access to the flood field which is difficult to understand as he now wishes to build there also, necessitating a considerable intrusion into the flood area, and contravening all Government Directives about such projects as the base fill required will always have a very high water content quite apart from when routine floods occur. The entire area is permanently soggy as can be appreciated by walking on the field. This is evident even in very dry spells with the river at a very low level.
6. The Developer illegally removed all the trees along the south side of the road in August 2009 and has, this year, illegally dumped soil along the entire edge of the flood plain from the present development to its western end. He was informed by the Planning Department in May this year, that this was illegal and the soil must be removed. To date nothing has been moved and the this soil is becoming rapidly overgrown.
7. As the City Council voted to re establish Green Belt status, one can only hope that this decision will be upheld..

Yours faithfully

  
Gordon H. Whyte.

Aberdeen City Council,  
Planning Reception,  
Planning & Sustainable Development,  
Marischal College  
Broad Street,  
Aberdeen.  
AB10 1AB.

5 Loirsbank Road,  
Cults,  
Aberdeen.  
AB15 9NE.

Duplicate

26 11 2011.

Application Number 111697.

Dear Sirs,

With reference to your communication of 22 11 2011, I wish to register my protest for the following reasons

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7. As the City Council voted to re establish Green Belt status, one can only hope that this decision will be upheld..

Yours faithfully,

Gordon H. Whyte.

7 Loirsbank Road  
Cults  
Aberdeen  
AB15 9NE  
08.12.2011

**Ref: Planning Application 111697 by Forbes Homes Ltd  
Excavation and Ground Works to form Compensatory Flood Storage**

Dear Sir/Madam

I am writing to object to the above planning application ref: 111697 on the following grounds;

This application is an inaccurate representation of the land it depicts. Currently, 4 houses do not exist on this piece of land. Indeed, this area of land is undeveloped, an active natural flood plain and a recognized "Special Area of Conservation". Therefore, there is absolutely no need for any compensatory flood measures to be put in place here and this application is not needed. Its approval would cause extensive, unnecessary damage to the environment and the function of this active flood plain.

Because of the lack of information within this application ref: 111697 and the confusion caused by the inaccuracy of its content, it is apparent that this application cannot be considered on its own and must be linked to the developers previous application ref; 111566 to build 4 houses in this same area.

Based on this I also have the following objections to this application ref: 111697:

1. This application goes against government policies of building on a Flood Plain and will incur an increased risk of flooding to adjoining land, properties and businesses. This is contrary to Scottish Planning Policy and PAN69.
2. It is proposed to achieve the flood compensation measures by cutting into a slope adjacent to an aqueduct and close to houses currently under construction. The extensive nature of the excavation work may compromise the integrity of the aqueduct and nearby housing, (a concern voiced by SEPA). So too, extensive excavation work to the west end of the site could compromise the integrity of the steep bank in that area and cause subsidence problems to the adjacent long standing property there. With little room for error before serious implications may result, the developer's calculations and resultant effects need to be checked by an independent expert.
3. Allowing this development to proceed would open the planning doors and set the precedent for other developers to build on the flood plain and exploit other sensitive areas of land for over development.
4. The land concerned is being proposed by the council to be reverted back to Green Belt in the next Aberdeen Local Development Plan and is officially recognized as a "Special Area of Conservation". This land should be protected, not developed on. The scale of the proposed work is excessive, extensive, and without precedent for any such 4 house development. The environmental destruction which would result from this development

is out of proportion to what the developer is gaining and goes against the council's policy of "avoiding adversely affecting landscape character...."

5. The developer's plans indicate that there is only 600mm clearance from the finished floor level of the houses to the anticipated inundation level of flood waters and, that parts of the rear gardens of all 4 plots will still remain within the functional floodplain. Again, this does not meet with requirements of Scottish Planning Policy. So too, as SEPA can confirm, the developers calculations of flood levels and frequency are very conservative and inaccurate. There is plenty of photographic evidence to show that that this land floods extensively far more frequently than the developer suggests.
6. Public safety would become an even bigger issue. The current narrow, winding road system in this area is substandard and would become increasingly dangerous with the increased traffic resulting from this 4 house development, together with the 8 house development currently under construction. The developer underestimates the number of cars this development will bring and also underestimates the resultant increased danger for both pedestrians and drivers. So too, parking available to the public to gain access to Allan Park is already extremely limited in this area. Allan Park is well used for league cricket matches, by cricket clubs, footballers and the general public. Currently, cars can often be seen parking well along the length of Loirsbank Road. If this development was to go ahead, parking on Loirsbank Road would no longer be possible because of the driveways being on both sides of the road and because of the roads narrowness. Surrounding roads are already double yellow lined or unsuitable because of their width and winding nature. No provision has been made for the complete loss of parking spaces to the general public using Allan Park this development would incur.

