



Aberdeen Local Development Plan Review

Main Issues Report Consultation Response

Question 1 – New Housing Sites

Are there any other sites that would be suitable for housing?

Yes, bid reference: B03/03 – Sunnyfield

Introduction

Our client, Carnoustie Links Development Ltd, wishes to promote bid reference B03/03 – Sunnyfield as a site that would be suitable for residential development and contests the officers' conclusion that it is undesirable.

The Proposed Aberdeen City and Shire Strategic Development Plan (PSDP) is clear that housing allocations should be small-scale. The Local Development Plan Main Issues Report then reiterates that point in stating that *“Any greenfield housing allocations should be small scale, have limited impacts on the environment and infrastructure and should not be extensions to existing sites identified in the Aberdeen LDP 2017.”*

The PSDP also emphasises that, where greenfield sites are to be considered, reducing travel distances and making walking, cycling and public transport more attractive to people will be particularly important considerations.

As set out in our client's initial response to the call for sites and in the following paragraphs, our client's site at Sunnyfield complies with these criteria, and indeed more so than other sites which have been assessed as desirable as allocations. As such, it should be looked on positively for inclusion in the new Local Development Plan.

Site assessment

The officers' assessment of bid reference B03/03 demonstrates that the site is south facing, with good drainage, no risk of flooding, and that development here would result in little or no loss of nature conservation or built/cultural heritage elements while also being reasonably connected to the existing settlement and with a core path within close proximity linking



Kingswells to Aberdeen. All of these factors support the allocation of the site for residential development. This notwithstanding, the assessment concludes that the site should remain as green belt on the basis that it is considered to be more elevated than other development in the area, such that any development here would be more prominent, and on the basis of concerns about the site being on a slope. As set out below, our client strongly disagrees with that conclusion, particularly given that the site scores a maximum of 3 for 15 of the 21 assessment criteria, and scores 1 for only 3 of those criteria, with the total score of 54 being greater than that of other sites in the area which have been assessed as desirable.

There is no indication in any of the Main Issues Report documentation of any weighting accorded to the assessment criteria such that a site in the same general area with a lower total score (such as bid reference B0320, which scores only 51) should be considered as desirable whilst that with a higher score (such as our client's site) is not. And indeed, if the provisions of the PSDP are taken into account, it would indicate that those sites which reduce travel distances and make walking, cycling and public transport more attractive to people should be allocated over and above those which do not contribute to achieving this objective. Our client's site scores a maximum of 3 in terms of each of the relevant criteria in this regard (those being proximity to existing settlement, accessibility, proximity to facilities - shopping/health/recreation, direct footpath/cycle connection to community and recreation facilities and resources, and proximity of employment opportunities). Site B0320 scores only 2 for proximity to existing settlement and accessibility, and only 1 for proximity to facilities.

In terms of the criteria against which the site has scored only 1, the following should be noted:

- **Exposure** – in the assessment of a larger site in this same location during the preparation of the current Aberdeen Local Development Plan (ALDP) it was recognised that, whilst the site is located just below the brow of Newpark Hill, the hill provides some shelter such that exposure was not considered a significant issue. The site now proposed for allocation is on the lowest lying and most sheltered part of that previous bid site, which means that it will be even more sheltered by higher land to both the north and east. In addition, structured landscape belts shown on the indicative plans submitted with the bid will further protect the site. Our client would be happy for the provision of such landscaping to be a requirement for the development of the site if allocated.
- **Slope** – the Council's call for sites response form requested information of the extent of bid sites with a slope of 1:12 or steeper, thereby suggesting that any site with a lesser gradient would be acceptable for development in principle (or at least would not be excluded on the basis of that slope). Whilst it is acknowledged that around half of this site is steeper than the 1:12 threshold, the average gradient across the site is 1:11. The indicative layout plan submitted with the bid demonstrates that this presents no issues



in terms of developing the site. Also, as stated in our client's response to the call for sites, large parts of the OP30 site to the south of Sunnyfield (on which construction of housing is currently underway) are at a steeper gradient. It is therefore difficult to understand why the Council has concluded that development on that site is acceptable whilst coming to a different conclusion in relation to Sunnyfield. As the indicative layout shows, it is possible to deliver a well-designed development here that works well with the site's topography, and is consistent with the scale and density of OP30.

