Strategic Place Planning

Aberdeen City Council

Business Hub 4

Ground floor north

Marischal College

Broad Street

Aberdeen

AB10 1AB

**For the attention of Aoife Murphy**

Dear Mr Murphy,

**220772/PPP: Erection of Children’s Nursery. Landscaping, Car Parking and Associated Infrastructure at Land to the west of Northcote Lodge, Craigton Road, Aberdeen**

With reference to the above planning application, the Community Council have had an opportunity to read all the associated documentation and attend a site meeting with the applicant and their agents.

As a result we would wish to add to our objection in the following terms.

Our objection falls two distinct issues, the intended use of green and conservation space and the suitability of the surrounding area for the intended purpose.

Allow us to deal, in the first instance with the use of green belt and conservation space.

In the planning statement submitted by the applicant, they particularly reference

* the National Planning Framework and Scottish Planning Policy,
* Aberdeen City and Shire Strategic Development Plan 2020,
* the Aberdeen Local Development Plan 2017,
* Aberdeen City Council Planning Policy,
* the National Planning Framework 4 and
* the Proposed Aberdeen Local Development Plan 2020.

# National Planning Framework 3 and Scottish Planning Policy

The applicants submission at 4.2 and 4.3 says

“*The Scottish Government published Scotland’s Third National Planning Framework (NPF3) in 2014 to guide spatial development at a national level. NPF3 sets out the Scottish Government long term spatial strategies to encourage sustainable economic growth and investment across Scotland’s communities.*

*The proposed nursery provides an opportunity for a purpose built, low carbon sustainable nursery in a sustainable, and convenient location. There is demand for a nursery facility in this location, the site is in close proximity, and walkable to a large residential catchment. The site would deliver a high quality outdoor environment, and would retain trees. It is in line with the four visions of NPF3*.”

That National Planning Framework sets out the National Developments for Scotland and its vision through 4 outcomes to create - a successful, sustainable place; a low carbon place; a natural resilient place and a connected place.

The applicant claims that *“There is a demand for a nursery facility in this location”*.

The demographic of the area of the application *is predominately* an older community with few nursery age children. We accept that there may be a demand in the city as a whole but not in the area proposed as suggested by the applicant. There would be few potential customers in the area and the majority of places would be filled by children from outwith the area.

Sustainable place – Building in this space would reduce sustainability not contribute to or increase it. There would be loss of natural habitat for local animals, loss of natural flora and loss of amenity for residents and visitors.

Low Carbon Place – whilst the proposed building, in itself may have low carbon emissions, its location means that the traffic to the nursery would, generally, be by motor vehicle. At our meeting the applicant accepted that many of the clients would travel into the area by motor car to use the facility. Most motor vehicles continue to have a high carbon footprint. The application will **increase** carbon emissions in the area not reduce or even have a carbon neutral effect.

Naturally Resilient place – We are unsure what falls into this definition so cannot comment.

Connected place – The site is not at the “heart” of the community, rather it is at the extreme end, and the proposed nursery would be last building in, the Airyhall community. It is located on a part of Craigton Road that is narrow and with a single narrow footpath on the south side of the road. The road has been a cause for concern by residents and has received frequent police attention regarding complaints of speeding motorists. Traffic flow on the road is heavy at peak times. There are no cycle paths and the width of both the road itself and the footpath, are not compatible with shared usage. The site is serviced by the local 15 bus service, the nearest stop being a short walk away. In short, the proposed site is in an isolated position with a poor infrastructure that will struggle to cope with increased demands on it.

The applicants submit, at Para 4.4 and 4.5 in their Planning Statement:

*“Scottish Planning Policy (SPP) is a non-statutory statement of policy on how the Scottish Government expects planning issues to be addressed. As a statement of Ministerial priorities, it is a material consideration that carries significant weight though it is for the decision maker to determine the appropriate weight in each case. Through SPP there is a presumption in favour of sustainable development which seeks to support economically, environmentally and socially sustainable places. SPP seeks to ensure a design led approach, promoting the right development in the right location. SPP seeks to ensure that new development creates a sense of place through the application of the 6 qualities of place which are; distinctive; safe and pleasant; welcoming; adaptable; resource efficient; and easy to move around and beyond.*

*The proposed development would meet the six qualities, and would promote sustainable development.”*

The applicants provide no supporting evidence to their claim that the proposed development meets the 6 qualities mentioned and until detailed plans are submitted, it is impossible to measure the extent to which these (*distinctive; safe and pleasant; welcoming; adaptable; resource efficient; and easy to move around and beyond)* are satisfied..

