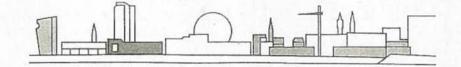
069 - MHAIRI JOHNSTON





# Proposed Aberdeen Local Development Plan 2015 Representation Form

Please use this form to make comments on the Proposed Aberdeen Local Development Plan, ensuring that your comments relate to a specific issue, site or policy in either the Proposed Plan, Proposed Supplementary Guidance, Proposed Action Programme or Strategic Environmental Assessment Environmental Report. Please include the relevant paragraph(s) and use a separate form for each issue you wish to raise.

The consultation period runs between Friday 20<sup>th</sup> March and Monday 1<sup>st</sup> June 2015. Please ensure all representations are with us by <u>5pm on Monday 1<sup>st</sup> June</u>.

Name	Mr () Mrs () Miss () Ms ()	Mhairi Johnston
Organisation	N/A	
On behalf of (if relevant)	Self	
Address	44 Falkland Avenue Cove Bay Aberdeen	
Postcode	AB12 3HZ	
Telephone		
E-mail		

Please tick if you would like to receive all future correspondence by e-mail

What document are you commenting on?	Proposed Plan Image: Constraint of the second s			
Policy/Site/Issue	OP58 Stationfields, Cove.	Paragraph(s)		

## What would you like to say about the issue?

I wish to represent my concerns regarding the adverse impact of this proposed residential development on;

· The landscape of Cove

"The LDP must take into account the landscape setting when settling allocations... The LDP should safeguard landscape character." (Supplementary Guidance, "Environmental Impact Assessment"). The coastal setting of Cove is inherent to its cultural heritage, identity and over all "sense of place". To build 150 homes on the Stationfields site would mean eroding one of the only remaining landscapes which typifies this, encompassing as it does an unspoiled, uninterrupted open sea scape which provides a coastal backdrop on entry to/exit from Cove.

· The local population

Stationfields remains locally important as a safe, open space for informal recreation, physical activity and access to the outdoors – for egs, dog walking and children playing. In this respect, the site performs a valuable community function at no cost to Aberdeen City Council. Additionally, vehicles frequently make a stop in Falkland Avenue so that the occupants, (local, visiting or working in the area), can enjoy this tranquil sea view. Aberdeen City Council located a litter bin on the street in acknowledgement of the numbers of people stopping to eat and enjoy this view.

· Biodiversity and ecology

Stationfields remains an important green link/corridor for local wildlife to move around and continue to inhabit an increasingly urbanised area. Residential development would remove this with adverse implications for the biodiversity and ecology of the area.

· Local and general environment, (i.e. issues of sustainability)

As a result of increased population there is likely to be an adverse impact regarding;

Air quality: via increased vehicle traffic.

Climatic factors: 150 houses will significantly increase energy consumption.

· Local infrastructure and amenities

Roads in the Stationfields area are already too small to cope with existing traffic flow and are congested as a "rat run" for daily commutes.

There are considerable waiting times as it is for the local medical and dental practices.

Loirston School is a small, ageing school which already has an ever increasing number of classes to accommodate each year.

There are few enough other amenities, (for e.g. for sport, leisure, recreation), available as it is for the current population in Cove.

Good planning and successful placemaking should provide infrastructure and amenities commensurate with an increasing population and this is not evident in Cove. A further substantial residential development will only serve to exacerbate these issues whereby Cove increasingly becomes a series of housing estates rather than a thriving community.

Also in relation to services and amenities, I am concerned that unabated residential development continues in Aberdeen without regard to the severe cuts made to local public services in areas such as health, social care and education. Equally, the cost of living in Aberdeen means we are not attracting or retaining the public sector workers, (for e.g. GP's, consultants, social workers, psychiatrists, teachers), required to make our services efficient. It is well known, for e.g., that schools all around Aberdeen are suffering from a shortage of qualified teachers with many senior staff having to take on this role in addition to their other duties. This is an issue regardless of the number of schools built and pupil roll within them and is a consideration relevant to every new residential development that will increase population. Where are the services to support this population? Everything else appears to be reviewed and then cut back with the exception of housing 'targets', which makes no sense in terms of the pressure placed on our diminishing services.

Other Issues:

SEE ADDITIONAL TYPED PAGE ATTACHED/OVERLEAF

### "What would you like to say about the issue?" CONTINUED

Other Issues:

#### NESTRANS potential proposal for rail halt

Regardless of whether or not this is something which the local community wishes to raise objections to also, it is surely not possible to give permission for the building of 150 houses, which would fill the Stationfields site, while a decision on building a railway station on this site is still pending.

I am also concerned that the NESTRANS proposal is not visible in the Proposed Plan and current background documents to which the public have been referred in considering their representations about the Proposed Plan 2015. Some people may consider this a preferred alternative use of the Stationfields site but are not likely to mention this in representations if not aware of the possibility. I am aware of it only as someone who has lived in the area for some time and has received notice of this potential proposal via correspondence from Aberdeen City Council Planning Department in relation to previous LDP's. A railway station is still being considered for Stationfields but only "residential development (150 homes)" is referred to in the most recent notification sent out to local residents. This, and its absence from other relevant documents, could be deemed as failing the principle of "full disclosure" required to enable a "fair hearing" for all stakeholders in the consultation process.

