

# Response ID ANON-B3JU-DSTT-K

Submitted to **Local Development Plan Main Issues Report 2019 Consultation**

Submitted on **2019-05-13 16:10:39**

## About You

### What is your name?

**Name:**

Angus Dodds

### What is your organisation?

**Organisation:**

Savills

**On behalf of:**

The Comer Group

### How can we contact you?

**Email:**

[REDACTED]

**Telephone:**

[REDACTED]

**Address:**

Savills

[REDACTED]

[REDACTED]

[REDACTED]

## 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?:

The attached Development Framework Document gives full details of our representation in support of the proposed allocation of land for residential (approximately 150 units) at Leggart Brae, to the south of the B9077 (South Deeside Road).

The document provides a robust framework showing that there are no technical constraints or issues likely to affect the delivery of a modestly scaled residential development enjoying generous amenity greenspace that will be similar in form and density to the successful development at nearby Deeside Brae. Extending established urban development envelopes in the way proposed through our submission document is recognised as a logical development strategy principle in the Scottish Planning Policy.

This document illustrates that in terms of Landscape Assimilation, Cultural Heritage, Ecology and woodland/Greenspace, Transportation, Ground conditions, Hydrology, Waste Water and Education, the subject site is ideally placed to deliver a housing development that will be welcomed by the local market, and can be supported in wider strategic planning terms. This means that there are no technical constraints which would prevent the delivery of the proposed housing allocation.

We would therefore welcome Aberdeen City Council Officers moving to allocate the subject site into the Proposed LDP. Page 2 of the attached document (Introduction: Executive Summary) suggests a form of words in the boxed text that could be applied to the site in the forthcoming Proposed LDP if Officers support these proposals. This suggests the following provisions:

"The identified residential development of circa 150 residential units is subject to full masterplanning process in conjunction with the identified Parkland surrounding the Leggart Burn. Proposals should provide for landscaping to frame the southern settlement edge, and be accompanied by detailed technical assessment of flood risk, drainage, ecology and transport (road traffic generation)".

### 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::**

Please see attached the following supporting documents:

Location/Site Plan

Supporting Development Framework Document

**Additional Files**

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

190513 Final Development framework document.pdf was uploaded

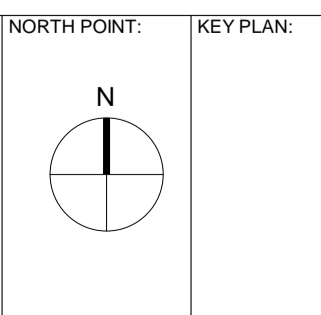




NOTES:

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 W: <a href="http://www.plusarchitecture.ie">www.plusarchitecture.ie</a>		PROJECT: 353	DATE: 05/07/18
CLIENT: Leggart Brae		DRAWING NO.: 353_B1_01_104	REVISION NO.:
TITLE: Site Plan - Red Line Boundary (City)		DRAWN BY: Author	SCALE AT A1 (Long): 1:2000
ISSUE TYPE: Information		CHECKED BY: Checker	SCALE AT A3 (Long):



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# Leggart Brae

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PLUS ARCHITECTURE

Development Framework Document | May 2019

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# Introduction

## Executive Summary

The proposal at Leggart Brae would be a modestly scaled residential development enjoying generous amenity greenspace that will be similar in form and density to the successful development at nearby Deeside Brae. Extending established urban development envelopes in this way is recognised as a logical development strategy principle in the Scottish Planning Policy.

Within the published Main Issues Report, it states that greenfield housing allocations should be small in scale, have limited impacts on the environment and infrastructure, and should not be extensions to existing sites identified in the Aberdeen LDP 2017. It is considered that the proposed site at Leggart Brae meets all the defining criteria, and would provide new houses in a format and at a location that can show demonstrable market appeal. While representations for a complimentary site across the boundary in Aberdeenshire has been made to the Aberdeenshire Main Issue Report consultation stage, the two sites can be developed entirely independently of one another.

In terms of Landscape Assimilation, Cultural Heritage, Ecology and woodland/Greenspace, Transportation, Ground conditions, Hydrology, Waste Water and Education, the subject site is ideally placed to deliver a housing development that will be welcomed by the local market, and can be supported in wider strategic planning terms.

As such we would welcome Aberdeen City Council Officers support for this site and their allocation of the subject site into the Proposed LDP, and would suggest the following form of words to confirm such an ambition:

Reference	Proposals	Overview
Leggart Brae	150 Homes (8,75 Ha)	The identified residential development of circa 150 residential units is subject to full masterplanning process in conjunction with the identified Parkland surrounding the Leggart Burn. Proposals should provide for landscaping to frame the southern settlement edge, and be accompanied by detailed technical assessment of flood risk, drainage, ecology and transport (road traffic generation).

