



**aberdeen** local development plan

**RESPONSE TO PROPOSED PLAN  
CONSULTATION:  
ALLOCATED AND ALTERNATIVE SITES**

ISSUE 3 - 17

<b>Issue 3</b>	<b>ALLOCATED SITES &amp; GENERAL AREA STRATEGY : BRIDGE OF DON/GRANDHOME</b>	
<b>Development plan reference:</b>	Pages 11-12 and 79-80; Proposals Map: Map 1, Table 3, Appendix 2, Policy RT4	Reporter:
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
<p>Ms Zara Lee (26)  Ms Lorraine Jones of sportscotland (41)  Mrs Pamela Shand (52)  Mr John Findlay of Ryden LLP on behalf of European Development Holdings Limited (58)  Mrs Elaine Farquharson-Black of Burness Paull LLP on behalf of Carlton Rock Limited (75)  Mr John McDonald (79)  Mr Malcolm Campbell of Knight Frank LLP on behalf of Moorfield Group Limited (94)  Mrs Shirley Copland (97)  Mr Chris Pattison of Turnberry Planning Ltd on behalf of The Grandhome Trust (101)  Mr Roger Laird of Archial Norr on behalf of Royal Aberdeen Golf Club (104)  Mr Roger Laird on behalf of Royal Aberdeen Golf Club (105)  Mrs Elaine Farquharson-Black of Burness Paull LLP on behalf of North East Scotland College (109)  Mr Mike Williams of c/o Scott Hobbs Planning on behalf of Scottish Enterprise (120)  Ms Emelda Maclean of Emac Planning LLP on behalf of Scotia Homes (152)  Mr Fraser Littlejohn of Montagu Evans LLP on behalf of Buccmoor LP (160)  Mr Ben Freeman of Bancon Developments (183)</p>		
<b>Provision of the Development Plan to which the issue relates:</b>	Overview of Direction for Growth in this area and specific Opportunity Sites	
<b>Planning authority's summary of the representation(s):</b>		
<p><b>Area Spatial Strategy General and Scope of Development</b></p> <p>152: Respondent is concerned over the deliverability of large strategic housing sites and reliance on single sites to provide for the required housing land supply. In Bridge of Don and Grandhome area, the housing land supply is dominated by the allocation of Grandhome (OP9) for 4,400 houses. Two other sites are currently being developed in the area and are both due for completion in 2017. After 2017 the housing supply is largely dependent on Grandhome coming forward and being developed at rate anticipated. An additional site is proposed to provide flexibility and choice in housing land supply - see Issue 4 Alternative Sites: Bridge of Don/Grandhome.</p>		

183: In the Bridge of Don/Grandhome area the allocations post 2017 are only to Grandhome. There is no choice available to developers. Failure to deliver the SDP requirement is most acute on the Grandhome site.

### **OP3 Findlay Farm**

94, 120, 160: Policy zoning for OP3 and existing developed part of the Energy Park should be changed from Policy B2 Specialist Employment Areas to Policy B1 Business and Industrial Land.

94: Flexibility is required regarding types of permitted uses to allow the Energy Park to grow. Current zoning (under Policy B2) does not give flexibility and conflicts with recently granted consent for extension of the energy park which allows Class 4,5 and 6 with no restriction on Class 5. It would be more appropriate to change the zoning to Policy B1 - Business and Industrial Land. Respondent provides an example of an OP site at Dyce Drive which is proposed to be rezoned from Specialist Employment Areas (BI2) in the extant Aberdeen Local Development Plan 2012 (OP32) to Business and Industry (B1) in the Proposed Plan (OP23).

160: Existing allocation is outdated and there is significant market interest to occupy space at the Park. Allocation should reflect planning consent.

### **OP4 Dubford Community Facilities**

26: Objects to development on the site. Concern raised about loss of green space for leisure/fauna, loss of views and safety. Local people strongly against.

### **OP6 Balgownie Primary School**

79: Reference to condition 2 on decision notice for the development (dated 29 January 2015). Planning reference 131860. Condition states no development shall commence on site until a detailed landscaping scheme has been submitted and approved by the authority. Concerns that established trees should be retained wherever possible.

### **OP7 Aberdeen College Gordon Street**

109: Support for continuing allocation of site. Request for additional land to be zoned as part of OP7.

52: Request for retention of wood adjacent to the site, should it be developed, to protect the site from the sea winds. Concern raised over loss of trees in light of a shortage in Aberdeen and the Proposed Local Development Plan Policies and Supplementary Guidance which indicates a preference for retention.

105: Site lies adjacent to Royal Aberdeen Golf Club. As an important tourist destination and significant contributor to the local economy. The amenity and setting of the golf club should be protected if the site is to be developed. Support for Appendix 2 "Other Factors" statement to retain woodland on site along the sites

boundaries.

### **OP9 Grandhome**

101: Respondent welcomes approach to greenfield release for housing and employment allocations. In particular respondent supports the allocation of site OP9 for a mixed use development of 7000 homes and 5 hectares of employment land.

97: Transport - Respondent concerned about the extensive development and consequential impact on residential amenity and traffic congestion which is already a problem. Respondent not convinced that there is a sufficiently robust plan for dealing with the increase in vehicular road traffic that the development would bring. The Third Don Crossing may aid, but respondent doubts it can cope with rise in traffic as a result of the development. Serious consideration of alterations to transport network is required. Dualling of Parkway and Persley Bridge would be necessary in addition to Third Don Crossing. Developers would need to make large contribution to improve road network.

Pollution - Concerned about increase in noise and air pollution as a result of increased traffic and congestion. Concern regarding impact on residents and close proximity of the development site to schools and a health centre. Insufficient reassurance has been given that there has been sufficient consideration given to current residents.

Tree Band - Concern that the development would impact on and weaken the existing peripheral tree band if the development was built in too close proximity to it. Housing should only be allowed at a sensible distance from the established tree band for protection of the trees and rural amenity. Due consideration needs to be given to preserving the green space amenity of the area. The loss of farming land just for commercial gain will have a negative impact on the semi rural appeal of the Bridge of Don area.

### **OP13 Aberdeen Exhibition and Conference Centre (AECC), Bridge of Don**

94: Propose recycling facility should be located more centrally to serve the whole community and reduce the need to travel. Suggests Grandhome as a suitable location (close to eastern edge). If considered acceptable at OP13 then high standards of landscaping and amenity (which apply to the Energy Park) must be applied regardless of where it is located.

104: Does not support the formation of a recycling centre in this location. Concern raised regarding the proposed location of the recycling centre being adjacent to the 14th hole of Royal Aberdeen Golf Course. Setting and amenity of golf course should be protected. Support retention of existing woodland buffer along southern half of the eastern boundary - request more substantial strategic landscape belt. Concern regarding loss of public parking as a result of developing the site and the impact this may have on attracting high profile golf tournaments.

160: Strong reservations in respect of inclusion of a household waste recycling centre within the site. Limited reference to potential amenity impacts of the inclusion

of the facility.

Proposed Plan does not qualify the nature of the waste recycling centre, its scale, or any environmental effect potentially prejudicing and undermining significant investment on nearby high amenity business and industrial development sites.

While statements will likely be made within any planning application submission regarding regulatory guidance and pollution control, it is not considered appropriate to allocate a site for this use if there has been no assessment.

### **OP75 Denmore Road**

41: Policy NE3 should apply to the allocation as it currently contains two full size pitches and changing accommodation.

58: Support for allocation of the site and its identification as a Commercial Centre. Concern that the site can only be developed in the event that the North Denmore Road site is developed - thus only maintaining not enhancing the retail offer in Bridge of Don and leaving a deficiency in retail provision in the area. The North Denmore Road site may not be developed. Given the size of the community and planned expansion to 2030 the Plan should be seeking to increase the retail offer in the area.

Expenditure leakage indicated in the retail capacity assessment for Bridge of Don area. Provision of additional food and non-food retail facilities would not have an adverse impact on existing facilities (Boulevard Retail Park, Kittybrewster or Berryden) and could claw back some expenditure leakage.

Development would consolidate existing non-food retail provision, encourage relocation of units dispersed through Bridge of Don and encourage single trip shopping. No technical impediments - site can be accessed from A90 and is accessible to cyclist and pedestrians. Proposals are in place to relocate existing playing fields. Site would satisfy a local need and would not conflict with adjoining land uses. There would be no significant loss to landscape, character and amenity of site or adjoining areas. No significant wildlife value and remainder of site is bounded by business, industry and residential uses.

### **Land at Jesmond Drive**

75: Respondent states the Proposed Plan incorrectly identifies land at Jesmond Drive as Urban Green Space rather than part of the existing built up area. Planning permission A4/0409 approved and consent implemented. Consent shows mixed use development on the site. The Council accepted the Reporter's findings to the Aberdeen Local Plan 2008 regarding removing the Urban Green Space designation from the site, but failed to carry out the amendments.

Respondent states that the error was repeated in the extant Aberdeen Local Development Plan 2012, with the boundary being further reduced. The Reporter did not consider the site boundaries in any detail as it was noted the planning permission had already been granted and development was underway. Current Local

Development Plan 2012 zoning and Proposed Plan zoning contravenes the Council's and Scottish Government's finding on the site. Land is covered by an implemented planning permission and required to be included on the built up area. Current planning application pending for erection of 21 affordable homes on the land in question. Indicative layout attached to representation shows all open space will be actively maintained and existing footpaths preserved.

### **Modifications sought by those submitting representations:**

#### **Area Spatial Strategy General and Scope of Development**

152: Allocate land at Shielhill Farm for a new mixed use neighbourhood.

183: Additional housing sites need to be allocated.

#### **OP3 Findlay Farm**

94, 120, 160: Policy zoning of existing Energy Park and proposed extension and OP3 Findlay Farm be changed from Policy B2 (Specialist Employment) to Policy B1 (Business and Industrial Land). Consequential changes to Appendix 2.

#### **OP4 Dubford Community Facilities**

26: No development on site.

#### **OP6 Balgownie Primary School**

79: See and comment on submitted detailed plan of landscaping before any works start.

#### **OP7 Aberdeen College Gordon Street**

52: Retention of the wood should the site be developed.

105: Support for wording under Appendix 2 - OP7 - Other Factors. "The woodland on site, particularly along the site's boundaries, should be retained." Strongly supported to ensure amenity of the golf club is protected.

#### **OP9 Grandhome**

97: Reduce the extent of the development of OP9.

#### **OP13 Aberdeen Exhibition and Conference Centre (AECC), Bridge of Don**

94: Consequential changes to Policy R4 and Appendix 2: Opportunity Sites due to requested removal of reference to a household recycling centre being located at

OP13 (AECC site) and replace with OP9 Grandhome.

104: Deletion of household waste recycling centre from the allocation. If this is not favoured then under the "Other Factors" section in Appendix 2 include text: "The Household Waste Recycling Centre shall be sited to ensure that no adverse impact on the amenity of the neighbouring golf course arises" and "A strategic landscaping belt at least 20 metres in width shall be planted along the eastern boundary of the development."

160: Remove reference to OP13 being appropriate for waste recycling centre (to replace facility at Scotstown Road) and make more explicit reference to the nature and appropriateness of any such uses across the site being determined/guided by the Development Framework. This process may determine that other sites are more appropriate for such development.

### **OP75 Denmore Road**

41: Previous Reporter's findings was that NE3 would apply to allocated development sites. If this remains the intention then policy protection in Scottish Planning Policy applies. If not, request reference made in the Plan to the need to compensate for the loss of facilities.

58: The Plan should accommodate both the consented convenience floor space at North Denmore Road and the existing bulky goods uses. It would be logical for both sites to be allocated through the Local Development Plan to accommodate a mix of convenience and bulky goods retailing. Descriptive text should be amended to allow the development of the site as an addition, and complementary to, the existing commercial centre at North Denmore Road.

### **Land at Jesmond Drive**

75: Area outlined in plan attached to representation should be removed from Urban Green Space and included within the existing built up area.

## **Summary of response (including reasons) by planning authority:**

### **Area Spatial Strategy General and Scope of Development**

152, 183: The Aberdeen City and Shire Strategic Development Plan (SDP) 2014 (CD12) proposed not to allocate additional land, but to 'roll forward' the allocations from the Aberdeen City and Shire Structure Plan 2009 (CD20) into the SDP, and this was accepted by the Reporter during the SDP's Examination (Issue 5 pages 54 - 74) (CD13). The Reporter's conclusion stated "Drawing all of these matters together, I conclude that the scale and distribution of growth provided for in the housing allowances is appropriate and sufficient, in accordance with the requirement of paragraph 117 of Circular 6/2013." Aberdeen City Council agrees with these

conclusions.

The Vision and Objectives for the Proposed Plan are the same as the Aberdeen City and Shire Strategic Development Plan 2014. The role of the Strategic Development Plan is to "set clear parameters for subsequent Local Development Plans and inform decisions about strategic infrastructure investment." (Circular 06/2013 paragraph 41, CD10). The Strategic Development Plan sets a clear strategy for development in Aberdeen, which includes housing allowances to be delivered through Local Development Plans.

Large, strategic-scale housing sites form an important part of the Proposed Plan's ambition to create sustainable, mixed communities. The merits and current position of Proposed Plan site OP9 Grandhome are discussed below.

Under Issue 2 we conclude that the Strategic Development Plan greenfield requirements have been fully met and we are confident that a continuous 5 year housing land supply can be met throughout the lifetime of this Proposed Plan. Accordingly, we do not consider it necessary to allocate any further greenfield sites beyond those already identified in the Proposed Plan.

The proposal for additional land is considered under Issue 4 - Alternative Sites: Bridge of Don/Grandhome.

### **OP3 Findlay Farm**

94, 120: The existing Energy Park is a long established centre for research and product development for the oil, gas and renewable energy sectors with a history spanning nearly 30 years and with strong connections to research, design and development, knowledge driven industries and related education and training. Planning permissions granted to date have been restricted to the aforementioned uses. It is important to note that Proposed Plan site OP3 and the existing Energy Park are located at a key position in the Energetica Corridor. Planning Permission in Principle ([P131483](#)) was granted on 7 November 2014 for Classes 4 and 5, with Class 6 use restricted to being ancillary to the Class 4 and 5 uses and limited to 20%. The restriction reflects the extant Local Development Plan's (CD42) Specialist Employment Area designation.

The zoning in the Proposed Plan (unchanged from the extant Local Development Plan 2012) is considered relevant and appropriate. There is no need to rezone the existing Energy Park or OP3.

94: The respondent mentioned the proposal in the Proposed Plan to amend zoning at Proposed Plan site OP23 Dyce Drive. OP23 is proposed to be rezoned (from Specialist Employment Areas (BI2) in the extant Local Development Plan 2012 to Business and Industry (B1) in the Proposed Plan) to reflect an existing planning consent (P041165 (RD46)) which was granted (19 November 2012) Planning Permission in Principle for Class 4 use and ancillary Class 5 and 6 uses. The use granted and under construction at OP23 is akin to Business and Industry (B1) zoning. As discussed above the use granted at OP3 reflects the extant Specialist Employment Area designation. In this regard, the two sites are not comparable –

OP3 is not under construction, the uses granted are different and there has been no submission of further applications for Matters Specified in Conditions at OP3.

#### **OP4 Dubford Community Facilities**

26: The site was allocated in the Aberdeen Local Plan 2008 (CD43) and is allocated in the extant Local Development Plan 2012 as Opportunity Site OP6 reserved for community centre, primary school, local shops etc. The principle of this allocation was tested at the Examination into the Local Development Plan 2012 (CD44) under Issue 7. It remains appropriate to identify the site as a development opportunity for community facilities within the wider residential zoning as there has been no significant change in circumstances which would justify an amendment to this designation.

#### **OP6 Balgownie Primary School**

79: Detail of the site, including landscaping, design and amenity issues, is an issue for consideration at planning application stage and is not an issue for consideration at the Local Development Plan level. An application for Detailed Planning Permission ([P131860](#)) was given Conditional consent on 29 January 2015 in line with extant Local Development Plan policies on design, trees and woodland, landscape, open space and Urban Green Space. Appendix 2 – Opportunity Sites within both the extant Local Development Plan and the Proposed Plan specifically states "The amenity space to the west of the site should be retained." A landscape design scheme was submitted to the Council as per Condition 2 specified in the decision notice. The [landscape design scheme](#) is available to view online.

#### **OP7 Aberdeen College Gordon Street**

105: Support for Proposed Plan Appendix 2 - OP7- Other Factors text relating to retention of woodland, particularly along the site's boundaries, is noted.

109: Support for continued allocation is noted and welcomed. Request for additional land to be zoned as part of OP7 is considered under Issue 4 – Alternative Sites: Bridge of Don and Grandhome.

52: Concern over loss of trees is noted. We consider it appropriate to retain woodland within the site to ensure satisfactory residential amenity. The entry for Proposed Plan site OP7 in Proposed Plan Appendix 2: Opportunity Sites specifically states "The woodland on site, particularly along the site's boundaries, should be retained." The planning application process will consider the design and layout of the site including the presence of existing trees on site. It is not considered an issue which is insurmountable to the development of the site.

#### **OP9 Grandhome**

The Strategic Development Plan sets the requirements for greenfield housing/employment allowances and these are set out in Figure 1 of the SDP on page 12 and in Schedule 1 on page 42. The majority of greenfield sites identified in

the Proposed Plan have been carried over from the extant Aberdeen Local Development Plan 2012, and most are at an advanced stage in terms of planning consents and Masterplans as detailed in the Proposed Action Programme (CD21). This site is a desirable option because there are relatively few planning and topographical constraints within the site itself and its scale means that those that do exist (such as woodland and shelter belts and historic features) can be maintained and even enhanced. The scale of development would mean that it can support its own public transport infrastructure as well as services and facilities such as a new town centre, schools and employment land. Its single ownership will assist its deliverability. Large, strategic-scale housing sites form an important part of the Proposed Plan's ambition to create sustainable, mixed communities.

This site is subject to an approved [Development Framework](#) for the whole allocation (all phases of the LDP to 2035) which was adopted as Supplementary Guidance to the extant Local Development Plan 2012 in October 2013. The site is also subject to an approved Planning Permission in Principle ([P131535](#)) for a mixed-use development comprising: up to 4,700 homes, town and neighbourhood centres (including commercial, retail, leisure and hotel uses), employment land (circa. 5 hectares), community facilities, energy centre, open space/landscaping, and supporting infrastructure, including access in line with the first two Phases of the extant Local Development Plan 2012. This Planning Permission in Principle was granted in February 2015 with legal agreement to ensure the necessary developer obligations are secured.

101: Support for the allocation is noted. The allocation at Grandhome is a key part of the spatial strategy for the north of Aberdeen City.

97: In response to the respondents concerns, taking each in turn:

Transport - Traffic modelling has been undertaken and a range of works agreed to the local roads network as part of the assessment process of the aforementioned Planning Permission in Principle (P131535). This has taken into consideration the proposed phasing and occupation of homes. Contributions have been sought for both local and strategic road network improvements via a legal agreement. Strategic improvements to the road network will be provided by the Aberdeen Western Peripheral Route (AWPR), improvements to the Haudagain roundabout and Third Don Crossing. The Council and its partner the North East of Scotland Transport Partnership (Nestrans) are committed to these schemes, and the Third Don Crossing is due for completion early 2016. Other infrastructure improvements are listed in Appendix 3 of the Proposed Plan, the Proposed Action Programme and the 'Delivering Infrastructure, Transport and Accessibility' section of the Proposed Plan.

Pollution - The scale of development allocated will enable a range of facilities to be provided on-site, will reduce the need to travel, and will result in a more sustainable development. Sustainable and walkable neighbourhoods are one of six Core Principles in the Grandhome Development Framework. A Noise Impact Assessment was undertaken as part of the aforementioned planning application process, and Conditions have been attached to the Planning Permission in Principle consent in the interests of mitigation and residential amenity.

Tree Band - As detailed in the Committee Report accompanying the Planning Permission in Principle and supporting documents (Planning and Design Statement, Landscape Statement and Development Framework) there are sections along the site boundary that are designated 'Ancient Woodland Inventory – Long Established Woodland (of plantation origin)' and areas of the site zoned under extant Policy NE1 (and this zoning continued via the Proposed Plan). As evidenced within the Development Framework, the areas of Green Space Network are being largely retained, and enhanced with additional green links across the site. The detailed layout of green spaces would be the subject of any subsequent Matters Specified in Conditions applications.

### **OP13 Aberdeen Exhibition and Conference Centre (AECC), Bridge of Don**

94, 104, 160: A recycling facility is required within the Bridge of Don area to replace the current facility on Scotstown Road which is not considered fit for purpose. Its replacement is a key priority within the Aberdeen City Waste Strategy 2014 – 2025 (RD31 (pages 21 – 23)). Delivery of the facility at Proposed Plan site OP13 is within the control of the Council as landowner. The Council wish to ensure that these facilities are fit for purpose with an improved range of recyclables. The facility at Grove Nursery in Hazlehead Park is an example of a modern high quality facility which will be replicated at OP13. At the time of writing (August 2015), a public consultation process had recently been undertaken with regards to a draft Development Framework for OP13 and is due to go before the [Communities, Housing and Infrastructure Committee](#) for approval on 27 October 2015. This masterplanning process provided a further opportunity for engagement with the community in relation to the detail of the site, which should address concerns in relation to the location, design, landscaping and mitigation of impact on the amenity of adjacent areas. The draft Development Framework provides two options for the location of the recycling facility within OP13. The final location for the recycling facility has not, therefore, been determined. Further surveys and tests will be required to determine the most appropriate location within the site as well as any necessary mitigation and licensing arrangements. The exact site and nature of the Household Waste Recycling Centre will be guided by the Council's Waste and Recycling Team. However, it is essential for the Development Framework to include options for it to ensure conformity with the Proposed Plan allocation as detailed in Proposed Plan Appendix 2: Opportunity Sites. Once the Development Framework has been approved it will be Interim Planning Advice. Once the Proposed Local Development Plan is adopted it will be put forward for adoption as statutory Supplementary Guidance which will again allow for further consultation. Subsequent planning applications will enable further public consultation on the specific details on the site.

94: There is no requirement in the adopted Local Development Plan for a recycling facility within Grandhome which has had its Development Framework adopted as Supplementary Guidance and gained Planning Permission in Principle since the adoption of the extant Local Development Plan in 2012. It would not be appropriate to apply additional requirements to existing, 'rolled forward' development sites which already have consent.

104: As detailed above, the masterplanning process and any subsequent planning

applications will consider detailed issues such as strategic landscaping and amenity of adjacent land uses. It is not considered appropriate to pre-empt the final decision regarding the location of the recycling centre by inclusion of text in the Proposed Plan relating to the golf course or proposed strategic landscaping.

160: It is not considered appropriate to pre-empt the final decision regarding the location of the recycling centre by inclusion of text in the Proposed Plan relating to the Development Framework guiding / determining the appropriateness of the use on the site. The Proposed Plan is the appropriate vehicle to determine the principle of land use – the Development Framework adheres to the requirements for the site as laid out in the Proposed Plan.

### **OP75 Denmore Road**

41: Proposed Plan Policy NE3 would apply to the allocation. Paragraph 3.101 states "this policy applies to all areas of urban green space including those not zoned on the Proposals Map". Furthermore the entry for OP75 in Proposed Plan Appendix 2: Opportunity Sites specifically states, in the event of the site being developed for bulky goods, "Pitches lost should be replaced in Bridge of Don by new or upgraded pitches which are of comparable or greater benefit".

58: The Aberdeen City and Aberdeenshire Retail Study 2013 (CD16 (pages 14 and 57 -59)) does not identify any quantitative deficiency of convenience retailing in the north of the city other than in some of the larger expansion areas identified around Aberdeen at Grandhome, West Aberdeen/Countesswells and Newhills. Development for bulky goods at OP75 is intended to maintain diversity (not fill a deficiency) of offer in Bridge of Don should the North Denmore site be developed. Irrespective of the suitability of OP75, there is sufficient overall retail offer in the Bridge of Don/Denmore/Dubford area. There is no requirement for additional retail offer over and above what is already consented/allocated at North Denmore site, Dubford and Grandholme. Furthermore additional retail offer may adversely impact other retail locations such as Beach Boulevard (CD16 (pages 98 -102)).

### **Land at Jesmond Drive**

75: An application for planning permission in principle ([P150369](#)) for 19 affordable housing units with associated car parking and landscaping went before the Planning Development Management Committee on 16 July 2015 and was approved by Members, subject to conditions and a legal agreement under Section 75 of the Town and Country Planning (Scotland) Act 1997, as amended ('Section 75 agreement'). The Committee Report details both the complicated development management and development plan history covering the points raised by the respondent.

As a brief summary, planning applications A0/0624 and A4/0409 (RD48 and RD49) were granted conditional Outline Planning Permission with associated Section 75 agreements, but ensuring that 11,200 square metres was to be maintained as public open space in perpetuity (included the area subject to this representation).

A subsequent Reserved Matters application (05/1169) (RD50) was granted conditional consent for the formation and landscaping of the area of open space –

this permission was partially implemented to provide pedestrian links, but no formal landscaping.

The Finalised Aberdeen Local Plan – Green Spaces – New Places 2004 (RD47 – see City Wide Proposals Map) identified the whole of the Jesmond Drive site as Urban Green Space and Green Space Network. In response to representations, the Council produced a series of Proposed Changes to the Finalised Plan and this included the identification of Jesmond Drive as an opportunity site for community facilities and the removal of Green Space Network from part of the site (RD70 Proposed Change G6, site Number 4 – see map)

The issue was considered at Public Local Inquiry in 2006 (CD45 – Volume 1, Chapter 2, Issue 35 pages 2-67 to 2-71). Following receipt of the Reporter's Report, the Council Modified the Finalised Local Plan to show the land at Jesmond Drive as Opportunity Site 104 (Suitable for mixed uses including local shops, nursing home, amenity open space and paths complementary to adjacent amenity open space, and housing (approximate 40 units, of which about one third are expected to be provided by a housing association).

This was published in the Finalised Aberdeen Local Plan Proposed Modifications on 18 January 2008 (RD71 page 34 of 225, and see map 6). This showed Opportunity Site 104 as Mixed Use with both Green Space Network (in line with Reporter's Recommendation) and as Urban Green Space (contrary to Reporter's Recommendation). The Modifications made by the Council were publicised and all Objectors (including the Respondent) were notified. No objections were received. The Aberdeen Local Plan 2008 was adopted on this basis.

No Objection was submitted to the allocation boundaries during the extant Aberdeen Local Development Plan 2012 cycle or the Examination. Representations were however received relating to concerns about the principle of OP11 (as it was named at that time) but no changes were made following the Examination. It is however worth noting that a closer review of the Proposals Map which accompanied the Local Development Plan 2012 reveals that the area of open space was not allocated as Green Space Network

The allocation and boundaries included within the Proposed Plan currently under Examination are the same as those within the extant Local Development Plan 2012, with the site to the south of the objection area identified for Mixed Use and the objection area itself designated as Urban Green Space. The OP11 label on the land to the south has been removed as the site is developed.

Fundamentally, at the time of the publication of the Proposed Plan, the Urban Green Space zoning was appropriate and wholly sufficient.

A further planning application ([P151068](#)) for the modification or discharge of the planning obligation regarding planning application A4/0409 in relation to Clause 2 (Open Space) is currently pending consideration by the Authority. We would however, expect the next iteration of the Local Development Plan to reflect this planning permission, assuming that a consent will have been issued by this point.

**Reporter's conclusions:**

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**Reporter's recommendations:**

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<b>Issue 4</b>	<b>ALTERNATIVE SITES: BRIDGE OF DON/GRANDHOME</b>	
<b>Development plan reference:</b>	No reference in the Plan	Reporter:
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
<p>Mr Gary Purves of Knight Frank LLP on behalf of Avant Homes (31)  Mr Ian Livingston of Ryden LLP on behalf of University of Aberdeen (63)  A &amp; G Cowie (71)  Mr John Findlay of Ryden LLP on behalf of Stewart Milne Homes (85)  Mrs Elaine Farquharson-Black of Burness Paull LLP on behalf of North East Scotland College (109)  Mr Scott Leitch of Halliday Fraser Munro on behalf of Langer Investments (118)  Mr Steve Crawford of Halliday Fraser Munro on behalf of Drum Property Group (150)  Ms Emelda Maclean of Emac Planning LLP on behalf of Scotia Homes (152)  Mr Bob Reid of Halliday Fraser Munro on behalf of Mr John McIntosh (156)</p>		
<b>Provision of the Development Plan to which the issue relates:</b>	Alternative sites in Bridge of Don/Grandhome	
<b>Planning authority's summary of the representation(s):</b>		
<p><b>Mill of Mundurno</b></p> <p>31: Remove land adjacent to Mill of Mundurno from Green Belt and allocate for housing. Site is logical and compact expansion of Dubford close to employment sources and accessible to public transport routes. Within close proximity of Aberdeen Western Peripheral Route northern terminus and Aberdeen Exhibition and Conference Centre. Located within Energetica Corridor. Site would be well contained within landscape, would not lead to coalescence. 25% of units would be affordable. Schools in area have declining school roll or are operating at less than capacity. Issues relating to integration with existing developments, linear crop marks and drainage can be addressed at planning application stage.</p> <p><b>Land at Balgownie (B0203)</b></p> <p>63: Object to failure to identify land at Balgownie as a mixed use development incorporating residential, employment and recreational land. Land is surplus to requirement and its redevelopment will contribute to the consolidation/improvement of the Universities' estate infrastructure across Aberdeen. Aberdeen Sports Village (ASV) now provides a base for the sporting facilities and as such land at Balgownie is now surplus.</p> <p>Residential land use in the vicinity is acceptable to the council with two development sites identified in the Proposed Plan at OP11 and OP12. One is under construction and the other has an application pending.</p>		

Proposal will result in 50% recreational/open space with the remainder as employment/residential use. Redevelopment of the land would deliver a sustainable development in the right location in line with Scottish Planning Policy (para 40).

Site would positively impact on the Energetica Corridor and enable expansion of the Aberdeen Science and Technology Park. Site is located within the Aberdeen City Strategic Growth Area. Site will be very accessible after the Third Don Crossing is complete. Core Path network paths are within close proximity. There is a shortfall in housing numbers and this site will help meet the shortfall. Site is effective and capable of delivery. The allocated sites are large and constrained.

### **Persley Croft (B0101)**

71: Include land at Persley Croft in the Local Development Plan. Located in popular area of the city within close proximity to Aberdeen airport/industrial sites in Bridge of Don and Dyce and has good connections to Aberdeen City Centre. Ideal location for variety of uses (housing, hotel, retail, commerce or industry).

Issues of access are not insurmountable. There are options to create adequate access. There is scope to access land from the west of the site which would be of mutual benefit to the Grandhome development. A potential third access (south of the site) has not been fully investigated by the Council - adequate room to create and improve upon existing access point.

All surrounding land has been included in the Local Development Plan. Site was originally part of the Grandhome estate which has been included in the Local Development Plan. Majority of Green Belt zoning has been lifted - not reasonable to consider the site at Persley to be different.

Development would prevent site becoming more derelict and increased negative impact visually and on adjacent housing developments. Site target for vandals.

Support for site by local councillors and MSP. Community Council in favour of tidying up the area.

### **Mundurno (B0202)**

85: Object to failure to identify site B0202 at Mundurno for development of mixed use sustainable community (1000 houses, retail/business hub and community facilities - single stream primary school and playfield fields).

Commitment to delivery of AWPR and Third Don Crossing has material implications for the Bridge of Don Area and the proposed site.

Continued assertion that the site performs Green Belt functions (contributing to identify and landscape setting of city, preventing coalescence between Bridge of Don and Potterton) is refuted. Site is located 2 kilometres from Potterton and is not visually connected. Construction of AWPR to north of site negates any prospect of

coalescence. The AWPR will entirely alter the character of the area.

Site lies within the city (Strategic Growth Area) and anchors the Energetica Corridor. Site is well served by public transport with good (and improving) access. Additional housing is required to be identified in the area to improve the integration of housing and employment uses and encourage sustainable walking and cycling linkages between the two.

### **Land at Shielhill (B0206)**

118: Objection to non-allocation of site B0206. Site proposal has been refined and is now proposed as key worker housing for 250 houses (site previously promoted as a sand and gravel quarry and for affordable housing).

Site is brownfield, lies within Energetica Corridor and is of low ecological value. No evidence of supported species. There will be a good landscape fit, high quality amenity areas and enhanced pedestrian links. Site is accessible to AWPR, Bridge of Don and Dyce employment centres and existing established residential areas.

There is a clear need and demand for housing (especially medium income housing). The houses will be: 100% of these will be affordable - available to a range of people in need; 25% of these will be made available to those on the Council housing waiting list; 75% of these will be sold at a 30% discount from open market value, to be made available to key workers, public sector / NHS / Council employees; A discount of at least 20% will be applied in perpetuity in relation to subsequent sales; 10 Homes for Heroes are proposed, with associated 30 square metres workshops.

### **Causewayend (B0210)**

150: Site promoted as bid site but was not supported as the Planning Authority believed they had allocated enough housing sites in line with the Strategic Development Plan. The MIR site review failed to recognise the opportunity and suitability of the site for development. It is contended that this is not the case. The negative reasons suggested in respect of the site are incorrect. Currently zoned as Green Space Network and Green Belt but it would be more appropriate for housing.

The site makes a sensible extension to Bridge of Don. The site falls within the southern section of the Energetica Corridor and could help deliver housing to support economic development.

Site is immediately adjacent to northern section of Bridge of Don's urban area covering approximately 34 acres of unused agricultural land. Ground is flat with no physical constraints. Landscape impact will be limited due to it sitting in a bowl and it will be a logical extension to existing built up area. Dry stone dyke located on sections of the boundary can be used to create a strong boundary which would be stronger than any features on the current green belt boundary. These will help integrate the proposed development into the landscape. Site sits in a bowl in the landscape reducing any local impacts. Small proportion of site is wooded – other sites in close proximity (Grandhome) were not discounted as they contained woodland. The site has no nature conservation designations. Contrary to the Main

Issues Report evaluation there can be no significant loss or disruption to natural conservation.

New access can be taken from eastern boundary. Development to the south has been designed to provide access to the site. The Council have recognised that the site is within 500 metres of a bus link and there is scope for a cycle and footpath link between the existing housing and the proposed site. The primary school is within 800 metres. Local facilities are close and no worse than any other part of the Bridge of Don.

