

Response ID ANON-B3JU-DST6-N

Submitted to **Local Development Plan Main Issues Report 2019 Consultation**
Submitted on **2019-05-13 13:22:24**

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1 Introduction

Section 1 provides a context for the Main Issues Report Do you have any comments in relation to this section?

Do you have any comments in relation to this section?:

2 Settlement Strategy

Question 1 New Housing Sites

Do you agree with our preferred housing sites? Are there any other sites that would be suitable for housing?:

See attached response regarding site which would be suitable for inclusion in the Local Development Plan.

Question 2 Housing Allowances Beyond 2032

Is there a need for us to identify further Housing Allowances or sites for the period beyond 2032?:

Question 3 Brownfield and other Opportunity Sites

Are there any further brownfield or other opportunity sites which would be suitable for redevelopment?:

Question 4 New Healthcare Facilities

Do you have any comments on these sites? Are there any other sites in these areas that we should be considering?:

4 Quality Places

MAIN ISSUE 4 Minimum Internal Space Standards for New Residential Development

How can we ensure that new residential development delivers an adequate amount of internal floor space for future occupants?:

Not Answered

Question 16 External Space Standards

Do you think that the amenity spaces currently delivered are of a sufficient quality? Should we strive for a better quality/ quantity of private/ semi-private residential amenity space across the city and refuse planning permission to proposals which do not meet our high standards? What standards would you like to see set for new dwellings, flats, and conversions in respect of quality and quantity of external amenity space?:

Question 17 Natural Environment

Do you agree that the proposed list of policies for Natural Environment gives a clearer and more coherent structure than at present?:

Question 18 Food Growing

How can the Local Development Plan support the delivery of food growing projects in the City? Do you think food growing should be included in the next Plan by way of a new policy, or through existing policy and guidance?:

8 Sustainable Mixed Communities

MAIN ISSUE 9 Inclusive Housing Mix (Housing for the Elderly and Accessible Housing)

How can the Local Development Plan ensure a greater mix of housing types is achieved in new developments?:

Not Answered

MAIN ISSUE 10 Residential Care Facilities

How should the Local Development Plan cater for proposals relating to Residential Care Facilities?:

Not Answered

MAIN ISSUE 11 Student Accommodation

How can the Local Development Plan cater to proposals relating to student accommodation?:

Not Answered

MAIN ISSUE 12 Houses in Multiple Occupation

How can the Local Development Plan support sustainable mixed communities, with regards to HMOs?:

Not Answered

Percentage limit of HMOs in each area:

Please explain why you chose your answer:

Geographical boundary of each area:

Please explain why you chose your answer:

Threshold for when planning permission is required for a HMO:

Please explain why you chose your answer:

Question 27 Community Planning

Is there anything else that the Local Development Plan can do to support the objectives of the LOIP or the aims of Community Planning?:

Question 28 Changing Places Toilets

Should large new developments that require public access provide Changing Places toilets? What types of venues should provide them?:

Additional Documents

Please include comments on other documents below:

Please include comments on other documents below::

Additional Files

If you have further information you would like to provide you may upload it here.:

Main Issues Report Response v2.pdf was uploaded



Main Issues Report Response

Craighill-Loirston

IAAB180030

Churchill Homes

May 3, 2019

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1 INTRODUCTION

This report has been prepared as a response to the Main Issues Report (MIR) on behalf of Churchill Homes who previously submitted a bid through the call for sites to Aberdeen City Council in preparation for the upcoming Local Development Plan (LDP).

The previous submission was determined to be undesirable by the Council with the MIR identifying several key constraints upon assessment of the site. Responding to the MIR, this report will briefly outline the proposal at Craighill once again before providing mitigation to address concerns raised by the Council.

It is trusted that following consideration of the points raised that the Council reconsider the Craighill site and ultimately hoped that the site be allocated it in the forthcoming LDP.

2 SITE BACKGROUND

2.1 Loirston Allocation

The site at Loirston has an extensive planning background, development has been planned at the site for some time now and Churchill Homes have been involved from the outset. The ownership across the whole Loirston site varies with the developers co-operating to bring the site forward for development. The various ownership is illustrated in Figure 1.

The land at Loirston was considered for inclusion in the Aberdeen LDP, adopted in 2012 and ultimately the Reporter recommended the site for inclusion in the plan. Application for Planning Permission in Principle (PPP) was subsequently submitted in 2013, this proposal sought to develop 1,067 homes on the site for part of the site. This was conditionally approved in July 2015 with the inclusion of 8ha of employment land and the developers have subsequently entered into a s75 agreement to bring the development forward.