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# 2.0 | Development Team



Developer	<b>Comer Homes Group</b>
Masterplanner	<b>Plus Architecture Limited</b>
Architecture	<b>Plus Architecture Limited</b>
Landscape Architecture	<b>LDA Design</b>
Planning Consultancy	<b>Savills</b>
Civil Engineering	<b>Mott MacDonald</b>
Ecology Planning	<b>Northern Ecological Services</b>
Transport Planning	<b>Transport Planning Limited</b>
Archeological Advisors	<b>Headland Archeology</b>
Flood Risk Assessment	<b>Kaya Consulting</b>

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PLUS ARCHITECTURE

**The Comer Property Group is one of the United Kingdom's largest and most successful property companies. It now has interests that extend into Europe and the United States.**

The current business was established over 30 years ago by brothers, Brian & Luke Comer, originally from Co. Galway, Ireland. After a great deal of tenacity and hard work, the Comers have created a leading property company with substantial development and investment interests in a number of market sectors, including:

- luxurious residential homes
- office parks
- retail parks
- hotels and leisure facilities
- retirement homes
- equestrian property and farm land

With its substantial resources, The Comer Group is set for continued major expansion. The Comer Group is privately-owned and employs 1,500 people. It has 150 companies worldwide with projects in England, Belgium, Germany, USA and Uganda. The Group is valued at approximately €3 billion. The portfolio is self-managed to maximise the Group's return on investment and efficiently run with invaluable expertise and knowledge.

## Comer Homes

Subsidiary, Comer Homes has special expertise in creating quality homes of great charm, character and distinction. It identifies and acquires landmark buildings, often with unique architecture and landscaped grounds that can be transformed internally into state-of-the-art living spaces while systematically restoring, preserving and enhancing the original structure.

High quality developments such as Princess Park Manor, Royal Connaught Park and Bradstowe House, amongst the vast portfolio, are a testament to the high standards and work ethic of the directors. Given their background and knowledge of construction methods, The Comer Group directors have the expertise to take on challenging projects. The Comer team's skills apply vision and style to achieve viable planning consents that maximise the potential of the company's sites and ultimately produce developments of distinction. The 'hands on' management style of the directors avoids a complex corporate process.

## Award-winning developer

Successful development in England, Germany and Ireland has fuelled further international expansion and a swathe of international awards has followed the company's success.

Awarded Entrepreneur of the Year in Ireland and the The Irish Post Award for Outstanding Contribution To Business in Britain Award for the business as a whole, the company has also picked a series of awards for specific sites including a What House Award in the Best Renovation category for Royal Connaught Park, together with a Sunday Times commendation for the conversion, restoration or refurbishment of an existing building. Royal Connaught Park was also commended as development of the year.

Princess Park Manor was awarded the Best Conversion accolade in the Evening Standard Awards and the Comer Group was awarded Best International Developer in the International Property Awards and Executive Developer Of The Year in the Business Britain Awards; altogether an impressive haul.



## The Development Team



The conversion of the former Royal Masonic School for Boys in Bushey, north London, to a new community of residential dwellings is a project representative of the Comer Homes ethos.

The development is set on generous landscaped grounds that are made available for all residents to enjoy and benefit from. The particular nature of the conversion of a Listed Building provided certain spaces (such as chapel spaces, assembly spaces and circulation spaces) that were put to use as communal residents spaces, such as common area lounge space and community event spaces.

A new gym facility has been integrated into the development, for residents to avail of.

Dwellings retain period features such as window, plaster and timberwork detailing and are typically large in size and often in duplex or triplex format, with residents private lifts.

The estate is an estate managed by Comer Property Management, which maintains the built and landscaped environment, as well as facilitating new residents with concierge service and features such as the Comer Homes mini-bus, which links residents with key transport nodes during the day and local retail and leisure amenity.



Royal Connaght Park, Bushey, North London  
Residential Masterplan Delivery  
Project Stage: Phases 1 & 2 Complete, Phase 3 ongoing