The Grandhome development will improve facilities and employment opportunities within this part of the city. Other local roads will be upgraded due to the AWPR.

### **Shielhill Farm (B0205)**

152: Shielhill Farm should be allocated for residential and mixed-use development in order to bring forward land in an appropriate location capable of delivering effective housing land in the first period of the Local Development Plan. Land at Shielhill Farm can contribute to the long-term growth requirements of the area.

Land can accommodate approximately 1,000 homes commencing 2020 at a rate of 100 per annum. A mixed use development is proposed for the site. It will be influenced by the masterplanning process. Allocation at Shielhill Farm will complement existing mixed use site at OP10 Dubford.

Site is well related to existing and emerging development context of the Bridge of Don area. Also well placed in terms of connectivity (south side of AWPR, west of A90 and Energetica Corridor).

### **Land at Perwinnes/North of Don Masterplan (B0209)**

156: Object to non-allocation of B0209 - North of the Don Masterplan for a mixed community of 2000-3000 homes. Any constraints to the North of the Don Masterplan are principally policy based rather than technical. The few technical issues which exist are common to any larger scale development. They are all capable of resolution.

There are minimal facilities in Bridge of Don - suburban town of 36,000 population. There has been no consideration of a substantial District Centre of strategic significance which could provide much of the local services and facilities and jobs that a settlement of this scale would normally justify. Once Grandhome is built an additional 15,000 - 18,000 population will be located in Bridge of Don. Congestion in the City Centre is at levels that the possibility of a local centre to serve a wider set of Town Centre needs could make sense for Bridge of Don, benefiting the City Region as a whole.

A masterplanned Town Centre for Bridge of Don is required. There is no rationale which would justify housing land constraint in the face of sensible masterplanning of places, infrastructure and facilities. Arguments made in the past by the North East of

Scotland Transport Partnership (Nestrans) that a route through Bridge of Don could undermine the AWPR Northern Leg no longer apply as the AWPR is now underway. A public transport loop (set out in North of the Don Masterplan) which links across the Third Don Crossing to University and Science Parks makes sense in planning terms with potential for dedicated hydrogen bus loop. The masterplan complements Energetica.

### **OP7 Aberdeen College Gordon Street**

109: Support for continuing allocation of site. However not all of the former campus has been included within the OP7 designation. The Gordon Centre has not been used by North East Scotland College (NESCOL) for teaching facilities since 2011, is no longer required for teaching purposes and its redevelopment of the larger site will form part of NESCOL's strategic plan going forward.

### **Modifications sought by those submitting representations:**

#### **Mill of Mundurno**

31: Remove land adjacent to Mill of Mundurno from Green Belt and Green Space Network and identify as a greenfield allocation post 2017.

#### **Land at Balgownie (B0203)**

63: Rezone to Mixed Use development encompassing expansion of Aberdeen Science & Technology Park, student and key worker accommodation and recreational/open space.

#### **Persley Croft (B0101)**

71: Site at Persley Croft to be included in the LDP.

#### **Mundurno (B0202)**

85: Site should be allocated to accommodate 500 houses in each phase of the Plan (1,000 in total) with associated ancillary uses and community facilities. Consequential changes to Proposals Map, Bridge of Don/Grandhome growth area, Tables 2 and 3 of the Proposed Plan and additional consequential amendments to text.

#### **Land at Shielhill (B0206)**

118: Land at Shielhill is removed from the Green Belt/Green Space Network zoning and allocated as an 'Opportunity Site' suitable for up to 250 key worker houses. Allocation to be subject to Masterplan to be agreed with the Planning Authority.

#### **Causewayend (B0210)**

150: Identify site to help delivery housing land now or into the future as a draw-down site should the failure to deliver the current allocations continue.

### **Shielhill Farm (B0205)**

152: Remove the Green Belt designation and allocate phased residential development for approximately 1,000 houses and other Mixed Use development with anticipated commencement in 2020.

### **Land at Perwinnes/North of Don Masterplan (B0209)**

156: Allocate the site or identify it as strategic reserve.

### **OP7 Aberdeen College Gordon Street**

109: Request that boundary be extended (as per plan attached to representation) and site be identified as an Opportunity for mixed use.

## **Summary of response (including reasons) by planning authority:**

### **General Strategy**

In preparing the Proposed Plan a Development Options Assessment (CD28, CD30 and CD31), Strategic Environmental Assessment (CD27), and Main Issues Report (CD29) were used to identify the most suitable locations to deliver the required growth. The majority of greenfield sites identified in the Proposed Plan have been carried over from the Aberdeen Local Development Plan 2012 (CD42) which went through a similar process at that time. Most of these sites are at an advanced stage in terms of planning consents and Masterplans as detailed in the latest version of the Action Programme (CD47).

The Aberdeen City and Shire Strategic Development Plan (SDP) 2013 (CD12) sets the requirements for greenfield housing and employment land allowances and these are set out in Figure 1 of the SDP on page 12 and in Schedule 1 on page 42. Under Issue 2 we conclude that the SDP greenfield requirements have been fully met and we are confident that a continuous 5 year housing land supply can be met throughout the lifetime of this LDP. Accordingly, we do not consider it necessary to allocate any further greenfield sites beyond those already identified in the Proposed Plan.

### **Mill of Mundurno**

31: We do not propose to allocate this site for development. The site was previously considered during the extant Local Development Plan 2012 Examination and rejected by the Reporter (CD44, Issue 11). Aberdeen City Council has reassessed this site, considered it undesirable, and rejected it on the grounds set out in the Proposed Plan Site Assessment Report (CD31). The B999 to the south of the site is a very busy road which helps to form a clear, robust and defensible Green Belt

boundary. Developing north of the B999 (above and beyond the existing Premier Inn development) would extend the built up area into open countryside. Residential development on this site would intrude significantly into the surrounding landscape. The site is isolated from local facilities and there are few sustainable transport options, making any development in this location heavily car reliant. This land should therefore remain as Green Belt.

### **Land at Balgownie (B0203)**

63: We do not propose to allocate this site for development. The site was previously considered during the extant Local Development Plan 2012 Examination and rejected by the Reporter (CD44, Issue 9). Aberdeen City Council has reassessed this site, considered it undesirable, and rejected it on the grounds set out in the Proposed Plan Site Assessment Report (CD31). The Green Space Network and Urban Green Space designations remain appropriate. The site is central to the Bridge of Don area and is easily accessible to local residents. The population will grow when the Proposed Plan allocations are implemented. This will generate an increased need for open space/playing fields. We acknowledge the improved facilities at Aberdeen Sports Village, however, these cannot compensate for the loss of local provision at Bridge of Don. While the University may no longer have a requirement for its own use, there is no evidence to suggest that there isn't a wider community requirement for this area of open space to be retained.

Scottish Planning Policy (SPP) (CD05, paragraph 226) allows for playing fields to be redeveloped where, among other reasons, a relevant strategy and consultation with **sportscotland** show that there is a clear excess of provision to meet current and anticipated demand in the area. This has not been demonstrated. SPP, paragraph 224, states that "Local Development Plans should identify and protect open space identified in the open space audit." This site is identified in the Council's Open Space Audit 2010 (CD41 pg 100). The site is close to public transport and core paths, which reinforces its importance within the Green Space Network and the opportunity it presents for recreational use. Although the Third Don Crossing route runs close by there will be no direct vehicle access to the site.

### **Persley Croft (B0101)**

71: We do not propose to allocate this site for development. Aberdeen City Council has assessed this site, considered it undesirable, and rejected it on the grounds set out in the Proposed Plan Site Assessment Report (CD31). The site is subject to significant constraints regarding access. The site is considered to be undesirable for development due to its location directly on the A90 Trunk Road (The Parkway), which is a major transport route. The Parkway severs the site from nearby residential development, services and facilities at Danestone, and would be very difficult and hazardous for pedestrians and cyclists to cross. The Parkway is a robust Green Belt boundary in this area. Considering the plans for development at Grandhome, it cannot be assumed that this road will become a significantly quieter local road post-Aberdeen Western Peripheral Route (AWPR). The responsibility of upkeep and maintenance of land lies with the landowner and is not a matter for the Development Plan process.

### **Mundurno (B0202)**

85: We do not propose to allocate this site for development. The site was previously considered during the extant Local Development Plan 2012 Examination and rejected by the Reporter (CD44, Issue 11). Aberdeen City Council has reassessed this site, again considered it undesirable, and rejected it on the grounds set out in the Proposed Plan Site Assessment Report (CD31). The site is currently zoned as Green Belt and Green Space Network and performs its Green Belt functions by contributing to the identity and landscape setting of the city, and preventing coalescence between Bridge of Don and Potterton. It is isolated from the existing settlement of Denmore by the B999 and topographical changes. Local primary schools could not cater for the demand generated by a development of this size. It is unlikely this scale of development could support the necessary neighbourhood facilities and services to significantly reduce residents' need to travel. There is no requirement for this site in addition to the Dubford site and other Bridge of Don sites.

### **Land at Shielhill (B0206)**

118: We do not propose to allocate this site for development. The site was previously considered during the Pre-Main Issues Report (Pre-MIR) stage and rejected as being unsuitable for development as a Quarry, as set out in the Pre-MIR Development Options Assessment Report (CD28). Aberdeen City Council has reassessed this site based on the updated proposal for residential use, considered it undesirable, and rejected it on the grounds set out in the Proposed Plan Site Assessment Report (CD31). This site lies to the west of the Dubford development. The Green Belt Review (CD38, pages 4-6 of 30) which supported the extant Aberdeen Local Development Plan 2012 found that the edge between Dubford and the proposed land at Shielhill site forms a clear boundary with a pronounced difference in vegetation between the gorse and heathland to the west and the improved grassland to the east. Residential development on this site would intrude significantly into the surrounding landscape. The site sits in an elevated position and is visible from a considerable distance. The site is isolated from local facilities and there are few sustainable transport options, making any development in this location heavily car reliant. The site lies within the Scotstown Local Nature Conservation Site (LNCS). This land should remain as Green Belt.

### **Causewayend (B0210)**

150: We do not propose to allocate this site for development. The site was previously considered during the extant Local Development Plan 2012 Examination and rejected (CD44, Issue 84). Aberdeen City Council has reassessed this site, considered it undesirable, and rejected it on the grounds set out in the Proposed Plan Site Assessment Report (CD31). Development on this site would have a severe impact on the surrounding landscape and weaken the defensible Green Belt boundary to the north of the city. The views from the B997 Scotstown Road would be prominent. The site is not well integrated with the existing settlement and it is thought that it would be difficult to link a new road between existing settlements to the south at Woodcroft to the proposed development. Consequently road access would need to be made on to the road to the north of the site and this may have safety implications. There would be some concern for pedestrians or cyclists aiming to

avoid the use of the car. This could lead to increased car dependency which is against policies described in national, regional and local policy. Alternative sites in more appropriate and sustainable locations throughout the city have been identified. These allocations meet the requirements set out in the SDP. Sufficient allocations have already been made in the Bridge of Don area to support the Energetica Corridor.

### **Shielhill Farm (B0205)**

152: We do not propose to allocate this site for development. Aberdeen City Council has assessed this site, considered it undesirable, and rejected it on the grounds set out in the Proposed Plan Site Assessment Report (CD31). The site is currently zoned as Green Belt and Green Space Network and performs its Green Belt functions by contributing to the identity and landscape setting of the city, and preventing coalescence between Bridge of Don and Potterton. It is relatively remote from existing facilities. Local primary schools could not cater for the demand generated by a development of this size. It is unlikely this scale of development could support the necessary neighbourhood facilities and services to significantly reduce residents' need to travel. There is no requirement for this site in addition to the Dubford site and other Bridge of Don sites.

### **Land at Perwinnes/North of Don Masterplan (B0209)**

156: We do not propose to allocate this site for development. The site was previously considered during the extant Local Development Plan 2012 Examination and rejected (CD44, Issue 11). Aberdeen City Council has reassessed this site, considered it undesirable, and rejected it on the grounds set out in the Proposed Plan Site Assessment Report (CD31). The proposal would have an impact on the overall Spatial Strategy of the Proposed Plan and would require a major reassessment of the proposed sites across the entire city. Many of the aims of the North of Don Masterplan are equally achievable by masterplanning the sites which are already allocated in the Proposed Plan. Having such a high proportion of allocations in the Bridge of Don area would reduce the choice of sites available elsewhere in the city and may prove more difficult to deliver the required development within the timescales envisaged. The site is deemed undesirable as it is open farmland and is a highly visible exposed hill. The hill is a landmark that provides a backdrop to development at Bridge of Don and helps to contain it. The site is poor in access terms, although it may be large enough to support its own services, facilities and public transport. However, development breaking out over the lower ground to the south before climbing up Perwinnes Hill would add a sense of urban sprawl and isolation unconnected to the existing urban area. Sufficient allocations have already been made in the Bridge of Don area to support the Energetica Corridor.

### **OP7 Aberdeen College Gordon Street**

109: The extent of the boundary in the Proposed Plan is the same as in the extant Local Development Plan 2012 (CD42). No submission, bid for development, or indication of a desire to amend the zoning has been submitted until this point in the

Development Plan preparation cycle.

Insufficient detail has been provided with regard to the type of mixed use which may be proposed on the site. Aberdeen City Council has assessed this site, considered it undesirable, and rejected it on the grounds set out in the Proposed Plan Site Assessment Report (CD31). In light of the adjacent primarily residential land uses it would not be appropriate to rezone the land as Mixed Use where there is uncertainty as to the type of uses proposed.

The boundary of Proposed Plan site OP7 Aberdeen College Gordon Centre should remain as proposed. The site is made up of redundant, unused land and buildings which Aberdeen College would like to see redeveloped in the future. The Opportunity Site is currently covered by residential designation (under Proposed Plan Policy H1 – Residential Areas). The remaining area owned by North East Scotland College (NESCOL) to the west of the site is also covered by a residential designation (Proposed Plan Policy H1). Proposed Plan Policy H1 states that new residential development will be approved in principle if it meets certain criteria relating to amenity. NESCOL would be able to redevelop the site to a complimentary use if the proposal was in accordance with the corresponding policies within the adopted Local Development Plan.

**Reporter's conclusions:**

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**Reporter's recommendations:**

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<b>Issue 5</b>	<b>ALLOCATED SITES &amp; GENERAL AREA STRATEGY: DYCE, BUCKSBURN &amp; WOODSIDE</b>	
<b>Development plan reference:</b>	Pages 11-12; Pages 80-82; Proposals Map; Appendix 2; Appendix 4; Appendix 6; Masterplan Table Page 38	Reporter:
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
<p>Mrs Evelyn Clark (14)  Mrs Evelyn Clark on behalf of Rented Accommodation (15)  Mrs Susan Fraser (19)  Mrs Sandra Rae (20)  Mr Gordon MacCallum of Keppie Planning Ltd on behalf of CALA Management Ltd and SRUC (24)  Mr Hugh Cumming (32)  Mr &amp; Mrs Ewen (48)  Mr Rab Dickson of the North East of Scotland Transport Partnership (59)  Mr Michael Lorimer of Ryden LLP on behalf of The University of Aberdeen/ Bon Accord Land Promotion Ltd (73)  Mrs Pippa Gardner of Progress Planning Consultancy Ltd on behalf of Miller Development Ltd (74)  Mr Ben Freeman of Bancon Developments (183)</p>		
<b>Provision of the Development Plan to which the issue relates:</b>	Overview of Direction for Growth in this area and specific OP sites	
<b>Planning authority's summary of the representation(s):</b>		
<p><b>Land Supply</b></p> <p><u>OP21 Rowett South</u></p> <p>73: To be consistent with the Strategic Development Plan the full allocation of 1940 units should be allocated within the Local Development Plan. Constraints on site due to the Council postponing the determination of pending applications within the Newhills Expansion Area and Dyce Drive Corridor until a cumulative impact assessment was undertaken and infrastructure requirements established. Build rates have been pushed back. University request that the 240 units within Phase 2 be brought forward to Phase 1 allocation.</p> <p><u>OP23 Dyce Drive</u></p> <p>74: Welcome the Land Release Strategy. OP23 has been omitted from the Table and no detailed reference to its contribution to the development of land supply is provided. This is important in representing the land supply in this location correctly.</p>		

## **Shortfall of Units**

183: The 2015 Housing Land Audit suggested the delivery rate anticipated in the Plan will not be achieved. There is a shortfall of 2,290 units in this area

## **OP18 Craibstone North and Walton Farm**

24: Object to allocation. Employment land in this corridor is in excess of the Structure Plan requirement of 60 hectares available at all times. Dyce Drive and Rowett North will meet the requirements. The site will not be required by 2027 and its continued reservation is having a blighting effect for no productive or sustainable reason. Assumed as generating traffic in Newhills traffic model by 2023 but the LDP doesn't envisage development until past 2027. This requires clarification.

## **OP14 Bankhead Academy**

19: Respondent's home, Bankhead School Lodge, is within the boundary of the site. Request to remove this from the Opportunity Site.

## **OP86 Dyce Railway Station Objection**

14, 15, 20, 32, 48: on the basis of loss of amenity space and open views. Car parking close to rear of properties. Negative impact on residents through noise and disturbance, especially at night, possible increase in anti-social behaviour and overlooking. Increase in traffic, light pollution and possible damage to residential properties. Union Row and Station Road not suitable for an increase in traffic.

Access - 20, 32: No access or detail given on the car park entrance.

Support - 59: Welcome allocation of the site. The North East of Scotland Transport Partnership (Nestrans) have commissioned a study to support this allocation. It includes background and context; demand; consultations; objectives; appraisal of options; design of car park and next steps.

## **Modifications sought by those submitting representations:**

### **Land Supply**

#### OP21 Rowett South

73: The full allocation of 1940 units should be allocated in the next Local Development Plan.

#### OP23 Dyce Drive

74: Amendment to Table 4 of the Proposed Plan to record Dyce Drive as an active

development site.

### **Shortfall of Units**

183: Additional housing sites need to be allocated.

### **OP18 Craibstone North and Walton Farm**

24: Re-allocate the site as mixed use, residential and educational. Remove as a reserved site for employment uses. This will avoid planning blight and assist the proposals the shorter-term allocated sites OP19 and OP23.

### **OP14 Bankhead Academy**

19: Bankhead School Lodge removed out of the boundary of the proposed site.

### **OP86 Dyce Railway Station**

14, 15: Leave it as green space. If car park goes ahead ensure space between the houses, walls and car park.

20: More parking restrictions.

32: Respondent would like the opportunity to purchase land behind his property to provide a buffer between his house and the proposed car park.

## **Summary of response (including reasons) by planning authority:**

### **Land Supply**

#### OP21 Rowett South

73: As discussed in Issues 2, we contend that the Proposed Plan is consistent with the Aberdeen City and Shire Strategic Development Plan (SDP) 2014 (CD12). Table 2 of the Proposed Plan (page 9) shows that up to the period 2026 the Proposed Plan allocates 16,982 greenfield homes. This is 18 homes short of the 17,000 SDP allowance over the same period. The 0.1% shortfall is not considered to be of any material significance and therefore it is not considered necessary to bring forward the 240 homes within Phase 2 to the Phase 1 allocation for Rowett South. The SDP is also clear (in paragraph 5.5), that in exceptional circumstances planning permission can be granted on sites within the 2027-2035 period. Work is currently underway on a transport study in the area and until the completion of this study it would also be premature to make any changes to the phasing.

#### OP23 Dyce Drive

74: Proposed Plan site OP23 is not included in Table 4 of the Proposed Plan

because it was identified in the Aberdeen Local Plan 2008 (CD43). It therefore pre-dates the allocations that have arisen out of the Aberdeen City and Shire Strategic Development Plan 2014 and the Aberdeen City and Shire Structure Plan 2009 (CD19). It is still proposed as an Opportunity Site because parts of the site are undeveloped and still have to obtain planning consent.

### **Shortfall of Units**

183: The issue regarding any shortfall of housing units is addressed within Issue 2: Housing and Employment Land Supply.

### **Sites**

In preparing the Proposed Plan a Development Options Assessment (CD28/30/31), Strategic Environmental Assessment (CD27), and Main Issues Report (CD29) were used to identify the most suitable locations to deliver the required growth. The majority of greenfield sites identified in the Proposed Plan have been carried over from the Aberdeen Local Development Plan 2012 (CD42) which went through a similar process at that time. Most of these sites are at an advanced stage in terms of planning consents and Masterplans as detailed in the latest version of the Action Programme (CD47).

The Aberdeen City and Shire Strategic Development Plan (SDP) 2014 (CD12) sets the requirements for greenfield housing and employment land allowances and these are set out in Figure 1 of the SDP on page 12 and in Schedule 1 on page 42. Under Issue 2 we conclude that the SDP greenfield requirements have been fully met and we are confident that a continuous 5 year housing land supply can be met throughout the lifetime of this LDP.

### **OP18 Craibstone North and Walton Farm**

24: This site was chosen following a rigorous assessment of all proposed development options during the preparation of the extant Local Development Plan 2012. It was found to be ideally located for employment development particularly, due to the existing allocations for employment land and Park & Choose in the immediate area. At the Examination into the extant Local Development Plan 2012 the Reporter found the site to be suitable for development. In the Examination report (CD13, Issue 14) the Reporter recognised that, in order to guarantee the availability of the employment land target set out by the Strategic Development Plan, an over-allocation for the Plan period is appropriate. Paragraph 2.16 of the Proposed Plan states that "The overall allocations are more than required by the Strategic Development Plan. It is important to take account of factors that will reduce the actual developable area of employment land such as strategic landscaping, the presence of pylons or other uses within zoned sites and land required for transportation". Therefore a change in the zoning of this site to that of mixed use, residential and educational is considered to be unnecessary. In relation to traffic modelling, the site is identified for 1.5 hectares up to 2027 and 18.5 hectares post 2027. The plan is therefore clear that regardless of separate traffic modelling projects the site is not due to come forward until 2027.

### **OP14 Bankhead Academy**

19: It is not the purpose of the Local Development Plan Proposals Map to make a distinction between private and public property. The map is intended to show land use zonings and allocations for new development sites across the city. The identification of a property such Bankhead School Lodge within an Opportunity Site does not force the landowner to develop the site but simply identifies that the site is suitable for development for the identified purpose. No change is therefore proposed.

### **OP86 Dyce Railway Station**

59: Support for OP86 is welcomed. The existing car park and surrounding streets have a limited capacity of 82 spaces (RD72). A recent report prepared for the North East of Scotland Transport Partnership (Nestrans), Dyce Rail Station Car Park – Initial Appraisal (RD72), has shown that the available car parking is reaching capacity and that with improvement works due to be undertaken by Network rail demand could reach 164 spaces by 2035.

The current situation has resulted in a reasonable amount of on-street parking in the vicinity that could be attributed to commuters. Scottish Planning Policy (SPP) Para 275 (CD05) is clear that Development Plans are required to identify rail infrastructure and support its delivery. Within National Planning Framework 3 (CD04) there is programmed investment in the Aberdeen to Inverness rail line including improvements between Aberdeen and Inverurie due to be complete by 2019. With these improvements now committed, as noted earlier demand at Dyce Railway Station is likely to increase. Through the Nestrans Regional Transport Strategy Refresh, approved by ministers January 2014, the section in relation to Rail (IC1), on page 24, (RD51) actively promotes commuter rail travel. Dyce Railway Station forms a key part of this network. The provision of the car park will encourage and promote a sustainable transport method and help to alleviate parking congestion in the area.

14, 15, 20, 32, 48: Issues in relation to the layout of the car park and the impacts of noise, light, overlooking etc. will all be considered as part of any future planning application. The provision of buffer strips and landscape to protect the amenity of the surrounding residences will be considered at that time. Issues in relation to Anti Social Behaviour are a matter for the police however the provision of a formal managed carpark will likely discourage the type of anti social behaviour that could take place on the current unmanaged open space.

Access – 20, 32: As the proposal is an extension to the existing car park, details surrounding access are more appropriately dealt with at the planning application stage and not within the Proposed Plan.

Purchase of Land – 32: The Local Development Plan does not cover matters involving the buying and selling of land.

<b>Reporter's conclusions:</b>
<b>Reporter's recommendations:</b>

<b>Issue 6</b>	<b>ALTERNATIVE SITES: DYCE, BUCKSBURN &amp; WOODSIDE</b>	
<b>Development plan reference:</b>	No reference in the Plan	Reporter:
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
<p>Mr Ian Livingston of Ryden LLP on behalf of University of Aberdeen (63)  Mr Anthony Aiken of Colliers International on behalf of MacTaggart and Mickel Homes (123)  Ms Meabhann Crowe of Colliers on behalf of MacTaggart and Mickel Homes and Mr Fabrizio Necchi (163)  Mr Simon Pallant of Scottish Government Planning and Architecture Division on behalf of Transport Scotland (167)  Mr Colin Fraser of Park Home Estates (170)  Mr Ben Freeman of Bancon Developments (183)</p>		
<b>Provision of the Development Plan to which the issue relates:</b>	Alternative sites in Dyce, Bucksburn & Woodside	
<b>Planning authority's summary of the representation(s):</b>		
<p><b>Land at Hillhead Centre (B0601)</b></p> <p>63: Object to the land at Hillhead Centre not being included as an Opportunity Site for residential development on the basis that, the site should not be identified as Green Belt, is close to the University, is a brownfield site and due to the shortfall in housing numbers.</p> <p><b>Lands adjacent to Bucksburn Primary School (B0102)</b></p> <p>123: Object to the lands adjacent to Bucksburn Primary School not being included as an Opportunity Site for residential development on the basis that, the site is well connected to services, it should not be identified as Green Belt or Green Space Network (and that these issues can be addressed through landscaping), that the site was previously identified in the Proposed Local Development Plan 2010 and only removed at Examination, that the site could help improve biodiversity and that site could address housing need in the short to medium term.</p> <p><b>Land South and West of Bucksburn Primary School</b></p> <p>163: Object to the land South and West of Bucksburn Primary School not being included as an Opportunity Site for residential development, on the basis that the site is well connected to services, should not be identified as Green Belt or Green Space Network (and that these issues can be addressed through landscaping), that the site was previously identified in the Proposed Local Development Plan 2010 and only removed at Examination, that the site could help improve biodiversity and that site</p>		

could address housing need in the short to medium term.

### **Green Belt and Green Space Network**

163: There should be a review of the Green Belt and Green Space Network.

### **Housing Land Supply**

163: Reference to how shortfalls from the Masterplan Zone developments are to be dealt should be included in the Proposed Plan.

### **Dyce Transport Study**

167: Suggestion that details of the ongoing cumulative microsimulation transport modelling of land allocations adjacent to the A96T near Dyce, should be included in the Action Programme.

### **Cairnfield Place**

170: Proposal to rezone land off Cairnfield Place, Bucksburn as residential or mixed use.

### **Persley Park**

170: Proposal to rezone Persley Park Mobile Home Park as Residential or Mixed Use on the grounds that the identification of the site as Green Belt is no longer appropriate, that the site will remain developed as a Mobile Home Park regardless of its status in the Plan and due to changes in the level of development in the surrounding area.

### **Clinterty (B0104)**

183: Object to the non-allocation of Clinterty (B0104) for approximately 100 houses and associated facilities on the grounds that, the site should not be identified as Green Belt, that the site will consolidate a scattered group of houses and will make up for constrained housing supplies in the area.

## **Modifications sought by those submitting representations:**

### **Land at Hillhead Centre (B0601)**

63: The site should be identified for residential development and open space provision, incorporating student and key workers accommodation.

### **Lands adjacent to Bucksburn Primary School (B0102)**

123: Include land at Bucksburn as a site for residential development in the Proposed Plan. Remove the Green Space Network designation at land at Bucksburn to allow

for sensitive residential development to take place and green networks to be created and enhanced via a well-designed and appropriate landscape framework. The Green Belt boundary as depicted on the Proposed City Wide Proposals Map reviewed to exclude land at Bucksburn and create a stronger boundary between the built form and the Green Belt beyond.

### **Land South and West of Bucksburn Primary School**

163: Include land at Bucksburn as a site for residential development in the emerging Local Development Plan.

### **Green Belt and Green Space Network**

163: Review how the Masterplan Zones (particularly Zone 3 and 4) affect the area of Bucksburn. Have a review of the Green Belt and Green Space Network to assist in linking these Zones without detrimentally affecting the small area of Bucksburn which has been omitted from either Zone. Form a robust, defined Green Belt boundary linking Masterplan Zones 3 and 4, which will allow for small-scale development/infill to take place on our client's site (land at Bucksburn).

### **Housing Land Supply**

163: Include reference to how shortfalls from the masterplan zone developments are to be dealt with as the Plan progresses.

### **Dyce Transport Study**

167: The Proposed Plan Action Programme should be amended to recognise the on-going study of the cumulative impacts of the allocations within the Dyce area, the associated transport constraints and the likely nature, scale and cost of transport interventions required to support the delivery of these allocations.

### **Cairnfield Place**

170: Change classification (from yellow with black dots) to Residential or Mixed Use.

### **Persley Park**

170: Change zoning from Green Belt/Brownfield to Residential or Mixed Use.

### **Clinterty (B0104)**

183: Remove Clinterty from the Green Belt and allocate as a small scale, up to 100 houses, development with local services.

**Summary of response (including reasons) by planning authority:**

In preparing the Proposed Plan a Development Options Assessment (CD28/30/31), Strategic Environmental Assessment (CD27), and Main Issues Report (CD29) were used to identify the most suitable locations to deliver the required growth. The majority of greenfield sites identified in the Proposed Plan have been carried over from the Aberdeen Local Development Plan 2012 (CD42) which went through a similar process at that time. Most of these sites are at an advanced stage in terms of planning consents and Masterplans as detailed in the latest version of the Action Programme (CD47).

The Aberdeen City and Shire Strategic Development Plan (SDP) 2014 (CD12) sets the requirements for greenfield housing and employment land allowances and these are set out in Figure 1 of the SDP on page 12 and in Schedule 1 on page 42. Under Issue 2 we conclude that the SDP greenfield requirements have been fully met and we are confident that a continuous 5 year housing land supply can be met throughout the lifetime of this LDP. Accordingly, we do not consider it necessary to allocate any further greenfield sites beyond those already identified in the Proposed Plan.

**Land at Hillhead Centre (B0601)**

63: We do not propose to allocate this site for development. Aberdeen City Council have assessed this site, considered it undesirable and rejected it on the grounds set out in the Proposed Plan Site Assessment Report (CD31). The proposal would lead to the loss of open space and tree cover in the Old Aberdeen Conservation Area. The site is also classified as Green Belt and Green Space Network. In terms of school capacity, St Machar Academy is due to reach capacity by 2022 and Seaton Primary is currently over capacity at 112% in 2015 (CD32).

**Lands adjacent to Bucksburn Primary School (B0102)**

123: We do not propose to allocate this site for development. The site was previously considered during the extant Local Development Plan 2012 Examination and rejected by the Reporter who recommended that this site (known then as OP27) should remain as Green Belt and part of the Green Space Network "to ensure a robust defensible green belt boundary for this part of Bucksburn". (CD44, Issue 18). Aberdeen City Council have reassessed this site, considered it undesirable and rejected it on the grounds set out in the Proposed Plan Site Assessment Report (CD31). While the site is in a relatively sustainable location with access to services there is no clear access to the site for vehicular traffic with an already constrained access point to the school from the A96. The topography of the site would also make development challenging in terms of layout, and as the site is within the Airport Contour Zone there may be restrictions on building heights. In terms of school capacity, Bucksburn Academy is due to reach capacity by 2020 and Brimmond Primary by 2018 (CD32).

## **Land South and West of Bucksburn Primary School**

163: The representation suggests that this site was included in the Proposed Local Development Plan 2010 (known then as OP27 (refer text above)) and subsequently removed by the Reporter at Examination, which is incorrect. The site is adjacent to the OP27 site (Lands adjacent to Bucksburn School) which was removed by the Reporter, and the site subject to this representation did not form part of that allocation.

We do not propose to allocate this site for development. This site was not put forward at the Pre-Main Issues Report Call For Sites stage in 2013, or submitted as a representation to the Main Issues Report in 2014. It has therefore only been proposed as a representation to the Proposed Plan. Aberdeen City Council has assessed this site, considered it undesirable and rejected it on the grounds set out in the Proposed Plan Site Assessment Report (CD31). Many of the site constraints from the adjoining site (discussed above) also apply to this site. The topography of this site is extremely challenging with a very steep incline for the majority of the site (approximately 1:6). Vehicular access would be particularly difficult due to this incline as would the site layout. The site is within the Airport Contour Zone which may restrict building heights and is also identified as potential contaminated land from a former quarry. In terms of school capacity, Bucksburn Academy is due to reach capacity by 2020, and Brimmond Primary by 2018 (CD32).

## **Green Belt and Green Space Network**

163: The issue of the boundary of the Green Space Network is dealt with in Issue 30 Policy NE1: Green Space Network and the boundary of the Green Belt is dealt with in Issue 31 Policy NE2: Green Belt.

## **Housing Land Supply**

163: The issue of Housing Land Supply is dealt with in Issue 2 Housing and Employment Land Supply and Policy LR1.

## **Dyce Transport Study**

167 At the time of preparing the Proposed Plan the scope of the transport study at Dyce was still being investigated. While an outline of the scope of the project and the expected detail are included in Proposed Supplementary Guidance Developer Obligations (CD25), it is proposed to significantly increase this detail prior to adoption of the Supplementary Guidance and once the study is complete. The development industry has been fully engaged with the study from the outset, and has provided significant assistance including working on draft legal agreements (under Section 75 of the Town and Country Planning (Scotland) Act 1997, as amended) and costings for developments in the surrounding area. The inclusion sought by the respondent in relation to the Proposed Action Programme (CD47) is reasonable. It is proposed to make the modification sought prior to adoption of the Proposed Action Programme.

**Cairnfield Place**

170: Land off Cairnfield Place is currently identified as Mixed Use, as is requested by the representation. The 'green dots' represent Green Space Network which would need to be considered as part of any future development of the site. Proposed Plan Policies H2 Mixed Use Areas and NE1 Green Space Network set out details of what development is acceptable in this regard. No action is therefore required.