The site's allocation in the LDP was maintained in the 2017 plan, the site is known in this plan as OP59. The allocation for OP59 is 1,500 homes and 11ha of employment land, this maintained the previous allocation and included the land under the ownership of Churchill Homes. The current allocation is highlighted in the blue line in Figure 1. The land subject to the bid would be an extension of the site and could benefit from the masterplan for Loirston.

This bid is for a small section of Churchill Home's unallocated land which lies on the periphery of the allocation and seeks a modest extension of the current allocation, the land in this bid remains under the ownership of Churchill enhancing the effectiveness of this site.



Figure 1: Site Ownership

2.2 Craighill

As previously noted, the PPP application did not include land under the ownership of Churchill Homes, however, progress is being made to take forward the planning permission for this land.

The site at Craighill measures 1.6 ha and is an extension of the previously allocated site. This submission seeks an extension of that site to allow a further 30 residential dwellings to be allocated, whilst it is a standalone application it is entirely related to the existing allocation in the extant LDP (OP59). It is necessary that the site is considered in the context of the wider development. The site at Craighill is outlined in red in Figure 2, the blue line represents the total land owned by Churchill Homes which extends to 26ha.

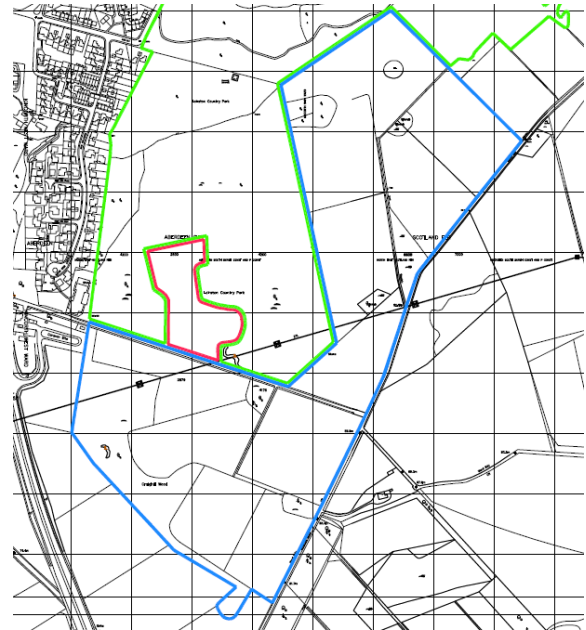


Figure 2: Craighill Site Location

The development is located on an area of improved grassland outwith the Kincorth Hill Local Nature Conservation Site (LNCS) and will connect to the street structure of the wider Loirston development, as well as providing pedestrian access to Kincorth Hill. The development will create an attractive housing development in keeping with the vision established for the wider Loirston development area.

2.3 Local Development Framework (LDF)

With the site at Loirston allocated in the LDP, it was decided to produce a Development Framework which provides further detail of the OP59 development and acts as Supplementary Guidance. This comprehensively outlines the various stages of development on the site and provides detail around the timeline for development. Reference will be made throughout this report to the Framework as it remains valid and is material to decision making on the site.

Development of Craighill has the potential to deliver 30 units and assist delivery of the challenging housing numbers, whilst it is acknowledged that the number is small, it can supplement other shortfalls which may occur and can be planned alongside the Loirston development. Ownership is not an issue as it is under control of the developer. Craighill may be considered to have challenges on infrastructure if considered alone, however, this site is put forward as an extension to an existing allocation where this infrastructure has been considered and planned.

3 KINCORTH HILL LOCAL NATURE CONSERVATION SITE

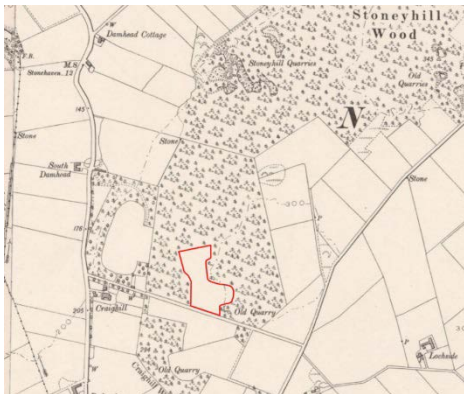


Figure 3: OS Map 1890

The site at Craighill is surrounded by the Kincorth Hill LNCS, in order to effectively present the site a brief outline of the LNCS will be provided and its relationship with the proposed development.