### Over reliance by decision makers in planning on the process of "mitigation"

Time and time again, permission is granted for residential development on the grounds that, while there are likely to be adverse effects, (such as the kind highlighted above with regard to Stationfields), these will be limited, (though not necessarily eliminated altogether), by mitigation measures . It therefore becomes a concern that the public consultation stage of planning proposals is actually a meaningless exercise – i.e. if Aberdeen City Council wish a proposal/application to go ahead, (in the case of Stationfields , at a recent local "Drop In Session", the representative for the Planning Department openly stated, as someone whose job it is to enable development and meet planning/building targets, that he thought the site represented , "an ideal development opportunity"), then they will allow anything - despite representations made by affected parties which may amount to legitimate concerns - on the grounds that any negative impacts of the development will be managed satisfactorily via mitigation. What is the point of allowing representations, and how is this a "fair hearing", if every concern can be answered in this way?

Not only does mitigation appear to be a convenient way of getting round objections, it is also a process in which I, and I would imagine many others, have little faith. I feel there is a lack of clarity and accountability in the process – for e.g. at what stage should mitigation measures be made specific, who is responsible for mitigation and how will they be made accountable for following through? I am aware that current policies make reference, for e.g., to the requirement that developers contribute to local infrastructure but it is not evident that this is followed up. One of our local Councillors highlighted that money set aside for amenities has been difficult subsequently to

track down and utilise for the purpose for which it was intended. He also mentioned that the argument has been successfully made that there is no money available for infrastructure and other amenities until houses on a new residential development have been sold – i.e. without clarity on how mitigation will be financed, developments have still gone ahead even though objections made may have been 'over ruled' with the justification of mitigation measures.

Furthermore, while mitigation appears heavily relied upon as a means of getting planning proposals /applications through, this is no guarantee of reducing adverse impacts on affected communities. I point to a current development in Cove, (Charleston), which appears to have been permitted on a land fill site and supported by a survey which was over 200% out in terms of material that would need to be cleared prior to building. The residents are now living beside two mountains of litter filled earth which not only looks unsightly, (from many vantage points in Cove), but also creates dust and smell. It is clear that ongoing mitigation measures on this site have not alleviated the nuisance, nor were any earlier mitigation plans for the development able to prevent this.

#### "What change would you like to see made?"

PLEASE REFER BACK TO THIS SECTION ON THE REPRESENTATION FORM. - OVER LEAF.

## What change would you like to see made?

I disagree that the Stationfields site should be allocated for residential development - it should instead be protected and valued as a green space.

I disagree that the current Cove Masterplan & Charette Report - which has been deemed out of date in the Proposed Plan 2015 on the grounds of its being drawn up in 2008 - is no longer relevant as a guide to successful planning in Cove. The weaknesses of Cove which were highlighted in this report remain unresolved and the strengths to be protected endure so that many of the points and principles documented would surely continue to inform any updated Masterplan.

Building on Stationfields contradicts the 'vision' referred to for Cove of creating, "A coherent and interconnected public open space that connects to the natural and agricultural landscape". Are planners saying that this is no longer desirable? If so, it is hard to escape the conclusion that they are instead saying something along the lines of, "Let's just keep building more houses to meet our targets and make a quick buck and to hell with any other principles of good planning."

The Charette Report/Masterplan also highlights that, "One of Cove's most prized qualities is its surrounding natural landscape". This unarguably remains true as well and Stationfields is an area very much representative of this, "prized quality" - KEEP IT NATURAL!

Please return the completed form by:

- post to the Local Development Plan Team, Aberdeen City Council, Business Hub 4, Ground Floor North, Marischal College, Broad Street, Aberdeen AB10 1AB; or
- email to ldp@aberdeencity.gov.uk

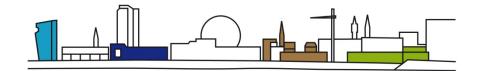
The representation form can be filled in, saved, e-mailed and/or printed. You must "save as" to ensure the completed form is saved with the changes you have made. If you need more space, please fill out another representation form or send a word document attachment via e-mail with your completed representation form. Please ensure all representations are with us by <u>5pm on</u> <u>Monday 1<sup>st</sup> June</u>.

Thank you. For more information, please visit <u>www.aberdeencity.gov.uk/aldp2016</u> or to contact the Local Development Plan Team call 01224 523470.

## **Data Protection Statement**

The comments you make on the Proposed Plan will be used to inform the Local Development Plan process and the Examination into the Local Development Plan by the Scottish Ministers' Reporter. You must provide your name and address for your representation to be considered valid, and this information will be made publicly available. Other personal contact details such as telephone and e-mail will not be made public, although we will share these with the Reporter, who may use them to contact you about the comments you have made. For more information about how Aberdeen City Council maintains the security of your information, and your rights to access information we hold about you, please contact Andrew Brownrigg (Local Development Plan Team Leader) on 01224 523317.





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Organisation					
On behalf of (if relevant)					
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Postcode					
Telephone					
E-mail					

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