**Persley Park**

170: This site was not put forward at the Pre-Main Issues Report Call For Sites stage in 2013, or submitted as a representation to the Main Issues Report in 2014. It has therefore only been proposed as a representation to the Proposed Plan. We do not propose to allocate this site for development. Aberdeen City Council has assessed this site, considered it undesirable, and rejected it on the grounds set out in the Proposed Plan Site Assessment Report (CD31). While the site is in a relatively sustainable location, close to some services and facilities, it is very prominent from the A90 which forms a strong boundary for the Green Belt. The existing Mobile Home Park is low density and very well screened and, as such, it has a very limited visual impact. Development on the site would have a negative impact on the Dyce Valley Prime Landscape Area and the adjacent River Don Corridor Local Nature Conservation Site. It would also weaken the strong Green Belt boundary that is formed by the A90. In terms of school capacity, Bucksburn Academy is due to reach capacity, by 2020 and Brimmond Primary by 2018 (CD32).

**Clinterty (B0104)**

183: Aberdeen City Council have assessed this site, considered it undesirable and rejected it on the grounds set out in the Proposed Plan Site Assessment Report (CD31) Whilst the site could potentially be developed and is free from absolute constraints, it is divorced from Aberdeen with no local services or transport links, and providing such links for walking, cycling and public transport would be difficult. The issue of housing land supply is dealt with in Issue 1 Vision and Spatial Strategy.

**Reporter's conclusions:**

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**Reporter's recommendations:**

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<b>Issue 7</b>	<b>ALLOCATED SITES &amp; GENERAL AREA STRATEGY: KINGSWELLS &amp; GREENFERNS</b>	
<b>Development plan reference:</b>	Pages 12-13, Pages 82-83, Proposals Map, Table 5, Table 5 notes, Appendix 2, Appendix 4: Masterplan Zones Table	Reporter:
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
<p>Mrs Elizabeth Reid of Albion Boarding Kennels (53)  Mrs Elaine Farquharson-Black of Burness Paull LLP on behalf of EnerMech Group Limited (81)  Ms Christine Dalziel of Halliday Fraser Munro on behalf of Drum Kingswells Business Park Ltd (134)  Mr Dominic Fairlie of Aberdeen Civic Society (136)  Ms Emelda Maclean of Emac Planning LLP on behalf of Scotia Homes (152)  Mr Ian Cox of Kingswells Community Council (177)  Mr Ben Freeman of Bancon Developments (183)</p>		
<b>Provision of the Development Plan to which the issue relates:</b>	Overview of Direction for Growth in this area and specific Opportunity Sites	
<b>Planning authority's summary of the representation(s):</b>		
<p><b>OP31 Maidencraig South East</b></p> <p>53: Object to residential development on this site due to the fact that there is an existing boarding kennel business within the site. The boarding kennels could cause loss of privacy for local residents, and potential noise and disturbance issues.</p> <p><b>OP33 Greenferns</b></p> <p>81: Supports the continued allocation of OP33 for mixed use development. Seeks the removal of Green Space Network designation from the campus area. Seeks the following changes to the Development Framework - the EnerMech campus should not be identified as an area of residential use. The blocks currently identified as 'C' and 'I' should be zoned for the expanded EnerMech campus. Phasing should also be altered to include areas C and I within the first phase of the development, and the local distributor road should be constructed in its entirety from Provost Fraser Drive to Provost Rust Drive.</p> <p><b>OP63 Prime Four Extension</b></p> <p>134: Support the site's inclusion in the Proposed Plan as a Specialist Employment area.</p> <p>136: The existing design for the Prime Four Extension is very low density and could</p>		

be increased. The site appears to be car oriented which is disappointing.

177: Objects to the inclusion of OP63 in the Proposed Plan on the following grounds. The site was considered as "undesirable" in the Aberdeen Local Development Plan Main Issues Report due to its intrusion into the surrounding landscape and there being insufficient over-riding benefits to justify its allocation for development.

The developer for this site has argued that their Phase 4 site is isolated from the road network and will be difficult to develop even when AWPR is in place. This temporary isolation of the Phase 4 site should not be used as a reason to press for inclusion of OP63 in the Plan. This access issue has only been highlighted as a problem post MIR despite the site being identified on plans for at least 4 years.

The developer for this site is seeking to expand their overall land allocation. The developer has not said they wish to substitute OP63 for the Phase 4 site and intends to develop both sites when access becomes available. Aberdeen City Council should not be supporting this as the combined land allocation exceeds the requirements of the Strategic Development Plan.

The inclusion of OP63 as an additional site will have a serious visual impact on the local landscape, damage the natural environment and have an adverse impact on the local road traffic.

Access for Phase 4 can be achieved through the existing road network within Prime Four. The developer has expressed a preference to access Phase 4 (and OP63) from the AWPR. However this would result in additional traffic congestion.

Aberdeen City Council made it clear from the outset of the new ALDP that no additional employment land was required as the adopted ALDP already met the requirements of the Strategic Development Plan.

The ALDP must take account of the other large business park developments under construction in and around the city together with premises being vacated as employers re-locate to new developments. If OP63 is included in the Development Plan, then the Phase 4 site becomes immediately accessible by means of a shared access route.

The developer is pressing for OP63 to be included in the ALDP to justify the expense of an access from the AWPR.

OP63 is an elevated site and is clearly visible from Westhill and the A944. The Quaker Burial Ground sits prominently in one of the fields of OP63 and will be devalued by a backdrop of modern buildings. The Burial Ground gives the area uniqueness and sense of place.

OP63 is bounded by West Woods of Hatton to the east and north which is both Ancient Woodlands and a Local Nature Conservation Site. The majority of OP63 was previously designated as Green Space Network in recognition of its conservation

and landscape value. Further development at OP63 will box in most of the Ancient Woodland and impact on its capacity to serve as a shelter and wildlife corridor.

Scottish Government ensured that the line of the AWPR avoided both the Burial Ground and Ancient Woodland. Respondent argues that Aberdeen City Council should not be prepared to ruin both sites now by allocating OP63 as a major development site.

### **Development at Kingswells and Greenferns**

152: Table 5 of the Proposed Plan identifies the two main housing sites as Maidencraig (750 homes) and Greenferns (1,350 homes plus 10 hectares employment land). The housing land supply for this area is dependent on the deliverability of these two strategic sites. The allocation of the Kingswells East site for 80 homes would provide increased flexibility in the delivery of effective housing land. The Kingswells East site is well located in relation to existing settlement and planned expansion.

183: Only the Greenferns site is phased to continue into 2017 and onwards to 2035. The 2015 Housing Land Audit suggests that up to 2026 there will be a shortfall of 950 units. An additional 350 units need to be allocated to meet the Strategic Development Plan requirements for 2017-2026.

### **Modifications sought by those submitting representations:**

#### **OP33 Greenferns**

81: Page 83 of the Plan should refer to the requirement to update the current Development Framework to identify EnerMech's campus within Greenferns as an area of commercial use, along with the areas of land which they have identified as suitable for their expansion plans. The Green Space Network should be removed from the campus, as it will restrict opportunities to develop the site. The detail of the development of the campus and the open space within the site should be determined as part of a masterplan for the EnerMech campus.

#### **OP63 Prime Four Extension**

177: Delete OP63 as a site for development.

### **Development at Kingswells and Greenferns**

152: Include land at Kingswells East for 80 homes.

183: Additional housing sites need to be allocated for this area.

## Summary of response (including reasons) by planning authority:

### **OP31 Maidencraig South East**

53: The principle of development on this site has already been established. This site was Examined by Reporters as part of the Examination into the Aberdeen Local Development Plan 2012 (CD44, Issue 29) and has been carried forward into the Proposed Plan from the extant Local Development Plan (previously known as OP43). The Maidencraig Masterplan (RD52) was adopted as Supplementary Guidance to the extant Local Development Plan in March 2013, and sets out how this site, and the site to the north (Proposed OP32 Maidencraig North East), are to be developed. Page 3 of the Maidencraig Masterplan shows the area of land where the boarding kennel business is located as developed land. Detailed Planning Permission ([P130491](#)) was approved subject to conditions for the erection of 92 dwellings (Phase 1A) on 05 April 2013 and development is underway on site.

### **OP33 Greenferns**

81: Support for Proposed Plan site OP33 Greenferns is welcomed and noted. The purpose of the Green Space Network is to maintain a strategic network of woodland and other habitats, active travel and recreation routes, greenspace links, watercourses and waterways, providing an enhanced setting for development and other land uses and improved opportunities for outdoor recreation, nature conservation and landscape enhancement. For this particular site, the Green Space Network designation covers the Bucksburn Local Nature Conservation Site. Proposed Plan Policy NE1 clearly states that, "Masterplanning of new developments should consider the existing areas of Green Space Network and identify new areas incorporating Green Space Network. Masterplans will determine the location, extent and configuration of the Green Space Network within the area, and its connectivity with the wider network." Appendix 2 of the Proposed Plan states in the 'Other Factors' section for OP33 that, "Proposals for a Special Needs School and extension to Enermec will need to be accommodated in a masterplan."

### **OP63 Prime Four Extension**

134, 136, 177: Support for Proposed Plan site OP63 Prime Four Extension is welcomed and noted. Following the publication of the Aberdeen Local Development Plan Main Issues Report 2014 (CD29) in which OP63 Prime Four Extension was considered to be 'undesirable', several factors have come to light and been considered which have led to the designation of this site for development in the Proposed Plan. The south west corner of Proposed Plan site OP29 Prime Four Business Park is constrained and undevelopable at present due to access issues. The Prime Four Business Park has been exceptionally successful, bringing a significant positive economic impact to Aberdeen over the last 3 years. The developable land has been built out and demand for plots is continuing. There is

therefore a strong argument for allocating more land for the Prime Four Extension now to allow for the continued growth and success of the site in order to capture this current demand.

Concern over traffic impact and suggestions about roads changes are noted, however this will be assessed as part of the Masterplan and planning application process. The Aberdeen Masterplanning Process - A Guide for Developers (CD46 ) explains what is expected from Masterplans and Development Frameworks including, in Section 3, their content. This should include a site description, including the surrounding area on issues such as open spaces, the landscape, greenspace network and so on and the context, identity and connections between them. In the 'Other Factors' section of Proposed Plan Appendix 2 (page 82) for the site it states, "Masterplan required. A TIA (Traffic Impact Assessment) will be required. In addition, adequate buffer zones for the Quaker Burial Ground and the woodland will need to be identified in the masterplan." In doing so there may be opportunities to secure better management of the woodland and Burial Ground as both appear to be somewhat neglected at the moment.

It is accepted that OP63 will be visible from the road network. However, the overall character of the immediate area is likely to change substantially with the construction of the Aberdeen Western Peripheral Route (AWPR). The western boundary of OP63 has been drawn to coincide with the boundary of land required for the construction of the AWPR. OP63 will therefore sit alongside the road and will not be seen as isolated or unduly prominent.

In terms of comments on density, it is always possible to increase this. However, this has to be balanced against the character of the site and the nature of the uses there. Prime Four is regarded as a high quality employment site that has been masterplanned from the start. Whilst some of the plot sizes are large, so are some of the buildings and it is considered that the uses and densities present are appropriate.

### **Development at Kingswells and Greenferns**

152, 183: The Aberdeen City and Shire Strategic Development Plan 2014 (CD12) sets the requirements for greenfield housing/employment allowances and these are set out in Figure 1 of the SDP on page 12 and in Schedule 1 on page 42. Under Issue 2 we conclude that the SDP greenfield requirements have been fully met and are confident that a continuous 5 year housing land supply can be met throughout the lifetime of this LDP. Accordingly, we do not consider it necessary to allocate any further greenfield sites beyond those already identified in the Proposed LDP. The suggested reasons for the release of additional land including the delay in delivery of sites, the number of large sites being too high and the overall target being unambitious were dealt with in the examination of the Strategic Development Plan (CD13) and it was found that there was no requirement to allocate additional land. The modifications suggested above by respondents 152 and 183 are dealt with in Issue 8 Alternative Sites in Kingswells and Greenferns.

**Reporter's conclusions:**

<b>Reporter's recommendations:</b>

<b>Issue 8</b>	<b>ALTERNATIVE SITES: KINGSWELLS &amp; GREENFERNS</b>	
<b>Development plan reference:</b>	No reference in the Plan	Reporter:
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
<p>Mrs Elaine Farquharson-Black of Burness Paull LLP on behalf of Carlton Rock Limited (75)</p> <p>Mr Alasdair Morrison of GVA James Barr on behalf of Leto Limited (89)</p> <p>Mr Ian Livingstone of Ryden LLP on behalf of Stewart Milne Homes (117)</p> <p>Mr Christopher Ross of Barratt North Scotland (125)</p> <p>Mr Roger Laird of Archial Norr on behalf of Mr S. Barrack (141)</p> <p>Ms Emelda Maclean of Emac Planning LLP on behalf of Scotia Homes (152)</p> <p>Mr Scott Leitch of Halliday Fraser Munro on behalf of ANM Group (155)</p> <p>Ms Meabhann Crowe of Colliers on behalf of AA Webster and Sons (162)</p> <p>Mr Ben Freeman of Bancon Developments (183)</p>		
<b>Provision of the Development Plan to which the issue relates:</b>	Alternative sites in Kingswells and Greenferns	
<b>Planning authority's summary of the representation(s):</b>		
<p><b>Hayfield Riding Centre and Fields to the East of Hazledene Road</b></p> <p>75: Two sites - subject to planning application 141026 for the construction of a hotel with swimming pool, spa, restaurants, banqueting/ conference facilities (Site A) and for the redevelopment of the Hayfield Riding School to form an equestrian centre (Site B) have been referred to the Scottish Ministers after Full Council gave a willingness to approve pending the securing of developer contributions, towards upgrading of access roads and paths, recreational and wildlife enhancements to Hazlehead Park, public bus services and the Strategic Transport Fund.</p> <p><b>Former Dobbies Garden Centre</b></p> <p>75: Former Dobbie Garden Centre should be removed from the Green Belt and Green Space Network and identified as an Opportunity Site for development. The Plan fails to meet the housing allowances in the Strategic Development Plan. The shortfall is likely to be exacerbated by delays in bringing forward large scale releases, such as the Council owned land at Greenferns which has failed to come forward for development despite having been allocated since 2008. The Council require to consider other smaller sites which can help to maintain a five year land supply.</p> <p><b>Site East of Lidl, Lang Stracht</b></p> <p>89: Allocate the site to the east of the existing Lidl store on the Lang Stracht as 'Retail'. There has been a long identified need for additional floorspace in the west of</p>		

Aberdeen that is confirmed in the Aberdeen City Council Retail Study. There is an opportunity for linked trips with the existing Lidl store and this additional retail space would address the needs of a growing residential population. The site is immediately adjacent to a previous detailed planning permission for a supermarket demonstrating that there is no traffic concern. There are no sites available for this type/scale of retail at either Rousay Drive District Centre or Lang Stracht or Mastrick Local Centres. There is good road and public transport access and it is well located in terms of proposed new residential areas.

### **Derbeth, Gillahill & Huxsterstone (Kingswells Expansion) (B0303)**

117: Object to the non-allocation of Derbeth (part of Development Option B0303) for the allocation of a mixed use development comprising 900 homes and 6.5 hectares of employment land. The AWPR upon completion will effectively become the defining boundary to the settlement, which is situated in the Green Belt. The land at Derbeth will become infill, maximising land resource whilst enhancing the character and setting of the area. With the high volume of employment allocation there needs to be further residential allocation to create a balanced and sustainable community. The site is effective and can be delivered quickly. It is served by good public transport.

162: The land at Derbeth Farm lies to the immediate northwest of Kingswells. It represents a logical and suitable location for development to take place with the ability to provide a mixed use development, new local centre and potentially educational facilities adjacent and connected to the existing Kingswells settlement. It is currently designated Green Belt and (partially) Green Space Network. The Plan has placed significant focus on greenfield land release and it is acknowledged that in many areas this is a necessity to meet LDP requirements. However, the Local Authority have a duty to release land in locations which are confirmed as viable and are or can become effective in the Plan period to deliver development. The Proposed Plan Green Belt boundary around the settlement of Kingswells is inappropriate and fails to acknowledge the terms of SPP. The boundary should be moved westwards to align with the visual and physical boundary of the AWPR. This would allow for development to take place at Derbeth Farm. This site is deemed suitable in terms of location for medium/long term development, which would represent a logical and viable expansion to the urban form in this area. It has been noted that the Council have not suggested to include a draw-down mechanism to meet any shortfall which may occur in Phase 1 or 2 of the land release schedule. It is therefore urged that the Council should review its position in respect of Derbeth Farm.

117: Object to the non-allocation of Gillahill (part of Development Option B0303) for the allocation of a mixed use development comprising 600 homes and a new primary school. Development at Gillahill would maximise land resources and enhance the character and setting of the area. Site relates well to and fits with the wider settlement, avoiding coalescence. With the growth of employment land at Kingswells there needs to be further housing allocations to create a sustainable and balanced community. The road network due to upgrades associated with the delivery of Prime Four, would be able to accommodate traffic generated from the proposed residential development. There are good walking, cycling and public transport links.

117: Object to the non-allocation of Huxterstone (part of Development Option B0303) for the allocation of a mixed use development comprising 90 dwellings. The site relates well to existing development, nearby services, employment land at Prime Four and the public transport network, which enhances the site's connectivity. The principle of residential development has been accepted upon the land at Huxterstone owing to the area being recognised in the Finalised Aberdeen Local Plan 2004 as a Future New Community. The site is unconstrained and developable in the short term. It will maximise land resource and enhance the appearance and setting of the area. Housing will be required to balance the employment allocations at Kingswells. The site will maximise land resource whilst preserving the setting of Kingswells as well as implementing a defining eastern edge to the settlement.

#### **Huxterstone Healthcare Facility (B0947)**

155: The land at Huxterstone (B0947) should be removed from the Green Belt/Green Space Network and allocated as an Opportunity Site suitable for the creation of a Healthcare Village for healthcare and related uses. The site lies within an area where major developments are being delivered, including Countesswells, Prime Four Business Park and the AWPR. There is only one private hospital in Aberdeen at present and there is a need for such a facility.

#### **Land at Newton East, Old Skene Road (B0306)**

125: Object to the non-inclusion of site B0306 as a residential development for 20 units within Phase 1 of the Plan. The site is located to the south of Old Skene Road. Development will not create an unacceptable impact on the surrounding landscape, there are well defined clearly identifiable visual and robust boundaries.

#### **Land at Kingswells East (B0305)**

152: The land at Kingswells East should be allocated for residential development in order to bring forward land in an appropriate location capable of delivering effective housing land in the first period of the Plan. The site is located to the east of Kingswells and to the north of Old Lang Stracht. The land is capable of delivering approximately 80 houses together with new public open space provision.

#### **Brownfield Site at Skene Road, Maidencraig (B0301)**

141: Request that the brownfield site at Skene Road in the Maidencraig area is included as an Opportunity Site in the Local Development Plan. It is 0.7 hectares and can accommodate 15 dwellings with open space. A pedestrian link would be provided to the nature reserve. It lies outwith the flood area. The Local Nature Reserve would be untouched by the development and measures would be taken to ensure the protection of bats. The approval of the Maidencraig Masterplan to the north shows the acceptability of development in close proximity to the LNR. SPP and SDP advocate that brownfield land is the preferred location for development. There is potentially a large shortfall in the supply of sites on brownfield land and the site at Maidencraig represents a suitable site for allocation.

**Maidencraig (B0311)**

183: Object to the non-allocation of site B0311 Maidencraig for either residential (200 units) or employment development. Due to the constrained housing developments in the area, an additional 350 houses are required to be allocated in the period 2017-2026 to meet SDP requirements. Additional land is also required to meet employment allocations as these mostly tied to constrained housing sites. The house site would be deliverable in the 2017-2026 period, and would be an extension of the existed masterplanned area. The development could be accommodated within the landscape up to the 145 metre contour line without risk of significant visual impact or risk of coalescence with Kingswells. Once new facilities are built in the Masterplan Zone these will be in close proximity. Either a residential, business or mixed use development on the proposed site is therefore proposed as suitable for addressing the shortfall identified in the delivery of sites allocated in the Local Development Plan 2012.

**Modifications sought by those submitting representations:****Hayfield Riding Centre and Fields to the East of Hazledene Road**

75: Identify both sites as Opportunity Sites in Appendix 2 and in the Proposals Map, referring to the Council's willingness to approve application reference P141026.

**Former Dobbies Garden Centre**

75: Remove the former Dobbies Garden Centre from the Green Belt and Green Space Network and identify it as an Opportunity Site for development. It should be included in Appendices 1 and 2 of the Plan as a brownfield site.

**Derbeth, Gillahill & Huxsterstone (Kingswells Expansion) (B0303)**

117: Remove land at Derbeth from the Green Belt and Green Space Network. Allocate the site for mixed use development for 900 homes. Table 5 should be modified accordingly.

162: Remove the Green Belt/Green Space Network status and allocate the site for longer term residential development.

117: Remove land at Gillahill from the Green Belt and Green Space Network. Allocate the site for mixed use development for 600 homes and a primary school. Table 5 should be modified accordingly.

117: Remove Green Belt status from the remaining land at Huxsterstone

**Huxsterstone Healthcare Facility (B0947)**

155: Remove Green Belt status from Huxsterstone and allocate as an Opportunity

Site suitable for the creation of a Healthcare Village.

**Land at Newton East, Old Skene Road (B0306)**

125: Remove site from the Green Belt and allocate as LR1. Modify Table 5 and Appendix 2 as required.

**Land at Kingswells East (B0305)**

152: Allocate land at Kingswells East for residential development in the Local Development Plan.

**Brownfield Site at Skene Road, Maidencraig (B0301)**

141: Allocate additional land at Maidencraig through the inclusion of the Skene Road brownfield site.

**Maidencraig (B0311)**

183: Remove the site from the Green Belt and allocate it as an Opportunity Site.

**Summary of response (including reasons) by planning authority:**

In preparing the Proposed Plan a Development Options Assessment (CD28, CD30, CD31), Strategic Environmental Assessment (CD27), and Main Issues Report (CD29) were used to identify the most suitable locations to deliver the required growth. The majority of greenfield sites identified in the Proposed Plan have been carried over from the Aberdeen Local Development Plan 2012 (CD42) which went through a similar process at that time. Most of these sites are at an advanced stage in terms of planning consents and Masterplans as detailed in the latest version of the Action Programme (CD47).

The Aberdeen City and Shire Strategic Development Plan (SDP) 2014 (CD12) sets the requirements for greenfield housing and employment land allowances and these are set out in Figure 1 of the SDP on page 12 and in Schedule 1 on page 42. Under Issue 2 we conclude that the SDP greenfield requirements have been fully met and we are confident that a continuous 5 year housing land supply can be met throughout the lifetime of this LDP. Accordingly, we do not consider it necessary to allocate any further greenfield sites beyond those already identified in the Proposed Plan.

**Hayfield Riding Centre and Fields to the East of Hazledene Road**

75: We do not propose to remove the Green Belt designation for these sites at this time. Both of the sites referred to by the respondent were received by Aberdeen City Council as proposals at the Proposed Plan stage of the Local Development Plan process. The sites were not put forward at the Pre-Main Issues Report Call For Sites stage in 2013, or submitted as a representation to the Main Issues Report in

2014. As such, the only occasion the Council has had to formally consider these sites in terms of their suitability for inclusion in the Local Development Plan has been at Proposed Plan stage in response to this representation. It is recognised that on 13 May 2015 Aberdeen City Council stated a willingness to approve planning permission for a country house hotel circa 200 bedrooms, spa, swimming pool, function and conference facilities, restaurants and equestrian centre on the Hayfield site, associated car parking and alterations to access roads ([P141026](#)), subject to conditions and the negotiation of a legal agreement under Section 75 of the Town and Country Planning (Scotland) Act 1997, as amended (CD02). This Section 75 agreement has not yet been finalised.

If the Council were to identify these sites as Opportunity Sites at this point in Plan preparation then this would be a Notifiable Modification to the Proposed Plan which would cause significant delays to the adoption process. Paragraph 87 of the Circular 06/2013 – Development Planning (CD10) makes it clear that delays to the adoption of a Plan should be avoided, “Scottish Ministers expect an authority’s priority to be to progress to adoption as quickly as possible. Pre-Examination negotiations and notifiable modifications can cause significant delay and so should not be undertaken as a matter of course”. Site assessments have been carried out (CD31) which found both sites to be desirable for the uses for which there is a willingness to approve planning permission. Given that both sites have a willingness to approve (pending the securing of developer contributions P141026) it is not deemed necessary to identify them as OP sites in the Proposed Plan at this time. We would however expect the next iteration of the Local Development Plan to reflect this planning permission, assuming that a consent will have been issued by this point.

#### **Former Dobbies Garden Centre**

75: We do not propose to allocate this site for development. Aberdeen City Council have assessed this site, considered it undesirable and rejected it on the grounds set out in the Proposed Plan Site Assessment Report (CD31). There are issues accessing the site, Hazledene Road is very narrow and there are several corners that have to be negotiated slowly due to blind spots. Development on this site would erode the rural setting and have a negative impact on the landscape of the area. Development would be unrelated to existing settlement and public transport links making the development potentially heavily car reliant. The site is surrounded by the Denwood - Hazlehead Local Nature Conservation Site (LNCS) (CD40) which contains a good network of paths and is well used by local people. The LNCS supports a number of breeding birds and mammals including Red Squirrel and Wych Elm. This site is not considered to be suitable for development and should remain as Green Belt.

#### **Site East of Lidl, Lang Stracht**

89: We do not propose to alter the zoning of this site. Aberdeen City Council has assessed this site, considered it undesirable for the use proposed, and considered the proposal to be undesirable (CD31). This site was not put forward at the Pre-Main Issues Report Call For Sites stage in 2013, or submitted as a representation to the Main Issues Report in 2014. It has therefore only been proposed as a representation to the Proposed Plan. The site is currently zoned under Proposed Plan Policy B1

Business and Industrial Land and rezoning to allow for retail development would result in the loss of this Business and Industrial Land. The site is currently occupied by a functioning car garage/workshop. The Aberdeen City and Aberdeenshire Retail Study 2013 (CD16) identifies retail deficiencies across the region. One of these deficiencies lies within Zone 29 West Aberdeen. The Retail Study (page 14) states that new convenience floorspace is required in Zone 29 and states that no specific location has been identified for this zone. It is however expected that the Countesswells development (Proposed Plan Opportunity Site 38) will meet some of the qualitative deficiencies for this area. The site East of the Lang Stracht lies on the border between Zone 29 West and Zone 28, as set out in Figure 3 of the Retail Study (page 10). Given the resultant loss of Business and Industrial land, Aberdeen City Council are of the opinion that the current zoning should remain. It is not considered that the findings of the Retail Study provide a sufficient reason for the zoning of this site to be altered.

### **Derbeth, Gillahill & Huxterstone (Kingswells Expansion) (B0303)**

117, 162, 155: We do not propose to allocate these three sites ((Derbeth, Gillahill & Huxterstone) for development. These sites were previously considered during the extant Local Development Plan 2012 Examination and rejected by the Reporter (CD44, Issue 35). The Reporter concluded that the Green Belt status of these sites was justified by reasons of protecting the setting of Kingswells and preventing encroachment into the countryside that separates Kingswells from Aberdeen.

Aberdeen City Council has reassessed this site, again considered them undesirable, and rejected them on the grounds set out in the Proposed Plan Site Assessment Report (CD31). In addition to the Green Belt status, there is no primary school capacity at Kingswells Primary School (CD32). There are also problems in terms of successfully integrating these sites with the existing Kingswells community, particularly pedestrian links and strong links to the Three Hills Local Nature Conservation Site (LNCS). We remain of the opinion that the Derbeth, Gillahill and Huxterstone sites should remain as Green Belt.

### **Huxterstone Healthcare Facility (B0947)**

155. We do not propose to allocate this site for development. The site was previously assessed at Pre-Main Issues Report stage in 2013 (CD28) for retail/commercial and was considered to be undesirable for development. The site is now proposed for a Healthcare facility and the Council has reassessed this site on this basis. The Council still consider the site undesirable and rejected it on the grounds set out in the Proposed Plan Site Assessment Report (CD31).

The site is located close to the proposed Aberdeen Western Peripheral Route's South Kingswells Junction, and it is acknowledged that healthcare in this location would be easily accessed. However, the land in question lies south of the A944 and this busy road helps to form a very well defined and robust Green Belt boundary, as is highlighted in the Green Belt Review (CD38). Allowing development in this area would weaken this boundary and could lead to coalescence with the proposed Countesswells development. It is for these reasons that this land should remain as

Green Belt.

**Land at Newton East, Old Skene Road (B0306)**

125: We do not propose to allocate this site for development. Aberdeen City Council has assessed this site, considered it undesirable, and rejected it on the grounds set out in the Proposed Plan Site Assessment Report (CD31). Although the site is small, the site contributes to maintaining the open setting between Kingswells and Aberdeen. Development on this site would have a negative impact on landscape and views and Kingswells Primary School is at capacity so any additional pupils generated by this development would compound this situation (CD32). We are of the opinion that this site should remain as Green Belt.

**Land at Kingswells East (B0305)**

152: We do not propose to allocate this site for development. Aberdeen City Council has assessed this site, considered it undesirable, and rejected it on the grounds set out in the Proposed Plan Site Assessment Report (CD31). The site sits just below Newpark Hill and occupies a significant position within the landscape. It is visible from Old Kingswells, many parts of new Kingswells, and the surrounding area to the south, east and west. The site is especially visible from the A944. Its development would encroach into the open countryside which separates Kingswells from Aberdeen. We are of the opinion that this site should remain as Green Belt.

**Brownfield Site at Skene Road, Maidencraig (B0301)**

141: We do not propose to allocate this site for development. Aberdeen City Council have assessed this site, considered it undesirable and rejected it on the grounds set out in the Proposed Plan Site Assessment Report (CD31). It is acknowledged that this proposal would include an area of land that has previously been developed and the development would be closely linked to the new community identified in the existing Local Development Plan at Maidencraig. However, the Den of Maidencraig (LNCS) (CD40) is an important feature that runs along the boundary of this site with the Maidencraig site. Any development in this area may increase the risk of flooding and increase the area of land at risk from flooding. Taking into account the potential impact on the Den of Maidencraig it is considered that there is no over-riding benefits arising from this site which would justify allocating it for development.

**Maidencraig (B0311)**

183: We do not propose to allocate this site for development. Aberdeen City Council have assessed this site, considered it undesirable and rejected it on the grounds set out in the Proposed Plan Site Assessment Report (CD31). This site was submitted for consideration during the process of preparing the extant Local Development Plan 2012 and it was determined through the Aberdeen Green Belt Review (CD38) that the existing track from the Lang Stracht to Fernhill cottage provides a robust boundary for the allocated Maidencraig development. This site is part of an area of open countryside which serves to prevent the coalescence of Kingswells and Aberdeen and helps to maintain their unique identities. Given that we have already concluded that we do not consider it necessary to allocate any further greenfield

sites beyond those already identified in the Proposed Plan, we are of the opinion that this site should remain as Green Belt.

**Reporter's conclusions:**

**Reporter's recommendations:**

<b>Issue 9</b>	<b>ALLOCATED SITES &amp; GENERAL AREA STRATEGY: COUNTESSWELLS</b>	
<b>Development plan reference:</b>	Pages 13-14 and Page 83. Proposals Map, Table 6, Table 6 notes, Masterplan Zones Table, Appendix 2	Reporter:
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
<p>Mr Ken Hutcheson (9)  Mr &amp; Mrs George and Maureen Findlay (22)  Mr &amp; Mrs Mark &amp; Karen Souter (27)  Mr Alexander Hamilton (36)  Mrs Jane Hamilton (37)  Mrs Dorothy Semple (43)  Mrs E. W Boyd (49)  Mrs Eve Glegg (50)  Mrs Joan Robertson (61)  Mr Sandy Hutchison (113)  Mr Dominic Fairlie of Aberdeen Civic Society (136)  Ms Emelda Maclean of Emac Planning LLP on behalf of Scotia Homes (152)  Mrs P.M. Fullerton (168)  Mr Michael Lorimer of Ryden LLP on behalf of Stewart Milne Homes (173)  Mr Ben Freeman of Bancon Developments (183)</p>		
<b>Provision of the Development Plan to which the issue relates:</b>	Overview of Direction for Growth in this area and specific OP sites	
<b>Planning authority's summary of the representation(s):</b>		
<p><b>Area Spatial Strategy</b></p> <p>152, 183: There is over-reliance on a single, large scale development to provide the required housing land supply in this area. There are concerns about the delivery.</p> <p>43, 50: There is significant development in this and surrounding areas. The cumulative impact of development needs to be addressed.</p> <p>173: Object to the allocation of 10 hectares of employment land. The focus should be on smaller scale business spaces, with flexible uses. This would promote a higher density, town centre approach.</p> <p>168: The building of large number of houses will not help the housing shortage, and there is an insufficient mix of housing. There is not the population to fill these</p>		

houses.

### **Transportation**

9, 22, 27, 36, 37, 43, 49, 50, 113, 168: Concerns about road infrastructure capacity.

43: The Bridge of Dee is at capacity at present.

22, 27: New road required prior to development.

22, 27: Emergency vehicles are struggling to access the roads in this area at present.

27: Building on site should be postponed until the completion and opening of the Aberdeen Western Peripheral Route.

136: Ensure there are sustainable means of travel, allowing and giving people the opportunity to travel to work on foot.

### **Infrastructure and Services**

27, 168: The schools at Kingswells and Cults are at capacity.

168: There are a lack of services in the area.

173: Support retail provision in the development but are disappointed the Proposed Plan has not stipulated where this will be. A mid-range supermarket will anchor retail provision. 7,000 metres squared should be allocated to Countesswells. A 2016 start date at Countesswells will provide an established population by 2025 coinciding with the Retail Strategy timescale for retail provision within Zone 29N.

### **Scale of Development**

36: Concern about the size and scope of the development.

### **Environmental Concerns**

113, 168: The development will have a negative environmental impact.

50, 61: The Green Belt, Hazelhead Woods and Hazelhead Park are needed and should be protected.

61: Wildlife is dependent on these areas.

### **Financial Impact**

113: Financial risk due to the downturn in oil at present.

**Detail of the Development**

136: The site needs to be mixed in terms of uses and residential property size.

**Modifications sought by those submitting representations:****Area Spatial Strategy**

43: Remove Countesswells. Build on brownfield land, possibly the old Hall Russell Yard.

152: Allocate Foggieton for 650 houses and other Mixed Use developments.