From 1st Edition mapping (1842-1882) Kincorth Hill was an area of woodland (Stoneyhill Wood) within which there was extensive quarrying. Within later editions the quarries are named as Kincorth Quarries and Kincorth Hill. Historic OS maps were reviewed to seek further detail on the quarries, the only record within close proximity to the site is the Craighill quarry which sits just south east. The area of additional land proposed for development at Craighill has never formed part of the woodland, the site location is outlined in red on the 1890 OS

map in Figure 3 and the field boundaries have not changed since. The historical use of the proposed site would most likely have been for agriculture which ceased some time ago.

The area around Kincorth Hill is surrounded by housing on three sides and moorland, agricultural land, housing and woodland on the remaining boundary. The hill is covered by an extensive network of paths of varying condition and has a small informal parking area. The site is well used by school groups and local people for walking, jogging and wildlife observation. The site adjoins back gardens of the neighbouring houses and is readily accessible from a number of points from the adjacent housing estate.

The key environmental assets of the site include heathland (both wet and dry), extensive gorse scrub, grassland, small coniferous plantations, small broadleaved plantations and a small artificial pond. Habitat improvement has focused on preserving the heathland as it is of greatest environmental significance at a national level. Heathland is becoming increasingly rare nationally and both the heath and grassland are threatened by scrub encroachment and invasion by non-native conifer species. There is potential to enhance the nature conservation value of the reserve through habitat management. There is also potential to increase the educational use of the reserve, particularly by local schools.

Kincorth Hill is identified as a LNCS and Aberdeen City Council Local Conservation Sites Booklet describes Kincorth Hill as *"part of 'the Gramps' and is one of the largest remaining areas of semi-natural vegetation in the Aberdeen City region. It is dominated by gorse/broom and willow scrub with dry heathland on the higher ground. Scattered trees, neutral grassland and small patches of wet heathland are also present. The proximity of the site to residential areas of the City makes it an important recreational and educational resource. The majority of Kincorth Hill is classified as a Local Nature Reserve"* (Aberdeen City, p27).

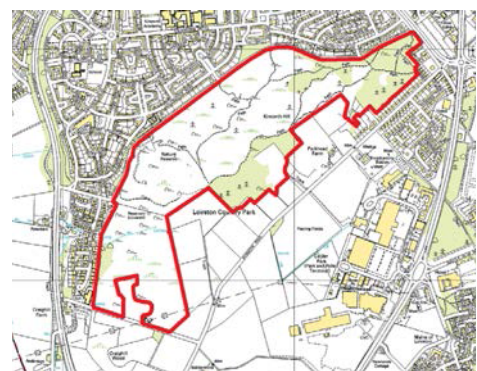


Figure 4: LNCS Kincorth Hill

The proposed site for development at Craighill is outwith the designated LNCS as demonstrated in Figure 4. The site is improved grassland and represents none of the characteristics identified of the LNCS. The main concern for the protection of the heathland at Kincorth is invading gorse. Being located with development surrounding additional population will have an insignificant effect on the heathland.

4 MAIN ISSUES RESPONSE

The development bid at Craighill was reviewed as part of the call for sites in Aberdeen, the MIR recommended it be classified as undesirable. Aberdeen City Council complete their reviews against certain criteria and ultimately provide a score for the site out of 63 for each site, Craighill scored 42. The scoring is purely indicative and there is no pass mark for sites, however, it provides helpful feedback which allows mitigation to be considered.

The scoring is conducted on a scale of 1-3 with 3 being desirable and 1 undesirable, utilising the scores issued for Craighill the mitigation required has been prioritised accordingly. The site scored 6 scores of 1 for the following reasons-

- Relationship to Existing Settlement
- Land Use Mix/ Balance/ Service Thresholds
- Accessibility
- Proximity to Facilities- Shopping/Health/Recreation
- Direct Footpath/Cycle Connection to Community and Recreation Facilities and Resources
- Proximity of Employment Opportunities

These have been considered as the highest priority in this response and will individually be addressed with relevant mitigation to attempt to rectify the lower scores.

Scores of 2 were also issued for 9 further criteria, these were-

- Exposure
- Aspect
- Natural Conservation
- Landscape Fit
- Land Use Conflict
- Physical Infrastructural Capacity
- Physical Infrastructure Future
- Service Infrastructure Capacity
- Other Constraints

These points will be addressed where mitigation can be provided. In some instances the assessment is considered fair and accurate. Where this is the case, no mitigation is provided and the criteria is not addressed. The feedback provided by the Council in their assessment of the site has also been provided for each point to provide context to the responses.

4.1 Relationship to Existing Settlement

"Proximity to existing residential development but not well-connected via existing road/ transport network. Redmoss Road currently only point of access."