- **Land use mix/balance/service thresholds** – it is accepted that, in general terms, the provision of housing here does not add to the mix of uses in the Kingswells area. At the same time however, bid reference B0320 has been assessed as being desirable for allocation, despite it also being proposed for residential use only and scoring less overall (51 compared with 54 for Sunnyfield). In addition, our client is willing for the entire site to be allocated for affordable housing, thus adding a much needed tenure to the housing mix which would contribute to the Scottish Government's More Homes affordable housing supply target of delivering at least 50,000 affordable homes by 2021. The Council's Local Housing Strategy 2018 to 2023 includes a strategic outcome of there being *"an adequate supply of housing across all tenures and homes are the right size, type and location that people want to live in with access to suitable services and facilities."* The allocation of land for affordable housing on this site which is acknowledged as being well located in terms of access to services and facilities, would then help to deliver both Scottish Government and Council objectives.

The site has been given a score of 2 against three of the assessment criteria, and again our client would stress the following in relation to each of these:

- **Landscape features** – the assessment notes that there are stone dykes surrounding the site to the north, east and south and that it is possible that these will be lost if the site was developed. In fact, whilst there are dykes on the north and south boundaries of the site to which this bid relates, the boundary to the east is marked by a post and wire fence. The stone dykes would be retained as part of any development here, with the creation of an entrance feature in the dyke forming the boundary with the Old Lang Stracht to the south. There is therefore no reason why the site does not score 3 for this criteria. Again, our client would be willing to accept the retention of the dykes as a condition for the development of the site if allocated.
- **Landscape fit** – it is maintained in the assessment that the site *"occupies a somewhat significant position within the landscape"* and that it would be partly visible from Old Kingswells, some parts of new Kingswells and the surrounding area to the south, east and west. However, there is already a row of three houses at the same level as Sunnyfield,



with the old church manse and other development beyond that. Development here would therefore be no more prominent than those developments, and would likewise be no more prominent than development at Prime Four, given where this is located. Importantly, once the site is developed, it would appear as a natural extension to the existing village.

The assessment also concludes that development at Sunnyfield would encroach into the open countryside. It is however noted that the assessment for bid reference B0320 also states that it contributes to the open setting between Kingswells and Aberdeen, but then goes on to state that the scale of development proposed would not encroach significantly upon the open countryside. It is difficult to understand how such a conclusion could have been reached for that site when Sunnyfield is in fact better located relative to Kingswells and would, as stated above, form a natural extension to the village. Site B0320 on the other hand would erode the green belt along the main east west route to and from Aberdeen thereby impacting on a significantly larger number of people. At the same time the development at OP30 already stretches into the open countryside, beyond the boundaries of Sunnyfield.

- **Service infrastructure capacity** – officers’ assessment of the site indicates that Kingswells Primary School will continue to be under capacity to 2025 (which is as far as the school roll forecasts current go). The addition of 7.2 primary school pupils which would be generated from the proposed 24 houses could still be accommodated within the existing available capacity of the primary school at 2025. Although Bucksburn Academy is forecast to be over capacity by 2025, 24 units at Sunnyfield would generate only 2.4 additional secondary school pupils, which would be insignificant in terms of the current forecasts and could be easily accommodated within additional accommodation to be provided at Countesswells.

It should also be noted that the assessment for Sunnyfield states that *“A new school at Countesswells **may be able to provide additional accommodation**, but this is unknown at present.”* whilst that for B0230 states that *“There **will** be new provision within the Countesswells Development for education and development **could support** these in the longer term.”* The later of these would seem to suggest a more positive outcome than has been applied to our client’s site.

For the reasons set out above, as well as those given in our client’s initial response to the call for sites, it is submitted that Sunnyfield should be allocated in preference to bid reference B0230 to provide much needed housing.