183: Allocate additional housing sites.

173: Reduce the employment land allowance.

**Transportation**

22, 27, 50: Build a new road before construction begins.

36, 37, 49, 168: Scale back development until the appropriate infrastructure is in place.

**Infrastructure and Services**

173: Allocate the full 7,000 metres squared retail provision identified for Zone 29 West in Countesswells.

**Environmental Concerns**

61: Retain the green areas.

**Financial Impact**

113: The site should be on hold until the economy has stabilised.

**Summary of response (including reasons) by planning authority:****Area Spatial Strategy General and Scope of Development**

36, 43, 50, 152, 168, 173, 183: The Aberdeen City and Shire Strategic Development Plan (SDP) 2014 (CD12) proposed not to allocate additional land, but to 'roll forward' the allocations from the Aberdeen City and Shire Structure Plan 2009 (CD20) into the SDP, and this was accepted by the Reporter during the SDP's Examination (Issue 5 pages 54 - 74) (CD13). The Reporter's conclusion stated "Drawing all of these matters together, I conclude that the scale and distribution of growth provided for in the housing allowances is appropriate and sufficient, in accordance with the requirement of paragraph 117 of Circular 6/2013." Aberdeen City Council agrees with these conclusions.

The Vision and Objectives for the Proposed Plan are the same as the Aberdeen City and Shire Strategic Development Plan 2014. The role of the Strategic Development Plan is to "set clear parameters for subsequent Local Development Plans and inform decisions about strategic infrastructure investment." (Circular 06/2013 paragraph 41, CD10). The Strategic Development Plan sets a clear strategy for development in Aberdeen, which includes housing allowances to be delivered through Local Development Plans.

Large, strategic-scale housing sites form an important part of the Proposed Plan's ambition to create sustainable, mixed communities. This allocation has been carried forward from the Aberdeen Local Development Plan 2012 (CD42). The principle of Countesswells allocation was tested during the Examination of the 2012 Aberdeen Local Development Plan (CD44, Issue 33). It remains appropriate to identify the site as a development opportunity for 3,000 houses and 10 hectares of employment land as there has been no significant change in circumstances which would justify an amendment to this designation.

The site is subject to an approved [Development Framework and Phase 1 Masterplan](#) which was adopted as Supplementary Guidance to the extant Local Development Plan in July 2014. The intention is for these documents to be re-adopted with the Proposed Plan upon its adoption. Planning Permission in Principle ([140438](#)) was approved by Full Council on 19 August 2015 (RD62). It was previously deferred to the Full Council meeting on 8 October 2014 (RD63), where Members were minded to approve the application subject to a legal agreement signed under Section 75 of the Town and Country Planning (Scotland) Act 1997 ('Section 75 agreement') relating to a number of matters. The Section 75 agreement has still to be signed and registered and a large number of parties are involved. Two further Planning Permission in Principle applications ([141888](#) and [141889](#)) have been lodged for alternative access arrangements, and a number of Detail Planning Applications ([140730](#), [141110](#) and [141665](#)) have been lodged. The principle and scale of the development has been well established and is deemed acceptable. No detail was provided on the Old Hall Russell Yard; therefore no assessment could be carried out to determine if the site was suitable.

## **Transportation**

9, 22, 27, 36, 37, 43, 49, 50, 113, 136, 168: A development of 3,000 dwelling houses, 10 hectares of employment land and associated services and facilities is going to necessitate a need for significant transport improvements. The Countesswells site, once complete will be a new community and the existing road

network is clearly not currently suitable to deal with additional traffic. The Masterplan for the site has identified transport and road upgrades, as does the Proposed Action Programme (CD21). The Aberdeen Western Peripheral Route is now being built, which will take traffic away from unsuitable roads heading north and south of the city. It is the Council's contention that this infrastructure is necessary to support this development.

Transport Assessment and infrastructure thresholds have been submitted with the current pending planning applications, and have been assessed by the Council's Roads Projects Team and Transport Scotland; these have been deemed acceptable. A Condition shall be applied to the Planning Permission in Principle [140438](#) limiting development to Phase 1 (comprising 1,000 residential units; 1,000 square metres Ground Floor Area Class 4 office space; 2,500 square metres Ground Floor Area Class 1 retail space; and associated ancillary uses) for the period prior to the Aberdeen Western Peripheral Route being open to traffic, and the consequent removal of Trunk Road status for the A90 Anderson Drive. Planning Permission in Principle Application [141889](#) requires the Kingswells roundabout to be upgraded by 401 units, and Planning Permission in Principle [141888](#) requires the Jessiefield Link by the 1001st unit.

### **Infrastructure and Services**

27, 168, 173: The required infrastructure for this area is identified in the Proposed Action Programme (CD21), the Infrastructure and Developer Contributions Manual SG (CD25), the [Development Framework and Phase 1 Masterplan](#) and the Planning Permission in Principle application [140438](#). The Planning Permission in Principle application identified that the development would provide one secondary school, and two primary schools, with one being a two stream, with the other capable of being a three stream if deemed necessary. The Development Framework and Phase 1 Masterplan, and Planning Permission in Principle application ([140438](#)) outlines two neighbourhood centres to accommodate shops and community facilities thereby providing services for the local community. The Planning Permission in Principle application outlines a further application would be required to be submitted on the detail of this. A UK Treasury guarantee for a £80 million loan to help finance infrastructure for the development was announced by the Chief Secretary to the Treasury on 15 August 2014 (RD64).

The Development Framework and Phase 1 Masterplan outlines a supermarket to meet the needs of the local community. The Aberdeen City and Aberdeenshire Retail Study 2013(CD16) states a requirement for 5,500 square metres (gross floor area) for the west of Aberdeen/Countesswells for a supermarket/superstore/other convenience. This does not all have to be provided in one location. It also specifically recommends for Countesswells a maximum 1,500 square metres (gross floor area) of general comparison floorspace - see Table 7 in the Executive Summary and Part 6 of the main report – Recommended Retail Strategy. Any retail proposals for Countesswells should align with these recommendations as outlined in paragraph 3.28 of the Proposed Plan and would need to be considered against the Plan's retail policies.

## Environmental Concerns

50, 61, 113, 168: The site was removed from the Green Belt with the adoption of the extant Local Development Plan 2012. Boundaries have been drawn as such to reduce impact on adjacent woodland areas, and Green Space Network is used to maintain a wildlife corridor through the site. Within the area identified there are no local, national or international natural heritage designations.

The impact of the development on Hazelhead Park is likely to be limited to an increase in recreational use. Providing doorstep opportunities for people to gain easy access to open space, woodland and parks is considered beneficial to the health and wellbeing of the population. As proposed in the Development Framework and Phase 1 Masterplan and the Planning Permission in Principle ([140438](#)), a proposed access road post 300 units will be formed from the Switchback (Jessiefield) and will cut through Hazelhead Woods. The woods will be furthered enhanced as an area of urban space through a core path linking Hazelhead Woods and Countesswells Woods.

## Financial Impact

113: The development would assist with meeting the housing and employment land need identified in the City, and complies with the Aberdeen City and Aberdeenshire Strategic Development Plan. The Plan is a long term vision for the city. It needs to be ensured that the opportunity is there to provide sufficient homes, places of employment and leisure activities to support this demand.

## Detail of the development

136: The development would be mixed use, as its allocation includes both housing and employment uses. Both the [Development Framework and Phase 1 Masterplan](#), and the Planning Permission in Principle application ([140438](#)) outline the development would be mixed use with neighbourhood centres. The development would need to comply with housing mix and affordable housing policies, and again both the Development Framework and Phase 1 Masterplan, and the Planning Permission in Principle application outlined this to be the case.

## Reporter's conclusions:

## Reporter's recommendations:



<b>Issue 10</b>	<b>ALTERNATIVE SITES: COUNTESSWELLS</b>	
<b>Development plan reference:</b>	No reference in the Plan	Reporter:
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
<p>Mr Tim Reid of Urban Wilderness Ltd on behalf of The Reid Family (138)  Ms Emelda Maclean of Emac Planning LLP on behalf of Scotia Homes (152)  Mr Michael Lorimer of Ryden LLP on behalf of Stewart Milne Homes (173)</p>		
<b>Provision of the Development Plan to which the issue relates:</b>	Alternative sites in Countesswells	
<b>Planning authority's summary of the representation(s):</b>		
<p><b>Thornhill (B0944)</b></p> <p>138: Object to the non-allocation of site B0944 for residential development. The site provides easy access to Aberdeen, would provide local leisure and recreation facilities and 25% of the housing would be affordable.</p> <p><b>Foggieton (B0921)</b></p> <p>152: Object to the non-allocation of site B0921 for 650 houses, a neighbourhood centre, public open space and woodland walks. The site would be closely aligned in location and principle of development of Countesswells and development would be guided through the masterplanning process</p> <p><b>Countesswells Expansion (B0918)</b></p> <p>173: Object to the non-allocation of site B0918. The development comprise six pockets of land, and would allocated 1,500 homes, with 1,000 homes in Phase 1 and 500 in Phase 2. New infrastructure will be delivered, as is outlined in the Countesswells Development Framework and Phase 1 Masterplan and the Planning Permission in Principle for Countesswells, and it is logical to build development off this road. Development would respect landscape.</p>		
<b>Modifications sought by those submitting representations:</b>		
<p><b>Thornhill (B0944)</b></p> <p>138: Allocate Thornhill for future residential development</p>		

**Foggieton (B0921)**

152: Allocate Foggieton as a residential led mixed use development

**Countesswells Expansion (B0918)**

173: Expand the boundaries of OP38 to include these parcels of land as a suitable location for development to be delivered post 2023.

**Summary of response (including reasons) by planning authority:****General Strategy**

In preparing the Proposed Plan a Development Options Assessment (CD28, CD30, CD31), Strategic Environmental Assessment (CD27), and Main Issues Report (CD29) were used to identify the most suitable locations to deliver the required growth. The majority of greenfield sites identified in the Proposed Plan have been carried over from the Aberdeen Local Development Plan 2012 (CD42) which went through a similar process at that time. Most of these sites are at an advanced stage in terms of planning consents and Masterplans as detailed in the latest version of the Action Programme (CD47).

The Aberdeen City and Shire Strategic Development Plan (SDP) 2014 (CD12) sets the requirements for greenfield housing and employment land allowances and these are set out in Figure 1 of the SDP on page 12 and in Schedule 1 on page 42. Under Issue 2 we conclude that the SDP greenfield requirements have been fully met and we are confident that a continuous 5 year housing land supply can be met throughout the lifetime of this LDP. Accordingly, we do not consider it necessary to allocate any further greenfield sites beyond those already identified in the Proposed Plan.

**Thornhill (B0944)**

138: We do not propose to allocate this site for development. The site was previously considered during the extant Local Development Plan 2012 Examination and rejected by the Reporter (CD44, Issue 53). Aberdeen City Council has assessed this site, considered it undesirable, and rejected it on the grounds set out in the Proposed Plan Site Assessment Report (CD31). The site would constitute a substantial but isolated development in the Green Belt, undermining the existing separation between Cults and Aberdeen. The site is remote in transport terms and there is insufficient capacity to accommodate school pupils within the current schools (CD32).

**Foggieton (B0921)**

152: We do not propose to allocate this site for development. Aberdeen City Council has assessed this site, considered it undesirable, and rejected it on the grounds set out in the Proposed Plan Site Assessment Report (CD31). The site forms part of the

Foggieton Local Nature Conservation Site (CD40, also see Proposed Plan Additional City Wide Proposals Map CD23) and development would result in the loss and/or disturbance of designated species and priority habitats. The site is also highly visible in the surrounding landscape and would have a negative impact on the character of the surrounding area.

### **Countesswells Expansion (B0918)**

173: We do not propose to allocate these sites for development. Aberdeen City Council has assessed this site, considered it undesirable, and rejected it on the grounds set out in the Proposed Plan Site Assessment Report (CD31).

The six areas for expansion about the existing allocated site, Countesswells (extant Local Development Plan OP Site 58, Proposed Plan OP Site 38). The site boundary of the Countesswells Site was subject to Examination as Issue 33 during the Examination into the extant Local Development Plan 2012 (CD44, Issue 33). Three of the proposed areas of expansion proposed by this representation have been subject to Examination previously, these are areas identified as '1', '4' and '5' in the Proposed Plan 2010 consultation response.

As part of the submission to the Pre-Main Issues Report consultation in 2009, bid 9/24: Countesswells covered an area larger than the eventual allocated site for Countesswells (RD53). The non-allocation of the larger site was subject to representation during the previous proposed plan consultation (RD54 & RD55).

The 2009 9/24: Countesswells submission included the land which is identified as '1' and '3' in this current representation to the Proposed Plan. The land identified as '3' in the submission to this Proposed Plan was not subject to a representation in the Examination into the extant Local Development Plan 2012, yet was nevertheless subject to Examination as the boundary of the Countesswells site was examined.

The areas identified as '4' and '5' in the representation to this Proposed Plan were also a subject of the Examination into the extant Plan. Area '4' and '5' were submitted in 2009 as Bid 9/50: Land to the West of Loanhead Road (RD56), and were subject to representation during the previous proposal plan consultation (RD57 & RD58).

The Reporter's Report following the Examination of the extant Local Development Plan 2012 Examination (CD44, Issues 33), in response to the representations on the site boundary, acknowledged that a review of the Green Belt was used by the Council to help identify the most appropriate boundary.

The Reporter's finding into Issue 33, point 9 further outlined, "I recognise that there could also be scope for extending the development area at Countesswells to incorporate suggested areas of land to the south-west and to the north-east. However, I agree that the boundaries defined by the Council are the most appropriate and that the area identified is likely to be sufficient to accommodate the scale of the development which is proposed, and at the densities of development envisaged. On this basis, I consider that no modifications to the site boundary shown on the proposals map are justified". The Proposed Plan currently subject to

Examination again seeks to make the most efficient use of land, and paragraph 3.76 states that a net density of 30 dwellings per hectare should be achieved, in line with sustainable mixed communities targets on page 37 of the SDP. It is submitted by the Council that by making the most efficient use of land there would not be a requirement to increase site boundaries for the Countesswells site. Basing the calculation on 20 dwellings per hectare to take account of landscaping, strategic road infrastructure and large areas of open space, there is sufficient land to provide 3,000 dwelling houses.

The placement of the access road within the [Development Framework and Phase 1 Masterplan](#) which is currently adopted as Supplementary Guidance to the extant Local Development Plan 2012, and the Planning Permission in Principle afforded to the development of the site ([140438](#)) do not automatically mean the land surrounding the access road would be developable land.

Further, this proposed expansion would lead to loss of woodland and disturbance to designated species and their habitats. Development on these sites would be visually intrusive and would have a detrimental impact on the surrounding landscape. The Countesswells allocation is anticipated to build out at a rate of about 200-250 units per year and is not expected to be complete until post 2020 (CD17). Adding additional land to the OP58 allocation is not likely to increase housebuilding on this site in the next plan period.

**Reporter's conclusions:**

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**Reporter's recommendations:**

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<b>Issue 11</b>	<b>ALLOCATED SITES &amp; GENERAL AREA STRATEGY: DEESIDE</b>	
<b>Development plan reference:</b>	Pages 14- 15 and Pages 83-86, Proposals Map, Table 7, Table 7 notes, Appendix 2, Appendix 5, Appendix 6	Reporter:
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
<p>Mr Graham Devereux (1)  Mr John Eagles (4)  Mrs Gillian Devereux (5)  Mrs Alison Olsen (7)  Mr Ken Hutcheson (9)  Alan Wilson (11)  Justin Austin of amec foster wheeler E &amp;I UK on behalf of National Grid (12)  Mr &amp; Mrs G Knox and Mr R Knox (13)  Erika Olsen (16)  Miss Lisa Burnett (23)  Mrs Sandra Cawthorne (39)  Mrs Janet Hosie (44)  Mr Ian Porter (46)  Dr H R Millar (47)  Mr &amp; Mrs Thain (51)  Ms Nina Turner of Scottish Natural Heritage (54)  Mrs Elaine Farquharson-Black of Burness Paull LLP on behalf of Leiths (Scotland) Limited (65)  Mrs Theresa Hunt of Burness Paull LLP on behalf of Mr George Souter (80)  Mr Albert Middler (83)  Ms Lavina C. Massie on behalf of Culter Community Council (98)  Mrs Juliet Macleod (99)  Mr Peter Roberts of Cults, Bieldside &amp; Milltimber Community Council (102)  Mr &amp; Mrs A Porter (107)  Mr Allan B. Chalmers (110)  Mrs Brigitte Matthews (114)  Ms Lynda Kelman (119)  Mr Ian Cowe of Forestry Commission Scotland (126)  Mr Kenny Clubb of Churchill Homes on behalf of Churchill Homes (151)  Mr Roy McLennan (171)  Mr Terence Fullerton (172)  Mr A. Lewis (174)  Mrs Sheila Waler (175)  Mrs Susan Lewis (178)  Mr Ben Freeman of Bancon Developments (183)  Mr Mark Kaczmarek (185)</p>		
<b>Provision of the Development Plan to which the issue relates:</b>	Overview of Direction for Growth in this area and specific OP sites	

## Planning authority's summary of the representation(s):

### **Deeside - General**

98: Developers should build affordable homes instead of giving contributions as planning gain. Culter Community Council need homes to keep the community viable and prevent it from becoming a dormitory suburb.

98: Culter Community Council are in agreement with most of the policies and have used them to evidence the Spatial Strategy comments. They highlighted how they could deter the erosion of Peterculter as a sustainable community with new family housing. Do not wish to see the community reduced to a dormitory suburb of the city.

183: The Peterculter Burn site is constrained in the Housing Land Audit. Three new sites at Peterculter were dismissed by the Reporter during the Examination into the extant Local Development Plan 2012, only the Oldford site will provide land supply in 2017-2026 phase of the Plan. 160 homes will be complete by 2016, a shortfall of 388. It also shows that 330 will be delivered up to 2026, against an allocation of 248. The remaining shortfall will be built post 2026. Significant failures to deliver housing in other parts of the city justify the increased allocation of housing land in the Deeside corridor.

9: Education - The recent Aberdeen City Council School Estate Consultation in respect of Culter Academy should have taken place prior to the development of new homes at Blairs.

### **OP43 Milltimber Primary School**

#### Designation

4, 39: Query as to why the site is designated as a brownfield site. The site should be left as open space. The site would be better used by developing it into a play park and sports field.

#### Trees and Loss of Open Space

39: The site is the only green space for recreation at the lower end of Milltimber. Mature trees around the park should be protected.

#### Scale of Development and Residential Amenity

4, 39, 44: The development should have regard to all existing properties and the quiet residential nature of the area. Houses on the site should be single storey. Any houses built should be in keeping with the existing properties on Binghill Park and Monearn Gardens, i.e. semi-detached, two storey houses. Very large, expensive detached houses would not be in-keeping. Residents of Binghill Park would have their outlook obliterated which could prove detrimental to house values. Any large

building will completely spoil open aspect from Binghill Park to the south

#### Flooding

4: Concerns about flooding on the site.

#### Transport and Access

39, 44: Concern about impact of increased traffic. Access would be from Binghill Crsecent which is already a busy access to roads beyond. Site entrance would be after two sharp bends which are already hazardous. Monearn Gardens is a narrow residential street unsuitable for increased traffic.

#### **OP48: Oldfold**

#### Traffic

13, 98: The allocation will result in a serious amount of extra traffic on North Deeside Road. Visibility splays required to access the site will require works within private property. The main junction of the site with A93 should be the existing junction from Binghill Road with improvement of the Tornadee junction and traffic lights.

#### Education

98: The new primary school should be located close to Binghill Road, north of Tornadee (central to Milltimber) to help connect the development with the existing settlement and to allow the community to access facilities without having to use North Deeside Road.

#### Conditional Support for Development

98: Conditional support for the development, subject to the points raised.

#### Status of Development Framework / Masterplan

98: Query as to whether the Development Framework / Masterplan has been completed.

#### Identification of Masterplan Zone

102: The Masterplan Zones Figure 1, page 34, omits to mention OP48

#### Action Programme

102: The Action Plan should include OP48 and as a result the detailed actions should be set out for Oldford.

### **OP39: Braeside Infant School**

11: Object to the loss of this valuable amenity to the area, the school may be required in the future. The development will cause disruption and inconvenience to the surrounding properties, and the development will lead to loss or erosion of the adjacent play area.

### **OP51: Peterculter Burn**

98: Support housing opportunity as it can be developed in the first phase, will support local primary school, encourage and sustain local businesses and sustain the viability and amenity of the community. Developer contributions will include leisure and play area. Affordable homes should be built on site.

183: Object to the allocation of the site.

### **OP52: Malcolm Road, Peterculter**

#### Previous Examination

5, 46, 5, 107, 183: The site was dismissed at the previous examination and the Reporter's recommendations for the site were that it should remain as Green Belt/Green Space Network due to Malcolm Road being substandard and development not contributing to a compact urban form. Hard to understand why this site is included due to the Reporter's negative comments. It was noted to be remote, isolated and with difficult access.

#### Natural Environment

5, 23, 51, 83, 107, 110, 114, 126, 174, 1: The area is covered by Ancient Woodland status. SPP states a strong presumption against removing Ancient Woodland. Existing trees would need to be removed and would not meet the requirements of SPP. The site is used by residents for leisure and development would have a significant impact on wildlife. Development would erode the Green Belt and set an unwelcome precedent for development of land with Green Belt status. It will ruin the character and countryside setting of Peterculter and have a significant visual impact on the immediate area. The site forms a natural boundary and development would make the definition between built up area and countryside less clear. There are already sufficient housing allocations in this area and development would intrude into the surrounding landscape. It would provide a precedent which should be discouraged. The site can be viewed clearly from Malcolm Road. Development of this scale would appear sporadic and isolated from Peterculter.

#### Infrastructure and Facility Constraints

5, 23, 46, 51, 107, 110, 114, 174, 175, 1: The schools and health centres are at capacity. Malcolm Road is a busy commuter route that is unsuitable for the volume and size of vehicles that use it. It would be nonsensical to add further development and junctions. The volume of traffic has increased dramatically due to commercial

office developments in Westhill. Located on the edge of the village it does not have good access, there is no continuous pavement and given the volume of traffic it is not very safe. Pedestrians have to cross at a hazardous crossing point due to poor visibility. This section of road is dangerous and has been the scene of a number of accidents. Developer has not demonstrated how a continuous footpath would be achieved and do not believe contributions will fund upgrades to the footpath and road. Third party ownership prevents the widening of the footpath. AWPR will not result in a decrease of traffic. The site is not on a bus route and access to the nearest stop is by a narrow path. The site is too far from the village resulting in increased use of cars and there is insufficient parking within the village. There is no existing sewerage capacity, the site has steep slopes and there is a lack of employment opportunities and facilities.

#### Flooding

23, 51, 83, 114: There are ground water/natural drainage issues with flooding after heavy rainfall and development will have an impact.

#### Mix of Use

114: Residential development will not contribute to a balance of land uses.

#### Support the Allocation

98, 151: Support housing allocation for the following reasons: They can be delivered in the first phase, will support local schools, encourage and sustain local businesses and help the viability and amenity of the community. The development will comply with the vision by providing affordable housing, leisure and play areas, there will be no vehicle access onto the Core Path, and paved path through the trees will be provided. Affordable homes should be built on the site.

80: Supports the allocation but has the following concerns: the site is in two separate ownerships and the respondent has been working to bring forward their land for high quality houses. The Plan should not prevent this happening at the earliest opportunity and the site should be recognised as the first phase of development. Page 15 requires the site to have a Planning Brief but page 85 refers to a Masterplan. Clarity is required. Council guidance on Masterplans/Planning Briefs are for sites in single ownership. The Respondent's site should be considered on its own as it is not of a scale to require either documents and the requirement to do so will slow down the development unnecessarily. There is no flood risk/drainage issues affecting the respondents site therefore a flood risk assessment is not justified. Tree loss will be kept to a minimum but the Plan must recognise the requirement for their removal.

#### Property Included

83: Notes that the south-eastern corner of OP52 includes his property and two others on Malcolm Road. Demands an explanation and objects to the proposed

development.

## **OP108: Mid Anguston**

### Sustainability

7, 16, 47, 98, 99, 119, 171, 172, 183: Object to the inclusion of the site. Rural community and the access to local employment opportunities and facilities are poor. There is no street lighting or footpaths and would encourage the use of cars. The existing road is in poor condition and does not allow two vehicles to pass. It is used by heavy agricultural vehicles. There will be additional cars which will contradict the Council's Transport Plan and SPP to reduce car usage. The site is 2 kilometres from public transport and 3 kilometres from amenities and shops. If the houses were necessary they could be located on more suitable sites. Community Council members do not enter into discussions with developers. Quarryhill Road would be the entrance/exit for the proposed houses but is not fit for the increase in traffic. There would be a loss of amenity for local residents. Close to Easter Anguston school for disabled and new riding school and increase in traffic would have safety issues for horse riders, vulnerable residents and their carers.

### Housing

98, 171: Site does not supply affordable housing. There are sufficient Green Belt allocations. There is an oversupply of housing in the area. There is a history of individual applications for new houses being refused on the basis of Green Belt allocation. Houses will be out of the price range for most people.

### Schools

7, 47, 98, 119, 171: Reluctant support given to the site during the preparation of the Local Development Plan 2012 due to concern regarding falling school rolls in Culter Primary School. This has now halted. Cults Academy is forecast to be over capacity. There is no guarantee people with children will buy these houses.

### Current Use

47, 119, 171: There is no vermin problem from the chicken sheds as is alleged by the developer. One argument for development is that the chicken sheds are an environmental health issue. It should be the responsibility of the owner to rectify this without the need to build houses.

### Water and Drainage

47, 171, 98, 171: There is no mains sewerage. Excavation, given the proximity to Anguston Quarry, would have severe repercussions. The quarry is the water supply for nearby houses and disturbance has potential risk to the water supply. There is concern about water seepage from the disused quarry. There is concern for the potential for pollution reaching the Gormack Burn. Drainage system is over capacity

and there are instances of local flooding.

### Environment and Landscape

7, 16, 47, 98, 119, 171: The chicken sheds are less intrusive on the landscape than eight detached houses. New homes will impact on views. The development will alter the nature and settlement pattern and destroy the rural character. There will be negative impacts in the landscape from urbanisation of the greenbelt and goes against greenbelt and landscape policies. It will be an isolated development out of character with the designated greenbelt land. Negative impact on wildlife with development leading to disturbance of wildlife, species and their habitats.

### Site Previously Rejected

7, 47, 99, 171, 183: The site was previously rejected at examination and deemed undesirable by officers at Main Issues Report Stage. Other sites were found to be more desirable than Mid Anguston.

### Gas Pipelines

12: Site is located within close proximity to gas pipeline. No permanent structures are built over or under pipelines or within the zone specified in the agreements. Local Authorities have a statutory duty to consider applications within the vicinity of pipelines and there is additional guidance that has been prepared by National Grid. If sites are taken forward developers should be made aware of the issues.

### Support

151: Support inclusion of OP108 Mid Anguston as a development site.

### **OP109: Woodend Peterculter**

### Environment

54, 178, 185, 126: Ancient Woodland is on the site and it is a priority habitat requiring protection. It is part of Green Space Network. Scottish Government guidance includes a strong presumption in favour of protecting woodland. It is difficult to see how 19 houses could be accommodated without impacting on the woodland. Any future proposal will not meet the requirements of SPP or Scottish Government policy and as a result it is not an appropriate site. Concerned about the impact on wildlife. It drains into an existing wetland habitat. Development would fragment the Green Belt and encourage more infill development.

### Support

83, 98: Support the proposed development. Dilapidated farm buildings make it necessary for their demolition. The area to the south west of the existing farm buildings is suitable for small development. Support housing opportunity for the following reasons: they can be developed in the first phase; will support local primary

school; will encourage and sustain small businesses into the District Centre; will help sustain the viability and amenity of the community; the development will comply with the Local Development Plan vision by including leisure and play areas; and affordable homes should be built on the site instead of monetary contributions.

#### Infrastructure

178, 183, 185: The location is unsuitable due to limited infrastructure, schools, GP practice, dental practice etc. Concerned about the increase in traffic that has already been generated by the equestrian centre, on such a small road. Other sites are more suitable and it has been rejected twice. Site is detached from the existing village, remote from services and projects into the Green Belt. The site has no access to transport links. There are no footpaths beyond Bucklerburn Drive, vehicle access is constrained and drainage is an issue.

#### **OP42: Kennerty Mill**

98: Support the redevelopment of brownfield site as it has become a local eyesore. Support for the following reasons: they can be developed in the first phase, will support the local primary school, will sustain new and existing businesses, will help sustain the viability and amenity of the community, affordable homes should be built on site instead of monetary contributions.

#### **OP44: North Lasts Quarry**

98, 65: Support the greenfield housing allocation for the following reasons: they can be developed in the first phase, will support the local primary school, will sustain new and existing businesses, will help sustain the viability and amenity of the community, affordable homes should be built on site instead of monetary contributions.

#### **Modifications sought by those submitting representations:**

##### **Deeside - General**

183: Additional housing sites need to be allocated.

##### **OP43: Miltimber Primary School**

39: Once Milltimber School is demolished, develop the land and field into a children's playpark and sports field. Save the mature trees that border the field.

##### **OP51: Peterculter Burn**

183: Remove the site from the plan.

##### **OP52: Malcolm Road, Peterculter**

5, 23, 51, 107, 110, 114, 174, 175, 183, 1: Remove the site from the plan. It is not

viable due to the lack of infrastructure, services and traffic control opportunities. Housing development in Peterculter should be put on hold. Retain the site as part of the Green Belt/Green Space Network.

80: The text should be amended to acknowledge that the site is in two separate ownerships. The Plan should identify the respondent's site as the first phase of OP52. It should be made clear that a Masterplan is not required for the respondent's part of the site nor is a Flood Risk Assessment. The Plan should recognise that there will be trees removed to provide access into the site.

**OP108: Mid Anguston**

7, 16, 47, 99, 183: Remove OP108 from the Local Development Plan. There are more desirable sites.

**OP109: Woodend Peterculter**

54: Advise that the boundary of the site is redrawn to exclude the areas of woodland. An alternative approach would be for the requirement of a development brief that would set out how the existing woodland would be protected and managed in the long term.

178, 183: Remove the Opportunity Site from the Plan, there are better sites.

**Summary of response (including reasons) by planning authority:**

**General Strategy**

The Aberdeen City and Shire Strategic Development Plan (SDP) 2014 (CD12) proposed not to allocate additional land, but to 'roll forward' the allocations from the Aberdeen City and Shire Structure Plan 2009 (CD20) into the SDP, and this was accepted by the Reporter during the SDP's Examination (Issue 5 pages 54 - 74) (CD13). The Reporter's conclusion stated "Drawing all of these matters together, I conclude that the scale and distribution of growth provided for in the housing allowances is appropriate and sufficient, in accordance with the requirement of paragraph 117 of Circular 6/2013." Aberdeen City Council agrees with these conclusions.

The Vision and Objectives for the Proposed Plan are the same as the Aberdeen City and Shire Strategic Development Plan 2014. The role of the Strategic Development Plan is to "set clear parameters for subsequent Local Development Plans and inform decisions about strategic infrastructure investment." (Circular 06/2013 paragraph 41, CD10). The Strategic Development Plan sets a clear strategy for development in Aberdeen, which includes housing allowances to be delivered through Local Development Plans.

## **Deeside – General**

98: This point is covered in Issue 28 Affordable Housing.

98: The Proposed Plan aims to deliver sustainable communities in the most sustainable locations. Peterculter is a well-established settlement to the west of Deeside and is a recognised Neighbourhood Centre in the extant Aberdeen Local Development Plan 2012. The Council considers that the continued viability and prosperity of Peterculter is an important goal for maintaining Deeside as a whole. The Council has recognised that in order to promote and protect local facilities, shops and infrastructure present within Peterculter it is desirable and necessary to identify sites which are deemed acceptable for residential development and have the potential to enhance the viability of Peterculter both as a population centre and as a Neighbourhood Centre.

183: The queries surrounding a shortfall in housing are dealt with in the General Strategy section above.

9: Education - Following the review of the school estate in Aberdeen City in 2012, the Council have been working through an extensive programme of consultations on changes to school zones and other matters relating to the estate. The programme and the timescales for each consultation were required to be approved in advance by Education Scotland. It was not possible to undertake the Cults Academy consultation any sooner, due to the other consultations which were required to be carried out at that time.

## **OP43 Milltimber Primary School**

### Background

This allocation has been carried forward from the Aberdeen Local Development Plan (2012) (OP55) and was previously considered by Reporters during the Examination of this Plan (Issue 46 CD44). The site will become available for development once a new Primary School for Milltimber is constructed as part of the OP48 Oldfold site. The site is still currently used for educational purposes.

### Designation

4, 39: The site has been previously developed, and thus is considered to be a Brownfield Opportunity Site. This was confirmed by the Reporter via the Examination of the extant Local Development Plan (Issue 46). The Aberdeen City and Shire Strategic Development Plan (SDP) 2014 (CD12) requires 7,500 homes on brownfield sites up to 2026 and residential development on this site will assist in meeting this requirement. The Reporter in the Examination into the extant Plan confirmed the site's suitability for residential development. The Council's Open Space Audit 2010 Report (CD41) identifies (on page 70) two existing local parks in Milltimber and notes (on page 71) that Milltimber residents are within 400 metre catchment of a local park. As such, there is no specific requirement for an additional local park within

Milltimber.

### Trees and Loss of Open Space

39: Although not specifically identified as Urban Green Space on the Proposals Map due to the small scale of the site, the grassed area of the site (school playing fields) is covered by Proposed Policy NE3 - Urban Green Space and will therefore be protected or replaced in accordance with this policy. With regards the protection of mature trees, this issue would be address via the consideration of any planning application for the site, giving due consideration to Proposed Policy NE5 Trees and Woodlands.

### Scale of Development and Residential Amenity

4, 44: At the current moment there is no planning application or design brief for the site. Therefore, specific questions regarding the design of the site are unable to be answered at this time. There will be, in due course, more opportunities for the public to comment on this site when a planning application or design brief is lodged. At the moment all comments regarding the layout and design of the proposed development have been noted. Impact on property values and views from private properties are not planning matters.