The outlook for settlements surrounding this site will be much different once development commences at OP59 and this must be considered for the Craighill development. 1,500 homes and 11ha of employment land are to be developed which will provide a significant level of development.

The road network was raised as a concern within the assessment, this must be considered alongside the LDF, which has identified two major connections to the existing road network at Wellington Road and have been agreed with Aberdeen City Council. These access points to the larger OP59 Loirston site would provide adequate access to the site which would complement the proposed existing access point at Redmoss Road, improvements would be required to Redmoss Road and these would be made as part of the wider development.

Craighill, when considered within the larger plan for Loirston and the plans in the LDF, is a small addition to an existing allocation which will benefit from all necessary infrastructure from the Loirston development.

4.2 Land Use Mix/ Balance/ Service Thresholds

"Very little land use at present, area is mainly rural. Located next to existing OP59 Loirston site for major mixed-use development; long-term development."

This point in the MIR acknowledges the proximity to the existing allocations at OP59 highlighting the mixed-use nature of the proposed development, the PPP application has 8ha of employment land approved including commercial, leisure and office uses. Once developed, the Craighill site will be able to benefit from these uses and will have sufficient mixture of use.

The LDF outlines the variety of uses which will be undertaken on the site-

- Neighbourhood Centre
- Commercial Units
- Community Facilities
- Local Retail
- Employment Land
- Housing
- Education Facilities

Considering this broad mixture of use it is considered that this site is well located to benefit from a mix of uses with minimal travel distances. Sufficient mixture of use is planned for and a further 30 houses complements the large scale Loirston development. Bearing this in mind it is contested that the Council should reconsider their evaluation under this heading and consider the site in the context of the wider development.

4.3 Accessibility

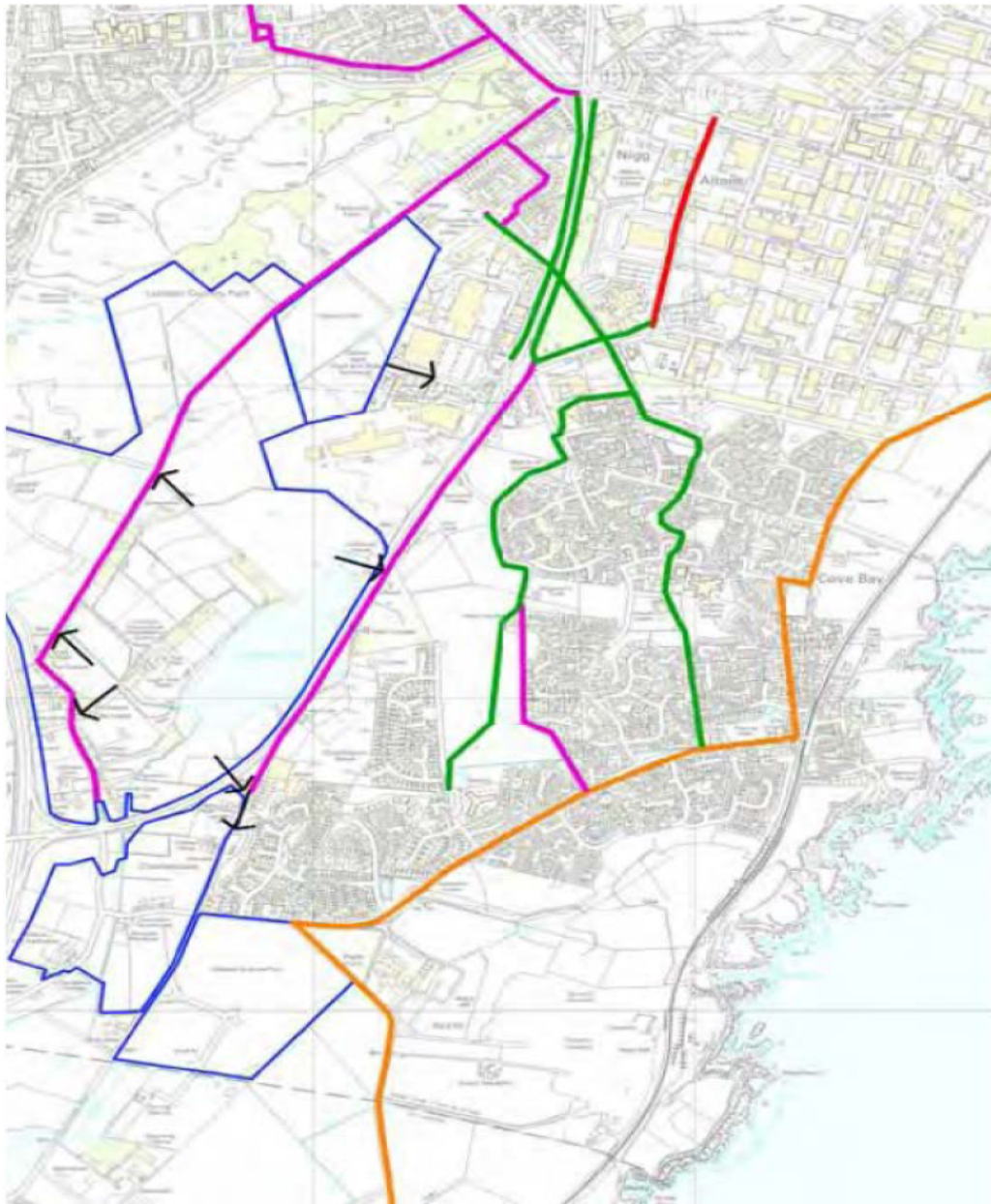
"Proximity Redmoss Road, but no pavement/ cycle space. Core located on south boundary (no.82 Kincorth to Loirston Loch)."

