

## Response ID ANON-B3JU-DSTD-3

Submitted to **Local Development Plan Main Issues Report 2019 Consultation**  
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## 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?:**

Please see attached housing site.

### 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?:**

### 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- Albyn.pdf was uploaded



# Main Issues Report Response

## Albyn Playing Fields

IAAB18-0003

Albyn School Limited  
April 29, 2019



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## **1 INTRODUCTION**

This report has been prepared as a response to the Main Issues Report (MIR) on behalf of Albyn School. They previously submitted a development bid through the call for sites in preparation of the upcoming Aberdeen Local Development Plan (LDP).

The submission is in relation to the playing fields of Albyn School which lie on the eastern edge of Peterculter. The proposal puts forth that the school relocate to new playing fields in closer proximity to the main school grounds which are located approximately 6 miles away on Queens Road in Aberdeen. The existing playing field would subsequently be developed into 100 attractively designed residential units. Prior submission for the site was made to Aberdeen City Council as part of the call for sites process, however, was subsequently determined as undesirable with the Council identifying several constraints in their MIR conclusion.

This report will briefly outline the proposal for the site as well as responding to the feedback from the MIR. It is trusted that the site will be given renewed consideration and ultimately hoped that the site be allocated in the forthcoming LDP.

## **2 SITE BACKGROUND**

The site in question is located on the eastern edge of Peterculter, with frontage along North Deeside Road. The site is surrounded by mature trees with a further attractive line of trees fronting along North Deeside Road. Heading northwards from North Deeside Road there is a collection of residential properties and the historic Culter House (former St. Margaret's School Boarding House), all of the properties are surrounded by relatively dense woodland.

To the north of the site is Kippie Lodge, a sports and country club with an associated golf course. To the east of Kippie Lodge is the recently opened Aberdeen Western Peripheral Route (AWPR) which now provides a prominent dividing line between the villages of Milltimber and Peterculter. The southern boundary follows North Deeside Road. To the south west, there is a collection of houses and the views open out towards the River Dee valley to the south east.

The site is currently in use as Albyn School's playing fields, the school grounds are located over 6 miles away on Queen's Road, Aberdeen. Presently, pupils are ferried to and from the playing fields by bus. Albyn School is an independent, co-educational day and boarding school for pupils aged 2-18.

### 3 PROPOSED DEVELOPMENT

The proposal is to redevelop the current school playing fields at Peterculter to provide a residential extension to the existing settlement and relocate the playing field, this relocation would involve an enhancement of the sporting facilities for Albyn School. The enhanced facilities would have outdoor pitches and courts with associated changing facilities. Options for relocation are currently being identified to ensure any potential site can provide the desired facilities and be in greater proximity to the school grounds. The development would be phased accordingly to ensure continued sports provision throughout the relocation, this is essential for the continued operation of the school.



Figure 1: Indicative Site Layout

The proposal for the vacant site is to develop approximately 100 homes, providing a variety of house types, sizes and tenures. Peterculter is a popular location and a broad mix of housing will provide people with enhanced choice in the availability of housing to allow them to remain in the settlement. Naturally, a provision of affordable housing would be provided for the village on site, given the high for affordable housing this should be welcomed.

Links to the existing core paths in Peterculter would be provided as well as open space with a playing area. SUDS would be provided at the eastern edge of the site as can be seen in the site layout in Figure 1. In developing the site for 100 units, it is anticipated that from the point of allocation in the upcoming LDP, firm plans can be progressed and the planning of the housing proposal would commence alongside the relocation of the playing fields within the lifespan of the forthcoming LDP.

## 4 PLAYING FIELDS

Scottish Planning Policy (SPP) provides advice in relation to outdoor sports facilities, it expects that these should be safeguarded from development except where:

- the proposed development is ancillary to the principal use of the site as an outdoor sports facility;
- the proposed development involves only a minor part of the outdoor sports facility and would not affect its use and potential for sport and training;
- the outdoor sports facility which would be lost would be replaced either by a new facility of comparable or greater benefit for sport in a location that is convenient for users, or by the upgrading of an existing outdoor sports facility to provide a facility of better quality on the same site or at another location that is convenient for users and maintains or improves the overall playing capacity in the area; or
- the relevant strategy and consultation with sportscotland show that there is a clear excess of provision to meet current and anticipated demand in the area, and that the site would be developed without detriment to the overall quality of provision (SPP, para 226).