### Flooding

4: A Flood Risk Assessment will be required to accompany any future development proposals and this is mentioned in the Opportunity Schedule in Appendix 2 of the Proposed Plan. Flooding and drainage issues would be addressed and agreed at planning application stage, in consultation with the Council's Flooding Team.

### Transport and Access

39, 44: Concerns over traffic impact and access arrangements are noted, however this will be assessed and agreed at planning application process, in consultation with the Council's Roads Project Team.

In summarising the above, the Council continue to recommend that this site is suitable for development, and that its development would help meet the Strategic Development Plan targets for brownfield development.

## **OP48 Oldfold**

### Background

This allocation has been carried forward from the Aberdeen Local Development Plan (2012) (OP62) and was previously considered by Reporters during the Examination of this Plan (Issue 40). The allocation is subject to a [Development Framework and Masterplan](#) exercise which was approved as Supplementary Guidance to the extant Plan in March 2013. Planning Permission in Principle for the development of approximately 550 residential units, commercial, primary school and associated

ancillary uses and infrastructure improvements including road junction formation on A93 ([130378](#)) was approved on 25th February 2015 and a subsequent Approval of Matters Specified by Condition (AMSC) Application for Phase 1 ([150260](#)) was approved on 06th August 2015.

### Traffic

13: A Transport Assessment was submitted to accompany the Planning Permission in Principle application, and was audited by the Council's Roads Projects Team. The need for a financial contribution towards improvements on North Deeside Road has been secured via a legal agreement signed under Section 75 of the Town and Country Planning (Scotland) Act 1997, as amended ('Section 75 agreement').

With regards the visibility splays required for the development, this matter has been addressed during the consideration of the Phase 1 AMSC Application ([150260](#)) and the visibility splays approved via this application do not require any works within the respondent's private property.

### Education

98: The location of the new Primary School has been approved via the Planning Permission in Principle application approved on 25th February 2015 ([130378](#)) further to a detailed Masterplanning exercise. The location of the Primary School is located off Bingham Road, as is the respondent's preference.

### Conditional Support for Development

98: Noted.

### Status of Development Framework / Masterplan

98: The Development Framework and Masterplan exercise was approved as Supplementary Guidance to the Aberdeen Local Development Plan 2012 in March 2013. We would intend to readopt this document as Supplementary Guidance to the Proposed Plan, following its adoption.

### Identification of Masterplan Zone

102: The Oldfold Masterplan Zone has been omitted from Figure 1 as it is considered that development of this site is sufficiently advanced and therefore the site no longer requires to be specifically identified as a Masterplan Zone.

### Action Programme

102: A response to this comment is provided via Issue 42 – Action Programme.

In summarising the above, the Council continue to recommend that this site is suitable for development, and that its development would help meet the Strategic

Development Plan targets for greenfield development.

### **OP39: Braeside Infant School**

11: As is outlined in Appendix 2 the school has a potential for future residential use. In the meantime the school can be used to house primary school pupils from the Countesswells development pending the development of a primary school there. Development will have to respect the surrounding residential amenity. The Council seek the retention of the play park in its current location to the south of the site and this is mentioned in the site description in the Opportunity Site Schedule in Appendix 2 of the Proposed Plan.

### **OP51: Peterculter Burn**

98: The support for the opportunity site is noted.

183: The site is already allocated in the adopted Aberdeen Local Development Plan 2012 as an Opportunity Site reserved for residential use (OP134). The principle of its allocation was tested at the previous Examination in Issue 50. It remains appropriate to identify the site as a development opportunity for residential zoning as there has been no significant change in circumstances which would justify an amendment to this designation. Peterculter is a well-established settlement to the west of Deeside with a recognised neighbourhood centre in the Aberdeen Local Development Plan 2012. The Council considers that the continued viability and prosperity of Peterculter is an important goal for maintaining Deeside as a whole. The Council has recognised that in order to promote and protect local facilities, shops and infrastructure present within Peterculter it is desirable and necessary to identify sites which are deemed acceptable for residential development and have the potential to enhance the viability of Peterculter both as a population centre and as a neighbourhood centre.

### **OP52: Malcolm Road, Peterculter**

#### Previous Examination

5, 46, 51, 107, 183: Although the site was removed during the Local Development Plan 2012 Examination it has since been reinserted as a preferred option during a Council meeting on 12 November 2013 in regard to the Local Development Plan Main Issues Report. The primary reasons being that it provided further housing opportunities and would help support the local primary school. There is excess capacity with regards to places at the local primary school with a capacity for 87 extra pupils in 2016, as set out in the School Roll Forecasts (CD32). It is recognised that this site lies out with 800 metres from the Neighbourhood Centre of Peterculter. It is, however considered that a residential development here would provide additional support to the community of Peterculter. The Council considers that the continued viability and prosperity of Peterculter is an important goal for maintaining Deeside as a whole. In order to promote and protect local facilities, shops and infrastructure present within Peterculter it is desirable and necessary to identify additional sites which are deemed acceptable for residential development and have the potential to enhance the viability of Peterculter both as a population centre and

as a Neighbourhood Centre.

### Natural Environment

5, 23, 51, 83, 107, 110, 114, 126, 174, 1: The site is designated as Ancient Woodland. Any development would be required to mitigate for any loss to established Woodland and comply with Policy NE5 of the Proposed Plan. These issues do not preclude designation as an Opportunity Site and can be dealt at the planning permission stage. The Council considers that this site is a natural extension to the existing community of Peterculter. Despite its elevated position, the existing trees, along with further supplementary planting should provide adequate screening of the site from the surrounding area and will reduce any landscape impacts arising from housing development there.

### Infrastructure and Facility Constraints

5, 23, 46, 51, 107, 110, 114, 174, 175, 1: The Council note the level of objection to this site based on the assertion that Malcolm Road is sub-standard and not suitable for the increased traffic that any development would facilitate. Discussions between any developer and the Local Authority Roads Department would be required to address the access issue but it is not considered that there are any technical concerns which prevent access being taken from Malcolm Road to the proposed site. Perceived deficiencies in Malcolm Road itself, for the level of traffic to be generated, can also be addressed at the planning application stage are not deemed to preclude designation for residential use. The construction of the AWPR should also see a reduction in the traffic currently using Malcolm Road to bypass Aberdeen. It is acknowledged that there are capacity issues at Cults Academy with forecasts indicating the school going over capacity in 2021. However, the housing numbers attributed to the Cults Academy catchment include those houses proposed in Countesswells. It is intended that this area will be removed from the Cults Academy catchment thereby relieving some of the pressures on Cults. Representations made reference to the distance to local facilities from the site. It is recognised that this site lies out with 800 metres from the neighbourhood centre of Peterculter. It is, however, considered that a residential development here would provide additional support to the community of Peterculter and to the neighbourhood centre. It is reasonable to expect that residents of this site would make use of Peterculter and its facilities and contribute towards its sustainability. The Proposed Action Programme (CD21) requires that site access from the B979 should be a loop or through road and walking access to both bus services are provided. There is a recognised concern regarding the main sewer at this location, however, again this is not felt to preclude allocation of this site for residential use. It is a matter which can and would be dealt with at the application stage.

### Flooding

23, 51, 83, 114: Drainage and run off issues along Malcolm Road are noted. Any development here would be likely to include drainage impact assessments and the implementation of SUDS schemes as appropriate in order to alleviate such issues. The requirement for a Flood Risk Assessment in support of any development proposal is identified in the Proposed Action Programme and in the Opportunity Site

Schedule in Appendix 2 of the Proposed Plan.

### Mix of Use

114: The Council has recognised that in order to promote and protect local facilities, shops and infrastructure present within Peterculter it is desirable and necessary to identify sites which are deemed acceptable for residential development and have the potential to enhance the viability of Peterculter both as a population centre and as a Neighbourhood Centre.

### Support the Allocation

98, 151: Support is welcomed for the Opportunity Site.

80: As this site is to be developed for more than 50 homes, the developer will be required to prepare a masterplan for the whole site prior to applying for planning permission. The requirement for a masterplan or Planning Brief covering the whole site is important to set out a fundamental framework for the way in which this residential site can best be developed. The masterplanning process will set out the key principles of the design approach but it should be noted that collaboratively masterplanning the sites together does not necessarily mean that they must be delivered together. There are precedents, within Aberdeen City, for sites in multiple ownership which have successfully been masterplanned in a collaborative nature. Masterplanning of this site should take into account Policy NE5 of the Proposed Plan (Trees and Woodlands), which seeks to protect and enhance Aberdeen's trees and woodland. Although the site is in two separate ownerships it is considered overall as one Opportunity Site. Therefore a Flood Risk Assessment will be required to address the whole site including the area owned by the respondent.

### Property Included

83: The boundary contains three properties along the southern edge of the site. We are of the opinion that Bucklerburn Road acts as a suitable southern boundary for the site. If these properties were zoned as Green Belt this would not meet the objectives of the Policy NE2: Green Belt. When this site is developed, in the next review of the Local Development Plan, these sites will be zoned as residential which would reflect the proposed use of this site and the current use of the properties.

### **OP108: Mid Anguston**

#### Supports Local Community and Services in Peterculter

Peterculter is a well-established settlement to the west of the city in Deeside. The Council considers that the continued vitality and viability of Peterculter is an important goal for maintaining Deeside as a whole. The Council recognises that in order to promote and protect local facilities, shops and infrastructure already present within Peterculter it is desirable and necessary to identify additional sites which are acceptable for residential development and have the potential to enhance the viability of Peterculter as a population centre.

### Sustainability

7, 16, 47, 98, 99, 119, 171, 172, 183: The Council accepts that the site is outwith the existing settlement at Peterculter. It is also accepted that accessibility to the major road network and public transport facilities is poor. It is anticipated that the majority of residents at the proposed site would use their own vehicles for transport. It is the Council's submission however, that given the relatively small number of units proposed for this site the impact on sustainability will be minimal and therefore acceptable. The Council would wish to note that there is an existing settlement at Mid Anguston, Peterculter and there are adopted roads, street lighting and refuse collections are carried out to the existing dwellings. The school bus has an existing route through Mid Anguston. A safe walking route exists from the site to the local primary school.

### Housing

98, 171: The Council's position is that the site would offer eight residential units close to the city for employment opportunities but retaining the character of living within a countryside setting. The housing which is proposed would be in keeping with the local area. The provision of a limited number of larger homes at the site is considered to contribute to a choice for home buyers of a range of properties available both within the Peterculter settlement and within the Aberdeen City boundaries as a whole.

### Schools

7, 47, 98, 119, 171: The zoned local Primary School, Culter Primary has excess capacity with capacity for 87 extra pupils in 2016.

### Current Use

47, 119, 171: The current condition of the site is considered undesirable and it is the Council's submission that removal of the chicken sheds would be a positive outcome if the site were to be included for residential development.

### Amenity

The Council does not consider that the inclusion of the site would cause significant detriment to the amenity of existing residential properties in the locality. Any question of amenity is something which would be dealt with at the planning application stage. Mitigation measures could be implemented to ensure that any impact on amenity is minimised or negated. The Council does not consider that potential impact on amenity of existing residential properties would be significant.

### Suitability of Alternative Sites

Various representations make reference to the fact that there are more desirable sites for development. It is the Council's submission that the inclusion of this site addresses the Council's identified desire to support and promote the existing

settlement at Peterculter.

### Proximity of Pipeline

12: The proximity of a pipeline to the proposed site is known and acknowledged by the Council. It is not felt to preclude residential development at the site.

### Water and Drainage

47, 171, 98, 171: The site falls within the River Dee catchment area. Various representations make reference to concerns in relation to water and drainage. It is the Council's position that the site is freely draining with no waterlogged areas and no flood risks have been identified by SEPA.

The Council therefore maintains that the allocation of this site for the residential development of 8 houses is appropriate and should be maintained.

### **OP109: Woodend Peterculter**

#### Supports Local Community and Services in Peterculter

54, 83, 98, 126, 178, 183, 185 : Peterculter is a well-established settlement to the west of the city in Deeside. The Council considers that the continued vitality and viability of Peterculter is an important goal for maintaining Deeside as a whole. The Council recognises that in order to promote and protect local facilities, shops and infrastructure already present within Peterculter it is desirable and necessary to identify additional sites which are acceptable for residential development and have the potential to enhance the viability of Peterculter as a population centre. The Council would like to highlight that the local Community Council support the inclusion of this site.

### Sustainability

The Council accepts that the site is outwith the existing settlement at Peterculter. It is also accepted that accessibility to the major road network and public transport facilities is poor. It is anticipated that the majority of residents at the proposed site would use their own vehicles for transport. It is the Council's submission however, that given the relatively small number of units proposed for this site the impact on sustainability will be minimal and therefore acceptable. The site is in close proximity to a site which has planning permission for a cricket pitch, club house and associated parking. The site is near to Core Path 51 (Garinhill Wood to Guttrie Wood) and Core Path 52 (Bucklerburn Road to Easter Anguston. The site is also near to Aspirational Path 4 (Peterculter to Milltimber). The school bus has an existing route through Woodend and refuse is already collected in the area. A safe pedestrian route to Culter Primary School exists from the site.

### Housing

The Council's position is that the site would offer 19 residential units close to the city

for employment opportunities but would have the character of living within a countryside setting. The provision of a relatively small number of homes at the site is considered to contribute to a choice for home buyers of a range of properties available within the Aberdeen City boundaries and to contribute to mobility in the housing market in this area.

### Environment

Various representations make reference to the woodland on the site. It is the Council's position that mitigation measures at the planning application stage could be implemented to minimise any loss of trees on the site. It is the Council's position that minimal loss of trees is an acceptable consequence of development contributing to the viability of Peterculter.

### Schools

The zoned local Primary School, Culter Primary has excess capacity with capacity for 87 extra pupils in 2016.

### Current Use

The current condition of the site is considered undesirable and it is the Council's submission that removal of the existing derelict and dilapidated farm buildings would be a positive outcome if the site were to be included for residential development.

### Amenity

The Council does not consider that the inclusion of the site would cause significant detriment to the amenity of existing residential properties in the locality. It is the Council's submission that woodland to the north and south of the site would screen the development and provide natural mitigation for impact of development. Any question of amenity is something which would be dealt with at the planning application stage. Mitigation measures could be implemented to ensure that any impact on amenity is minimised or negated. The Council does not consider that potential impact on amenity of existing residential properties would be significant.

### Suitability of Alternative Sites

Various representations make reference to the fact that there are more desirable sites for development. It is the Council's submission that the inclusion of this site addresses the Council's identified desire to support and promote the existing settlement at Peterculter.

### Water and Drainage

It is the Council's position that there are no known flooding risks or drainage issues at the site. The Council therefore maintains that the allocation of this site for the residential development of 19 houses is appropriate and should be maintained.

**OP42: Kennerty Mill**

98: We welcome the support for the allocation of Proposed Plan Site OP42. Peterculter is a well-established settlement to the west of Deeside and is a recognised Neighbourhood Centre in the extant Aberdeen Local Development Plan 2012. The Council considers that the continued viability and prosperity of Peterculter is an important goal for maintaining Deeside as a whole. The Council has recognised that in order to promote and protect local facilities, shops and infrastructure present within Peterculter it is desirable and necessary to identify sites which are deemed acceptable for residential development and have the potential to enhance the viability of Peterculter both as a population centre and as a Neighbourhood Centre.

**OP44: North Lasts Quarry**

98, 65: We welcome the support for the allocation of Proposed Plan Site OP42. In response the Opportunity Site is identified for ongoing mineral extraction. There is no housing proposed and there for no requirement for affordable homes.

**Reporter's conclusions:**

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**Reporter's recommendations:**

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<b>Issue 12</b>	<b>ALTERNATIVE SITES: DEESIDE</b>	
<b>Development plan reference:</b>	No reference in the Plan	Reporter:
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
<p>Mr Gary Purves of Knight Frank LLP on behalf of Mr McDonald (56)  Miss Shelley Thomson of Stewart Milne Homes (82)  Mr Ewan Maclean of Emac Planning LLP on behalf of Polmuir Properties Limited (84)  Mr John Findlay of Ryden LLP on behalf of Stewart Milne Homes (85)  Mr John Findlay of Ryden LLP on behalf of Mr Russell Balsillie and Family (95)  Ms Lavina C. Massie on behalf of Culter Community Council (98)  Mr Roger Laird of Archial Norr on behalf of Parkie Property and Development Limited (103)  Mr Roger Laird of Archial on behalf of Mr &amp; Mrs A.N. Ironside/Midstocket Development Company (106)  Miss Lucy Sumner of Halliday Fraser Munro on behalf of Shivas Trust/ D Gray &amp; Others (122)  Mr Christopher Ross of Barratt North Scotland (125)  Ewan Maclean of Emac Planning LLP on behalf of Stewart Milne Homes (128)  Mrs Theresa Hunt of Burness Paull LLP on behalf of Mr Ian Suttie (133)  Mrs Theresa Hunt of Burness Paull LLP on behalf of Cults Property Development Limited (142)  Mr Steve Crawford of Halliday Fraser Munro on behalf of Mr W Donald (145)  Mr Gary Purves of Knight Frank on behalf of Rubislaw Estates (154)  Mr Fraser Littlejohn of Montagu Evans on behalf of E Yule Esq PER Kennedy Consultants (161)  Mr Colin Fraser of Park Home Estates (170)  Mr Ben Freeman of Bancon Developments (183)</p>		
<b>Provision of the Development Plan to which the issue relates:</b>	Alternative sites in Deeside	
<b>Planning authority's summary of the representation(s):</b>		
<p><b>BIELDSIDE</b></p> <p><b>Murtle Den &amp; Surrounds, Bielside (B0922)</b></p> <p>84: Object to failure of site being included for one or two housing units. The proposed houses would fit with local character and there are recent precedents.</p> <p>84(2) Object to the land zoning of bid site B0922 and the neighbouring land. The area is not justifiable part of the Green Belt.</p> <p><b>Murtle Den, Bielside</b></p>		

95: Land has potential to accommodate development without detriment to the area. No consideration given to Green Belt boundaries in the preparation of the Proposed Plan. SPP prepared after the Green Belt Review and takes a more relaxed approach. Development of Oldford Farm will result in a physical connection between Bielside and Milltimber but they will be visually separate. Character would not be lost by removal of the Green Belt. There are precedents along the Deeside corridor. Redevelopment of Waterwheel Inn will be out of keeping with the area and demonstrates that Green Belt designation serves little purpose. Redrawing the Green Belt boundaries with the area removed would create stronger defensible boundaries. Green Space Network provides an additional layer of control that can work without the Green Belt.

## **CULTS**

### **Thornhill, Craighton Road (B0924)**

125: Object to the non-inclusion of site for a residential development of 150 units.

## **MILLTIMBER**

### **Brookfield (B0902)**

56: Site should be identified as a small scale greenbelt housing site for 20-30 houses for over 55's / retired / elderly persons. Consultation with the Cults, Bielside and Milltimber Community Council has indicated there is a need for this type of specialist housing, as it is not being sufficiently provided for in the local area. Larger housing allocations in the local area such as Oldfold and Countesswells have not been delivered as originally anticipated. Development specific for this age group would not conflict with the delivery of other existing housing allocations at Oldfold or Countesswells. The site is immediately available and free from constraints. There would be no coalescence between Bielside and Milltimber. The visual impact on the landscape would be relatively minor. The site sites adjacent to the Oldfold site and can be well contained within existing and proposed woodland. The site is highly sustainable in terms of proximity to public transport routes.

### **Contlaw (B0915)**

85: Site should be identified for the development of a phased development comprising residential, business and commercial, local shopping provision and community facilities with associated strategic landscaping and public open space. Provision is also made a new primary school with associated playing fields. There will be no visual or physical harm to the landscape setting and identity of Milltimber. Officers' assessment of the site fails to consider the urbanising effect of the AWPR which will change the character of the area significantly and will provide a well-defined physical boundary to the west of Milltimber. A re-think of the Green Belt boundaries are required. Capacity constraints at Cults Academy are not an impediment to development and capacity could be increased through developer contributions. The site has good public transport links and could accommodate a Park & Ride facility serving the A93 corridor. With its 9 hectares of employment land,

the site would create a more sustainable Deeside.

### **West of Contlaw Road (B0946)**

85: Site should be identified for the development of 10-15 residential units. This site could be developed as a stand-alone site or as Phase 1 of the larger Contlaw proposal. The AWPR which will change the character of the area significantly and will provide a well-defined physical boundary to the west of Milltimber. A re-think of the Green Belt boundaries are required. The site enjoys an attractive setting adjacent to an established residential area and within walking distance of bus routes along the A93 North Deeside Road. The site is also well placed to take advantage of the services and facilities available in Peterculter and Bielside. The topography of the site and landscape features would ensure its containment in landscape terms and the development would have minimal impact on landscape setting. The scale of development proposed would not have a significant impact on infrastructure.

### **Guttrie Hill West (B0907)**

106: Site should be included as a residential allocation for five houses with shared drive. The site is a brownfield site, previously used for quarrying. If any protected species are present, there will be mitigation measures. The houses can be adapted and therefore will provide a mix. The historic features on site will not be damaged. No negative impact on schools. The AWPR is in close proximity, and there is good public transport and paths.

### **Guttrie Hill East (B0908)**

106: Site should be allocated as suitable for a sustainable energy vehicle refuelling station. This would create a charge point for electric vehicles, hydrogen refuelling for vehicles running on fuel cells, an LPG dispenser, in addition to conventional petrol and diesel. It would also include ancillary retail facilities, of the same scale as that found in a conventional petrol station. The site is ideally located at the Milltimber junction of the AWPR. Support for this type of development is provided at every level of hierarchy of planning policy in Scotland. There would be no negative impact on natural heritage, or cultural heritage. The Ancient Woodland status is outdated. The site relates well to the existing built up area of Aberdeen. The area will be subject to major change over coming years as a result of the AWPR.

### **Binghill Farm (B0933)**

145: The site would act as a logical extension to the Oldfold site (OP48). The reasons for rejecting Binghill are not in any way robust. Transport does not provide an excuse for not zoning the land. The site is zoned as Green Belt and Green Space Network however the principle of development is established in a major housing site adjacent to Binghill Farm and nearby Countesswells. The medium to low density nature proposed for the site would not be overbearing to the character of the landscape and it would not extend north beyond the Oldfold allocation. Its integration with the settlement would support a clear, defined physical boundary and not contribute to sprawl. Existing path access would be maintained and enhanced. Little value would be retained through preventing development in favour of the Green

Space Network. A small portion of the site would be developed, retaining land for open space, paths and access, and landscape retention. New allocations are scarce in Deeside and a low number of completions have taken place resulting in sites being carried forward. The allocation of small and medium scale sites is the key to reaching housing delivery targets.

### **Culter House Road (B0901)**

154: The site is suitable for housing development (12 units) once the AWPR has been completed. The site does not warrant a Green Belt or Green Space Network designation for the following reasons: 1. Logical Greenbelt boundary is the AWPR, 2. The land is a gap site and development would infill between OP46 and OP47, 3. Removing the land from the Greenbelt will not lead to urban sprawl, 4. The land has little or no value in terms of providing a landscape setting or access to open space. The site is free from constraints, there is already street lighting along Culter House Road, it is within walking distance of public transport routes and connects directly onto the footpath link to the AWPR. There are pavements up to the edge of the site and there is a Core Path Network in the vicinity. The indicative site layout includes a new cycleway/footpath through the middle of the site. Culter House Road will become a dead end once the AWPR is completed and the existing road network will be capable of accommodating a small increase in traffic. The only future housing allocation is Oldford which is controlled by one housebuilder and does not provide a choice. The site is on the Aberdeen side of the AWPR and will be well contained. The site is not visible from public vantage points. The AWPR will vastly change the character of the area and the identification of the site as part of the Green Belt does not protect or enhance the quality, character or landscape setting of the city. There is no public access to the countryside and the site offers nothing in terms of protecting or promoting wildlife, recreational or landscape access value to the wider Green Space Network.

### **Milltimber South (B0940)**

183: Site should be allocated for 60 houses and associated commercial uses. Due to the constrained housing developments in the area, an additional 150 houses are required to be allocated in the period 2017-2026. Due to housing constraints elsewhere in the city the Deeside corridor would be able to accommodate approximately 1000 new homes. Design and landscaping would minimise visual impact. The current view will be replaced by one of the AWPR, routed 25-30 metres above current level. The delivery of the AWPR will provide convenient access for the site, via a grade separated interchange to the west.

## **PETERCULTER**

### **Business Site, Peterculter**

98: A small scale business park should be allocated adjacent to the urban part of Peterculter

### **Malcolm Road, Peterculter (B0943)**

82: Object to the site (B0943) Malcolm Road not being included for 25 residential units. Site can be delivered, has good accessibility and close to amenities. Opportunity Sites 51, 52 and 109, in Peterculter, are not appropriate.

#### **Land North of Peterculter (B0909)**

103: Site is half a mile north of Peterculter and suitable for 8 houses. Demand for single storey houses for elderly. Shared access could be provided. Site previously rejected for being adjacent to a Special Area of Conservation and Local Nature Conservation Site but this is incorrect. Development could not be described as having an adverse effect on the landscape. Site is close to Peterculter and has better access than sites that are currently in Proposed Plan. Site is not at risk from flooding, there would be no adverse impact on the landscape, no restriction to open space access, and is adjoined by development on all sides. Small scale development would not impact infrastructure capacity.

#### **Cobblestock, Peterculter (B0930)**

122: South west end of Peterculter submitted previously. The Reporters previously had positive comments. There is scope for small scale development in Peterculter. No homes are planned for delivery in Phase 2 of the Proposed Plan. New housing allocations are limited while housing delivery targets continue to fall short. A range of small/medium sites which can be delivered are needed. In the Main Issues Report checklist the site scored higher than Mid Anguston but yet it was considered less acceptable. Site is closer and more accessible. The road network has capacity, the site is a logical extension and would not contribute to sprawl.

#### **Rob Roy Mobile Home Park, Malcolm Road, Peterculter**

170: Rezone land to Residential or Mixed Use. Currently a developed residential site for 101 park homes within the Greenbelt. In a position to replace with new Mobile Homes (Park Homes) or replace with conventional homes and remove from Green Belt. Lifespan and value would be more. Park Home residents have the right to stay for the duration of the owner's life. If mobile homes are replaced it will remain as such for the foreseeable future. Site has mains sewerage, hydro-electric substation, there is a pavement and street lights. With the AWPR there will be no difference in traffic between park homes and conventional housing. Only opportunity to change to conventional housing and would be classed as brownfield development.

#### **Hill of Ardbeck, Peterculter (B0934)**

183: Object to non-allocation of Hill of Ardbeck for 61 houses, improved management of open space and contribution to recreational facilities. Constrained housing developments elsewhere have resulted in Deeside being able to accommodate approximately 1000 homes. Part of site has Ancient Woodland and is a Local Nature Conservation Site. Development limited to the bowl to minimise environmental and visual impacts. Site previously supported by the Reporter in 2008 when submitted as sheltered housing. Would provide 25% affordable housing and create a better recreational resource than overgrown area that it is now.

### **Peterculter East (B0935)**

183: Object to the non-allocation of Peterculter East for 38 houses and a business park. Due to constrained housing developments there is a requirement for additional houses and the Deeside corridor could accommodate new homes. The AWPR will improve connectivity and the grade separated junction will provide direct access to the site. Site will provide employment opportunities and is a logical infill. Housing will contribute to needs. Both the business park and housing are free from constraint.

### **Newmill, Peterculter (B0937)**

183: Object to the non-allocation of Newmill. Site split between the City and Shire boundary. Due to constrained housing developments there is a requirement for additional houses and the Deeside corridor could accommodate new homes. It would be masterplanned, landscaped, delivered quickly and help to address the shortfall in residential and business land allocations.

### **Kennerty Farm, Peterculter (B0938)**

183: Object to the non-allocation of Kennerty Farm, Peterculter for 22 houses. Due to constrained housing developments there is a requirement for additional houses and the Deeside corridor could accommodate new homes. The site will meet housing requirement and is a logical extension to the settlement. Close proximity to Local Nature Conservation Site and Special Area of Conservation. Drainage and landscaping will be provided to mitigate and enhance the area.

## **PITFODELS**

### **Parklea House**

133: Garden ground of Parklea should be removed from the Green Belt and rezoned as R1: Residential. The Appraisal notes that Parklea's garden ground does not meet any principles of the Green Belt policy such as to warrant retention of that designation. It demonstrates the removal of the Green Belt designation from Parklea will (1) not affect the important characteristics of the landscape setting of Aberdeen; (2) create a more defensible road boundary to the Green Belt by using an existing road - Baird's Brae and (3) rationalise the Green Belt in this location to reflect the local characteristics of the area.

### **Inchgarth Road Residential and Link (B0912)**

142: Objects to the non-allocation of the site for 100 residential units and the provision of a new link road from Inchgarth Road to North Deeside Road, and the removal of the site from the Green Belt and Green Space Network. The site would be developed taking into account the local context, sustainable transport and the link road would be beneficial to the wider network, for pedestrians, cyclists and a potential new bus route.

### **Inchgarth Road Mixed Use and Link**

142: Object to the non-allocation of the site for 300 units of student accommodation, all weather pitch, 60 residential units and a link road, and the removal of the site from the Green Belt and Green Space Network.

Student accommodation fulfils a specific need within the city as is outlined in Policy H5: Affordable Housing and the supporting Supplementary Guidance. Communities facilities are also supported within the Local Development Plan as is outlined in Policy CF2: New Community Facilities. Community facilities include education related facilities.

The site would be developed taking into account the local context, sustainable transport and the link road would be beneficial to the wider network, for pedestrians, cyclists and a potential new bus route.

### **Land at Station Road, Pitfodels**

142: Objects to the non-allocation of 0.8 hectare site for three residential units and landscaped grounds. Remove the site from the Green Belt and Green Space Network. The site would be developed taking into account the local context and sustainable transport, and would be absorbed easily into the settlement.

### **Land at Pitfodels Station Road, Cults**

161: Remove the site from the Green Belt and designated for three no. detached residential units. Infill development contributes to the housing land supply, and development of this site would not undermine the Green Belt Policy but would provide a more defensible Green Belt Boundary along the line of the South Deeside Way.

### **Craigton Road (B0939)**

183: Object to the non-allocation of Craigton Road for 32 houses and a care home, with woodland buffers. Due to constrained housing development in the area, and beyond new housing could be accommodated in the area. Allocating the site would create a more defensible Green Belt boundary.

## **WESTHILL**

### **Cadgerford and Backhill Westhill (B0931/B0932)**

128: Object to the non-allocation of B0931 and B0932 and a development site of 6 hectares of employment land and 600-700 homes on Aberdeen City side of the site. A cross boundary Masterplan is advocated for the site. Development strategy has been prepared. The Westhill Capacity Study (Aberdeenshire Council) indicates growth will continue to Westhill. Housing allocations are needed to balance employment land. The site is accessible, in close proximity to local facilities and could assist with infrastructure issues.

**Modifications sought by those submitting representations:**

**BIELDSIDE**

**Murtle Den & Surrounds, Bielside (B0922)**

84: Identify land at Murtle Den for the allocation of one or two detached houses.

84: Identify site and the neighbouring land (shown by the blue boundary) as H1: Residential Areas.

**Murtle Den, Bielside**

95: Green Belt zoning should be removed and identified as a residential area.

**CULTS**

**Thornhill, Craigton Road (B0924)**

125: Remove from the Green Belt and allocate as Land Release 1.

**PETERCULTER**

**Malcolm Road, Peterculter (B0943)**

82: Delete sites OP52 and OP109. Allocate site for 25 residential units and associated infrastructure for release within the first 5 years.

**Land North of Peterculter (B0909)**

103: Site should be included in the Local Development Plan.

**Cobblestock, Peterculter (B0930)**

122: Change land zoning to Residential

**Rob Roy Mobile Home Park, Malcolm Road, Peterculter**

170: Change zoning from Green Belt/brownfield to Residential or Mixed Use.

**Hill of Ardbeck, Peterculter (B0934)**

183: Allocate site for 61 houses.

**Peterculter East (B0935)**

183: Allocate the site for 38 houses and a business park.

**Newmill, Peterculter (B0937)**

183: Remove the Green Belt status and allocate the site.

**Kennerty Farm, Peterculter (B0938)**

183: Allocate site for 22 houses.

**PITFODELS**

**Parklea**

133: Removed the garden ground from the Green Belt zoning.

**Inchgarth Road Residential and Link (B0912)**

142: Remove the site from the Green Belt and Green Space Network and allocate for residential and a new link road.

**Inchgarth Road Mixed use and Link**

142: Remove the site from the Green Belt and Green Space Network. The land should be identified as an Opportunity Site

**Land at Station Road, Pitfodels**

142: Remove the site from the Green Belt and Urban Green Space and allocate for Residential development

**Craigton Road (B0939)**

183: Allocate the site for 32 houses and a care home

**WESTHILL**

**Cadgerford and Backhill Westhill (B0931/B0932)**

128: Allocate 6 hectares of employment land and 600-700 houses.

**Summary of response (including reasons) by planning authority:**

## **General Strategy**

In preparing the Proposed Plan a Development Options Assessment (CD28, CD30, CD31), Strategic Environmental Assessment (CD27), and Main Issues Report (CD29) were used to identify the most suitable locations to deliver the required growth. The majority of greenfield sites identified in the Proposed Plan have been carried over from the Aberdeen Local Development Plan 2012 (CD42) which went through a similar process at that time. Most of these sites are at an advanced stage in terms of planning consents and Masterplans as detailed in the latest version of the Action Programme (CD47).

The Aberdeen City and Shire Strategic Development Plan (SDP) 2014 (CD12) sets the requirements for greenfield housing and employment land allowances and these are set out in Figure 1 of the SDP on page 12 and in Schedule 1 on page 42. Under Issue 2 we conclude that the SDP greenfield requirements have been fully met and we are confident that a continuous 5 year housing land supply can be met throughout the lifetime of this LDP. Accordingly, we do not consider it necessary to allocate any further greenfield sites beyond those already identified in the Proposed Plan.

## **BIELDSIDE**

### **Murtle Den & Surrounds, Bielside (B0922)**

84: We do not propose to allocate this site for development. Aberdeen City Council has assessed this site, considered it undesirable, and rejected it on the grounds set out in the Proposed Plan Site Assessment Report (CD31). Any development of this site would be prominent from North Deeside Road, particularly when travelling west. Although next to the allocated site at Oldford, Murtle Den Road provides a good Green Belt boundary for development to the west. Murtle Den Road is tree lined and helps to screen and contain Oldford. The effect of this would be lost if development occurred here. The topography and woodland around Murtle Den prevents visual and physical coalescence between Milltimber and Bielside. The site contributes to the landscape setting of the area and should remain zoned as Green Belt. Further detail on the justification of the Green Belt boundary in this locale can be found in Figure 15 of the Green Belt Review (CD38) which examined the boundaries of the allocated sites identified in the extant Local Development Plan 2012.