This point has been somewhat addressed under relationship to existing settlement, however, will now be more comprehensively addressed. The MIR notes that the site is within proximity to Redmoss Road which provides no pavement or cycle space, it further notes that the southern part of the site connects with Aberdeen's Core Path 82. These points are acknowledged but this submission would again refer to the LDF which addresses much of the concerns raised by the Council as well as highlighting plans for core path upgrades, these improvements would also be incorporated into Craighill. The LDF states, "The movement of pedestrians and cyclists has been considered as a priority from the outset" (Loirston LDF, p26), this indicates the importance of cyclists and pedestrians when designing the layout and ensuring optimum accessibility.

Access in the area will be completely redeveloped with the wider proposals at Loirston and this will provide necessary improvements to allow walking and cycling to be given higher priority and subsequently increase the accessibility of the site. These principles would be followed at the Craighill site where access for cyclists and walkers would be maintained. Cycle routes have been designed in to the layout of site OP59 and any extension to this for Craighill would naturally be incorporated.

The plans for cycling and core paths have been extracted from the LDF in Figures 5 and 6, these show that ample plans have been made to factor these elements in to the masterplan. Figure 5 shows how the OP59 site will connect with existing cycling network surrounding the site. Figure 6 shows the proposed general path network as well as existing and proposed core path routes through the site. The Development Framework also notes that Core Path 82 will be upgraded and extended as part of the development resulting in public gain for those who use the path. Minor amendments may be necessary to the LDF plans as some changes to the original layout have occurred since their formation. Key to the submission at Craighill is that the LDF has extensively planned for the inclusion of cycle routes and core paths through the site and Craighill would have no impact on this and would be able to benefit from the excellent access links these would provide.

Given the comprehensive approach on accessibility adopted by the LDF. The public would enjoy considerable gain on the core path network and cyclists in Loirston would have excellent links to local cycle routes on the periphery. For these reasons it is considered that the Council should reconsider their initial assessment of the site on grounds of accessibility.