The proposal put forward in this bid is the redevelopment of sports pitches to achieve the objective of providing new improved outdoor sports facilities for the school which would be of better quality than existing ones. The enhanced facilities will also be more suitably located for Albyn School, minimising reliance on bus journeys and providing a more sustainable operation as well as reducing disruption to pupils. This proposal is, therefore, supported by the third exception from SPP as outlined above and would permit the relocation of the playing fields due to the enhanced provision of the school.

Early engagement is being sought with sportscotland as their involvement as a statutory consultee is anticipated in any subsequent planning application and early collaboration could be constructive. Sportscotland have a planning guidance document outlining their role in the planning system, this states, "of key importance is that replacement capacity is delivered to replace that which is to be lost" (Sportscotland, p3). This point is of the upmost relevance to the Albyn development and is at the heart of the project as the school seek to provide improved facilities for pupils and ultimately provide an improved sports and education offer. Any subsequent plan for the new playing fields would also refer to sportscotland design guidance to ensure good quality design. Early indications from sportscotland suggest they would be supportive of the proposal.

There are potential sites available for playing fields and further investigation is being undertaken by Albyn School, even at this early stage a site has been offered to the school for relocation. In the rearrangement of the playing fields, the continued access to outdoor sports facilities throughout any development process will be fundamental to the operation of Albyn School and factored in ensuring that an equivalent playing field is available at all times throughout for pupils.

## 5 ABERDEEN HOUSING

An important function of the planning system in Scotland is the delivery of houses, SPP outlines the national policy on the requirement of planning to enable the delivery of new homes. The policy states -

*"The planning system should*

- *identify a generous supply of land for each housing market area within the plan area to support the achievement of the housing land requirement across all tenures, maintaining at least a 5-year supply of effective housing land at all times;*
- *enable provision of a range of attractive, well-designed, energy efficient, good quality housing, contributing to the creation of successful and sustainable places; and*
- *have a sharp focus on the delivery of allocated sites embedded in action programmes, informed by strong engagement with stakeholders"* (SPP, para 110).

The Housing (Scotland) Act 2001 requires local authorities to prepare a Local Housing Strategy supported by an assessment of housing need and demand, this assessment then informs the planning system, LDPs take figures from this assessment for example. SPP states that, "plans should be informed by a robust housing need and demand assessment (HNDA), prepared in line with the Scottish Government's HNDA Guidance. This assessment provides part of the evidence base to inform both local housing strategies and development plans (including the main issues report). It should produce results both at the level of the functional housing market area and at local authority level, and cover all tenures" (SPP, para 113). HNDAs are designed to give broad, long-run estimates of what future housing need might be, they provide an evidence-base to inform housing policy decisions in LDPs.

Together, Aberdeen and Aberdeenshire comprise the strategic body for planning at a regional level for the city region, together they completed the most recent HNDA in 2017. Aberdeen City and Aberdeenshire Councils then collaboratively produce their housing targets through the Strategic Development Plan (SDP) This was most recently adopted in March 2014, however, a renewed plan is currently proposed and has been reviewed to establish upcoming housing targets. The renewed SDP is currently going through its required period of consultation prior to coming into effect, however, it outlines the proposed housing targets for Aberdeen City Council up to 2040. The proposed SDP targets Aberdeen City to deliver 1,100 homes per annum from 2019 until 2032, whilst the authority have managed to achieve this target recently, review of the Draft Housing Land Audit suggests that there will be difficulties across this period due to the effectiveness of some of the sites and the overconcentration in certain area of Aberdeen.

Aberdeen City Council's 2018 HLA outlines that there was a total housing capacity of 23,509 for Aberdeen City with 1,955 of these being constrained. The 2019 Draft HLA states that there is a total capacity of 23,345 and 3,112 of this is constrained. This is a significant increase in constrained land which will ultimately lead to difficulties in the coming years and less housing being delivered within the lifespan of the next LDP.