I trust the council will carefully consider these important issues before making a decision on this application.

Yours sincerely,

Diane Cant





Development Management Team  
Enterprise, Planning and Infrastructure  
Aberdeen City Council  
Business Hub 4  
Marischal College  
Broad Street  
ABERDEEN  
AB10 1AB

Ref: DSS/YST  
Your Ref: 111697  
Date: 9 March 2012

**BY HAND**

**AND BY EMAIL: [pi@aberdeencity.gov.uk](mailto:pi@aberdeencity.gov.uk)**

Dear Sirs

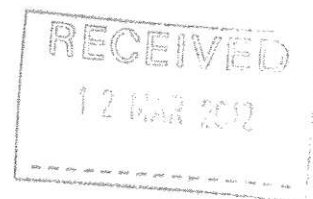
**Planning Application Reference: 111697**  
**Excavation and ground works to form compensation storage areas at Loirsbank Road, Land to south west, Cults, Aberdeen**

We act for Mr and Mrs Cant, the owners of 7 Loirsbank Road, Cults, Aberdeen. Please find attached our clients' objection in respect of planning application reference 111697. A copy has also been emailed to [pi@aberdeencity.gov.uk](mailto:pi@aberdeencity.gov.uk).

Yours faithfully



**David Scott**  
**Partner - Ledingham Chalmers**



**PLANNING APPLICATION REFERENCE: 111697****Excavation and ground works to form compensation storage areas at Land to South West of Loirsbank Road, Cults, Aberdeen**

We act for Mr and Mrs Cant, owner occupiers of 7 Loirsbank Road, Cults, Aberdeen. Our clients object to the application which has been submitted by Forbes Homes Limited for the excavation and ground works to form compensation storage areas at Loirsbank Road.

Our clients have already submitted an objection to the Applicant's separate application for the erection of four houses on Loirsbank Road (P111566), which we understand will be determined at the same time as the above application.

The basis of the present application for the compensatory flood storage area is to compensate for the volume of flood water displaced by the land raising as a result of the proposed four-house development, and in order to avoid creating additional flooding further downstream. Therefore the applications are inextricably linked, although are to be dealt with by the planning authority as separate applications.

Our clients' objection is on the following basis:

- The application site falls within land designated in the Adopted Local Development Plan as Green Belt. The proposals do not comply with the policies justifying development in the Green Belt.
- The applicants have not demonstrated that the proposals for compensatory storage will truly compensate for the land-raising, in terms of volume of water.
- The concept that the proposed compensatory storage areas would "become part of the flood plain", is flawed. The proposed area for compensatory storage lies within the 1 in 200 (+20% climate change allowance) flood and already forms part of the functional flood plain.
- The proposals will create an unacceptably adverse impact on the landscape when viewed from the River Dee SAC.
- It is the responsibility of the planning authority is to have regard to the risk of flooding when determining the planning applications

Dealing with these issues in detail:

**1. Planning Policy****1.1 Aberdeen City & Shire Structure Plan**

1.1.1 In its section on 'Sustainable development and climate change' the structure plan states that account needs to be taken of flooding and possible changes to that due to climate change. One of the targets in this section is to avoid development on land which is at an unacceptable risk from river flooding.

**1.2 Adopted Local Development Plan 2012**

The Aberdeen City Local Plan was formally adopted on 29 February 2012. It therefore forms the principal development plan against which the application is to be considered. The following matters are relevant:-