Legend






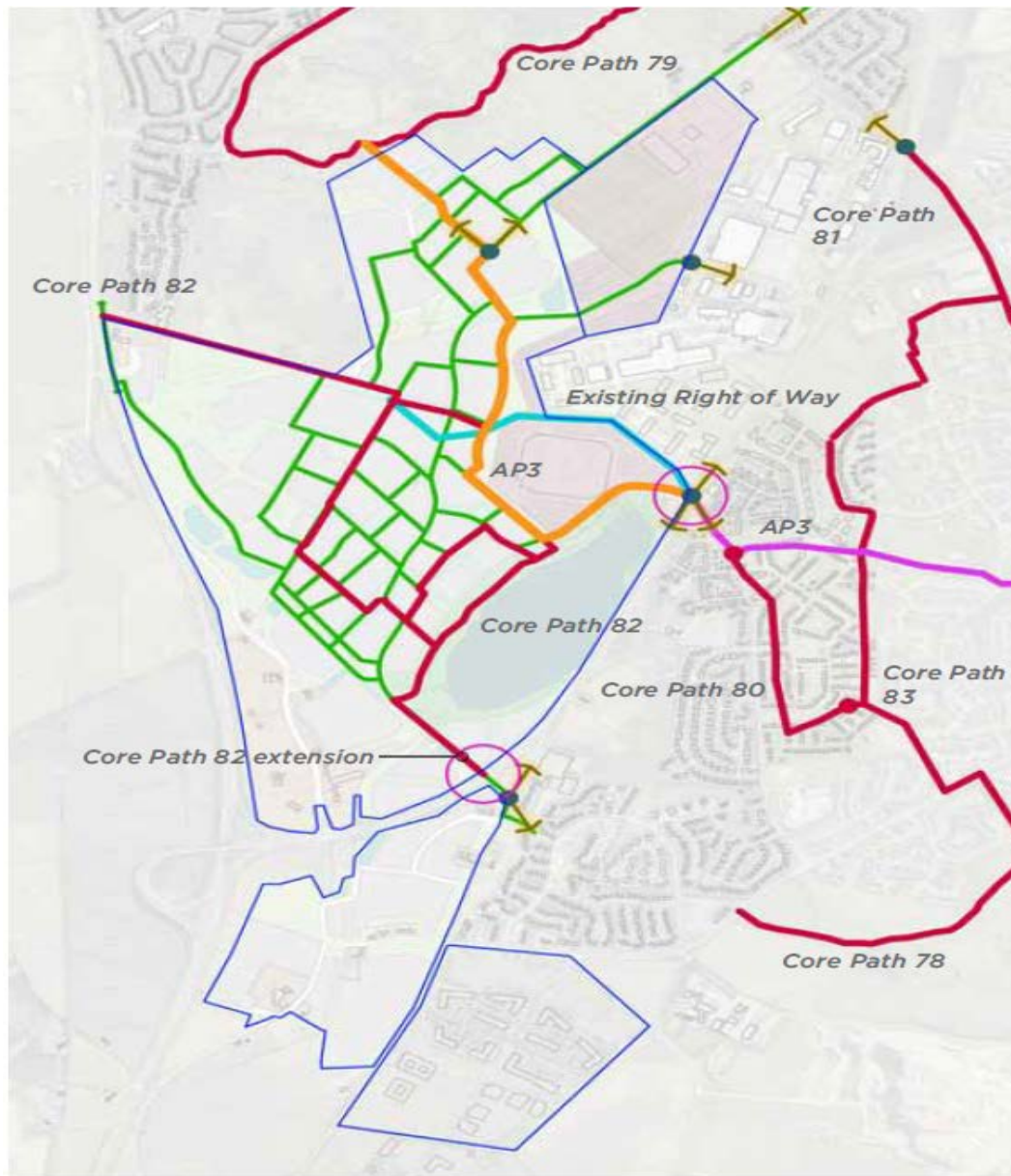
-  National Cycle Route 1
-  Local cycle route (on-road cycle lane)
-  Local cycle route (traffic free)
-  Other route
-  Indicative location for connection to existing network

Figure 5: Planned Cycle Routes Through the Development. Source Loirston Development Framework
Source: Loirston Local Development Framework



Legend









-  Existing Core Path with improvements
-  Aspirational Core Path (outwith Framework area)
-  Proposed alternative route for Aspirational Core Path (within Framework area)
-  Existing Right of Way
-  Proposed general path network
-  Connecting node
-  Onward connection
-  Indicative crossing point

Figure 6: Core Path Plan for Loirston
Source: Loirston Local Development Framework

4.4 Proximity to Facilities- Shopping/Health/Recreation

"Schools located in Cove Bay, Sainsbury's local within new Charleston development to north. Cove Bay Health Centre around 1 mile north. New major development proposed within Loirston OP59 masterplan area in long-term."

The LDF outlines the plans for various facilities to be developed in the area and sets key points of development when these will be provided, a s75 agreement as part of the PPP application in 2013 further ensures that this infrastructure will be built at appropriate milestones throughout the development that has been approved.

Section 6.2 of the s.75 agreement outlines the delivery of key elements of the development such as a health facility, schools and water provision. The s75 agreement outlines the developer contributions which will be made to the Council to facilitate the extension of the doctor and dentist provision available in the area. The developers are also required to provide a pharmacy on the site prior to the occupation of the 750th house as per the terms of the s75 agreement.

Schools have been adequately planned for, the recent completion of Lochside Academy provides sufficient secondary education provision and a primary school contribution is to be made on the occupation of the 200th house. The MIR notes Abbotswell PS as the nearest primary school, however, Loirston PS is of a similar distance and both are forecast to have ample capacity on the most recent roll forecasts.

It is contested by this submission that there has been a failure to account for forthcoming facilities which will be implemented as part of the OP59 development, the site at Craighill seeks to join on to this larger scale development and as such will have adequate proximity to facilities. These varied facilities have been adequately outlined in the LDF and it is essential to consider this, therefore, it would be requested that Craighill be reconsidered under this criteria.