**2. Aberdeen City and Shire Strategic Development Plan 2020**

In Paragraphs 4.6 to 4.8, the applicants reference the Aberdeen City and Shire Strategic Development Plan

At Paragraph 4.7, the applicant quotes from the Development Plan

*“Part of the vision for the plan is “By 2040, Aberdeen City and Shire will have grown and evolved to become an even more attractive, prosperous, resilient and sustainable European City Region. It will be an excellent place to live, visit and do business.” A number of aims are set out in the plan to support this vision including:*

* *Provide a strong framework for investment decisions which will help to grow and diversify the regional economy in a sustainable manner;*
* *Promote the need to use resources more efficiently and effectively whilst protecting and where appropriate enhancing our assets; and,*
* *Take on the urgent challenges of climate change.*

No comment is made as to how the application meet this vision but we would suggest that this application does not meet this vision

* The scale of the proposed business (120 children) will hardly contribute to the local economy. Although it could be argued that, by caring for children, the parents are free to carry out employment that does contribute.
* The asset in this instance is the green space and the application erodes rather than protecting or enhancing it.
* As pointed out above, the method of travel to the proposed nursery will be mainly by car with car exhaust actually creating more environmental pollution

1. **Aberdeen City Council Planning Policy**

Paragraphs 4.13 to 4.27, the applicant makes a case for the council to accept that this application meets the requirement for re-designation of the green space.

The Community Council disagree with their contention on the following points:

*“4.13* ***Policy NE1 Green Space Network*** *protects the wildlife, access, recreation, ecosystem and landscape value of the green space network, and will not permit development that would erode the character or function of the GSN. In this case, the site is of low ecological value, low landscape value, and is not currently available for recreational access. The proposal would not erode the GSN, as there would remain a significant area of green space, which connects with the GSN to the north. The green space network in this location does not contribute to access or recreation, and the ecological survey demonstrates there is minimal ecological value. The supporting Environmental Walkover Report finds that the site is improved grassland with no evidence of badgers or red squirrels and only low potential for other species such as hedgehog or amphibians. There could be bat foraging potential, but the proposal would have no impact on this.”*

Any building on this site would erode the character of the GSN. The site is in a rural setting with only one building, on the eastmost side, as a neighbour. The land to the south and west are open fields with Craigton road bounding the northmost side of the plot. On the north side of Craigton Road at this point are open playing fields. Many local residents use the site and the surrounding field as a dog exercise area. The “supporting environmental walkover report” was compiled following a single survey in February, a time when many animals are well into hibernation and some bird species having migrated for the winter.

*“4.14* ***Policy NE2 Green Belt*** *only permits development in the green belt in limited circumstances, such as an extension of an existing use, replacement of an existing building or an essential infrastructure requirement. The proposed development does not meet these requirements. However, there is strong justification to depart from the policy in this case. The proposed nursery is required meet a need for nursery childcare in the local area. There are no alternative sites or locations within the local area where this use could be accommodated. This site is in the control of the applicant and is deliverable. The forthcoming NPF4 promotes 20 minute neighbourhoods, this proposed nursery would ensure that the neighbouring residential areas have access to childcare within walking distance.“*

We agree with the applicant that this development does not meet the requirements of development in the green belt and do not agree that there is a strong justification to depart from current Council Policy.

There is very little demand for nursery childcare in the local area. As stated above, it is accepted that there may be a need in the wider area, Aberdeen City, but not in an area within 20 minutes walk of the proposed facility as suggested by the applicant. The majority of the nursery clientele will not reside in the immediate area

The site on which the former Braeside School occupied is currently vacant, as are plots within the area previoujsly occupied by the Treetops Hotel, there is also potential for building in the developing “Dandara” community off Countesswells Road and indeed, within the new Countesswells Development.

*“4.15 The site does not result in coalescence with Cults, there is significant green space remaining between the two areas.”*

Whilst the Community Council agree that the Airyhall and Cults communities do not coalesce the green space between the two has already been eroded and approval of this application will lead to further intrusion and erosion and sets a precedence for future applications.