- 1.2.1 **Zoning** - the area where the compensatory flood storage would be located, is zoned as green belt. The relevant policy in the Local Development Plan is Policy NE2. No development will be permitted in the green belt other than for a number of specific uses, including those essential for agriculture. The current proposals are not essential for agriculture, and therefore the application does not comply with the Plan's green belt policy. Development in the green belt should have regard to other policies in the plan including in relation to landscape and natural heritage.
  - 1.2.2 **Landscape** – Landscape character is referred to in Policy D6 and is designed to protect elements of Aberdeen's unique landscape character. The Policy states that development will not be acceptable where it may have a significant adverse affect on the landscape character and elements which contribute to, or provide, a distinct 'sense of place'. The footpaths along the river Dee on both sides of the river provide this distinct sense of place, and by quarrying or digging into the embankments of the sloping flood plain, to simply creating a large hole to hold additional floodwater, caused by a housing development, leaves not only two large scars on the landscape, but loses the distinct character of the area from the river Dee footpaths. This is therefore contradictory to Policy D6.
  - 1.2.3 **Flooding** – Policy NE6 is relevant 'Flooding and Drainage' – Development will not be permitted if, '*inter alia*' it would increase risk of flooding or be at risk of flooding. The proposed development of four houses is clearly at risk of flooding, and the Applicants accept that the flooding will extend into the rear gardens of the houses. The rear gardens constitute part of the "development" and therefore such proposals will not comply with Policy NE6.
  - 1.2.4 **Natural Heritage** – Policy NE8 makes reference to natural heritage and specifically to the River Dee SAC. It requires supporting evidence to be submitted for any development that may have an adverse effect on a protected species, demonstrating the need for the development. The response from SNH as statutory consultees confirms the potential for an adverse impact on protected species, and yet the Applicant has not demonstrated the need for the housing development of the compensatory storage scheme.
- 1.3 **Scottish Planning Policy**
    - 1.3.1 The basic premise of SPP in respect of development in areas susceptible to flooding is contained at para 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*"

- 1.3.2 SPP states in para 203, that *"built development should only take place on functional flood plains where it will not affect the ability of the flood plain to store and convey water, where the development will not be at risk of flooding and where the development will not increase the risk of flooding elsewhere"*. The lack of detailed information on the potential of the proposals to adequately mitigate the flood risk demonstrates that the requirements under SPP have not been met.
- 1.3.3 The risk framework states that in medium to high risk areas that are undeveloped, exceptions may arise if a location is essential for agriculture and an alternative lower risk location is not achievable. The current application has no agricultural element (unlike the previous application in respect of the access road).
- 1.3.4 Scottish Planning Policy states that medium to high risk areas are generally not suitable for additional development. Loss of floodplain storage must be minimised and this proposal does not minimise the loss.

## **2 Insufficient Evidence of Effectiveness of Compensatory Storage**

- 2.1 The field identified for the proposed compensatory storage works is under water several times a year. Therefore this is not a theoretical consideration, but a very real scenario.
- 2.2 The 1 in 200 year (plus Climate Change) flood plain level of the site is 11.57m AOD, however anecdotal evidence is that the site floods far more frequently than that, below the level of 11.57m.
- 2.3 If the proposal is to be approved then the planning authority will have to be entirely satisfied that the result of the compensatory storage is fully compliant with the obligations imposed under Pan 67 and SPP.
- 2.4 Compensatory storage on a site within the existing flood plain does not provide the same level of compensation as would be the case if the compensatory storage was provided on a site outwith the existing flood plain. SEPA are clear that provision of compensation storage within the functional floodplain is not acceptable. There are no doubt a number of reasons behind their position:-
- 2.4.1 Porosity of the soil. The material being removed in order to provide the compensatory storage is generally more absorbent than the deeper rock or clay which would be exposed as a result. Therefore the capacity of the remaining landscape to absorb water is reduced as a result.
- 2.4.2 As the compensatory storage is situated within the flood plain, the absorption capacity will already be at 100% in the event of a flood event. By building on part of the flood plain, and providing compensatory storage within the existing flood plain, the absorption capacity of the lost land is not compensated by the "compensatory storage". Therefore a greater level of compensatory storage is required, beyond the amount of land taken out of the flood plain through landraising.
- 2.4.3 Compensatory storage within the flood plain only provide additional storage equivalent to the material excavated. There is no additional "vertical" storage

above this. There is a real risk of "double counting" if the Applicants seek to provide the compensatory storage within the existing flood plain.

- 2.5 The impact of any change to the flood plain would be significant. There are already 8 houses to the south of Loirsbank Road in the process of construction, and the Applicant has an application in the course of consideration for a further four houses to the south of Loirsbank Road. The evidence of our clients is that houses and their gardens are already at significant risk of flooding. The creation of "compensatory flood storage" within the existing flood plain will do very little to decrease the risk of flooding to these properties.