4.5 Direct Footpath/Cycle Connection to Community and Recreation Facilities and Resources

"Road link via Redmoss Road. No pavement space for pedestrian and cycle. Local bus routes are 3/3G & 18 via A956 Wellington Rd only. Calder Park Park & Ride at Redmoss Road."

Reference should be made to the previous points raised in the accessibility criteria in this report with regards to footpath and cycle connections. Figures 5 and 6 illustrate the planned connections in the wider development of Loirston and these illustrate the ample connections which have been factored in. Development at Craighill would naturally benefit from these connections too as the site would simply extend on to the OP59 allocation. The Council appear to have assessed the site against this with no consideration for the Framework for OP59. Again, like previous submissions in this report there are two crucial reference points, firstly the s.75 agreement which requires the developer to provide recreation facilities. The agreement outlines when these facilities must be made available. For example, the development must make payments at stages of the development to ensure community and sports facilities are in place for residents, these are required at the occupation of the 350th, 500th and 650th housing unit.

Section 5.4.7 of the LDF comprehensively outlines the open space categories of the development and what provision has been planned, for example, all residents will be within 400m of a play zone, five of these have been identified in the Framework and will be suitable for children between 3 and 18.

The LDF acknowledges that the site is not well served by buses presently, however seeks to amend this through the design and layout of the site. The need for buses was identified at an early stage when formulating the plans following input from residents at consultation events. Bus routes through the site have subsequently been planned for, this would follow the primary route through the site and serve the wider community at six bus stops which have been identified along the route. Discussions have been held with the major bus operators in the city who have indicated a willingness to run a service through the Loirston site. Measuring the distance from the Craighill site to the proposed bus stops highlights that the site would be approximately 400m from a bus stop and would therefore fulfil national policy requirements.

It is suggested for this criteria that a forward looking approach must be adopted when assessing the development at Craighill whereby all infrastructure development outlined in the Framework must be taken into account. Doing so illustrates that all necessary community connections and facilities have been well planned and will be in place prior to Craighill being developed as the wider Loirston allocation is developed first.

4.6 Proximity of Employment Opportunities

"Site is close to existing Industrial Estate (Altens) and Business Parks (Gateway/ Balmoral). City Centre is within commuting distance."

The employment opportunities in the area must be considered against the future development of employment land in the area. Policy LR1 in the adopted LDP states that employment land on existing allocated sites allocated from 2017-2026 will be approved in principle within areas designated for employment. This would be applicable to Loirston where 11ha of employment land was initially allocated and 8ha of this has subsequently been approved in principle by the Council.

Further to the employment land at Loirston is a further allocation of 22.5ha in Cove which could also provide residents of Loirston with sufficient opportunity. This land would also be aligned with policy LR1 and as such should be principally approved. It is conceded that the site at Craighill is purely residential development, however, neighbouring OP59 and further employment sites in Cove provide substantial employment land which would provide employment opportunities for residents of Craighill.

Currently, there is a high level of employment land within 1km of the site at Balmoral Business Park with further opportunities at Altens Industrial Estate. When this is considered against the development at Craighill concerns regarding land use mix should be alleviated. Considering the aforementioned points, it would be put forth that the Council should reconsider their assessment of Craighill under this heading. The adopted approach did not consider the wider picture of 33.5ha of employment land being allocated in the LDP, this is proposed to come forward before 2035 and as such provides ample employment opportunities for potential residents of Craighill.

4.7 Landscape Fit

"Site falls in the Kincorth Hill Landscape Character Area. Site is a Prime Landscape Area (Hill). It is considered that the track bordering the south of the site provides a robust green belt boundary."

Policy D2 of the extant Aberdeen LDP requires all developments to have a "have a strong landscape framework which improves and enhances the setting and visual impact of the development." The LDF provides a comprehensive landscape framework which was established from the outset, ensuring a strong greenspace network is established and sustainable development delivered at Loirston.

The landscape framework for OP59 was also developed in adherence with the Supplementary Guidance issued by the Council on Open Space. Review of this also indicates that the development at Craighill will be compliant with the Council's policy as ample open space has been planned for. The surrounding area of Craighill has some celebrated landscape features, these are-

- Loirston Loch
- Existing Watercourses
- Landscape Features
- Drystone Dykes

These features would not be impacted by the development at Craighill and would be retained as part of the OP59 development. The neighbouring LNCS at Kincorth Hill has already been addressed in this report and all features with this popular feature would also be retained where local residents can enjoy views to the surrounding area. This prime landscape area would be unaffected by Craighill and as such the submission should not be constrained due to its proximity with the hill.