# The Development Team.

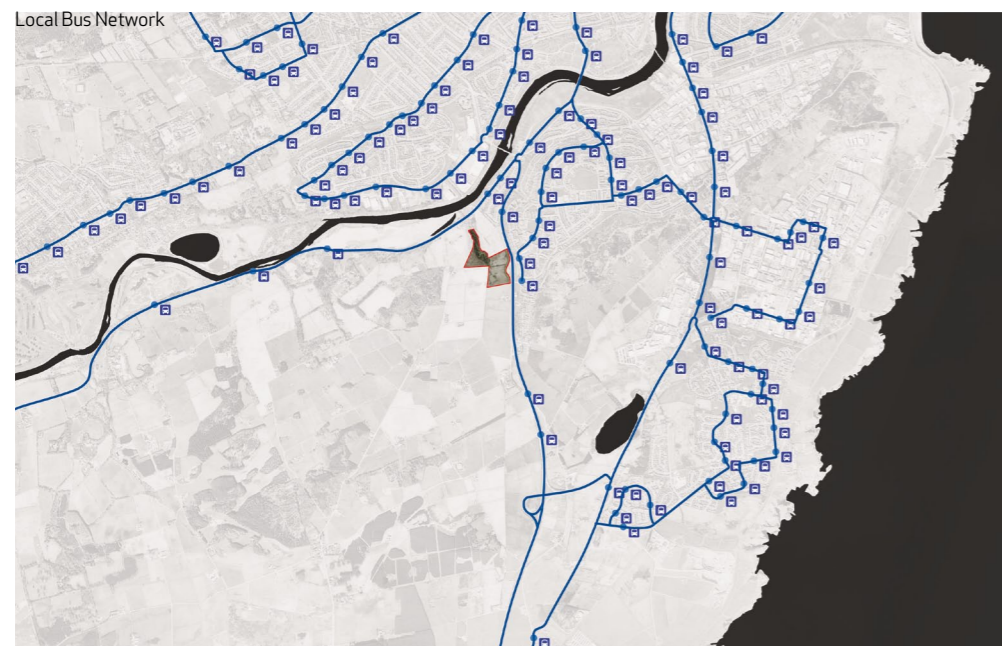
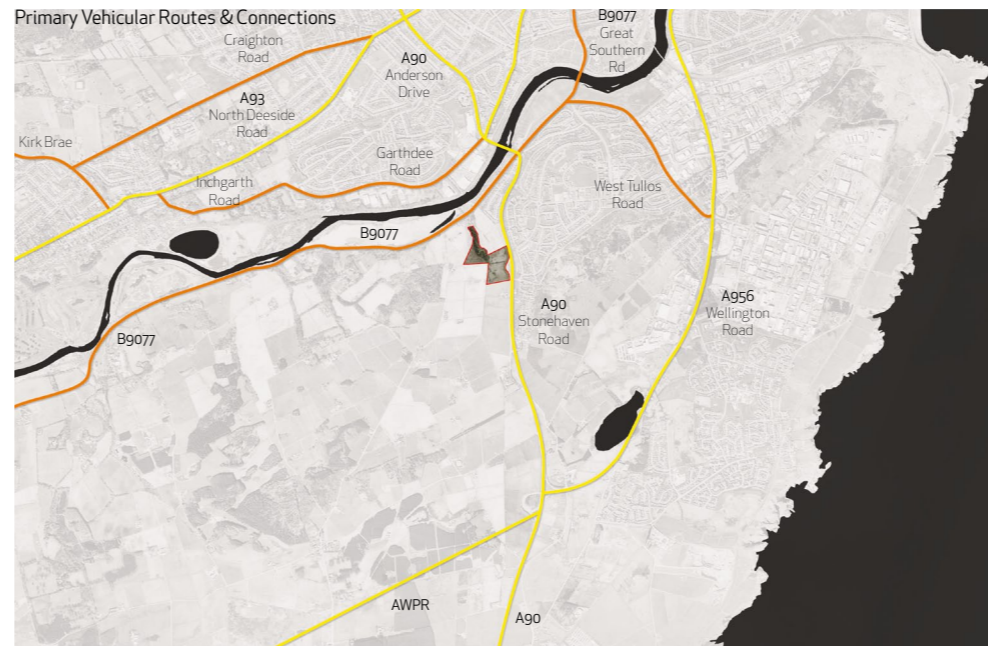




## 3.0 | The Location



# The location



### 3.1 Local Amenity Analysis

An analysis of Local Amenity Analysis has been undertaken under the following headings, which are graphically presented in this report:

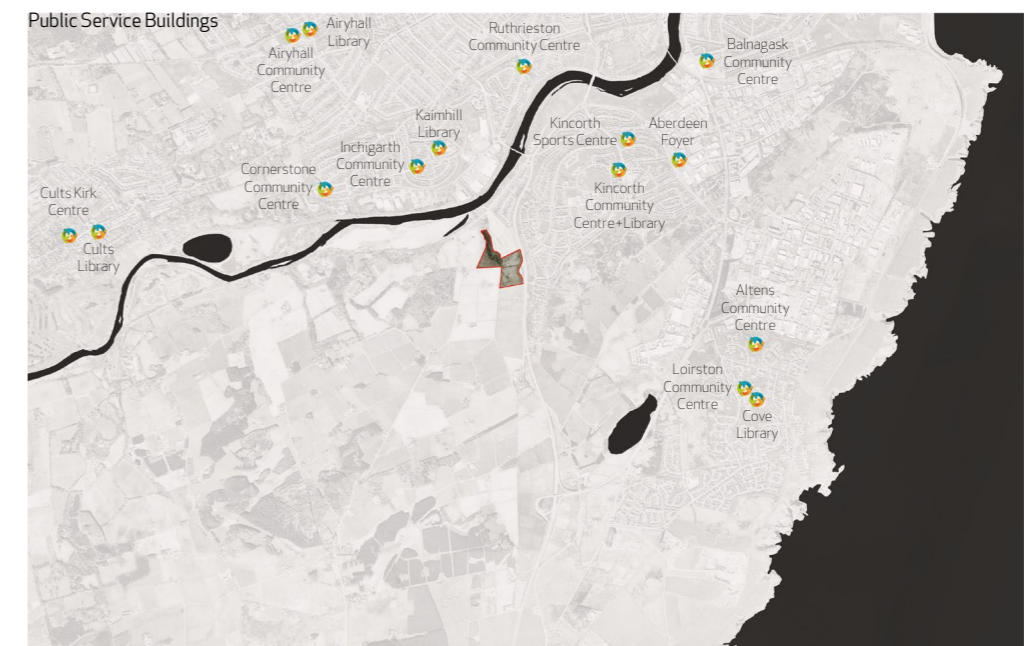
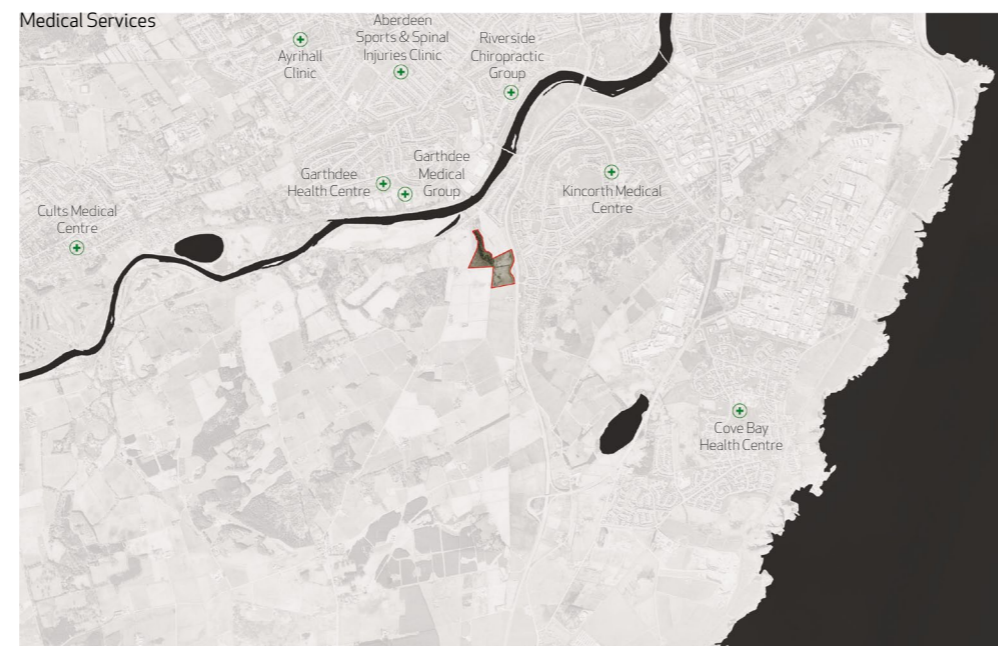
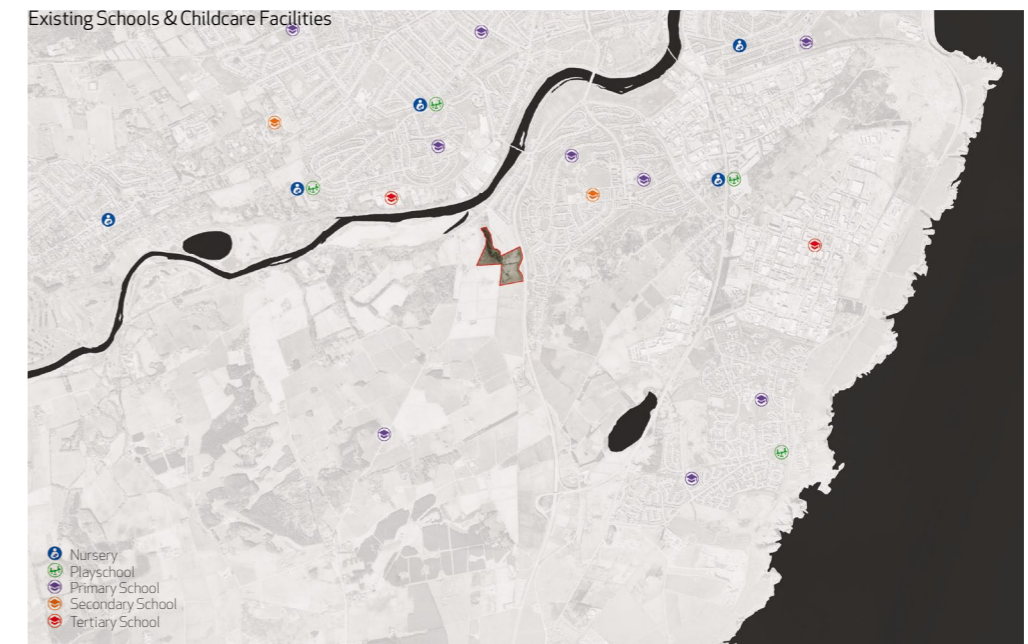
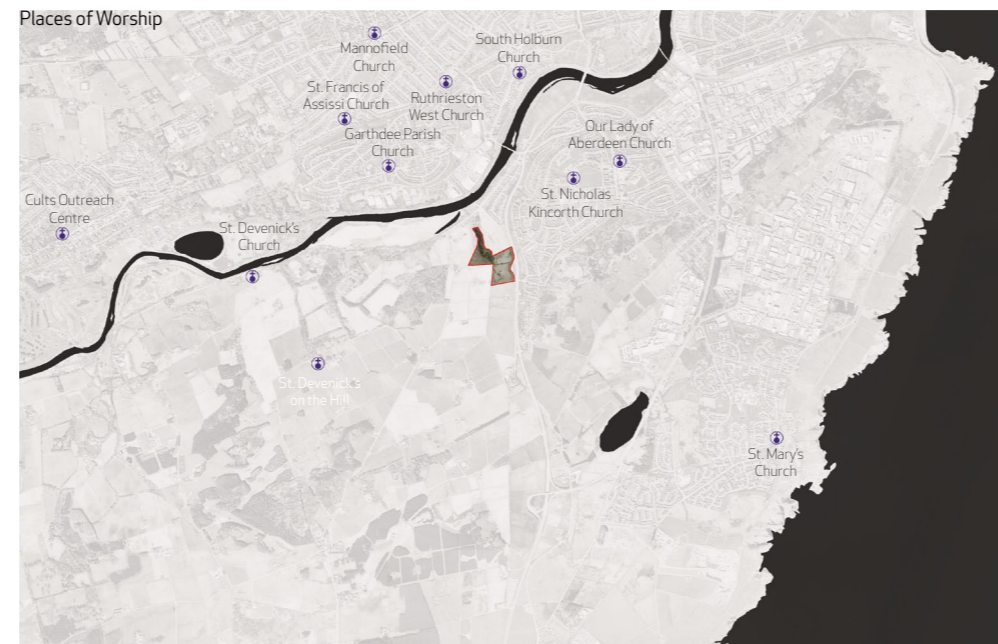
- Railway Connections
- Primary Vehicular Routes & Connections
- Local Bus Network & Stop Locations
- Local Nature Conservation Sites