### **3 Accuracy of Flood Risk Data**

- 3.1 Without commissioning their own reports, SEPA and any objectors to the proposed development are reliant on the accuracy and completeness of any information supplied by the applicant. There is no independent assessment of the flood risk or the impact of the proposed works.
- 3.2 The original base report on which the Applicant's Flood Risk Assessment (prepared by Fairhurst) was based notes that the topographical data available in respect of the reservoir (immediately downstream of the proposed development) lacks accuracy. The same may be true in respect of their data relating to the development site.
- 3.3 Our clients are concerned at the assessments made in respect of the proposed location of the two compensatory storage areas have been based on analysis of the east site only, with the same data being used for the western site. The soli type, depth, porosity and condition may be very different at the two locations, and therefore detailed analysis should have been carried out at both locations.
- 3.4 There is a significant risk that the compensatory storage facility located on the existing floodplain may lead to double counting of available storage. Only levels below the existing ground level line should be calculated.

### **4 Landscape**

- 4.1 Compensatory flood storage would involve significant alteration of the landscape. The works would be visible from the River Dee and from south of the river. The resultant quarrying of the soil and rock would have a significant adverse impact on the landscape.
- 4.2 The River Dee is designated as Special Area of Conservation (SAC) and should be protected at all costs, both in terms of any silt or contaminants entering the river, and the impact on the SAC in terms of landscape impact as a result of the works.
- 4.3 The proposed storage is to be achieved by cutting into a slope adjacent to an existing aqueduct and close to the proposed and existing housing units. This leads to concerns that the slope next to the aqueduct may be compromised and the integrity of the aqueduct and proposed housing may also be compromised.

## 5 Previous Application

- 5.1 We are aware that the previous application by the applicants for an access track within the site, including compensatory storage, was approved by the Council in 2011 following the withdrawal of SEPA's objections to the proposals. That was entirely different scenario. The reason SEPA withdrew their objection was as a result of the wording in Scottish Planning Policy (SPP)
- 5.2 Scottish Planning Policy states that "*medium to high risk areas are generally not suitable for additional development. Exceptions may arise if a location is essential for agriculture and an alternative lower risk location is not achievable*"
- 5.3 The proposals are no longer agricultural in nature, and therefore the exception that enabled SEPA to withdraw their previous objection no longer applies.
- 5.4 This present proposals are also for a much greater area of land-raising and the volumes of compensatory storage indicated are significantly increased compared to the previous application.

## 6 Statutory Consultees

### 6.1 SNH

- 6.1.1 SNH previously submitted objections to the Applicant's application for four houses on Loirsbank Road, and have confirmed that their advice contained in their letter dated 29 November 2011 also applies to this proposal.
- 6.1.2 SNH's comments were based on the potential impacts to the River Dee Special Area of Conservation. Their opinion is that the proposed development could have a likely significant effect on the features of interest of the River Dee SAC, and there is a risk of pollution to the River Dee SAC.
- 6.1.3 Despite their suggestion that SNH's concerns could be dealt with by conditions attached to any consent issued, requiring the applicant to submit proposals on how they would deal with silt, sediment and other contaminants arising from the development, this is an unsatisfactory solution, as it does not take any account of the potential for additional flooding during the period the works are being carried out, and the release of sediments into the river as a result.

### 6.2 SEPA

- 6.2.1 SEPA will only consider landraising in a flood plain to be acceptable if it is linked to the provision and maintenance of compensatory flood water storage to replace the lost capacity.
- 6.2.2 The view of SEPA is that compensation flood storage is not acceptable where the proposed storage area lies within a functional floodplain. That is clearly the case here.
- 6.2.3 The Applicant's own Flood Risk Statement states that, after completion of the four houses on Loirsbank Road, parts of rear gardens of all four plots will still

remain within the functional floodplain of the River Dee and may be subject to periodic inundation.

- 6.2.4 SEPA have a duty to reduce overall flood risk and promote sustainable flood risk management. This application does not provide for sustainable flood risk management where the result will be regular inundation of the rear gardens of consented developments, as well as the potential inundation of the houses themselves.

## 7 Additional Comments

### 7.1 Traffic and Noise

- 7.1.1 The proposals are for considerable civil engineering works, which would inevitably amount to an increase in the level of noise arising from the construction process, and the commercial vehicles taking access to and from the site along Loirsbank Road.