The most common constraint on land is ownership, however, it is put forth that the location of some of the sizeable allocations in the HLA will lead to an overcrowded market in some locations further impacting the housing delivery in Aberdeen, this is particularly evident north of the city where many sizeable allocations have been made. Many of these allocations will naturally compete against one another, the programming of some of these sites will be extremely challenging to deliver in such a



crowded market. Table 1 below outlines the programming which has been factored into the Draft Housing Land for these allocations to the north of Aberdeen.

<b>Table 1 Competing Sites in Aberdeen City North</b>								
<b>Site</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>	<b>2025</b>	<b>2026+</b>
<b>Grandhome</b>	90	100	120	150	200	200	200	3608
<b>Dubford</b>	44	51	36	22	0	0	0	0
<b>Davidsons Papermill</b>	45	45	50	60	60	60	60	200
<b>Craibstone South A</b>	30	60	60	30	30	60	60	370
<b>Rowett South</b>	124	212	130	122	135	135	135	707
<b>Burnside Drive</b>		10	27					
<b>Stoneywood</b>	24							
<b>Cranfield Farm</b>	4	3						
<b>Jesmond Drive</b>			15					
<b>Total</b>	<b>361</b>	<b>481</b>	<b>438</b>	<b>384</b>	<b>425</b>	<b>455</b>	<b>455</b>	<b>4885</b>
Source: Draft Aberdeen City and Aberdeenshire Housing Land Audit 2019								

Whilst it is not suggested that these sites will not make sizeable contributions to the housing land supply in Aberdeen, it is contested that due to their location and size they will ultimately complete against each other leading to a failure to deliver the programmed completions. Looking at historical completions, the completions are significantly increased. The only exception was 2017 where the completion of PRS units at Stoneywood resulted in a large number of completions in this area.

There is also an expectation for delivery of housing from some large brownfield developments within the city and Broadford Works and Pittodrie Stadium are both forecast to contribute 760 units within the coming period. There are uncertainties that will factor into the potential development of these sites. With no developer at either site and both subject to constraints to the future development that affect the timing and the cost of development.

<b>Table 2 Major Brownfield Sites in Aberdeen City</b>								
<b>Site</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>	<b>2025</b>	<b>2026+</b>
<b>Broadford Works</b>	0	203	257	0	0	0	0	0
<b>Pittodrie Stadium</b>	0	0	150	150	50	0	0	0

The HLA in Aberdeen suggests that there is sufficient land allocated to deliver the target housing numbers. This submission would not disagree with this, however, it is put forth that the form and location of allocations and available land will struggle to deliver the housing supply targets

To overcome this it is suggested that the Council must consider some smaller sites which will not compete with existing allocations and approvals. Failure to do so could lead to a failure to deliver the necessary level of housing in the years to come.

## 6 MAIN ISSUES REPORT RESPONSE

The development bid at Albyn Playing Fields was reviewed as part of the call for sites in Aberdeen, the MIR recommended it be classified undesirable. Aberdeen City Council conduct their reviews against certain criteria and ultimately provide a score for the site out of 63 for each site, Albyn scored 48. The scoring is purely indicative and whilst there is no pass mark for sites, it provides helpful feedback for allowing 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 Albyn the mitigation required has been prioritised accordingly. The site scored 3 scores of 1 for the following reasons-

- Natural Conservation
- Proximity to Facilities- Shopping/Health/Recreation
- Other Constraints

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

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

- Flood Risk
- Drainage
- Landscape Features
- Landscape Fit
- Relationship to Existing Settlement
- Land Use Mix/Balance/ Service Thresholds
- Proximity of Employment Opportunities
- Physical Infrastructure Future
- Service Infrastructure Capacity

These points will also be individually addressed other than where there is opportunity to combine criteria and provide a singular response to address both headings such as flood risk and drainage. Where a criteria is not addressed, it indicates agreement with the Council's assessment of the site and the point cannot be mitigated. The feedback from the Council has been provided under the headings below to provide context to the response.