# The Location

## 3.1 Local Amenity Analysis

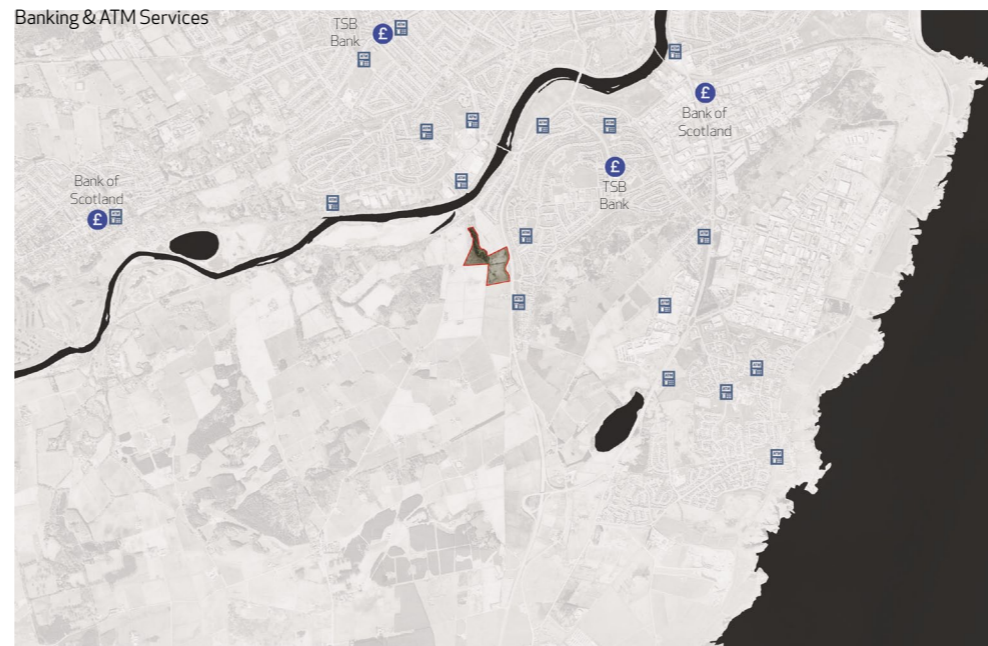
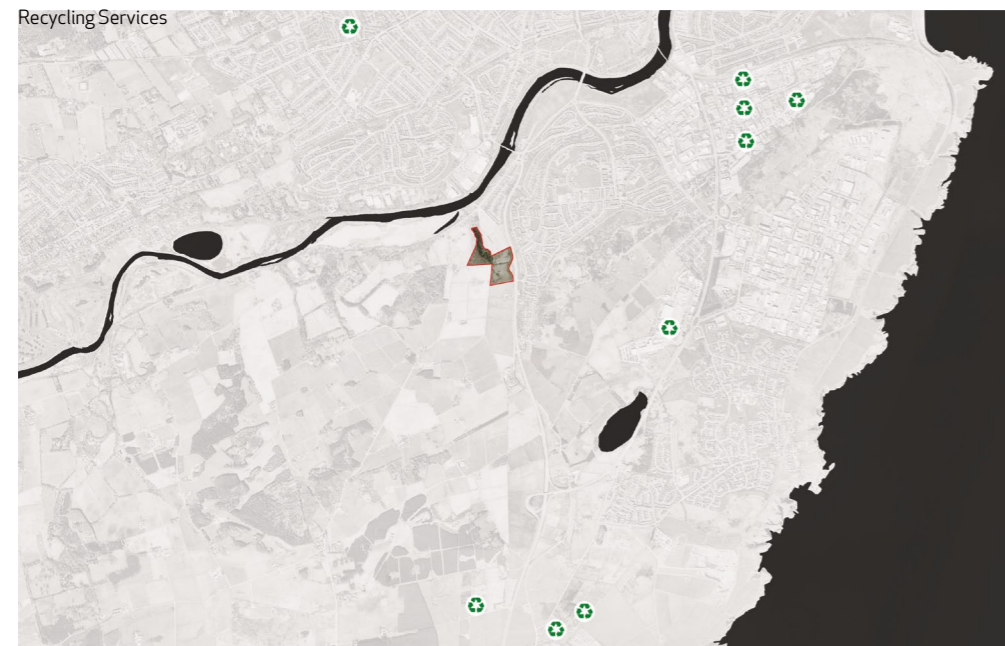
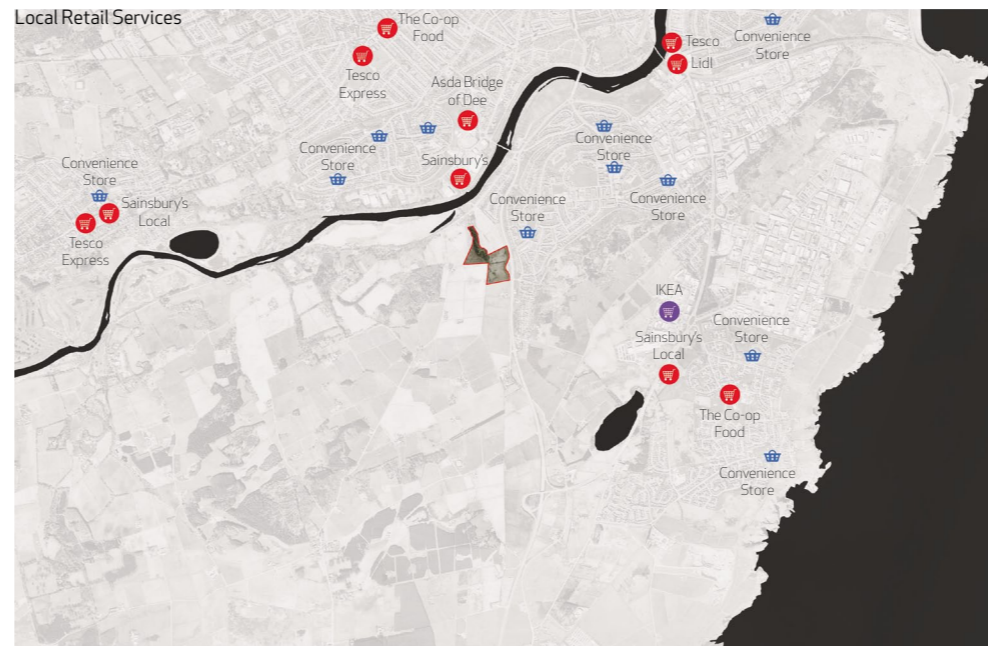