### 7.2 Use of Matting

- 7.2.1 It is the suggestion that a three dimensional cellular matting type material (such as Enkamat) is used to ensure slope stability, and to prevent further erosion. While this may assist in the prevention of erosion, and allows Grass and landscaping to be planted on the Enkamat, it makes the land (and any topsoil placed on top of the Enkamat), unsuitable for agricultural purposes. Therefore the proposal will sterilise the agricultural nature of the land.

- 7.2.2 Although the stability of the land may not in itself be a planning consideration, any consent requiring works which would effectively prevent the land from being used for agricultural purposes would be a planning consideration. The Green Belt designation of the site, means that no development will be permitted in the green belt unless essential for agriculture. That is clearly not the case here.

## 8 Notification to Scottish Ministers

- 8.1 If SEPA sustain their objection to the application on the basis of flood risk (as they have in respect of the application for the four houses to the south of Loirsbank Road) and the planning authority proposes to grant planning permission contrary to SEPA's advice, then the application must be notified to the Scottish Ministers as per The Town and Country Planning (Notification of Applications) (Scotland) Direction 2009.

- 8.2 This indicates the essential element of flood risk in determining the location of any development. Planning Authorities are not permitted to grant consent against the recommendations of SEPA without obtaining specific approval of the Scottish Ministers.

## 9 Engineering Works in the Water Environment

- 9.1 Any proposed development within the flood plain (including the compensatory flood storage) is likely to be a controlled activity under the Water Environment (Controlled Activities) (Scotland) Regulations 2011. Due to the concerns raised regarding the impact of the proposed land-raising for the four houses,

and the impact on the floodplain storage as a result of the compensatory storage works, the proposals are unlikely to be acceptable under Controlled Activities Regulations.

## 10 Summary

- 10.1 The application should be determined in accordance with the development plan unless material considerations indicate otherwise. The application proposal is for compensatory flood storage which is required in respect of a residential development situated within an area which is designated as Green Belt in the Adopted Local Development Plan. The proposals have no agricultural purpose to enable the application to be considered on that basis. It is therefore not an acceptable development in terms of green belt policy.
- 10.2 The development of four houses south of Loirsbank Road will result in loss of floodplain storage which may increase flood risk elsewhere. The proposed compensation storage is not acceptable development as it lies within the functional floodplain.
- 10.3 The impact on the landscape when viewed from the River Dee SAC to the south of the proposed development is not acceptable, and is contrary to Local Development Plan Policy D6.

Against the above background we would therefore respectfully request that the proposed application 111697 is refused.

**Ledingham Chalmers LLP**  
**Agents for Mr and Mrs Cant**



**From:** <webmaster@aberdeencity.gov.uk>  
**To:** <pi@aberdeencity.gov.uk>  
**Date:** 05/12/2011 20:33  
**Subject:** Planning Comment for 111697

Comment for Planning Application 111697

Name : Rosemary Wood  
Address : 41 Deevview Road South  
AB15 9NA

Telephone : [REDACTED]

Email : [REDACTED]

type :

Comment : I object to the proposed flood storage plan and development of 4 houses on the basis that is a foolhardy and environmentally insensitive development.

The proposed development site is a rural floodplain which is regularly submerged and the proposal necessitates building up the land some 5-6m over datum to build the additional 4 houses. The flood storage plan provides insufficient information for me to assess the effectiveness of the proposed flood compensation sites, but it all looks sketchy, poorly thought out and environmentally insensitive.

The opposite bank of the river Dee has already been tampered with during the last 10 yrs, causing more rapid flow and greater water displacement, and this further damage to the floodplain can only exacerbate the situation resulting in potential for increased flooding up and down stream.

I hope the planning department and elected members reject this application.

**From:** <webmaster@aberdeencity.gov.uk>  
**To:** <pi@aberdeencity.gov.uk>  
**Date:** 07/12/2011 14:38  
**Subject:** Planning Comment for 111697

Comment for Planning Application 111697

Name : Alison Jermieson  
Address : 50 Deeview Road South  
Cults  
Aberdeen  
AB15 9NA

Telephone :

Email :

type :

Comment : This has to be one of the most badly thought out and worst presented planning applications ever. 'Fag packet' is overly flattering. There is no information given whatsoever. However why would bringing flood water closer to Loirsbank Road and existing properties be a good idea? This also blocks the existing access to the field and to the golf club.