### **Natural Conservation**

*"Site located in Green Belt and GSN. Contributes to green space between two Deeside settlements; Peterculter and Milltimber. Site associated with bat habitat and/ or activity (sightings and wooded features). A significant number of designated species have been sighted within and just outwith the site boundary."*

The MIR notes that the site sits within the green belt and contributes to green space between Peterculter and Milltimber. This point is acknowledged, however, the design which would be put forward for the residential units would seek to retain as much greenspace as possible. The tree lined frontage of the site would be retained and boundary treatments which are suitable for the area would be implemented to minimise impact of the development. Policy D2 of the extant Aberdeen City LDP states, "Quality development will be informed by the existing landscape character, topography and existing features to

sustain local diversity and distinctiveness, including natural and built features such as existing boundary walls, hedges, copses and other features of interest" (Aberdeen City, p29). This policy would be at the heart of the development at Albyn where the existing landscape would naturally shape the site and be preserved to the highest possible standard.

The MIR further comments that the site is associated as a bat habitat and significant species have been sighted within and just outwith the site boundary. Relevant surveys and studies would be undertaken to establish the bat habitat and potential impact to ensure that they are not harmed in any manner. The design will ensure that the landscape change is minimal, the majority of the landscape features of this site which are enjoyed by species in the area will remain even after housing development.

### **Proximity to Facilities- Shopping/Health/Recreation**

*"Over 800m to nearest neighbourhood centre (Peterculter) shops and amenities."*

The MIR notes that the site is over 800m from the nearest neighborhood centre, this fact is not disputed, however, the impact of this on the site assessment is contested. The distance of 800m is not believed to be so extreme that the score should be so low, rather given the relative ease to access the town centre along North Deeside Road this should have resulted in a far less severe score and should be reconsidered.

Planning Advice Note 75 'Planning for Transport' requires sites to be within 1.6km walking distance to local facilities, development at Albyn would comfortably comply with this. The advice note also notes that housing should be within 400m of bus services, again the development would comply with this with bus stops being 100m from the site in both directions. The site is 380m from a pub, 500m from a doctor and 730m from a local social club. The A93 also provides dedicated cycle lanes on the road from the site to the neighborhood centre as well as well-kept pavements therefore active travel would not be deterred.

For the foregoing reasons, it is strongly suggested that this criteria be reassessed. Having reviewed developments in Peterculter there are several examples of sites which have been allowed at over 1km from the town centre and some are over 1.5km which provide residents with far less proximity to facilities. Potential residents of Albyn would be in close proximity to an ample number of facilities and residents are afforded a number of means to get there.

### **Other Constraints**

*"The site is categorised as open space (playing fields and tennis courts). Although they are currently private playing fields, mitigating their loss (as required by SPP) would result in the development of replacement playing fields, which in turn could result in the potential consumption of greenfield land. Outdoor recreation is a suitable green belt use."*

The report highlights concerns over the redevelopment of supplementary land to replace the playing fields at Albyn, it is thought this would result in consumption of greenfield land. The report then concludes by stating "outdoor recreation is a suitable green belt use." The concluding statement appears to be somewhat contradictory to the previous statement. It indicates that there would be an acceptance of development on greenfield if it were for outdoor recreation, playing fields would satisfy this and the relocation is therefore deemed to be acceptable development of greenfield land.

The initial submission clearly outlines that the development will only proceed where a site for improved playing grounds can be found, validation of this improvement will be sought with sportscotland. Early contact with sportscotland was made, after being informed of the development they were supportive of the enhanced facilities and increased proximity of the site. Development will also allow the Albyn School to not rely on buses to transport pupils to the facilities. This disruption for pupils will not only hinder their enjoyment of sports but also increase traffic and increase emissions, this routine is not sustainable.

The development is supported by SPP in redeveloping playing fields, it is acknowledged that the development will be greenfield, however, extensive steps will be taken to ensure the development impact is limited and greenspace will be retained.

### **Flood Risk & Drainage**

*"Some risk of surface water flooding."*

*"Slight risk of surface water flooding suggest that some small pockets of poor drainage exist within the site."*

The feedback highlights a slight risk of surface water flooding due to poor drainage, it is suggested this would be adequately addressed through the provision of SUDS as part of the proposed development. The location of the SUDS site is indicated in the site layout at the east of the site. SEPA's flood risk map indicates that any risk at the site is miniscule and the provision of SUDS would more than satisfactorily address this whilst also significantly enhancing the current drainage provision for the area.