### **Murtle Den, Bielside**

95: We do not propose to allocate this site for development. Aberdeen City Council has assessed this site, considered it undesirable, and rejected it on the grounds set out in the Proposed Plan Site Assessment Report (CD31). The topography and woodland around Murtle Den prevents visual and physical coalescence between Milltimber and Bielside. The land at Murtle Den is important to maintaining the separate identities of the two communities and development on this site would lead to coalescence. The exclusion from Green Belt areas of existing built development, or sites which may offer some re-development opportunities would be contrary to the purpose of encouraging development to locate within the existing built-up area of the

city, or on various large areas of land allocated specifically for new development. Therefore, the site contributes to the landscape setting of the area and should remain zoned as Green Belt.

## **CULTS**

### **Thornhill, Craigton (B0924)**

125: We do not propose to allocate this site for development. Aberdeen City Council has assessed this site, considered it undesirable, and rejected it on the grounds set out in the Proposed Plan Site Assessment Report. The site was previously assessed at Pre-Main Issues Report stage (Pre-MIR) and was deemed undesirable for development (CD28). The unit number was unspecified at Pre-MIR stage. The site was considered and rejected by Reporters following the Examination of the 2012 Local Development Plan (Issue 53, CD44). The development would constitute a substantial but isolated development in the Green Belt undermining the existing separation between Cults and Aberdeen. The site is remote from transport links and there is insufficient school capacity as is outlined in the Proposed Plan Site Assessment Report.

## **MILLTIMBER**

### **Brookfield (B0902)**

56: We do not propose to allocate this site for development. Aberdeen City Council has assessed this site, considered it undesirable, and rejected it on the grounds set out in the Proposed Plan Site Assessment Report. The site is situated in an area of wooded farmland which acts as a buffer between Milltimber and Bielside and occupies a very significant visual point as one travels towards Milltimber. Development on this site would therefore impact on the surrounding landscape and school capacity constraints should also be specifically noted (as it should not be assumed that no children would be generated from the development). It is noted that the proposal is for over 55's housing for retired / elderly persons. Outcome 6 of the Aberdeen Local Housing Strategy 2012-2017 (RD59, pg 109) is to: "Improve the housing experience for all vulnerable groups with particular housing needs and in particular minority groups so they can live independently through the provision of accessible accommodation and support systems", which includes ensuring the provision of suitable housing stock to meet the needs of an increasing elderly population. It is considered that the mix of house types and tenures on sites already allocated within the Deeside area will assist with meeting this Outcome and there is no overriding need for this type of specialist housing which would override the Council's decision not to allocate this site for development.

### **Contlaw (B0915)**

85: We do not propose to allocate this site for development. The site was considered and rejected by Reporters following the Public Local Inquiry into the 2008 Local Plan (Issue 83, CD45) and the Examination of the Local Development Plan 2012 (Issue 53). Aberdeen City Council has reassessed this site, again considered it undesirable, and has rejected the inclusion of the site on the grounds set out in the

Proposed Plan Site Assessment Report. Most of the site would be a long walk from the bus route on North Deeside Road although it is acknowledged that the site is large enough to accommodate its own facilities. Development of this site would have significant landscape impact, particularly the areas which are above the 90 to 95 metre contour line within which most of Deeside is contained. The presence of the Aberdeen Western Peripheral Route (AWPR) through this area makes it even more important to maintain a green buffer between Milltimber and Peterculter. Contlaw Road itself and the woodland north of Milltimber provides distinct Green Belt boundaries and these features serve to contain the settlement and protect its identity. The Green Belt functions of the area should therefore be maintained.

With regards the suggestion by the Respondent that the capacity at Cults Academy could be increased by way of developer contributions, the school was built to take the maximum number of pupils for the size of the site. As such, the possibility of extending the school would be technically complex and could not be delivered while staff and pupils were in the building. School capacity constraints therefore remain important consideration for this proposal.

#### **West of Contlaw Road (B0946)**

85: We do not propose to allocate this site for development. The site was considered and rejected by Reporters following the Examination of the Local Development Plan 2012 (Issue 53). Aberdeen City Council has reassessed this site, again considered it undesirable, and has rejected the inclusion of the site on the grounds set out in the Proposed Plan Site Assessment Report. The site proposes development on land between the Aberdeen Western Peripheral Route and Milltimber and on land included within the Green Space Network. Coalescence with Peterculter has been a reason in the past that development has been resisted in this area. The site is situated in an attractive landscape setting which provides a green wooded backdrop to Milltimber. The woodland along with Contlaw Road itself provides a clearly defined boundary between Milltimber and the Green Belt in this area. Development on this site would impact on the surrounding landscape, and, although the proposal is for a small scale development, capacity constraints, particularly at Cults Academy, would also impact upon the suitability of this site.

#### **Guttrie Hill West (B0907)**

106: We do not propose to allocate this site for development. Aberdeen City Council has assessed this site, considered it undesirable, and rejected it on the grounds set out in the Proposed Plan Site Assessment Report. The site is covered in its entirety by Ancient Woodland, is designated as a Local Nature Conservation Site (LNCS), and is also a habitat for protected species including bats and red squirrel. The biodiversity value of the site would be negatively impacted by development. The site is in a highly unsustainable location, being completely unrelated to existing settlement at Culter and an unacceptable distance from local facilities and employment opportunities. There are also capacity constraint issues at Cults Academy, although it is noted that the proposal is only for five units (and that this number has been reduced from previous submissions).

**Guttrie Hill East (B0908)**

106: We do not propose to allocate this site for development. Aberdeen City Council has assessed this site, considered it undesirable, and rejected it on the grounds set out in the Proposed Plan Site Assessment Report. Although felled, this site retains its formal status as Ancient Woodland, although it is clear that its biodiversity value has been significantly diminished. The main constraints affecting this site are its isolation from existing settlement and inaccessibility by walking, cycling or public transport. It is unlikely that effective links would be able to be made to encourage this. Although direct access to the strategic road network is needed for a vehicle refuelling station, this proposal would form an isolated outpost of development, accessible only by car from the AWPR. A 'ribbon' of small, isolated developments along the Aberdeen Western Peripheral Route is not considered to be a desirable or sustainable desirable pattern of development.

**Binghill Farm (B0933)**

145: We do not propose to allocate this site for development. The site was considered and rejected by Reporters following the Examination of the extant Local Development Plan 2012 (Issue 53). Aberdeen City Council has reassessed this site, again considered it undesirable, and has rejected the inclusion of the site on the grounds set out in the Proposed Plan Site Assessment Report. The site would not sit well in the landscape given that it is located above the 90-95 metre contour line on the Deeside Valley which generally marks the northern limit to development of the north Deeside settlements. Breaching this could lead to urban sprawl northwards. The site also has limited facilities within 800 metres and there are school capacity constraints, particularly at Cults Academy.

**Culter House Road (B0901)**

154: We do not propose to allocate this site for development. The site was considered and rejected by Reporters following the Examination of the extant Local Development Plan 2012 (Issue 53). Aberdeen City Council has reassessed this site, again considered it undesirable, and has rejected the inclusion of the site on the grounds set out in the Proposed Plan Site Assessment Report. This proposal covers land that was previously Ancient Woodland but has now been felled. This development would be in an unsustainable location on the edge of Milltimber. There are also school capacity issues associated with this proposals, particularly at Cults Academy. It is considered that the Green Belt and Green Space Network allocations should be retained.

**Milltimber South (B0940)**

183: We do not propose to allocate this site for development. The site was considered and rejected by Reporters following the Examination of the extant Local Development Plan 2012 (Issue 53). Aberdeen City Council has reassessed this site, again considered it undesirable, and has rejected the inclusion of the site on the grounds set out in the Proposed Plan Site Assessment Report. The site is designated as Green Belt and Green Space Network as it allows good views across the Dee Valley – as such development would impact on the River Dee Valley

landscape as development would be very prominent from North Deeside Road and from the River Dee itself. The area contributes to a sense of place and to landscape setting and should therefore remain as Green Belt and Green Space Network. There are also school capacity constraints, particularly at Cults Academy.

## **PETERCULTER**

### **Business Site, Peterculter**

98: No site has been identified to support the request for more business land to be provided at Peterculter. The Spatial Strategy of the Proposed Plan complies with the employment land allocations set out in the Strategic Development Plan, therefore there is no requirement to allocate more business land.

### **Malcolm Road, Peterculter (B0943)**

82: We do not propose to allocate this site for development. The site was considered and rejected by Reporters following the Examination of the extant Local Development Plan 2012 (Issue 52). Aberdeen City Council has reassessed this site, again considered it undesirable, and has rejected the inclusion of the site on the grounds set out in the Site Assessment Report. The site is not considered suitable for development due to its isolation and poor accessibility to employment opportunities, local facilities and public transport. The proposal is poorly related to the main settlement at Peterculter and is part of the countryside north of Malcolm Road which serves to maintain its setting. It is part of the green backdrop to Peterculter which contributes to protecting its landscape setting. It should therefore remain as Green Belt.

### **Land North of Peterculter (B0909)**

103: We do not propose to allocate this site for development. The site was previously considered during the Main Issues Report stage and rejected as being unsuitable for development as set out in the Pre-Main Issues Report Development Options Assessment, Issue 3 (CD28). Aberdeen City Council has reassessed this site, again considered it undesirable, and has rejected the inclusion of the site on the grounds set out in the Proposed Plan Site Assessment Report. The site is not considered suitable for development due to its isolation and poor accessibility to employment opportunities, local facilities and public transport. The proposal is poorly related to the main settlement at Peterculter and is part of the countryside north of Malcolm Road which serves to maintain its setting. It is part of the green backdrop to Peterculter which contributes to protecting its landscape setting. It should therefore remain as Green Belt.

### **Cobblestock, Peterculter (B0917)**

122: We do not propose to allocate this site for development. The site was previously considered during the extant Local Development Plan 2012 Examination and rejected (CD44, Issue 52). It has since been resubmitted as a development bid with a reduced area and a proposal for 15 units. We are still of the same opinion that the site at Cobblestock is unsuitable for development. Road access is extremely

poor - it is a narrow, single track, steep and with sharp bends in places. The physical characteristics of the access roads and the presence of gardens and houses next to it could restrict road widening and will make this a difficult issue to mitigate.

#### **Rob Roy Mobile Home Park, Malcolm Road, Peterculter**

170: We do not propose to allocate this site for development. The site is not considered suitable for development due to its isolation and poor accessibility to employment opportunities, local facilities and public transport. The proposal is poorly related to the main settlement at Peterculter and is part of the countryside north of Malcolm Road which serves to maintain its setting. It is part of the green backdrop to Peterculter which contributes to protecting its landscape setting. It should therefore remain as Green Belt.

#### **Hill of Ardbeck, Peterculter (B0934)**

183: We do not propose to allocate this site for development. The site was considered and rejected by Reporters following the Examination of the extant Local Development Plan (Issue 52). Aberdeen City Council has reassessed this site, again considered it undesirable, and has rejected the inclusion of the site on the grounds set out in the Proposed Plan Site Assessment Report. Its recreational use and designation as a Local Nature Conservation Site makes it an undesirable development option and it should remain as Green Belt.

#### **Peterculter East (B0935)**

183: We do not propose to allocate this site for development. Aberdeen City Council has assessed this site, considered it undesirable, and rejected it on the grounds set out in the Proposed Plan Site Assessment Report (CD31). Development on this site would be very prominent from the Aberdeen Western Peripheral Route and would have a significant impact on the surrounding landscape. Any development would only partially be related to the main settlement of Peterculter and its shops and services. The Proposed Plan identifies sufficient greenfield housing land. Therefore, we do not think this site should be rezoned from Green Belt and believe the current zoning reflects the site more appropriately.

#### **Newmill, Peterculter (B0937)**

183: We do not propose to allocate this site for development. Aberdeen City Council has assessed this site, considered it undesirable, and rejected it on the grounds set out in the Proposed Plan Site Assessment Report (CD31). Development would be likely to have a significant impact on the surrounding landscape and may have a negative effect on the species and habitats of the Culter Burn Local Nature Conservation Site, which is adjacent to the site. The site would be poorly related to the existing settlement at Peterculter and isolated from shops and services, meaning that it is likely to be heavily car-dependent.

#### **Kennerty Farm, Peterculter (B0938)**

183: We do not propose to allocate this site for development. Aberdeen City Council has assessed this site, considered it undesirable, and rejected it on the grounds set out in the Proposed Plan Site Assessment Report (CD31). Development would have a significant impact on the surrounding landscape and any development would only be partially related to the main settlement of Peterculter and its shops and services.

## **PITFODELS**

### **Parklea**

133: We do not propose to allocate this site for development. Aberdeen City Council has assessed this site, considered it undesirable, and rejected it on the grounds set out in the Proposed Plan Site Assessment Report. The site lies within the Pitfodels Conservation Area where the pattern of development and setting creates a visual break from the urban pattern of Aberdeen City. The area is characterized by large detached villas set within spacious landscaped gardens with generous tree planting. This relates back to the original feu splitting of 1845. The building plots between North Deeside Road and Rockland Road/Airyhall Road have a very distinctive pattern comprising a tiered arrangement of frontage tree belts and open lawns and further trees set around the buildings. The properties are typically around 100 -200 metres set back from North Deeside Road. Behind the building is another tier of lawns and/or tree belts adjacent to Rocklands Road. Parklea forms the western most boundary of the Green Belt on the north side of North Deeside Road and follows the pattern of development as described above, and therefore established a defensible Green Belt boundary. The Green Belt designated extends to the east and south of the site again reflecting the historic pattern of development of the area, therefore reflecting the local characteristics and maintaining the visual break between the city and Pitfodels.

### **Inchgarth Road Residential units and a link road (B0912)**

142: We do not propose to allocate this site for development. Aberdeen City Council has assessed this site, considered it undesirable, and rejected it on the grounds set out in the Proposed Plan Site Assessment Report (CD31). Development would have a significant impact on the Deeside Line Local Nature Conservation Site with a new road having to cross this area and with a likely impact on the trees and the setting of the Green Belt and Pitfodels Conservation Area. The 'Access from the South' study is exploring the merits of a link road between Inchgarth Road and North Deeside Road as part of a wider solution combined with the proposals for the Bridge of Dee (RD60). The Access from the South Study is not due for completion until late Summer/Early Autumn 2016. This site is located within the Pitfodels Conservation Area and is Green Belt, providing significant visual separation between Garthdee and Lower Deeside which protects their separate identities. It therefore contributes to the landscape setting of these settlements. Although there are other developments in this area, its predominant character is still rural. This, together with the tree cover, prevent both visual and physical coalescence of Garthdee and Cults. Further development would shift the balance from a predominantly rural to a more urban character. This site is an important part of the area which prevents coalescence and therefore serves a Green Belt function

that should remain.

### **Inchgarth Road Mixed Use and Link Road**

142: We do not propose to allocate this site for development. Aberdeen City Council has assessed this site, considered it undesirable, and rejected it on the grounds set out in the Proposed Plan Site Assessment Report. The development would have a significant impact on the Deeside Line Local Nature Conservation Site with a new road having to cross this area and with a likely impact on the trees and the setting of the Green Belt and Pitfodels Conservation Area. The Access from the South Study is exploring the merits of a link road between Inchgarth Road and North Deeside Road as part of a wider solution combined with the proposals for the Bridge of Dee. The Access from the South Study is not due for completion until late Summer/Early Autumn 2016. This site is located within the Pitfodels Conservation Area and is Green Belt, providing significant visual separation between Garthdee and Lower Deeside which protects their separate identities. It therefore contributes to the landscape setting of these settlements. Although there are other developments in this area, its predominant character is still rural. This, together with the tree cover, prevent both visual and physical coalescence of Garthdee and Cults. Further development would shift the balance from a predominantly rural to a more urban character. This site is an important part of the area which prevents coalescence and therefore serves a Green Belt function that should remain.

### **Land at Station Road, Pitfodels**

142: We do not propose to allocate this site for development. Aberdeen City Council has assessed this site, considered it undesirable, and rejected it on the grounds set out in the Proposed Plan Site Assessment Report. This site is located within the Pitfodels Conservation Area and the area is currently Green Belt, which provides significant visual separation between Garthdee and Lower Deeside and which protects their separate identities. It therefore contributes to the landscape setting of these settlements. Although there are other developments in this area, its predominant character is still rural. This, together with the tree cover, prevents both visual and physical coalescence of Garthdee and Cults. Further development would shift the balance from a predominantly rural to a more urban character. This site is an important part of the area which prevents coalescence and therefore serves a Green Belt function that should remain. There is limited school capacity; Cults Primary School will be over capacity by 2016, and Cults Academy by 2021.

### **Pitfodels**

161: We do not propose to allocate this site for development. Aberdeen City Council has assessed this site, considered it undesirable, and rejected it on the grounds set out in the Proposed Plan Site Assessment Report. The site is part of the Green Belt buffer between Cults and Garthdee which helps to maintain their separate identity and contributes to the landscape setting of Aberdeen. The site is within the Pitfodels Conservation Area which is characterized by large detached villas set within spacious landscaped gardens with generous tree planting. This relates back to the original feu splitting of 1845. Green Belt is the predominant zoning within the Conservation Area. Although there are other developments in this

area, its predominant character is still rural. This, together with the tree cover, prevents both visual and physical coalescence of Garthdee and Cults. Further development would shift the balance from a predominantly rural to a more urban character. This site is an important part of the area which prevents coalescence and therefore serves a Green Belt function that should remain. There is limited school capacity; Cults Primary School will be over capacity by 2016, and Cults Academy by 2021 (CD32).

### **Craigton Road (B0939)**

183: We do not propose to allocate this site for development. Aberdeen City Council has assessed this site, considered it undesirable, and rejected it on the grounds set out in the Proposed Plan Site Assessment Report. The site was zoned as OP64 within the extant Aberdeen Local Development Plan 2012 with a residential use for 20 units. Planning permission ([P110020](#)) was granted in May 2012 for the erection of residential development comprising of 20 units, which are now built and occupied, and have satisfied the Opportunity Site allocation. A care home was approved in 2009 ([P090141](#)) with [notice of completion](#) submitted in 2013. A further application ([P131354](#)) was refused for five terraced units, and upheld on appeal ([PPA-100-2060](#)) with the Reporter citing landscape setting, conservation area character, the mature wooded areas associated with the original development of Airyhall House, amongst other more detailed reasons related to the design, material and layout of the development proposal, as reasons for upholding the refusal..

This site plays an important role in separating the settlements of Aberdeen and Cults and is therefore an important part of the Green Belt. The site also contains many mature trees and has an established wildlife and recreational function. The site is semi-rural and wooded in context. The existing development reflects the character and appearance of Airyhall Road.

### **WESTHILL**

#### **Cadgerford, Westhill (B0931)**

128: We do not propose to allocate this site for development. The site was previously considered during the extant Local Development Plan 2012 Examination and rejected (CD44, Issue 37). Aberdeen City Council has assessed this site, considered it undesirable, and rejected it on the grounds set out in the Proposed Plan Site Assessment Report (CD31). The Site Assessment Report highlights the presence of a major gas pipeline which constrains the site. The site is remote from the built up area of Westhill and the accessibility of the site is therefore quite poor and difficult to integrate with the existing settlement. Any development would be considered to pose a significant impact on the surrounding landscape. It is part of the open countryside which separates Kingswells and Westhill, and serves a vital Green Belt function by maintaining their separate identities and landscape settings.

#### **Backhill, Westhill (B0932)**

128: We do not propose to allocate this site for development. Aberdeen City Council has assessed this site, considered it undesirable, and rejected it on the

grounds set out in the Proposed Plan Site Assessment Report (CD31).The presence of a major gas pipeline constrains the site. Development would also intrude significantly into the rolling agricultural landscape which surrounds Westhill, and helps to maintain the separate identities of Westhill and Kingswells. Therefore this land performs a vital function as Green Belt and it would not be appropriate to allocate this land for development.

**Reporter's conclusions:**

**Reporter's recommendations:**

<b>Issue 13</b>	<b>ALLOCATED SITES &amp; GENERAL AREA STRATEGY: LOIRSTON &amp; COVE</b>	
<b>Development plan reference:</b>	Page 15, 86, 87, Proposals Map, Table 8, Table 8 notes, Materplan Zone table, Appendix 2, Appendix 4, Appendix 5, Policy R4	Reporter:
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
<p>Mrs Gillian Laing (6)  Miss Sandra Thomson (8)  Ms Kirstin McKenzie (10)  Miss Lynn McVeigh (21)  Mr Roderick Menzies (25)  Mrs Heather Watt (28)  Mr Scott Morgan (29)  Ms Jennifer Elrick (30)  Mrs Shona Evans-Morgan (33)  Mr David Fryer of Torry Community Council on behalf of Torry Community Council (35)  Miss Stephaine O'Callaghan of QUOD on behalf of Scotia Gas Networks (SGN) (40)  Ms Lorraine Jones of sportscotland (41)  Mrs Marie Milton (45)  Mr Ian Stark (55)  Mr John Findlay of Ryden LLP on behalf of Cyan Properties Limited (57)  Mr Rab Dickson of the North East of Scotland Transport Partnership (59)  Mrs June Stark (60)  Booker Limited on behalf of Makro Self Service Wholesalers Ltd (62)  Mr Michael Hyde (68)  Ms Mhairi Johnston (69)  Dr Sandie Munro of Torry Medical Practice (70)  Mrs Wendy Buchan (72)  Miss Jennifer Paton (86)  Kris Furness of SITA UK (91)  Mr Malcolm Campbell of Knight Frank LLP on behalf of Hermiston Securities Limited (93)  Miss Jodie Stark (96)  Mr Alan Strachan of Nigg Community Council (111)  Mr Ian Cowe of Forestry Commission Scotland (126)  Mr Andrew Philp (135)  Mrs Theresa Hunt of Burness Paull LLP on behalf of Aberdeen Football Club (146)  Ms Michele McPartlin of Cove and Altens Community Council on behalf of Cove and Altens Community Council (147)  Miss Katie McLachlan (169)  Miss Laura Ferguson (176)  Mr Ben Freeman of Bancon Developments (183)  Mrs Lucy Philip (186)</p>		

**Provision of the Development Plan to which the issue relates:**

Overview of Direction for Growth in this area and specific OP sites

**Planning authority's summary of the representation(s):**

**OP58: Stationfields**

Environment/Wildlife

6, 8, 10, 25, 28, 29, 30, 33, 45, 55, 60, 68, 69, 72, 86, 96, 135, 169, 176, 186: Housing development will result in loss of wildlife such as bats and deer, and green and open space. Bats are a European Union protected species. Local flora and fauna will be destroyed by development. Loss of Green Belt impacts on nature conservation areas.

96: Negative impact on Fowlsleugh nature reserve as the cliffs are used as breeding ground by seabirds.

Transport Issues

6, 8, 10, 21, 25, 28, 29, 30, 33, 45, 55, 60, 68, 69, 72, 86, 96, 135, 169, 176, 186: Traffic is already busy at rush hour times and housing development will only increase this. Roads are narrow and unable to cope, especially Coast Road. There are inadequate transport facilities. Other developments add to the traffic. Increase in traffic will affect air quality.

10, 45: A new station would be good to link Cove with Aberdeen, and it would reduce traffic.

29, 33, 86: Building houses will deny residents the possibility of a train station

45: Area around railway station could be landscaped to provide habitat for wildlife and improve air quality, noise and congestion.

69: Permission for 150 houses shouldn't go ahead while a decision on building a railway station is pending. The rail halt proposal is not visible in the Proposed Plan and is not referred to in the most recent neighbour notifications.

147: Proposed Plan doesn't mention provision of a railway station. If this is not provided there is no need to develop the site. It should be returned to Green Belt and community facilities provided instead.

169: There is existing shortage of parking. Additional housing will only compound this.

Inadequate Facilities

6, 8, 10, 21, 25, 28, 29, 30, 33, 45, 60, 68, 69, 72, 86, 96, 135, 169, 176, 186: facilities such as shops, healthcare, sewage, community centre. No leisure facilities

in the area. There are already too many houses and there are additional ongoing developments in and around Cove.

### Landscape

8, 28, 69, 96, 186: Additional development will spoil general views and views over the sea.

68: The Council should consider more creative and forward thinking uses for how to develop beautiful landscapes around the city.

### Education

28, 29, 30, 33, 69, 86, 96, 135, 169, 186: Loirston Primary School is already stretched; the development will overload it. Schools are already at capacity.

### General

21, 72: Housing development is very close to railway line and is unsafe for children.

28: Development being described as 'low-cost' brings concerns of security. This will negatively impact the value of homes.

68: Extra houses will only benefit the developers. There is no evidence of building communities, just houses.

96: Development should be targeted towards redeveloping brownfield sites in central Aberdeen.

186: Clear plans need to be agreed by local residents to take account of any raised concerns

### Cove Masterplan and Charette Report

69: Disagree that current Cove Masterplan and Charette is out of date and no longer relevant. Developing Stationfields contradicts the Masterplan's 'Vision' for Cove to 'create a coherent and interconnected public open space that connects to the natural and agricultural landscape'. Planners are sacrificing good planning to meet targets and make money.

147: Who will carry out the new Cove Masterplan and when will it be commissioned?

### **OP54: Altens East and Doonies**

### General

35: Respondent requests a number of conditions be attached to any planning permission for OP54. Copy of letter submitted to Development Control Manager also

submitted as part of representation.

### Supports Allocation

91: Strongly support the allocation and safeguarding of land for the development of a materials recycling facility/a refuse derived fuel plant and a depot for the Council's collection fleet.

## **LOIRSTON AND COVE**

### **Torry**

35: Regrets that key sites in Torry have been placed under 'Loirston and Cove' heading. Torry is a community with strong architectural and spatial character, not a dormitory.

### **Traffic**

35: There is an increase in commuter and commercial traffic due to developments outwith Torry, which has led to air pollution particularly in Wellington Road and Market Street. Lorries should be banned to protect the residential character of the area. There should be a new bypass built in Torry to protect health and the built environment. Road and infrastructure must be implemented prior to development; however, the south of River Dee is already overdeveloped. This has resulted in inadequate roads and a lack of safety for pedestrians.

### **Torry Academy**

35: This site should remain in use for education and the community.

### **Walker Road School**

35: Recommend that this school becomes a Listed Building because of its architectural character.

### **East Tullos Industrial Estate**

35: This is the oldest industrial estate in Aberdeen and is in need of de-industrialisation and modernisation.

### **Consultation**

35: Full and early consultation should be undertaken with Torry Community Council to establish appropriate development for the community's benefit.

### **Housing Capacity**

183: Only 75 units are expected to be delivered up to 2016, giving a shortfall of 1025 units. However, the Housing Land Audit anticipates that the remainder will be

built out before 2026. No further development is planned for this extensive area of the city, beyond 2026.

### **OP103: Former Torry Nursery School**

35, 70: Site should be reserved for health and social care uses. Torry Medical Practice has seen an increase of patients from 3,000 to over 7,000 patients. The current care system is poorly funded and an increase in population will lead to a future care crisis.

### **OP107: East Tullos Gas Holding**

35: Oppose identification of the site for an Energy from Waste facility on grounds of public health, air pollution and increased presence of commercial vehicles on an over-stretched and inadequate network of roads.

40: Object to zoning of site as business and industrial use.

### **OP104: Craiginches Prison**

35: Welcomes creation of affordable homes and awaits details of scheme layout and impact on local roads and schools.

### **OP60: Charleston**

#### Business & Industry Use

93: OP60 should be changed from employment use to business and industry and phasing brought forward to 2017-2026. High take up of employment in Aberdeen suggests the city will run out of suitable Class 5 and 6 before 2027. Proposed Plan should identify additional land to meet future requirements to maintain the 70 hectares of future growth.

#### Increased Traffic

111: This development and other proposed developments in the area will generate an increase in traffic, all of which join Wellington Road (A956), which currently suffers congestion at peak periods. A956 junction capacity improvements, as stated in Section 5 of the Main Issues Report will be unable to deal with the increased traffic. The whole A956 and its associated junctions should be subject to 'capacity improvements'.

### **OP59: Loirston**

#### Increased Traffic

111, 147: This development and other proposed developments in the area will generate an increase in traffic, all of which join Wellington Road (A956), which currently suffers congestion at peak periods. The whole A956 and its associated

junctions should be subject to capacity improvements before any houses occupy the site.

#### General Support

146: Supports allocation of site for a new football stadium. It's in accordance with Scottish Planning Policy, paragraph 226 and this requirement was identified in the Strategic Development Plan.

#### **OP61: Calder Park**

111: This development and other proposed developments in the area will generate an increase in traffic, all of which join Wellington Road (A956), which currently suffers congestion at peak periods. A956 junction capacity improvements, as stated in Section 5 of the Main Issues Report will be unable to deal with the increased traffic. The whole A956 and its associated junctions should be subject to 'capacity improvements'.

#### **OP64: Ness Tip**

126: Site is not ideal as it is partially afforested. Scottish Planning Policy and Scottish Government Policy in the Control of Woodland Removal state a general presumption in favour of protecting woodland sites. If an alternative site is not available then mitigation planting should be required with any future development consents.

#### **OP62: Nigg Bay**

137: Respondent notes that the harbour proposals have evolved and the footprint is now different to that of National Planning Framework 3 and the Proposed Plan.

The land zoned under Policy B5 should be subject to further adjustment to reflect the draft Harbour Revision Order Boundary and the southern breakwater. The Headland at Greg Ness will likely be used as a temporary construction and manufacturing area during the construction of the breakwater, Post construction the headland would be reinstated, but with an access road retained to enable access for breakwater maintenance. It is not proposed this area would form part of the Harbour Revision order, not part of the harbour's land ownership or permanent lease.

35: Open and green space around Torry should be preserved. Any proposals to change the natural environment character and open space should be subject to public consultation.

#### General Support

59: Supports creation of new deep water harbour facility at Nigg Bay and welcomes its inclusion in Proposed Plan.

### Woodland

126: Site is not ideal as it is partially afforested. Scottish Planning Policy and Scottish Government Policy in the Control of Woodland Removal state a general presumption in favour of protecting woodland sites. If an alternative site is not available then mitigation planting should be required with any future development consents.

### Doonies Farm

147: The proximity of the Recycling Centre and the indication from the Proposed Plan that fields near and beyond the Bridge of One Hair are to be taken over imply that Doonies Farm will not remain.

### Land-Use Change

35: No consents should be given to by-pass or expedite any change of use of lands, such as in the provisions of the Harbour Revisions Act.

### **OP110: Wellington Circle (Former Makro)**

#### Support for Allocation

57, 62, 147: Support the identification of the site as a potential Class 1 use site.

57: The Council's Retail study identified a need. The site identified in the extant Local Development Plan at Altens Thistle Hotel has not delivered (it has recently been refurbished and there remains an unexpired lease on the site). The allocation of the Makro site as an opportunity for retail use will address a longstanding deficiency in retail provision to the south of the city. Makro site lies immediately opposite the site allocated in the extant Local Development Plan and will serve the same catchment area (including new development areas in the vicinity). The site currently benefits from a wholesale retail use with associated service access and car parking infrastructure. The proposal also utilises an existing building. The site is easily accessible by foot and cycle. The proposal safeguards existing jobs and creates new employment opportunities as well as providing a much needed retail facility for the existing communities. There is public support for the site. There is no alternative site capable of delivering a supermarket use to serve the existing communities and areas of future housing. The Makro site is capable of delivering a supermarket use in the short term. The Council's assessment of the site identified it as "highly suitable for development" and scored highly in the Assessment Matrix. The Council's Communities, Housing & Infrastructure Committee determined to include the Makro site within the Proposed Plan as OP110 at their meeting on 28 October 2014. There is a live planning application pending for the part change of use of the Makro building to accommodate a supermarket of 5,750 square metres. Modifications sought to paragraph 3.28 and Proposals Map to reinforce Opportunity Site designation.

62: Makro wish to continue trading from current location but the building is too large

for their requirements. Pending planning application provides Makro the opportunity to downsize, secure their continued presence on the site and retain local employment.

### Traffic Concerns

111: The proposed development will generate a significant increase in the volume of traffic within the area, all of which join the A956 (Wellington Road) which currently has significant congestion at peak periods. Respondent listed other proposed development, or developments already under construction which will exacerbate the current A956 congestion. Respondent refers to projects listed in Main Issues Report Section 5 Infrastructure and Transport. States that bullet point "A956 Junction Capacity Improvements" will be insufficient to deal with the increased traffic and promotes that the whole A956 and its associated junctions should be the subject of "Capacity Improvements".

147: Concerns about level of traffic in and around site OP110 due to recently approved Travellers' Site and new proposed South of the City Secondary School. Road improvements identified for OP59 must be carried out before this development commences. Or new revised traffic lists should be installed at the Wellington Circle entrance to the roundabout so that cars can exit the site easily and freely.

### Object to Allocation/Alternative Site Promoted

93: Respondent wants to see opportunity for retailing/proposed supermarket at OP110 deleted from the Proposed Plan and transferred to OP59 at Loirston. At the Main Issues Report Committee the Planning Officers recommended that Loirston was identified for retail development, however the Committee did not support this and allocated the site at Makro. No justification was provided. Location at OP110 is not suitable for Class 1 supermarket. It is located within an area allocated for Business and Industry. It is important to safeguard the supply of existing industrial and business land situated in strategic locations. Demand for employment land and Class 5/6 remains high in Aberdeen and in the south of the city. Land should not be lost to non-industrial uses.

93: Alternative site at Loirston recommended by the Respondent. The Loirston site can accommodate suitable retail development within the identified retail centre in the Loirston Development Framework and would help anchor a viable village centre in this location. The site at Loirston is deliverable and located to serve the south of the city. It will be accessible by public transport and can be accommodated on the local traffic network. The site is considered to have sufficient prominence to attract an operator to the site. An application is pending determination for retail development at Loirston (P141754).

### **OP105: Kincorth Academy**

41: Consideration should be given to whether the outdoor sports facilities on site serve a community purpose and whether some/all should be retained.