*“4.16 The adjacent care home was granted permission in the green belt (reference 090141) by Aberdeen City Council, as there was a need and no other alternative sites were available. It is the same set of circumstances for this proposed children’s nursery, with no alternative sites available in the vicinity. There is a need for an additional children’s nursery to meet the funded hours for 3-5 year olds in this area (see supporting Market Assessment Report, and also Section 5.7 and 5.8 below).”*

As alluded to above, there are other suitable sites available to the applicant but, they have chosen not pursue them. The care home is not a valid comparator. Its location does not attract an increase in vehicular traffic at peak times on a daily basis. The location complimented the “over 50” residential complex immediately to its south. The “Market Assessment Report” referred to reports on the situation vis-à-vis Aberdeen and not the Airyhall/Braeside community particularly.

*“4.17* ***Policy D2: Landscape*** *requires development to have a strong landscape framework which improves and enhances the setting and visual impact of the development, unifying urban form, providing shelter, creating local identity and promoting biodiversity. The proposed development would sit adjacent to the nursing home, and would fit into the landscape character. Retained trees and proposed landscaping would ensure the development fits into the landscape. The site is adjacent to a built-up area so has minimal landscape impact.”*

How can any building fit into the open land/green belt character? The whole “character” of open land is that is “open” and the requirements of green belt status is that it is left undeveloped (“except in **very** exceptional circumstances”). The Community Council submit that the building of a private nursery in this plot of green space does not constitute “very exceptional circumstances.

The built up area in the vicinity are the residential properties on the east side of the site and, although close by, is not adjacent nor contiguous. The care home is immediately adjacent to the site and could not be described as built up..

*“4.18* ***Policy D4: Historic Environment*** *requires development to enhance the historic environment. High quality design that respects the character, appearance and setting of the historic environment will be supported. The site sits within the Pitfodels Conservation Area, which is the largest conservation area in Aberdeen at 191 hectares. The site sits on the northern boundary of the conservation area. The ‘Aberdeen City Conservation Area Character Appraisals and Management Plan: Pitfodels, January 2015’ document is relevant guidance. This document notes that there are views across the site, but these are dominated by the electricity pylon (see figure 3 below).”*

This development application does not “enhance” the historic environment rather, the applicants suggest that the building will respect the character. This is not enhancing.

The applicant makes no comment on why the Conservation area status should be waived/ignored. It is in place to ensure that the environs are protected from degradation by development.

*“Policy NE8: Natural Heritage* ………..*4.22 An ecological walkover survey has been carried out by Astell Associates. This has found that the site is improved grassland with no evidence of protected species. There is no impact on adjacent trees which offer foraging potential for bats. Lighting will need to be considered in future detailed designs so as to minimise impact.”*

Once again, it is pointed out that this was a one time survey carried out in February when many animal species are in hibernation and birds migrate.

*4.23* ***Policy NE9: Access and Informal Recreation*** *indicates that wherever possible, developments should include new or improved provision for public access, permeability and/or links to greenspace for recreation and active travel. The proposal does not have any impact on existing public routes. Pedestrian access into the site from Craigton Road will be provided.*

The proposed building does not provide new or improved provision for public access and actually recinds informal recreation of people wishing to utilise the field for dog exercise or rambling, restricting current access.

*“4.24* ***Policy T2: Managing the Transport Impact of Development*** *and the corresponding Supplementary Guidance: Transport and Accessibility indicate that development should be commensurate with the scale and anticipated impact and that new developments must demonstrate that sufficient measures have been taken to minimise traffic generated and to maximise opportunities for sustainable and active travel. A Transport Statement has been prepared by Fairhurst to accompany this application. The statement indicates that the proposed development will have no adverse impact on the local road network. The site will be accessed via a new junction formed off the existing Northcote Lodge Care Home access road.”*

The “Transport Statement” is based on comparators of the consultant’s choice – mainly in England – and not on the impact at the site. No traffic survey has been carried out against which a relevant report can be compiled. There has been no monitoring, for example, of hour by hour traffic flow, vehicle speeds or pedestrian footfall. The transport statement is irrelevant as it is not site specific.

It is contended that with most children being dropped off at the proposed nursery between 8am and 9am and being collected between 5pm and 6pm, 10 car parking spaces will not be adequate for delivery and collection of 120 children. Once the parking slots have been filled, parents/guardians will seek car parking space as close to the site as possible. This will result in “on street parking” and as alluded to above, Craigton Road, at this location, is too narrow to sustain parking. In addition there is a possibility of people parking on the road to impinge on the pathway restricting pedestrian access. It is disappointing that the Council Roads Department have supported the transport plan.