### **Landscape Features & Fit**

*"Some potential loss or disturbance of mature trees defining site boundaries."*

*"Visible from the A93, roadside frontage. Some residential properties on the north side of the site. Currently playing/sports fields. Half the site is located within the 'Lower Deeside' character area, and the other is located within 'Valley' character area (prime landscape)."*

The potential for some tree loss is acknowledged, however, this would be kept to a minimal level. The current tree lined front to the site would be retained to ensure any impact on the landscape would be slight and every effort would be taken to minimize the amount of trees which would be impacted. These trees currently add to the attractiveness of the area, hence the efforts to ensure the retention of these.

The MIR notes the site is located within the Lower Deeside Character Area, Aberdeenshire Council outline the features of the landscape noting it as an Area of Landscape Significance. The document outlines several key points which this bid is aligned with. Trees would be planted through the development to enhance the wooded landscape of the area and a high degree of retention of the existing trees would complement this. The new planting would also be sympathetic of the tree types in the area ensuring they were native and of a similar nature to existing trees, this would help integrate the development to those in the existing settlement and prevent it standing out.

The designations outlined in the MIR have been noted and appropriately sensitive design would ensure the character of the area is retained and ensure that those living in or passing through the area enjoy a pleasant experience. The landscape of the area is a key asset and the development of Albyn playing fields would only seek to enhance this landscape of rich colours and woodland. It would be put forth that the

Council should reconsider their approach for this criteria, mitigation has been provided to minimize the impact to the landscape.

### **Relationship to Existing Settlement**

*"Fronts onto the N Deeside Rd, proposals represent settlement expansion between Peterculter and Milltimber. Risk of coalescence. Slightly east of the main settlement area."*

The site sits on the immediate outskirts of Peterculter to the east, it is suggested by the MIR that allowing development to proceed would risk coalescence. The AWPR has virtually ensured that coalescence between Peterculter and Milltimber will be impossible due to its pronounced division of the two suburbs.

This limited extension of Peterculter does not increase the risk of coalescence, it is conceded that the development will be an expansion between Peterculter and Milltimber, however, the AWPR provides an impenetrable buffer between the two settlements. This would have no impact on the excellent sense of place which exists within the village of Peterculter at present and as such should not restrict development for this site. It is therefore contested that the Council should reconsider this element of the development.

### **Land Use Mix/ Balance/ Service Thresholds**

*"Housing only proposed. Mostly housing in the local area with some commercial/ agriculture use along A93 North Deeside Road. The development may provide the basis for attracting and supporting services and facilities."*

The development proposed at Albyn is exclusively housing, this point is highlighted by the MIR which also states, "the development may provide the basis for attracting and supporting services and facilities." The ability to attract services to Peterculter is a clear benefit of the development, it has the potential to encourage services to Peterculter and improve its sense of place for new and existing residents. There have been numerous reports in recent years highlighting the feeling in the village amongst local residents that there is a lack of services in the village.

Having reviewed the current offer of facilities and amenities in Peterculter, it would be advocated that any development which has the ability to attract facilities and amenities to the village should be encouraged given the limited offer. Development of 100 houses in the village has the potential to increase the population by roughly 5%, it would be reasonable to assume that this would contribute to a more vibrant local economy and encourage services to open and enhance amenity for residents. Further, an increase in the amount of options for play, recreation and work would be expected to coincide with this.

For this reason it is suggested that the site should not be negatively considered due to the clear benefits it can provide Peterculter.

### **Physical Infrastructure Future**

*"Access to high speed broadband within area. Other services not known."*

This topic received limited feedback for the report to respond to, the only specific point noted was that there was access to high speed broadband in the area, outwith this the MIR stated that other services were unknown.

It would be contested that this criteria be reconsidered, the site is a natural extension to the Peterculter settlement which has all the essential utility infrastructure to allow development to proceed. Having reviewed other submissions provided through the call for sites, it appears some have been assumed to have sound infrastructure without having to prove its existence. These sites have subsequently not been marked down and this should also apply to Albyn. The bid appears to have been hastily assessed with little investigation for what physical infrastructure exists. The development is for 100 units and is, therefore, not of a scale which will have significant detrimental effect on any existing infrastructure.

It would be suggested that the assessment of the bid on this topic be reconsidered, the site has all required infrastructure and it appears that the assessment of Albyn has not been considered in a manner consistent with the review of other submissions.