## **Modifications sought by those submitting representations:**

### **OP58: Stationfields**

#### Environment/Wildlife

6, 8, 10, 25, 30, 55, 60, 69, 72, 86, 96, 135, 169, 176, 186: Less development should be built on greenspace. No culling of innocent wildlife. Impact on conservation area needs to be investigated prior to development. Leave land as is.

68: Fields could be developed into local green space or nature park where local wildlife can be preserved.

#### Transport Issues

6, 10, 25: Infrastructure should be able to cope with the increased traffic. Issues of road safety should be addressed.

30: Move the development north, this would reduce traffic impact.

169: Better to use land to build a train station which will improve access to the city and ease congestion.

29, 33, 86: Leave land as is and reserve it for the train station.

#### Inadequate Facilities

6, 10, 21, 25, 60, 169, 186: Provide extra facilities. Improve facilities.

55, 72, 176: Area is already dense so just look after current residents. Leave land as is

135: An action plan showing accountability for facilities' improvements should be drawn up prior to planning permission.

#### Landscape

8: Fewer houses should be built on the land.

69, 96: One of Cove's most prized qualities is its natural landscape. Keep it natural.

#### General

28, 72: Objects to Plan and site should be left as is.

96: Biodiversity and the views of local residents should be the main concern for the Council. Leave the site as is. If not, there are other options including opening up site for recreation, using the site for education since the school is close-by, or build a

small railway station.

## **LOIRSTON AND COVE**

### **Torry**

35: A new section entitled 'Torry' should be introduced.

### **OP103: Former Torry Nursery School**

35, 70: Reserve site for health and social care use. Housing development would remove this option and place burden on the existing Practice's ability to deliver essential medical services. Reference to unmet health needs should be included in Appendix 3.

### **OP107: East Tullos Gas Holder**

#### Object to Allocation

40: Site should be designated as "white land" or for other higher value uses e.g mixed use, residential, retail.

### **OP60: Charleston**

#### Business and Industry Use

93: The phasing of OP60 should be brought forward in the new Proposed Plan to period 2017-2026. This should be reflected in the Proposed Plan as follows:

1. The land at Charleston be included in Table 7: Development at Loirston and Cove for 20.5ha of employment land for the period Phase 1:2017 - 2026.
2. The zoning of OP60 be changed from Land Release Policy (LR1) to Business and Industry (B1).
3. OP60 Charleston in the Proposed Plan Action Programme under Masterplan Zone 8: Loirston OP59, OP60, OP61 be amended to reflect the site is allocated to the period 2017 - 2026.

### **OP62 Nigg Bay Harbour Expansion**

137: The extent of the B5 allocation at Nigg Bay should be amended to reflect that shown on the accompanying draft Harbour Revision Order boundary plan.

### **OP110: Wellington Circle (Former Makro)**

57: Opportunity Site designation should be reinforced by reference to the proposal in paragraph 3.28 of the Plan as it clearly addresses an existing deficiency in retail provision. Underlying Business and Industry designation applied on the City Wide Proposals Map should be removed and replaced with designation identifying

Commercial Centres (NC6).

62: No change - support the allocation.

93: OP110 deleted from the Proposed Plan City Wide Proposals Map, Appendix 2 and Action Programme. Reference should be made to the retail opportunity/proposed supermarket being included within OP59 Loirston in both Appendix 2 and the Action Programme.

**OP105: Kincorth Academy**

41: Consider whether any of the outdoor sports facilities should be retained on site for community use.

**Summary of response (including reasons) by planning authority:**

**OP58: Stationfields**

General

This site was first identified (OP8) in the Aberdeen Local Plan 2008 (CD43) and has been carried over from the extant Aberdeen Local Development Plan 2012 (CD42) following favourable consideration at the last Examination under Issue 59 (CD44). The principle of housing on the site is therefore long established. It is well located to benefit from, and support local services such as primary schools, shops and community facilities which are within walking distance. Whilst the site does not count towards the Aberdeen City and Shire Strategic Development Plan (SDP) 2014 (CD12) housing allowances, it will nevertheless contribute towards maintaining a healthy 5 year housing land supply. The Housing Land Audit 2015 shows completions on site from 2016 onwards (page 41, CD17).

21, 28, 68 72: Housing is a basic human need and it is important that everyone has access to housing of a reasonable quality that is affordable to those with modest incomes. In the case of OP58, development that comes forward on this site would be required to deliver some affordable housing units which would help to build an overall sustainable mixed community. Development in OP58 would be required to comply with Proposed Plan Policy D1 Quality Placemaking by Design. Proposals would be considered against these six essential qualities: distinctive, welcoming, safe and pleasant, easy to move around, adaptable and resource efficient, in order to create sustainable development that enhances the social, economic, environmental and cultural attractiveness of Cove.

96: The SDP sets the requirements for brownfield, greenfield and employment allowances and these are set out in Figure 1 of the SDP on page 12 and in Schedule 1 on page 42. The Proposed Plan has already allocated a significant amount of brownfield land for housing, in line with the SDP. Furthermore, Proposed Plan site OP58 was identified in the Aberdeen Local Plan 2008 (CD43) and part of the site

was included in the [Cove Masterplan and Charette Report](#), which included a participatory process.

186: Any planning application that comes forward for OP58 Stationfields will be subject to standard consultation procedures.

#### Environment/Wildlife

6, 8, 10, 25, 28, 29, 30, 33, 45, 55, 60, 68, 69, 72, 86, 96, 135, 169, 176, 186: Where it is suspected that a Protected Species is present on this particular site, a survey will be recommended as part of any development proposal that is brought forward and it would have to comply with Proposed Plan Policy NE8. In addition to this, all residential development proposals will have to comply with all relevant policies regarding protecting and enhancing the natural environment.

#### Transport Issues

6,8, 10, 21, 25, 28, 29, 30, 33, 45, 55, 60, 68, 69, 72, 86, 96, 135, 169, 176, 186: Residential development at OP58 Stationfields will be required to carry out a Transport Assessment according to Policy T2 Managing the Transport Impact of Development. They would be required to demonstrate that sufficient measures have been taken to minimise any generated traffic, this would include any impacts on Coast Road. In addition to this, all residential proposals on this site will have to meet the standard parking requirements found in the Proposed Supplementary Guidance Transport and Accessibility (CD25).

The suggestion that having a train station will ease congestion has been noted. Aberdeen City Council recognises that a train station in Cove would help to alleviate traffic congestion. At present there are no firm proposals for a train station at Cove. However, the North East of Scotland Transport Partnership (Nestrans) have confirmed that further studies are due to be carried out in the next 12-18 months in order to identify opportunities for improving rail opportunities in and around Aberdeen, building on the upgrade which is currently ongoing to enhance the Aberdeen-Inverness line. This study will include consideration of the appropriateness of a new station in Cove and will be aligned with the City Region Deal, which will dictate the timeframes. If a train station proposal was to come forward, it would need to meet the principles of Proposed Plan Policy D2- Landscape, which aims for developments to improve and enhance the setting and visual impact of any development, unify urban form, provide shelter, provide local identity and promote biodiversity.

#### Inadequate Facilities

6, 8, 10, 21, 25, 28, 29, 30, 33, 45, 60, 68, 69, 72, 86, 96, 135, 169, 176, 186: The [Cove Masterplan](#) identified the need to create a Commercial Centre that serves walkable neighbourhoods. This was to be located on OP56 Cove, which is also part of the Masterplan and is currently being developed. OP56 Cove is in close proximity to OP58 Stationfields, and so any created facilities can be used by persons living in the development on both sites. In addition to this, Proposed Plan Policy I1 Infrastructure and Developer Contributions indicates that development must be

accompanied by the infrastructure, services and facilities required to support new or expanded communities and the scale and type of developments proposed. Where development either individually or cumulatively will place additional demands on community facilities or infrastructure that would necessitate new facilities or exacerbate deficiencies in existing provision, the Council will require the developer to meet or contribute to the cost of providing or improving such infrastructure or facilities.

### Landscape

8, 28, 68, 69, 96, 186: Any residential development proposal that comes forward would be required to comply with Proposed Plan Policy D2-Landscape. The proposals would need to respect the existing landscape and improve upon it through quality development.

### Education

28, 29, 30, 33, 69, 86, 96, 135, 169, 186: Aberdeen City Council's School Roll Forecast (CD32) indicates that Loirston Primary is within capacity and is able to accommodate residential development that will come forward for this site. The School Roll Forecast also indicates that Kincorth Academy, which is the other school in this catchment area, will also be able to accommodate any residential development that comes forward.

### **Cove Masterplan and Charette Report**

69, 147: The [Cove Masterplan and Charette Report](#) will need to be updated when the Proposed Plan 2016 is adopted. Moreover, the Masterplan and Charette does not include the whole OP58 site area. Therefore, any update to the Masterplan should include the whole of OP58 to help avoid incremental development that doesn't fit the area's overall design. Any development on the part of this site that is included in the Masterplanning boundary area will be based on the adopted Masterplan and would align with its vision. Any development outwith the Masterplan area will also take into account the existing adopted Masterplan and will work to connect existing public open spaces and natural landscapes.

### **OP54: Altens East and Doonies**

#### General

35: The representation dealt with the detail of a live planning application ([150432](#)), rather than the principle of development on the site, and as such is not considered an issue to be dealt with through the examination of the Proposed Plan. The representation was copied to the Development Management Officer dealing with the planning application which, at the time of writing, remains a pending application.

#### Supports Allocation

91: Support is welcomed and noted. The creation of a material recycling facility,

refuse derived fuel plant ancillary facilities is a key priority of the Aberdeen City Waste Strategy 2014 - 2025 (RD31). The principle of its allocation was tested at the previous Examination (CD44, Issue 128), albeit the area has since been extended towards the coast road. It remains appropriate to identify the site as a development opportunity for waste facilities within the wider Business and Industry zoning as there has been no significant change in circumstances which would justify an amendment to this designation. At the time of writing, a planning application ([150432](#)) for erection of materials recycling facility and refuse derived plant with associated car parking and landscaping is pending determination.

## **LOIRSTON AND COVE**

### **Torry**

35: Aberdeen City Council recognises that Torry is a community with strong architectural and spatial character. The Proposed Plan identifies eight Masterplan Zones in the City containing allocated greenfield sites. The allocated sites in Torry are not greenfield allocations and therefore do not warrant being included as a Masterplan Zone nor being given a new section in the Proposed Plan.

### **Traffic**

35: Aberdeen City Council recognises that air quality problems are predominantly a result of emissions from road vehicles and this is reflected in the Air Quality Management Areas, of which Wellington Road and Market Street are included. The Aberdeen Air Quality Action Plan (CD37) recommends a range of initiatives to address air quality problems. This includes raising awareness of air quality issues, promoting sustainable transport, reducing the need to travel, improving traffic management and transport infrastructure, and consideration of a Low Emission Zone. It is outwith the remit of the Aberdeen Local Development Plan to ban certain vehicles from an area. Proposed Plan Policy T1-Land for Transport identifies land that has been safeguarded for several transport projects that will help to alleviate traffic congestion within the city boundary. In addition, Proposed Plan Policy T2-Managing the Transport Impact of Development requires proposed development to demonstrate that sufficient measures have been taken to minimise any traffic generated.

### **Torry Academy**

35: Torry Academy is not an allocated site in the Proposed Plan.

### **Walker Road School**

35: Aberdeen City Council is not responsible for the listing of buildings. This is the responsibility of Historic Scotland.

### **East Tullos Industrial Estate**

35: East Tullos Industrial Estate is an established business park and has been

zoned in the Proposed Plan for Business and Industry. Aberdeen City Council welcomes planning applications that seek to modernise this business park. These applications would be dealt with in accordance with the Proposed Plan policies.

### **Consultation**

35: Aberdeen City Council undertake consultation with relevant appropriate key agencies and the general public during the Masterplanning and planning application stages when the details of the proposed development have been further investigated.

### **Housing Capacity**

183: The Aberdeen City and Shire Strategic Development Plan (SDP) 2014 (CD12) sets the requirements for housing and employment allowances and these are set out in Figure 1 of the SDP on page 12 and in Schedule 1 on page 42. The Proposed Plan has already allocated a significant amount of land for residential development, in line with the Strategic Development Plan. The life of the Proposed Plan covers the period up to 2026. Although indicative allocations for the period post-2026 are highlighted, this is not a requirement. The South city area has additional non-allocated sites which will also contribute to residential development in this area. These can be found in the Housing Land Audit 2015 (CD17). Comments on residential development capacity have been further dealt with in Issue 2.

### **OP103: Former Torry Nursery School**

35, 70: The National Health Service (NHS) is responsible for assessing whether an area is in need of additional health and social care facilities. It is therefore responsible for submitting a bid for any sites it wishes to be put forward for health and social care uses as part of the Local Development Plan. Moreover, the NHS is a member of the Future Infrastructure Requirements Services (FIRS) Working Group and is content with the allocation of OP103 Former Torry Nursery School for residential development.

### **OP107: East Tullos Gas Holder**

The creation of an Energy from Waste facility is a key priority of the Aberdeen City Waste Strategy 2014 - 2025 (RD31) in support of Scotland's Zero Waste Plan 2010 (CD08). At their [meeting on 4 December 2013](#), the Zero Waste Management Sub Committee considered an Energy from Waste [Business Case](#) and [Appendix](#). The Committee [resolved](#) to approve the recommendations in the Report and specifically that a site/sites should be nominated for inclusion in the next Local Development Plan for an Energy from Waste Facility. In line with Scottish Planning Policy (CD05) (para 96) the Proposed Plan has identified "opportunities for integrating efficient energy and waste innovations within business environments."

OP107 was subject to a development bid, is partially within Council ownership (recycling centre), and is available for development. The industrial setting makes the site suitable for an Energy from Waste facility in line with Scottish Planning Policy and Proposed Plan policies. It is close to a wide range of users of heat and power.

The site is also close to OP54 (the materials recycling facility and collection depot) and this will minimise the impact of vehicle trips between the two facilities.

35: It is understandable that people can be concerned about waste facilities and one of the advantages of the site is that it is located away from the main residential areas. We agree that such facilities should be located to sites where potential impacts on human health can be minimised. This is likely to be one of the considerations of an Environmental Impact Assessment which would be required as per Proposed Plan Policy R5 Energy from Waste. Modern waste facilities have to be licensed by Scottish Environmental Protection Agency (SEPA) and operate to a very high standard. The Regulations covering this activity place strict limits on emissions and extensive modelling of emissions dispersion is required before a permit can be considered. As a result, waste facilities should not have any more adverse effects than other industrial processes that could be considered suitable on the site. SEPA will consult with the Local Authority, Health Board and other appropriate persons when determining whether to permit a license. Once operational, SEPA will monitor and enforce standards as necessary.

The proposed development will be required to carry out a Transport Assessment according to Proposed Plan Policy T2 Managing the Transport Impact of Development. It would need to demonstrate that sufficient measures have been taken to minimise any generated traffic, this would include any impacts on the road network, including Wellington Road.

40: We would reiterate that waste facilities are generally considered acceptable uses on Business and Industrial Land (B1) in line with Scottish Planning Policy (CD05) (paragraph 186) "Suitable sites will include those which have been identified for employment, industry or storage and distribution" and that this land is zoned as such in both the extant Aberdeen Local Development Plan 2012 (CD42) and in the Proposed Plan. Proposed Plan Policy R5 states that "industrial sites with the potential for connection to the electricity grid and with potential users of heat or power are likely to be suitable locations for energy from waste facilities." This accords with Scottish Planning Policy (CD05) (paragraph 183) "Any sites identified specifically for energy from waste facilities should enable links to be made to potential users of renewable heat and energy." There is a good mix of potential users in the area which includes surrounding businesses, residential properties including flats and high rise, a school which has a swimming pool at Tullos Primary and potentially developments associated with the harbour at Nigg Bay.

Whilst we appreciate there will be costs associated with decommissioning the gas holder site, the Proposed Plan considers the principle of development on the site and whilst viability/land values is a concern for the landowner that in itself does not justify a change in zoning. The site was subject to a development bid and the principle of Energy from Waste has been considered acceptable by the Council. Rezoning to any other land designation would result in any subsequent planning application for the Energy from Waste facility being contrary to the Development Plan in that there are policies in place which state that industrial sites are likely to be the appropriate locations. Furthermore mixed use, residential and retail are not land uses which we would consider to be acceptable in this location which is fundamentally an industrial estate. Part of the site is currently used as a Household Waste Recycling Centre so

is already used for waste management purposes. There are no circumstances in which we would zone "white land" - the Development Plan is intended to guide development to the appropriate locations and "white land" would provide no guidance.

#### **OP104: Craiginches Prison**

35: Support is welcomed and noted. The provision of affordable homes helps to relieve Aberdeen of the severe affordability pressures that it faces and it also helps to create sustainable mixed communities. Aberdeen City Council undertake consultation with relevant appropriate key agencies and the general public during the masterplanning and planning application stages when the details of the proposed development will be further investigated.

#### **OP60: Charleston**

##### Business and Industry Use

93: The role of the Strategic Development Plan (SDP) (CD12) is to "set clear parameters for subsequent Local Development Plans and inform decisions about strategic infrastructure investment" (Circular 6/2013 paragraph 41) (CD10). The SDP (paragraphs 3.15-3.16) sets a clear strategy for development in Aberdeen, which includes housing and employment allowances to be delivered through Local Development Plans. The Proposed Plan has allocated more land for Business and Industrial development up to 2026 than is required by the Strategic Development Plan. Removing OP60 from Phase 2 of the employment land allocations would create a significant departure from the allowances set in Figure 6 of the SDP on page 26 and discussed in more detail in Issue 1. In this context, it would be prudent to retain the current zoning of OP60: Charleston as Land Release Policy and to keep the phasing as it is.

##### Increased Traffic

111: Aberdeen City Council recognises that the location of development can have a significant impact on the local transport network. The Aberdeen City and Shire Cumulative Transport Appraisal (CTA) (CD18) highlighted the impact new development across the North East would have on transport infrastructure. This resulted in the decision to secure contributions through a Strategic Transport Fund (STF) (Supplementary Guidance to the SDP) (CD19) to fund the delivery of infrastructure. The A956/A90 Corridor is one of the infrastructure projects that will be funded by the STF along with a further crossing over the River Dee. In addition to this, all significant new developments would be required to carry out a detailed transport assessment according to Proposed Plan Policy T2-Managing the Transport Impact of Development. It would be required to demonstrate that sufficient measures have been taken to minimise any generated traffic, this would include impacts on Wellington Road.

#### **OP59: Loirston**

### Increased Traffic

111, 147: See comment above.

### General Support

146: Support has been welcomed and noted.

### **OP61: Calder Park**

111: Aberdeen City Council recognises that the location of development can have a significant impact on the local transport network. The Aberdeen City and Shire Cumulative Transport Appraisal (CTA) (CD18) highlighted the impact new development across the North East would have on transport infrastructure. This resulted in the decision to secure contributions through a Strategic Transport Fund (STF) (Supplementary Guidance to the SDP) (CD19) to fund the delivery of infrastructure. The A956/A90 Corridor is one of the infrastructure projects that will be funded by the STF along with a further crossing over the River Dee. In addition to this, all significant new developments would be required to carry out a detailed transport assessment according to Proposed Plan Policy T2-Managing the Transport Impact of Development. It would be required to demonstrate that sufficient measures have been taken to minimise any generated traffic, this would include impacts on Wellington Road.

### **OP64: Former Ness Tip**

126: Aberdeen City Council acknowledge that there is a presumption in favour of protecting woodland sites in Scottish Planning Policy (paragraph 201) (CD05). The Proposed Plan also notes that the protection of tree and woodland cover contributes to sustainable development and enhances the services provided by woodland ecosystems. Development on Proposed Plan Site OP64 Former Ness Tip would be required to comply with Proposed Plan Policy NE5 Trees and Woodlands. This Policy has a presumption against activities that result in the loss or damage to trees and woodland that contribute to nature conservation, local amenity or climate change adaptation and mitigation. Development would be required to provide information detailing safeguarding measures for the protection and long term management of the existing trees.

### **OP62: Nigg Bay**

137: The Council strongly welcomes the identification of the new Nigg Bay harbour development within National Planning Framework 3 (CD04) and has, and continues to, work with the harbour board on its delivery. As a Planning Authority the Council nevertheless has a requirement to ensure any development is done in a balanced way to minimise the negative and enhance the positive impacts of such as scheme. While it is noted that the Harbour proposals have developed, the changes are not outwith the OP62 site boundary indicated in the Proposed Plan.

It is noted that the area zoned for harbour use is smaller than the overall OP62 site boundary. The Harbour zoned area reflects the proposals as presented to the

Council at the time of preparing the Proposed Plan and does not prevent suitable development coming forward outwith this zoning but still within the OP62 site boundary. The purpose of this smaller harbour zone footprint was to prevent the loss of Green Belt and Urban Green Space which was not necessary for the delivery of the harbour. The proposal to use land either inside or outside the boundary on a temporary basis during construction is generally acceptable and will be considered as part of the application.

Finally the development of an access track to the breakwater would be acceptable under our current and proposed Green Belt and Urban Green Space Policies NE1 (under paragraph 3) and NE2 (under point 2 essential infrastructure).

### Open and Green Space

35: Proposed Plan Policy NE3-Urban Green Space safeguards areas of Urban Green Space from development unless the replacement provision. Moreover, Proposed Plan Policy NE4-Open Space Provision in New Development aims to ensure that functional, useful and publicly desirable open space is provided as part of new development. Development that comes forward on OP62 Nigg Bay will be required to comply with both Policies NE3 and NE4. Aberdeen City Council undertake consultation with relevant appropriate key agencies and the general public during the Masterplanning and planning application stages when the details of the proposed development have been further investigated.

### General Support

59: Support has been welcomed and noted.

### Woodland

126: Aberdeen City Council recognise that there is a presumption in favour of protecting woodland sites in Scottish Planning Policy (paragraph 201) (CD05). This has also been reiterated in Proposed Plan Policy NE5-Trees and Woodlands. However, in the case of OP62 Nigg Bay, there is no woodland located within the site boundary.

### Doonies Farm

147: The boundary of OP62 Nigg Bay will have no effect on Doonies Farm. Moreover, the eastwards extension of OP54 Altens East and Doonies will have no effect over and above what was previously identified in the extant Local Development Plan 2012 (CD42).

### **Land-Use Change**

35: The Harbours Act 1964 (RD04) is outwith the scope of the Local Development Plan Process. To support any development proposals for OP62 Nigg Bay, a Development Framework/Masterplan, Flood Risk Assessment and full Transport Assessment are required. In addition, harbour proposals will be subject to three

separate but closely related consenting regimes:

- (i) A Harbour Revision Order to deliver and construct the harbour, under the Harbours Act 1964 which is submitted to Transport Scotland for approval by Scottish Parliament;
- (ii) Planning Permission in Principle for ancillary and temporary works related to the construction of the harbour, and further Applications for Matters Specified in Conditions and/or detailed planning permissions under the Town and Country Planning (Scotland) Act 1997 (CD02) as amended; and,
- (iii) Marine Licences under the Marine (Scotland) Act 2010 (RD05).

At the time of writing, the [Draft Nigg Bay Development Framework](#) has been produced by planning and design consultants Barton Wilmore on behalf of Aberdeen Harbour Board, Scottish Enterprise and Aberdeen City Council. This was prepared following the Council's adopted Aberdeen Masterplanning Process. The Draft Framework will set the context for a series of more detailed Masterplans to come forward in the future for the three sub-areas of Nigg Bay (Harbour), East Tullos and Altens. Furthermore, to encourage further consultation, the Draft Framework was approved for a 6-week public consultation at the [Communities, Housing and Infrastructure Committee](#) on 27 August 2015.

#### **OP110: Wellington Circle (Former Makro)**

Representations received to the Main Issues Report highlighted limited progress in establishing a retail use on the site identified in the extant Local Development Plan 2012 at OP76 Souter Head Road (Altens Thistle Hotel). In response to representations received to the Main Issues Report the location for a supermarket in the south of the city was for debate. Officers agreed (RD40 - Issue 25) that it was unlikely that the identified site at Souter Head Road would be delivered and that a need for a supermarket to the south of the city remained as its development was highlighted as a retail commitment in the Aberdeen City and Aberdeenshire Retail Study 2013 (CD16).

The Planning Authority's recommendation in the draft Proposed Plan was that there was potential for retail development (serving local needs) to be accommodated within the identified retail centre stated in the [Loirston Development Framework](#) to assist in anchoring a village centre for Loirston.

At the meeting of the [Communities, Housing and Infrastructure Committee on 28 October 2014](#) (Item 21), the Council considered the responses to the Main Issues Report and took a view which placed greater weight of development at the site now identified in the Proposed Plan at OP110. They concluded that OP110 was favoured over OP59 and incorporated OP110 as the preferred location for retail to the south of the city in the Proposed Plan which was then subject to a ten week consultation process.

OP110 has a number of advantages over OP59. First the proposal would utilise an existing building and car park. This will be much easier and quicker to deliver. It is essentially a refurbishment of an existing building rather than a new purpose built

facility elsewhere. OP110 is more central to the communities in the south of Aberdeen and more readily accessible to them from Wellington Road and the public transport that uses that road. It is very close to the original proposal at Souter Head Road.

A detailed planning application ([140924](#)) for alterations to existing Makro building and partial change of use from Wholesale Retail Warehouse (Class 6) to Supermarket (Class 1) on OP110 was considered at the [Planning Development Management Committee meeting on 18 June 2015](#). The Committee approved the application pending a legal agreement under Section 75 of the Town and Country Planning (Scotland) Act 1997 (CD02) ('Section 75 agreement') to address matters involving local and strategic roads infrastructure contributions.

At the same time a planning application for permission in principle ([141754](#)) was received on the site at Loirston (OP59). This was not however, close to the village centre but a separate stand alone site.

Both planning applications were considered at the [Planning Development Management Committee meeting on 18 June 2015](#) (Item 2 and 3). The Committee favoured the site identified in the Proposed Plan at OP110 with the other being refused planning permission in accordance with Officer recommendation.

Following the Member's decision on 18 June 2015 of willingness to approve the application pending Section 75 agreement, the applicant's agent approached the Planning Authority to request amendments to the terms of the planning application submission ([140924](#)). The amendment proposed alterations to existing building and part change of use from wholesale retail warehouse (Class 6) to two retail units (Class 1). The Planning Development Management Committee considered the proposed amendment at the [17 September 2015 meeting](#) (Item 9) and agreed the amendment. At the time of writing, the consent had not yet been issued due to pending Section 75 agreement.

#### Support for Allocation

57, 62, 147: Support is noted.

57: Paragraph 3.28 of the Proposed Plan highlights retail deficiencies identified in the Aberdeen City and Aberdeenshire Retail Study 2013 (CD16). The study took "committed retail opportunity" into account and OP76 (Souter Head Road) provided opportunity in the south of the city. The designation of OP110 has come about due to the recognition of a need to identify a replacement site for the "committed retail opportunity" currently identified at OP76 Souter Head Road in the extant Local Development Plan 2012 (CD42) (which has now been removed in the Proposed Plan). Taking this into account there is no need to specifically mention OP110 in paragraph 3.28 as this specifically relates to new retail requirements arising from new communities.

The site at OP110 is located in the established Wellington Industrial Estate. The overarching policy designation in this area is for Business and Industry. It would not be appropriate to amend the zoning when the allocation identified in Appendix 2 of

the Proposed Plan provides sufficient certainty by specifically stating Class 1 retail as being suitable. A commercial zoning would be inappropriate for a single supermarket site and would be inconsistent with the approach taken with other zonings on the Proposals Map.

### Traffic Concerns

111, 147: Aberdeen City Council recognises that the location of development can have a significant impact on the local transport network. The Aberdeen City and Shire Cumulative Transport Appraisal (CTA) (CD18) highlighted the impact new development across the North East would have on transport infrastructure. This resulted in the decision to secure contributions through a Strategic Transport Fund (STF) (CD19) to fund the delivery of infrastructure. The A956/A90 Corridor is one of the infrastructure projects that will be funded by the STF. In addition to this, development on OP110: Wellington Circle (Former Makro) would be required to carry out a transport assessment according to Proposed Plan Policy T2-Managing the Transport Impact of Development. It would be required to demonstrate that sufficient measures have been taken to minimise any generated traffic, this would include impacts on Wellington Road.

### **Object to Allocation/Alternative Site Promoted**

93: As the allocation at OP110 discussed above is appropriate and sufficient there is no requirement to consider an alternative site or make modifications sought by respondent. Sufficient provision, to meet local needs, has been identified in the [Loirston Development Framework](#) (adopted as Supplementary Guidance to the extant Plan in May 2013). The Framework confirms that locations for local retail (Blocks B3 and B4) have been identified and these "landuses are intended to provide support services for the new residential community and are likely to take the form of an 'express' and/or local supermarket and other retail uses." Planning Permission in Principle ([130892](#)) was granted on 1 July 2015.

### **OP105: Kincorth Academy**

41: The Council's intention is to retain the green space and oval running track which currently exist on the site. The swimming pool will not be retained as a new pool will be provided on the site of the new South of the City Academy.

### **Reporter's conclusions:**

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### **Reporter's recommendations:**

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<b>Issue 14</b>	<b>ALTERNATIVE SITES: LOIRSTON &amp; COVE</b>	
<b>Development plan reference:</b>	No reference in the Plan	Reporter:
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
<p>Mr Ian Livingstone of Ryden LLP on behalf of Stewart Milne Homes and John Lawrie (Aberdeen) Ltd (64)</p> <p>Mr Malcolm Campbell of Knight Frank LLP on behalf of Hermiston Securities Limited (93)</p> <p>Mr Gary Purves of Knight Frank on behalf of Mr and Mrs Nicol (143)</p> <p>Mr Oliver Munden of Persimmon Homes (157)</p>		
<b>Provision of the Development Plan to which the issue relates:</b>	Alternative sites in Loirston & Cove	
<b>Planning authority's summary of the representation(s):</b>		
<p><b>34-40 Abbotswell Road</b></p> <p>64: Promotes site for residential development. Aberdeen's employment land exceeds Strategic Development Planning Authority targets. Site has good accessibility and rezoning it from business and industrial to residential will make it compatible with surrounding uses i.e. care home, offices and recreational facilities.</p> <p><b>Land at Blackhills of Cairnrobin</b></p> <p>93: Site should be allocated for Business and Industry as an extension to Aberdeen Gateway and Mains of Cairnrobin Business Parks. Site was previously removed from Local Development Plan because it was within 400 metres of a standoff buffer zone to Blackhills Quarry. Any danger zones will be confined within the quarry's landholdings and a landscaped buffer zone will provide separation between Blackhills Quarry and the site. This site needs to be considered in the context of employment land zonings in both Aberdeen City and Aberdeenshire Local Development Plans. It can help supplement the supply of Class 5 and 6 land and provide an important vehicular connection with the employment land to the south.</p> <p><b>Land at Heathvale</b></p> <p>143: 5.7 hectares site should be removed from the Green Belt and Green Space Network as it is surrounded by development on all sides. Site is unkempt and contains no special landscape features. It offers no opportunities for public access. It should be considered for residential development. Appropriate buffer will be retained where site adjoins Wellington Road. Land at Charleston Wood is no longer designates as a District Wildlife Site and is of no environmental value. It would however form part of a considered and logical landscape strategy.</p>		

### **Land at Hydrogen Fuelling Station**

147: The site of the recently approved Hydrogen Fuelling Station, Hydrogen Generation and Fuel Cells is not mentioned anywhere in the Plan. There is no OP site number for it and it's not on the OP map for the Cove area.

### **Land at Rigifa Farm**

157: The six acre site does not contribute to its current designation of Green Space Network and Green Belt as the recent construction of Aberdeen Gateway Business Park (lies immediately southwest of the site) has eroded the purpose and context of the Green Belt in this particular location. It has potential for residential development of approximately 70 units. The farm buildings within the site also have potential for redevelopment as part of the wider site area. Developable land for this site offers no significant constraints to development and has been amended to include only land lying outwith the 250 metres exclusion zone associated with requirements for blasting at Blackhills Quarry. Other large scale greenfield releases from the current Local Plan have experienced delay in implementation. This development will provide a defensible long term boundary to the green belt in this location and offers opportunity to provide a more robust strategy with regards to the Green Space Network.

### **Modifications sought by those submitting representations:**

#### **34-40 Abbotswell Road**

64: Brownfield site should be identified for residential development.

#### **Land at Blackhills of Cairnrobin**

93: Site be removed from the Green Belt and identified for Business and Industry. It should be included in Table 7: Development at Loirston and Cove for 5.5 hectares of employment land for the period Phase 1:2017 - 2026 and also included in Appendix 2. It should be identified as an Opportunity Site in the Action Programme.

#### **Land at Heathvale**

143: Land at Heathvale, Cove should be removed from the Green Belt and Green Space Network and an alternative land use such as residential development should be considered.

#### **Land at Hydrogen Fuelling Station**

147: Make a new OP site for the Hydrogen Fuelling Station.

#### **Land at Rigifa Farm**

157: Site at Rigifa Farm should be included as an Opportunity Site suitable for

approximately 70 residential units falling within phase 1: 2017 - 2026.

**Summary of response (including reasons) by planning authority:**

**General Strategy**

In preparing the Proposed Plan a Development Options Assessment (CD28, CD30, CD31), Strategic Environmental Assessment (CD27) and Main Issues Report (CD29) were used to identify the most suitable locations to deliver the required growth. The majority of greenfield sites identified in the Proposed Plan have been carried over from the Aberdeen Local Development Plan 2012 (CD42) which went through a similar process at that time. Most of these sites are at an advanced stage in terms of planning consents and Masterplans as detailed in the latest version of the Action Programme (CD47).

The Aberdeen City and Shire Strategic Development Plan (SDP) 2014 (CD12) sets the requirements for greenfield housing and employment land allowances and these are set out in Figure 1 of the SDP on page 12 and in Schedule 1 on page 42. Under Issue 2 we conclude that the SDP greenfield requirements have been fully met and we are confident that a continuous 5 year housing land supply can be met throughout the lifetime of this LDP. Accordingly, we do not consider it necessary to allocate any further greenfield sites beyond those already identified in the Proposed Plan.