*“4.25* ***Policy T3: Sustainable and Active Travel*** *and the corresponding Supplementary Guidance: Transport and Accessibility require new developments to be accessible by a range of transport modes with an emphasis on active and sustainable transport. As indicated above in relation to Policy T2 the proposal provides opportunities for active travel given its proximity to existing pedestrian routes. The site is also in close proximity to several residential neighbourhoods within walking distance. Further details are provided in the supporting Transport Statement.”*

The comment is re-iterated that the majority of the customer base for the proposed nursery will not be within the immediate area and, therefore will not be within a 20 minute walking distance of the facility. In addition, the current infrastructure struggles to cope with current usage. Craigton Road, at this and other points are regularly given police attention to complaints of speeding by motorists. Whilst a bus route is nearby, the footpath access to the site is narrow as is Craigton Road itself and there is no provision of cycle lanes nearby

*“4.26* ***Policy NE6: Flooding, Drainage and Water Quality*** *will not permit development that will increase the risk of flooding, or be at flood risk. Surface water associated with development must have the most appropriate available SUDS and avoid flooding and pollution both during and after construction. The supporting Drainage Assessment by Fairhurst outlines that foul waste will be discharged to the public sewer. Surface water will be attenuated on site and discharged to the surface water public sewer.”*

The report deals with the impact of the business itself, not the impact of the building on natural water or drainage courses in the immediate vicinity or the effect of building on them on other properties such as Northcote Lodge.

*“4.27* ***Policy R6: Waste Management Requirements for New Development*** *should have sufficient space for the storage of general waste, recyclable materials and compostable wastes where appropriate. The proposal makes provision for storage of bins, in a location which is accessible for refuse vehicles. The swept path drawing demonstrates service vehicles can safely access the site.”*

The separate report in relation to this issue has concerns about a limited turning area which will be exacerbated by an overcrowded car park with clientele fighting for parking spaces. It is noted that the applicant is trying to address this issue.

**4. National Planning Framework 4 – Position Statement**

When referencing the above document, the applicant says

*5.2 Under ‘Liveable Places’, NPF 4 seeks to promote localism and the introduce a 20 minute neighbourhood concept to reduce the amount of travel required for residents to access services and facilities they need within their community. The proposed nursery would enable provision of nursery facilities in an area where there is not currently provision of private nursery care, and aligns with the 20 minute neighbourhood concept. Policy 7 supports the principle of 20 minute neighbourhoods, and specifically mentions the need for ‘local childcare, schools and lifelong learning opportunities’ to be considered in communities. The proposal therefore supports one of the key visions of NPF4.*

*The Community Council point out that there are a number of nursery facilities within the area, in fact, that meet the 20 minute walk. - Bright Horizons, Gt Western and Broomhill as examples.*

*Only part of that “Policy 7” is supported – the need for childcare – as laid out above, the potential client base will be more than a 20 minute walk away. In addition it is also noted that the clients who may reside within the 20 minute zone, may be unwilling to walk and CHOOSE to use their vehicles. Many will be dropping off or picking up before or after their working day*

**5. Proposed Aberdeen Local Development Plan 2020**

The applicant submits in Para 5.7 and 5.8:

*“5.7 The proposal is considered to be in accordance with Policy D2 of the Proposed Aberdeen LDP 2020.*

***Need***

*5.8 The separate Market Assessment Report outlines in detail the need for this proposed nursery facility. The Local Authority cannot fulfil the requirements of provision of 1140 hours per year per child for 3-5 year olds without assistance from private partners. In addition, the model of childcare offered by the Local Authority is restricted to certain times, and doesn’t always meet the requirements of working parents. The operator of this nursery already operates a nursery in the area, which has been ‘highly commended’ in Inspectorate Reports, and has a waiting list of over 100 children. This proposed custom-built state of the art nursery would also meet these standards, and deliver high quality childcare to the AB15 area.”*

The AB15 postcode are is not local to the area. It covers a wider area - Bieldside, Craigiebuckler, Cults, Hazlehead, Kingswells, Mannofield, Milltimber, and Summerhill. Only Mannofield satisfies the 20 minute walk proposal.

**The Community Council object to this application for planning permission in principle. The applicant agrees that the proposed site is within both a designated Green Space AND a Local Conservation Area but has shown no “exceptional reason” why the Aberdeen City Council should suspend its own policy of protection of Green Spaces to allow the application.**

Yours sincerely,

pp Braeside and Mannofield Community Council.