### **Service Infrastructure Capacity**

*"The site would be zoned to Culter Primary and Cults Academy. There is adequate capacity in Culter Primary, however Cults Academy is forecasted to exceed capacity in 2021."*

Reference is made through the bid to education capacity, there is ample primary school infrastructure in Peterculter with a declining roll noted at the local primary school. The crux of the issue is secondary education, as it stands, this would be provided at Cults Academy which is forecast to be at 104% capacity by 2022. It is worth highlighting that this figure is on the basis that extremely ambitious housing figures are delivered in the area. Further, it would appear that the numbers in the Councils forecast have not considered new build schools which are expected in the near future, for example, development at Countesswells. This development has an obligation to construct a new secondary school prior to the completion of their 1000<sup>th</sup> house, this would naturally provide sufficient supplementary capacity to alleviate the issue and allow future development in the area, the 1000<sup>th</sup> unit is forecast to be delivered around 2021. The allocation being sought by Albyn would not come in to effect until the LDP is adopted in 2022, therefore, the new secondary school would be in place and provide ample secondary education capacity for the area.

If built today Albyn would prevent a challenge for secondary schools in the area, the reality is though that this development will not come forward prior to 2022 by which time a new secondary school will be built. In 2022 Cults Academy is estimated to be at 104% capacity. Some of this strain will be alleviated when the new school is finished and therefore whether the secondary schooling be provided by Cults or a new school, there will be sufficient capacity. Secondary education should not negatively influence any assessment of this bid as sufficient schooling options would be available, therefore, it would be put forth that reassessment under this criteria should occur for the site at Albyn.

## **Summary**

It is put forth by this response that the Council should reconsider their assessment of several points of the assessment conducted on the Albyn Fields development. Some of the points raised in the MIR are fair and not disputed, however, it is considered that the following topics should be reconsidered-

- Proximity to Facilities-Shopping/Health/Recreation
- Physical Infrastructure-Future
- Land Use Mix/Balance/Service Thresholds
- Relationship to Existing Settlement
- Flood Risk & Drainage
- Other Constraints
- Natural Conservation
- Landscape Features and Fit
- Service Infrastructure Capacity

It is not suggested that these have been eradicated, however, cumulatively they can be mitigated and should not prevent a residential development on the site.



## 7 CONCLUSION

This report has responded to Aberdeen City Council's MIR concerning plans for development at Albyn Playing Fields. The plans for this site have been resubmitted and it is trusted that the Council will reassess Albyn Playing Fields and consider the submissions put forth in this report. It is subsequently hoped that the Council conclude that it is an effective and desirable site and includes it in the upcoming LDP.

The enhancement of playing fields for school pupils should be welcomed, Albyn School are seeking to provide pupils an enhanced offer for sports in a more suitable location. Currently pupils have to take a 10 mile round bus trip to enjoy sports, this undoubtedly could be improved. Coupled with this, there are numerous bus journeys to and from the school ground which could be avoided with the advent of more suitably located playing fields. Combined, these points justify Albyn School's desire to move, the development of the current playing fields would facilitate this and is supported by numerous policies.

Aberdeen have set ambitious targets for housing delivery in the next 5 years and beyond, an increase of 86% is required on the previous five year average delivery rate if they are to achieve targets. This is not impossible, however, serious consideration must be afforded to all sites. Ownership is a regular constraint that prevents development in Aberdeen that is not an issue for Albyn. The development of the playing fields is for 100 units, this volume can deliver units within the lifespan of the LDP. This should ensure the development is viewed more favorably than sites which have been clogging the housing pipeline for years now, for example, there are allocations which have not been delivered in nearly 20 years still in the HLA. Reliance on dead wood will not deliver the housing numbers for Aberdeen City Council.

The MIR presented feedback on how the Council considered the bid at Albyn, some of the points raised are conceded to be fair. However, a thorough review of all points raised was undertaken for the purposes of this submission and it is considered that the Council may have erred in some of the conclusions reached. These points have been raised in this report, further mitigation has been provided on issues such as landscape, drainage and proximity to services and collectively, these points should show the Council's views require to be reconsidered.

Albyn School could benefit from the development, Peterculter community could benefit from the development and Aberdeen City Council could benefit. There are many potential benefactors from this development and as such it is contested that it should be allocated in the 2022 LDP for Aberdeen.