**From:** <webmaster@aberdeencity.gov.uk>  
**To:** <pi@aberdeencity.gov.uk>  
**Date:** 07/12/2011 14:41  
**Subject:** Planning Comment for 111697

Comment for Planning Application 111697

Name : Adam Smith  
Address : 49 Deeview Road South  
Cults  
Aberdeen  
Ab15 9NA

Telephone :

Email :

type :

Comment : The information given is sketchy and impractical to say the least, how can anyone make an informed comment with no information? However how can bringing flood water closer to Loirsbank Road and existing properties be a good idea? I sincerely hope that the elected members vote against this and voice the feelings of the residents.

**From:** <webmaster@aberdeencity.gov.uk>  
**To:** <pi@aberdeencity.gov.uk>  
**Date:** 02/03/2012 14:29  
**Subject:** Planning Comment for 111697

Comment for Planning Application 111697

Name : Kathryn Wade  
Address : 3 Earlsparke Avenue  
Bielside  
Aberdeen

Telephone :

Email :

type :

Comment : I object to this planning application as I do not believe that houses should be built on a well known flood plain - this area floods regularly. I also object on the basis that this is green belt land.

**From:** <webmaster@aberdeencity.gov.uk>  
**To:** <pi@aberdeencity.gov.uk>  
**Date:** 12/03/2012 12:07  
**Subject:** Planning Comment for 111697

Comment for Planning Application 111697

Name : Derek Young  
Address : 4 Loirsbank Road  
Cults  
Aberdeen  
AB15 9NE

Telephone :

Email :

type :

Comment : With reference to the above, may I lodge objection to the application on the grounds that the works envisaged do not adequately address the issues they seek to address.

This applicant received, I would suggest controversially, consent for 8 dwellings along Loirsbank Road and is now seeking further development for 4 houses located on a flood plain and in an area of significant natural beauty.

On this occasion, hopefully the Planning Department will not support the application on an area already designated green belt

Regards

Derek Young

PI - Planning Application 111697 Loirsbank Road

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**From:** "Derek Young, Young & Co" [REDACTED]  
**To:** "pi@aberdeencity.gov.uk" <pi@aberdeencity.gov.uk>  
**Date:** 01/12/2011 11:27  
**Subject:** Planning Application 111697 Loirsbank Road  
**Attachments:** IMG\_1273.JPG

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Please may I table the attached photograph of the area under consideration and register my objection to the application as it will irreparably destroy the character of the area

Derek Young  
Young & Company  
1 Queens Lane South  
ABERDEEN  
AB10 6XW

Tel: [REDACTED]  
Mobile: [REDACTED]  
Email: [REDACTED]



[REDACTED]

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Young & Company  
Queens Lane South  
Queens Cross  
Aberdeen  
AB10 6XW

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PI - Ref.111697

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**From:** "The Old Mill Inn" [REDACTED]  
**To:** <citydev@aberdeencity.gov.uk>  
**Date:** 03/12/2011 10:11  
**Subject:** Ref.111697  
**Attachments:** Part.002

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Dear sir, Re 4 new houses Flood Plain River Dee Loirsbank Road, Cults.

We would object to this development as it increases the risk to all other properties along the River Dee.

I am amazed developers are still trying to build on the flood plain when we have seen the disasters that occur.

Regards,

Mike French  
Partner

**The Old Mill Inn**  
South Deeside Road, Aberdeen. AB12 5FX  
Phone: [REDACTED]  
Email: [REDACTED]

**From:** <webmaster@aberdeencity.gov.uk>  
**To:** <pi@aberdeencity.gov.uk>  
**Date:** 12/12/2011 3:14 pm  
**Subject:** Planning Comment for 111697

Comment for Planning Application 111697

Name : David Cant  
Address : 7 Loirsbank Road  
Aberdeen  
AB15 9NE

Telephone : [REDACTED]

Email : [REDACTED]

type :

Comment : I object to this application for the following reasons.

1. Excavation in this area may cause subsidence to nearby property and would almost certainly cause some structural damage due to heavy plant operations causing severe vibrations. This already noticeable with Forbes Homes operating in this area.
2. This area is currently under review to be rightfully reinstated as green belt and as such no application of this kind should be approved. Add to that, the area is a flood plain and all such modification will affect the levels of flooding.
3. The proposed works will cause a lot of disruption, noise, pollution and does not provide any benefit to the community.