**34-40 Abbotswell Road**

64: Aberdeen City Council has assessed this site, considered it undesirable, and rejected it on the grounds set out in the Proposed Plan Site Assessment Report (CD31). There is potential for conflict between new residential development and existing business and industrial uses which are present on the site. The narrow site means that there is insufficient space for a buffer between the proposed residential area and existing business. This means that it will be difficult to maintain an acceptable external amenity for residents. This could lead to complaints which could in turn, prejudice the operation of the existing businesses. In addition the narrow site means it will be difficult to develop high rise development with a sufficient buffer between it and the significant tree belt to the west.

The site is subject to a pending planning application for the demolition of the existing business and industrial land and the erection of a 100 unit flatted residential development inclusive of 24 affordable units, associated infrastructure and landscaping. This application is contrary to the current Development Plan. It is expected the planning application will be presented to committee in December 2015.

**Land at Blackhills of Cairnrobin**

93: Aberdeen City Council has assessed this site, considered it undesirable, and rejected it on the grounds set out in the Proposed Plan Site Assessment Report (CD31) Issues remain with land use conflict between the quarry and the proposed

business use.

### **Land at Heathvale**

143: Aberdeen City Council has assessed this site, considered it undesirable, and rejected it on the grounds set out in the Proposed Plan Site Assessment Report. The site is zoned as Green Belt and Green Space Network. The allocation of housing within this area would not relate well to existing development and has poor links to local facilities.

### **Land at Hydrogen Fuelling Station**

147: A planning application ([141552](#)) for the site and development was approved at Development Management Committee on 28 May 2015. The timing of this meant that there was no opportunity to include the site in the Proposed Plan which was agreed earlier in January 2015. However, because the site is subject to an approved planning permission, it is considered unnecessary to identify the site as an opportunity site at this stage.

### **Land at Rigifa Farm**

157: Aberdeen City Council has assessed this site, considered it undesirable, and rejected it on the grounds set out in the Proposed Plan Site Assessment Report (CD31). The site is zoned as Green Belt with the north west corner as both Green Belt and Green Space Network. The allocation of housing within this area would be isolated within a greenbelt zoning with only the western edge relating well to existing development. A planning permission ([130490](#)) was approved in January 2015 extending the operating lifespan of the quarry to 2050. The proposed site would abut the northern edge of the quarry OP site; therefore consideration would have to be given to the potential for a negative impact on the business practice of the quarry due to neighbouring residential use.

### **Reporter's conclusions:**

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### **Reporter's recommendations:**

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<b>Issue 15</b>	<b>CITY CENTRE DEVELOPMENT GENERAL</b>	
<b>Development plan reference:</b>	Page 26; Appendix 4	Reporter:
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
<p>Mr James Sinclair (3)  Mr Norman Haggart of Queen Street Church of Scotland (18)  Mr Mike Williams of c/o Scott Hobbs Planning on behalf of Scottish Enterprise (120)  Mr Dominic Fairlie of Aberdeen Civic Society (136)  Ms Catherine Thornhill of Savills (UK) on behalf of Hammerson plc (158)  Mr Simon Pallant of Scottish Government Planning and Architecture Division (164)  Mrs Irene Strachan (187)</p>		
<b>Provision of the Development Plan to which the issue relates:</b>	City Centre	
<b>Planning authority's summary of the representation(s):</b>		
<p><b>City Centre Masterplan and Delivery Programme</b></p> <p>3, 18: Concerns relating to concept developments outlined in the City Centre Masterplan, the materials used and transportation and access impacts</p> <p>120: Support the City Centre Masterplan and Delivery Programme.</p> <p><b>Mix of Uses in the City Centre</b></p> <p>136: Paragraph 3.18 should include residential as these uses contribute to the vitality of the centre.</p> <p><b>Retail Core and Union Square</b></p> <p>158: Support the inclusion of Union Square within the City Centre Retail Core.</p> <p><b>Town Centre Strategies</b></p> <p>164: There needs to be commitment to progress the development of town centre strategies, as per paragraph 65 of Scottish Planning Policy. We would suggest the inclusion of a 'connection' in the development plan, to allow the spatial elements of the town centre strategies to be developed into Supplementary Guidance as and when they are prepared.</p> <p><b>Public Realm City Centre Improvements</b></p> <p>187: A number of suggestions are put forward for improving the city centre and the public realm. These include providing a roof top restaurant for His Majesty's</p>		

Theatre, greening the Castlegate, emphasising the Salvation Army building, green space should be located in front of St Andrew's Cathedral, provide a skatepark and amphitheatre, Woolmanhill Hospital should be regenerated into housing and possibility and 6 bed mini ward, sorting out the wind tunnelling on Union Street.

**Modifications sought by those submitting representations:**

**City Centre Masterplan and Delivery Programme**

3: All decision making on future city centre developments removed from Council administration officials.

120: Amend the Plan to place greater emphasis on identifying and securing funding mechanisms and delivery of essential infrastructure to secure the implementation of the City Centre Masterplan

**Town Centre Strategies**

164: Amend the Proposed Plan to provide a suitable statement to set out that, following the preparation of town centre health checks, town centre strategies will be prepared to deliver improvements to the town centres, and that Supplementary Guidance will be brought forward to cover the spatial elements of town centre strategies.

**Retail Core and Union Square**

158: Union Square should be identified as an Opportunity Site.

**Summary of response (including reasons) by planning authority:**

**Town Centre Strategies**

164: The long term vision for the City Centre has been progressed through the City Centre Masterplan and Delivery Programme 2015 (CD33). The document was agreed at Full Council on 24 June 2015 (RD67). The City Centre Masterplan and Delivery Programme 2015 outlines four key themes, eight objectives and a number of proposed projects and interventions for the City Centre. Future Masterplans will be worked up to provide detail on specific projects and interventions; these will be feed into future Aberdeen Local Development Plans at the relevant time. Retail Health Checks will continue to be implemented bi-annually to check activity, physical environment, property, accessibility, and community of our retail centres, with the next checks programmed for 2016. The exact nature of the Supplementary Guidance documents which will be derived from the City Centre Masterplan and Delivery Programme 2015 are unknown at this time. The Local Development Plan Team will be heavily involved with the City Centre Masterplan Team to research and deliver the detailed Supplementary Guidance documents when these come forward, and

embed these into future Aberdeen Local Development Plans.

### **City Centre Masterplan and Delivery Programme**

3, 18, 120: The support for the City Centre Masterplan and Delivery Programme 2015 is welcomed.

The objections submitted relate to the City Centre Masterplan and Delivery Programme 2015, which was consulted on just prior to the Proposed Plan, and in which a number of conceptual developments were outlined. It is expected that site specific developments within the City Centre Masterplan and Delivery Programme 2015 will be further worked up by the City Centre Masterplan Team in conjunction with other Council Teams and Departments, and these will then feed into future Aberdeen Local Development Plans. The City Centre Masterplan and Delivery Programme 2015 time frame goes beyond the 10 year scope of the Local Development Plan. Identifying and securing funding mechanisms for the developments outlined in the City Centre Masterplan and Delivery Programme 2015 will be the remit of the City Centre Masterplan Team. Transportation, access to existing facilities and community uses, and materials used would be assessed within a site specific Masterplan and/or planning application.

Delegated powers and the ability for Officers to make decisions, is outlined within Section 56 Local Government (Scotland) Act 1973 (CD01), and Section 43A Town and Country Planning (Scotland) Act 1997, as amended (CD02). The delegated powers given to Officers in Aberdeen City is subject to Committee approval.

### **Mix of Uses in the City Centre**

136: Paragraph 3.18 of the Proposed Plan outlines that the city centre is a place where people choose to live, visit, meet socially and it offers a wide range of good and services. Therefore, the residential nature of the city centre is outlined within the paragraph already. The principle of residential use in the city centre is also supported with the Proposed Harmony of Uses Supplementary Guidance (CD25). Proposed Plan Policy NC1: City Centre Developments – Regional Centre outlines that development within the city centre must contribute towards the delivery of the vision for the City Centre Masterplan and Delivery Programme 2015. This document says that a mix of uses within the city centre will help to achieve the goal of a vibrant city centre. As outlined above, it is expected that a number of site specific Masterplans will be developed providing further detail on the conceptual developments with the City Centre Masterplan and Delivery Programme 2015. Within these will be proposals for residential developments.

### **Retail Core and Union Square**

158: The support for the inclusion of Union Square within the City Centre Retail Core is welcomed.

In 2013 a retail study (CD16) was commissioned by the Aberdeen City and Aberdeenshire Strategic Development Planning Authority, Aberdeen City Council and Aberdeenshire Council to investigate the retail provision and needs of the

region. The study identified a requirement to allocate further 30,000 - 35,000 square metres of retail space in the city centre to 2022. Following consultation on the Main Issues Report (CD29), the Proposed Plan, in paragraph 3.22, identifies four areas in the city centre where retail development would be supported: OP102 Crooked Lane/George Street, OP67 Aberdeen Market, OP96 Upper/Basement Floors 73-149 Union Street and the OP91 Marischal Square development. This paragraph also says that further expansion and improvements to the existing retail stock in the City Centre Retail Core will be encouraged and this could include the main shopping centres at Bon Accord, St Nicholas, Trinity and Union Square. Further detail on this will be addressed through the City Centre Masterplan and Delivery Programme 2015 to ensure flexibility and delivery.

We do not consider it necessary to identify Union Square as an Opportunity Site. The Union Square development sits within the City Centre Retail Core zoning which is the preferred location for major retail development; therefore the principle of retail development in this area is supported and encouraged. Were a planning application to come forward, the scale of development would need to support the wider aims of the Local Development Plan; ensuring there is a resilient, safe, attractive, accessible and well connected city centre. A Proposal of Application Notice ([151362](#)) is pending for the site to extend the shopping centre to provide additional mixed use floorspace.

### **Public Realm City Centre Improvements**

187: The Proposed Plan supports the development of quality places which add to the social, economic, environmental and cultural attractiveness of the city, as outlined in paragraph 3.1, Policy D1 and the six qualities of successful placemaking.

A number of concepts for improving the public realm of the city centre are outlined with the City Centre Masterplan and Delivery Programme 2015 (CD33). As outlined above it is expected site specific Masterplans will be brought forward by the City Centre Masterplan and Delivery Programme Team. Conceptual developments outlined within the City Centre Masterplan and Delivery Programme 2015 which are relevant to the representation focus on the Castlegate including the Citadel. A number of public realm developments are also outlined. When the site specific Masterplans/planning applications for the concepts in the City Centre Masterplan and Delivery Programme 2015 are submitted, further public consultation will take place whereby many of these public realm issues can be explored in detail. The NHS is responsible for health care provision and communication regarding services would be better directed towards them.

Air Quality is an issue for Aberdeen City and we exceed both European Union and UK air quality targets for nitrogen oxides and fine particulate matters (CD37). Three Air Quality Management Areas (AQMAs) exist within Aberdeen City, and one of these is in the City Centre (encompassing Union Street, Market Street, Virginia Street, Commerce Street, Guild Street and Bridge Street, and parts of Holburn Street, King Street and Victoria Road). This is outlined in paragraph 3.50 of the Proposed Plan and the Proposed Air Quality Supplementary Guidance (CD25). Policy T4: Air Quality and Supplementary Guidance Air Quality (CD25) state that development proposals which will have a detrimental impact on air quality will not be permitted unless mitigation measures are proposed and agreed. Policy T3:

Sustainable and Active Travel encourages active non-motorised travel which will assist in combating poor air quality.

**Reporter's conclusions:**

**Reporter's recommendations:**

<b>Issue 16</b>	<b>NEW POLICY</b>	
<b>Development plan reference:</b>	No reference in Plan	Reporter:
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
Miss Stephaine O'Callaghan of QUOD on behalf of Scotia Gas Networks (SGN) (40) Mr Ross Anthony of The Theatres Trust (92) Mr Peter Roberts of Cults, Bieldside & Milltimber Community Council (102)		
<b>Provision of the Development Plan to which the issue relates:</b>	New Policies Proposed	
<b>Planning authority's summary of the representation(s):</b>		
<p><b>Gas Holder Site (OP107)</b></p> <p>40: Aberdeen Local Development Plan should include a Policy in order to enable strategic direction when planning for the future of Gas Holder Sites.</p> <p><b>Tourism, Leisure and Culture</b></p> <p>92: The Local Development Plan should ensure that all residents and visitors have access to cultural opportunities. Policies that support and enhance cultural facilities and activities can be used as a catalyst for wider cultural development and city regeneration.</p> <p><b>Infrastructure</b></p> <p>102: A Policy should be developed to ensure infrastructure is delivered regardless of whether a development is completed.</p>		
<b>Modifications sought by those submitting representations:</b>		
<p><b>Gas Holder Site (OP107)</b></p> <p>40: New Policy to be included in the next Local Development Plan Policy: Hazardous Installations. Hazardous installations will be identified in the Strategic Development Plan. The Council will take into account the need to incentivise and fund decommissioning.</p> <p><b>Tourism, Leisure and Culture</b></p> <p>92: The Local Development Plan should contain a Policy (possibly named Tourism, Leisure and Culture) that specifically aims to protect, support and enhance existing</p>		

leisure and cultural facilities from change of use or redevelopment, unless it can be demonstrated that there is no longer a community need for that facility, as well as providing criteria for encouraging new cultural development of all sizes.

### **Infrastructure**

102: New Policy requiring the completion of infrastructure irrespective of the completion of the development.

### **Summary of response (including reasons) by planning authority:**

#### **Gas Holder Site (OP107)**

40: The decommissioning of contaminated land is addressed in Proposed Plan Policy R2 Degraded and Contaminated Land. This Policy is framed by The Environment Act 1995 (RD03) which applies the “polluter pays” principle. As highlighted in the supporting text of the Policy, this means that the cost of remediating such land is spread among “polluters, landowners and taxpayers”. This policy also notes that PAN 33: Development of Contaminated Land (RD27) must be consulted. The PAN notes that there may be situations where the benefit of the remediation of such sites may “take priority over other policy objectives”. As such the planning process already considers the implications of remediation and its impact on the viability of developing such sites and an additional Policy would be of little benefit.

#### **Tourism, Leisure and Culture**

92: The Proposed Plan is a land use based planning document and, as such, where development proposals come forward which are culture, tourism or leisure related, or impact on such uses, they will be assessed on their merits and the appropriateness of the development within the context of the area. The importance of these uses is however recognised and this is reflected in several policies in the Plan. The Plan aims to promote the principles of Scottish Planning Policy Para 36 (CD05) including those around Placemaking. It seeks to do this by putting Placemaking at the centre of all development within the city. This is reflected by its inclusion in one of the first Policies within the plan, Policy D1 - Quality Placemaking by Design. A fundamental element of Placemaking, and of this Policy, is the importance of culture to the success of any place or city. Policy D1 does this by emphasising that “Places that are distinctive and designed with a real understanding of context will sustain and enhance the social, economic, environmental and cultural attractiveness of the city.” In this way the Council recognise the importance of culture and has imbedded in a policy that applies to all development in the city.

In areas which can be specifically identified as being important to culture, tourism and leisure, this has been included in the relevant policies. For example Proposed Plan Policy NC1 City Centre Development – Regional Centre, emphasises the importance of the city centre as a city wide and regional hub for leisure and retail. It also highlights the need for a sequential approach to the location of such uses to

protect and support such developments in the city centre. Proposed Plan Policy NC9 Beach and Leisure, recognises the importance of the beach as a centre of leisure and seeks to safeguard the area through a policy and a land use zoning. At a corporate level Aberdeen City Council's administration have set out their Vision for the city in their vision document a Aberdeen – the Smarter City, 2012-2017(RD32), which includes making art and culture a priority within the city. One of the many results of this can be seen in the £30 million refurbishment of the Aberdeen Art Gallery. In light of the above it is clear that both the Council as a corporate body and the planning department through the Proposed Plan and the planning process already consider this issue in some detail. The inclusion of an additional Policy is not considered necessary.

### **Infrastructure**

102: The importance of infrastructure is highlighted throughout Scottish Planning Policy Para 15, with a requirement for Local Development Plans to allocate sites to maximise the benefits which can be achieved from existing and new infrastructure provisions. National Planning Framework 3 (NPF3) (CD04) also highlights this by showing the Scottish Government's considerable commitment to new infrastructure in the form of the new harbour at Nigg Bay and proposed rail upgrades. The availability of infrastructure was amongst the criteria examined in the Development Options Site Selection process (CD28) at Pre-Main Issues Report stage in 2013. The Proposed Plan, and the supporting Proposed Action Programme (CD47), also identify infrastructure requirements as set out in Circular 06/2013: Development Plans (CD10). Appendix 3 of the Plan sets out the expected major infrastructure requirements in each of the Proposed Masterplan Zones to highlight to developers and the community what is, or will be expected, from each development.

These infrastructural requirements will be secured through the Masterplanning and planning application process. However any infrastructure secured through the planning process must be done on the basis of the scale of development proposed and its impact. The Scottish Government sets out the circumstances in which planning obligations can be used in Circular 03/2012: Planning Obligations and Good Neighbour Agreements (CD11). This document states that any planning obligation must be related to the development and proportionate in scale. The Circular also sets out a series of policy tests, these include that any obligation must fairly and reasonably relate to the scale of the development and "be reasonable in all other respects". All of this is done to ensure that any obligation required through the planning process is directly related to the scale of impact of the development as it is the development that must fund or part fund such obligations. If a development is not completed or does not reach a level required by the planning permission or legal agreement under Section 75 of the Town and Country Planning (Scotland) Act 1997, as amended (CD02) for the delivery of a piece of infrastructure, it would not be reasonable to require its delivery. It would therefore be unreasonable and contrary to Circular 03/2012 to form a Policy which required the delivery of infrastructure to satisfy a deficit not caused by the development. However if the development were to continue at a later date the same obligations would apply and the developer would have to complete any infrastructure requirement attached to the original planning permission.

**Reporter's conclusions:**

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**Reporter's recommendations:**

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<b>Issue 17</b>	<b>ALLOCATED SITES: CITY CENTRE AND URBAN</b>	
<b>Development plan reference:</b>	Page 87-90, Proposals Map, Policy R4, Appendix 2, Appendix 5, Appendix 6	Reporter:
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
<p>Mr Heri Fernandes (2)  Mrs Mackay of Pootung Cottage (17)  Mr David Fryer of Torry Community Council on behalf of Torry Community Council (35)  Miss Diane Morrison of St Mark's Church (67)  Mr Alasdair Morrison of GVA James Barr on behalf of F&amp;C REIT Asset Management (87)  Mr Abdul Latif of The New Aberdeen Mosque and Community Centre Project (116),  Mrs Marianne Evans of c/o MAC Ltd on behalf of Charlie House Appeal (Registered Charity SC042643) (121)  Miss Samantha Jackson of CBRE Ltd on behalf of John Lewis (139)  Mrs Theresa Hunt of Burness Paull LLP on behalf of Aberdeen Football Club (146)  Mrs Claire Coutts of Ryden LLP on behalf of NHS Grampian (148)  Mr Colin Fraser of Park Home Estates (170)  Mr George Murray (180)  Mrs Susie Murray (181)  Mrs Irene Strachan (187)</p>		
<b>Provision of the Development Plan to which the issue relates:</b>	Opportunity Sites within the existing built environment	
<b>Planning authority's summary of the representation(s):</b>		
<p><b>OP36 Charlie House</b></p> <p>121, 148: Supports the identification of OP36 for the delivery of Charlie House as a respite and care facility to support children with complex disabilities and life limiting illnesses. Aberdeen City Council have failed to remove the Urban Green Space zoning when drafting the Proposals Map. Request the Urban Green Space zoning is removed from this site on the Proposals Map on the basis the zoning conflicts with the Opportunity Site zoning. Support given to the retention of the site boundary as contained in the Development Bid, in order to accommodate infrastructure works and landscaping.</p> <p><b>OP66 Manor Walk</b></p> <p>170: Mobile Home Park Site should be allocated for any type of housing, not just social housing. Mixed Use would be a suitable classification as it also includes residential use.</p>		

### **OP77 Cornhill Hospital**

180, 181: Too many trees are to be destroyed in and around the area. This will have a negative impact on privacy and wildlife, including nesting birds. (**Note** - A petition was submitted for this site. The date on the petition is April 2014; 11 months prior to the consultation on the Local Development Plan. The petition relates to the planning application for the site ([130381](#)), not the Proposed Plan.)

### **OP81 Denburn and Woolmanhill**

67, 87, 148, 187: Many of the members of St Mark's church use the car parking spaces in the Denburn Car Park, not only on Sundays but during the week to attend the activities which take place in the church and hall. A large part of our revenue comes from hall lets from outside organisations, and good car parking facilities are vital. Support the identification of OP81 for a Mixed Use development. Woolmanhill Hospital should be regenerated into housing. Respondent queries whether it could have a 6 bed mini ward to prepare patients leaving hospital for return to their homes - allowing relatives and friends to visit and ease transition from hospital to home.

### **OP85 King Street/Beach Esplanade**

116: Entry for OP85 includes the sentence: "until proposals for these uses are progressed, or if a decision is made not to pursue them, the existing open space use will be protected by NE3 Urban Green Space." The middle part of this sentence ("or if a decision is made not to pursue them") is unhelpful to the community as there is no question of the development not occurring.

### **OP87 Pittodrie Park**

146: Aberdeen Football Club welcomes the allocation of OP87 for a proposed residential development. Planning Permission in Principle has been granted and the redevelopment of Pittodrie stadium is linked to the construction of a new stadium on site OP59.

### **OP97 Victoria Road Primary School**

35: This site should be recognised as within Torry, and not the City Centre. A new section specific to Torry should be created within the Plan. The Community Council affirm their commitment to the retention of granite buildings, and this building should be retained for conversion to social needs-led housing, including key workers.

### **OP99 The Waterfront, Torry**

17, 35: Too many houses/flats are proposed This will have a negative impact as there is nowhere to park and the streets are already narrow (especially St Fitticks Road), the pavements do not exist. Why close the school and then build more houses? This site should be recognised as within Torry, and not the City Centre. A new section specific to Torry should be created within the Plan.

**OP102 George Street/Crooked Lane**

2, 139: Comments in Support: We would be supportive of new retail development on this site where it enhances the public realm and attractiveness of this part of the city centre. John Lewis considers that the current area would benefit from improvements and this development could provide the catalyst for achieving this and enhanced links into the John Lewis store.

Comments Against: There are already two large malls located in the City Centre. Union Street is already in a sorry state due to shops moving from the high street into the malls. The small businesses in the city centre are already struggling due to the downturn in the economy, and opening/extending malls will add to their difficulties. A resident of St Andrews Street, and is not prepared to sell up and move out to make way for this development. The allocation is leading to uncertainties and will lead to residents finding it difficult to sell their houses.

**Modifications sought by those submitting representations:****OP36 Charlie House**

121, 148: Remove Urban Green Space zoning from the Proposals Map at OP36.

**OP66 Manor Walk**

170: Change of classification from Social Housing to Mixed Use.

**OP77 Cornhill Hospital**

180: Keep the trees.

**OP81 Denburn and Woolmanhill**

67, 148: Clarification on what car parking facilities will be available and urge that there is not a reduction in the number of spaces available.

**OP85 King Street/Beach Esplanade**

116: Change the entry for OP85 so it reads: "site identified by Council resolution for a Mosque, community facilities and open space. Until proposals for these issues are progressed or finalised, the existing open space will be protected by Policy NE3 Urban Green Space."

**OP87 Pittodrie Park**

146: The extant planning permission should be noted in the description of OP87 on page 89.

**OP97 Victoria Road Primary School**

35: This site should be recognised as within Torry, and not the City Centre. A new section specific to Torry should be created within the Plan. The Community Council affirm their commitment to the retention of granite buildings, and this building should be retained for conversion to social needs-led housing, including key workers.

**OP99 The Waterfront, Torry**

17, 35: Fewer flats/houses. Space is required for children to play / hang out. Make St. Fitticks Road broader. A shop in the area would be an advantage Clean the streets and remove the recycling more regularly, especially where Abby Road meets St. Fitticks Street. A new section specific to Torry should be created within the Plan.

**OP102 George Street/Crooked Lane**

2: Abandon the proposals.

**Summary of response (including reasons) by planning authority:****OP36 Charlie House**

121, 148: The site was previously considered by Reporters during the Examination of the extant Local Development Plan 2012 (Issue 81) (CD44) when a proposal for residential development of circa 40 dwellings was considered unsuitable by both Aberdeen City Council and the Reporter. The current proposal for the site is the development of a specialist children's respite and care facility. Support for the identification of the site as an Opportunity Site is noted. The decision to retain the site as Urban Green Space has been made intentionally and is not a mapping error. The site is still considered Urban Green Space and any subsequent planning application for this site would need to be assessed against Proposed Plan Policy NE3 – Urban Green Space. Policy NE3 states that permission will not be granted to redevelop Urban Green Space for any use other than recreation or sport, however does make provision for exceptions to this general rule so long as an equivalent and equally convenient and accessible area for public space is laid out and made available in the locality by the applicant for Urban Green Space purposes. Other criteria which any proposal must also meet are also noted in the Policy. Development of this site for the use proposed has been considered acceptable by Officers in principle given the proximity of the site to Woodend Hospital, the proposed location of built development away from areas at risk of flooding, and the intention to only build upon a small proportion of the site area, with the remaining site area developed as sensory and other interactive gardens which would enhance both the landscape character and quality of the Urban Green Space at this location.

**OP66 Manor Walk**

170: This allocation has been carried forward from the extant Aberdeen Local Development Plan 2012 (CD42) where it is listed as OP21. The site zoning for the

Mobile Home Park is 'Residential Areas (H1)' which is still considered appropriate given that the site sits within an established residential area. It is neither considered necessary nor suitable to amend the site zoning to Mixed Use as the respondent suggests. Proposals for non-residential use within this area would be considered against Proposed Plan Policy H1.

### **OP77 Cornhill Hospital**

180, 181: The allocation is subject to a [Development Brief](#) which is Supplementary Guidance to the extant Aberdeen Local Development Plan 2012 (CD42). An application for Planning Permission in Principle for Demolition of former Hospital Buildings and Proposed Residential Development of 323 units with associated car parking, open space and infrastructure was submitted in March 2013 ([130381](#)). At its meeting of 12th February 2015, the City Council's Planning Development Management Committee agreed a willingness to approve the Planning Permission in Principle application, subject to the conclusion of a legal agreement under Section 75 of the Town and Country Planning (Scotland) Act 1997, as amended. Negotiations on this legal agreement are ongoing.

During the determination of this application for Planning Permission in Principle an Arboricultural Impact Plan was submitted by the applicant and was assessed and considered acceptable by Aberdeen City Council. The Committee Report (RD76) for the application notes that: "A total of 207 trees were identified in the (tree) survey, with 17 trees identified as category-U, meaning that they are not considered to be suitable for retention. Of the 190 trees surveyed as 'appearing sound and healthy', 2 are category-A, 49 category-B and 149 category-C. A total of 91 trees are to be felled to allow the proposed development. Of those 101 trees, none are category-A, 14 are category-B and 77 are category-C. Whilst it is recognised that a significant number of trees would be removed for facilitate the proposed development, it is noted both that a degree of tree loss on this site was foreseen in order to deliver the level of development envisaged by the Cornhill Development Brief and that the trees to be removed are predominantly of Category-C quality. Replacement tree planting, at a minimum rate of 2 new specimens for every tree to be removed, is recommended in order to ensure that the site maintains its landscape character and the character of the Conservation Area is not adversely affected. The applicants have submitted proposals for replacement planting, however a fully detailed scheme will be required, incorporating an Arboricultural Impact Assessment in order to further establish the impact on retained trees and make recommendations accordingly." This requirement for a detailed scheme of planting is included as a Condition to the proposed consent (Condition 12). An associated application for Conservation Area Consent was submitted at the same time ([130382](#)) and was approved on 21 July 2015.

### **OP81 Denburn and Woolmanhill**

67, 87, 148, 187: Support for the identification of the site as Mixed Use development opportunity is noted. At the current moment there is no planning application for the site. Therefore, specific questions regarding the design of the site, including proposed car parking provision, are unable to be answered at this time. There will be, in due course, more opportunities for the public to comment on this site when a

planning application is lodged. At the moment all comments regarding layout and design of the proposed development have been noted. The Council approved the City Centre Masterplan and Delivery Programme 2015 (CD33) on 24 June 2015 and Aberdeen City Council is currently working on how to best resource and deliver the range of projects that come under the City Centre Masterplan. The Masterplan accepts that a City Centre Car Parking Strategy is needed in order to: maximise the offering of Park and Ride sites to reduce the overall number of vehicles entering the city centre; maximise current off-street parking available in the city centre; and, increase membership to the Aberdeen Car Club. The Masterplan and Delivery Programme recognises that the Denburn car park is very important to a number of residential and non-residential uses in the area. Therefore any redevelopment that may take place in the Denburn / Woolmanhill area will need to take into consideration car parking provision and recommendations from the intended Car Parking Strategy.

### **OP85 King Street/Beach Esplanade**

116: This allocation has been carried forward from the extant Aberdeen Local Development Plan 2012 (CD42) where it is listed as OP107. The wording which is included within the Proposed Plan is consistent with the wording in the extant Plan. It is considered that there is no need to change the wording as per the suggested modification as the text as currently drafted allows the Council the comfort that the Urban Green Space designation will be protected should proposals for the site not take place. The Respondent's commitment to the delivery of the project is noted.

### **OP87 Pittodrie Park**

146: Support for the continued allocation of Proposed Plan Site OP87 for residential development is noted. The proposed modification to Appendix 2 is discussed separately under Issue 40.

### **OP97 Victoria Road Primary School**

35: This allocation has been carried forward from the extant Aberdeen Local Development Plan 2012 (CD42). It should be noted that the Aberdeen City and Shire Strategic Development Plan 2014 (CD12) requires 7,500 homes on brownfield sites up to 2026, and residential development on this site will assist in meeting this requirement. The Proposed Plan continues to identify this site as a brownfield site and notes its suitability for sensitive residential redevelopment. This would not preclude the development of the site for social housing or key worker accommodation. With regards the potential demolition of this building, the Proposed Plan does not suggest that demolition of the existing building on site would be necessary for development, and indeed Proposed Plan Policy D5 – Our Granite Heritage notes that the Council seeks the retention and appropriate re-use, conversion and adaption of all granite features, structures and buildings.

It should however be noted that the building in question has not been listed for its architectural or historic interest, and the site does not lie within a Conservation Area. Demolition of the buildings on site could be progressed under Part 23, Class 70 of The Town and Country Planning (General Permitted Development) (Scotland) Order

1992 (RD77). The Reporter should also note that an application for detailed planning permission to demolish the existing Victoria Road Primary School and subsequently erect 62 residential units with associated open space, parking and infrastructure was validated on 03 August 2015 is currently pending consideration by Aberdeen City Council ([151260](#)). With regards the Respondent's suggestion that a new section specific to Torry should be included in the Local Development Plan, Aberdeen City Council recognises that Torry is a community with strong architectural and spatial character. The Proposed Plan identifies eight Masterplan Zones in the City containing allocated greenfield sites. The allocated sites in Torry are not greenfield allocations and therefore do not warrant being included as a Masterplan Zone nor being given a new section in the Proposed Plan.

### **OP99 The Waterfront, Torry**

17, 35: This allocation has been carried forward from the extant Aberdeen Local Development Plan (2012) (CD42) where it was listed as OP129 and was previously considered by Reporters during the Examination of this Plan (CD44, Issue 79) where the Reporters considered the Council's approach to the site as reasonable. The site is covered by the [Old Torry Planning Study 2002](#) and this document would be considered in any future applications for planning permission. The Study is not however Supplementary Guidance to the extant Local Development Plan 2012. A proportion of the site has planning permission / has been developed although a proportion remains without permission, hence the continued identification of this site as an Opportunity Site in the Proposed Plan. As future applications for planning permission come forward within this site there will be further opportunities for the public to comment on detailed proposals. With regards the concerns regarding traffic and parking, these points are noted and a detailed assessment of any future proposals for the site would include consideration of the Proposed Supplementary Guidance on Transport and Accessibility (CD25) as well as Proposed Plan Policy H2 Mixed Use Areas.

The respondent's suggestion that spaces for children to play / hang out is noted, and any future proposals for residential development would require to demonstrate how they would meet the terms of Proposed Plan Policy NE4 – Open Space Provision in New Development. With regards to the question over the decision to close Victoria Road School, at the time this decision was taken in 2008, the available data on School Roll Forecasts showed that the school would remain below 40% occupancy for the following 8 years. If the school had remained open then it would have remained under occupancy, making it inefficient to run, which would have been difficult to justify.

With regards the respondent's suggestion that a shop in the area would be an advantage, the Mixed Use zoning would not restrict a retail proposal so long as the scale were to be considered acceptable in the context of Proposed Plan Policy NC4 – Sequential Approach and Impact and Proposed Plan Policy NC5 – Out of Centre Proposals. Points regarding street cleaning and uplift of recycling are not planning matters. With regards the respondent's suggestion that a new section specific to Torry should be included in the Local Development Plan, Aberdeen City Council recognises that Torry is a community with strong architectural and spatial character. The Proposed Plan identifies eight Masterplan Zones in the City containing allocated

greenfield sites. The allocated sites in Torry are not greenfield allocations and therefore do not warrant being included as a Masterplan Zone nor being given a new section in the Proposed Plan.

**OP102 George Street/Crooked Lane**

2, 139: Response to Comments in Support: The respondent's comments in support of the proposed allocation are duly noted.

Response to Comments Against: In 2013 a retail study (CD16) was commissioned in 2013 by the Aberdeen City and Aberdeenshire Strategic Development Planning Authority, Aberdeen City Council, Aberdeenshire Council to investigate the retail take and shortcomings of the region. The study identified a requirement to allocate further 30,000 - 35,000 square metres of retail space in the city centre to 2022. This potential is driven by a combination of expenditure growth per capita and large population increases within the catchment area served by the city centre. Additional floorspace will also help to prevent expenditure leakage and maintain the city centre as the primary retail area of the North East. Following consultation on the Main Issues Report in 2014 (CD29), the Proposed Plan, in paragraph 3.22, identifies four areas in the city centre where retail development would be supported; Crooked Lane/George Street, Aberdeen Market, Upper/Basement Floors 73-149 Union Street and the Marischal Square development. With regards the respondent's comments on the inclusion of private property within the Opportunity Site boundary, this point is noted, however land ownership is not a planning matter.

**Reporter's conclusions:**

**Reporter's recommendations:**