The relatively small scale development of Craighill for 30 residential units should not be hindered due to landscape fit, it sits outwith the LNCS and would have no impact on the features which surround the site. OP59 plans to provide many new and enhanced landscape features and these should be considered for Craighill given the adjoining location.

4.8 Land Use Conflict, Natural Conservation & Other Constraints

"Green Space Network and adjacent LNCS/ LNR. Little land use mix in the area."

"Site located within GSN. Site is located within (but not part of) Kincorth Hill LNCS / LNR. Japanese Knotwood recorded within 100m of site boundary."

"The area is used recreationally (as part of Kincorth Hill) and there are paths/desirec lines within the site."

Three headings have been collectively addressed here, each scored 2 in the assessment by the Council and the MIR feedback consistently highlights the Green Space Network in Aberdeen for each. It has therefore been decided to address these collectively for the submission.

The impact on Green Space Network is acknowledged, however, the proposal ensures that the network remains, access through the site is planned and the existing links to key green sites are retained. For example, routes between the LNCS and Loirston Loch are retained and enhanced as part of the LDF. The desire paths which can be seen through the Craighill site would be used to plan routes through the site to ensure there is no public loss from the development. These naturally formed paths clearly indicate that the public use it as a connection to the various green space features in the area. Thus, it would be crucial to retain these and enhance them to provide public gain. Recent upgrades to Core Path 82 enhance the amenity around the site and may provide a new alternative route for those who visit the area for recreation.

As previously noted the LDF proposes to implement a sensitive landscape framework, this would lead to the creation of a strong Green Space Network. Several references are made to the green space network throughout the development Framework illustrate its importance to the developers and a significant portion of the site is retained for the purposes of green space with a minimum 1ha being provided for every 1000 population.

The site at Craighill is a natural extension and has the potential to benefit from all of the planned green space enhancements and developments associated with the OP59 site. Naturally, provision would be made at Craighill to ensure there is public gain and this would be achieved through the conversion of the desire lines into paths which members of the public can continue to use to access the various green features in the surrounding area. For the aforementioned reasons it is suggested that the development does not detract from the GSN.

4.9 Physical Infrastructural Capacity & Physical Infrastructure Future

"Waste water and water capacity according to Bid form."

Little feedback is provided in the MIR on this topic, it simply states, "Waste water and water capacity according to Bid form." No suggestion has been made by the Council that this is not the case and it is difficult to understand why the site would be negatively considered on this basis. Having reviewed other sites which were submitted to the Council, many bids have had infrastructure assumed where it is noted as existing in the call for sites form. This approach does not appear to have been applied consistently as Craighill has been given a somewhat negative score. It would therefore be put forth that the Council should reconsider their approach to Craighill under this heading as it is not aligned with other approaches. There is sufficient water and waste water capacity on the site and as such the site should not be marked down for this.

4.10 Service Infrastructure Capacity

"Abbotswell PS: 2019 85%; 2020 90%; 2021 93%; 2022 91% Lochside Academy: 2019 79%; 2020 83%; 2021 84%; 2022 88%."

Having considered the feedback provided in the MIR by the Council it is difficult to understand why the site was marked down under this heading. The schools which are highlighted by the MIR are both forecast to be well within capacity in 2022 and this does not change beyond this time. The proposed development at Loirston also commits to the development of a new primary school in the area to meet the demand which comes from the development. This requirement is also outlined in the s75 agreement for the PPP application which requires the primary school contribution to be made by the occupation of the 200th house.

These points would suggest adequate education infrastructure within the area and it would be urged that the Council reconsider their assessment of Craighill on this topic.

5 CONCLUSIONS

This report has responded to Aberdeen City Council's MIR concerning plans for development at Craighill, Loirston. The approach adopted by the Council seems to have been to consider Craighill in isolation with insufficient links made to OP59 and the mixture of development will bring forward. The proposal in this submission must be considered alongside the OP59 development, the promoter is seeking an extension to an existing allocation and is reliant on much of the infrastructure provided at Loirston. Therefore it would be put forth that the links to OP59 are taken into account when assessing the site as this will have a profound impact on the outcomes reached.

The development provides an addition to a development that is programmed to be built out over the next plan period and an allocation of this land represents an appropriate infill that following the wider development can provide additional housing land supply.

It is trusted that the Council will reassess Craighill and take account the submissions put forth in this report. It is subsequently hoped that the Council conclude that it is an effective and desirable site which should be recommended for inclusion in the upcoming LDP.