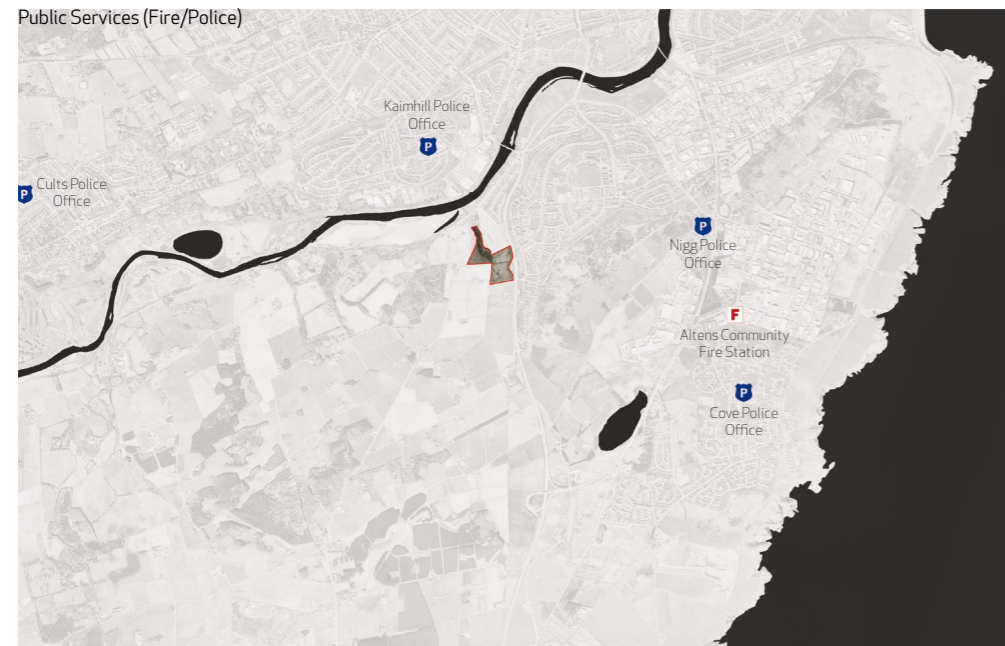
An analysis of Local Amenity Analysis has been undertaken under the following headings, which are graphically presented in this report:

- Places of Worship
- Existing Schools & Childcare Facilities
- Medical Services
- Public Service Buildings





# The location



## 3.1 Local Amenity Analysis

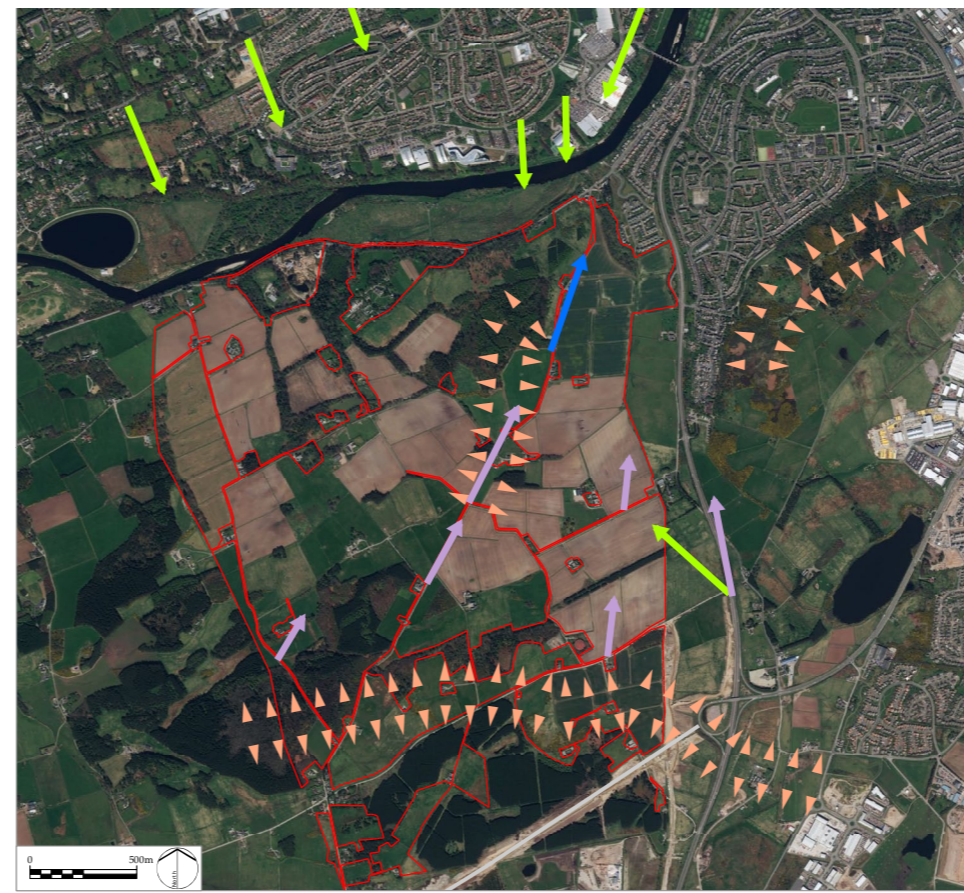
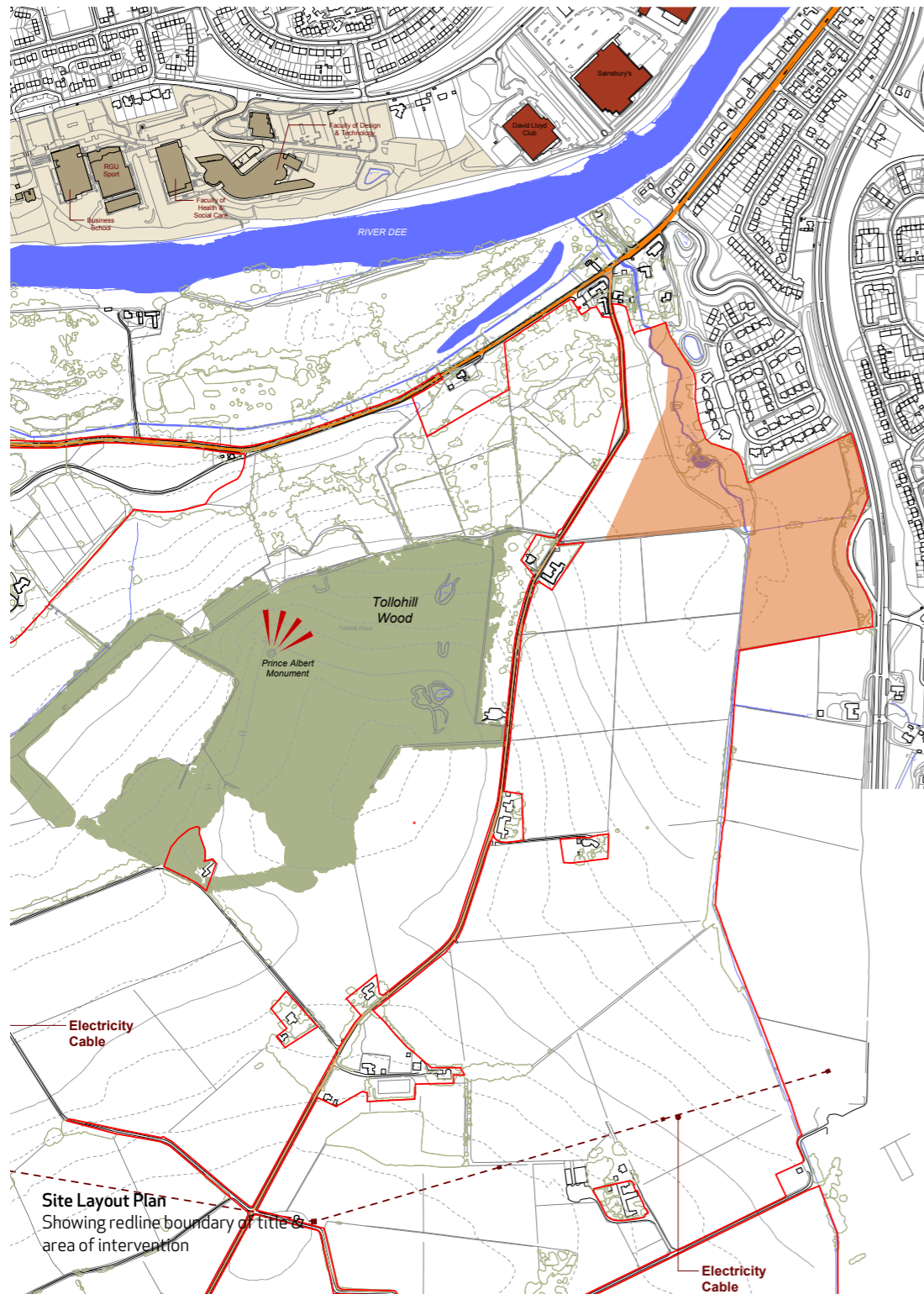
An analysis of Local Amenity Analysis has been undertaken under the following headings, which are graphically presented in this report:

- Public Services (Fire/Police)
- Local Retail Services
- Recycling Services
- Banking & ATM Services



# 4.0 | Site Context

# Site Context



- LEGEND
- Site (approx)
  - AWPR
  - Future development area
  - ➔ View to city and sea
  - ➔ River view
  - ➔ Views into site
  - ▲ Ridge
  - ▼ Ridge

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## 4.1 Site Description and Landscape Fit

The site extends to 8.41 hectares and is currently occupied by agricultural land which descends to the north and west toward the River Dee, and rises to the east toward the soon to be de-trunked A92. Residential development has taken place to the north at the Deeside Brae development in the last decade.

The subject site has a clear landscape framework within which to structure any proposed development. The valley landform and vegetation around the Burn of Leggart provides an opportunity for a parkland area to straddle the burn, and situate new residential development on its eastern bank, complementing the approach that has already been taken at Deeside Brae to the north. The A92 and Deeside Brae would therefore provide a 'hard' boundary to the site, while planting along the development's southern edge, and the gradual descent of the Leggart Burn valley would provide the 'softer' edge to the site's south and north-west.

The approach outlined above would allow a modest development on the scale proposed to assimilate well with surrounding land forms, and the built elements to the north and east. Topography and landscape fit are therefore not considered to be matters that would preclude the proposed development coming forward in the emerging Local Development Plan.

The sections below set out the site context in relation to archaeology, ecology, road network, geo-technical, flooding and drainage and education. This helps to narrate the context of the site both in terms of the area subject to these representations and the wider setting of the site and surrounding land.



# Site Context

## 4.2 History & Archeology authored by Headland Archeology

Headland Archaeology has already undertaken a cultural heritage assessment of the site and its surroundings, having identified an Inner Study Area including the site, and an outer study area beyond this.

There are no designated heritage assets recorded on the National Record of the Historic Environment (NRHE) within the ISA and only one, a Category B Listed Building currently in use as a private residence (LB146, Figure 2), within the Outer Study Area (OSA, a 100m radius around the ISA). While the proposed development has the potential to affect the setting of this building, this is not considered to be a major constraint to the development as it is currently proposed.

In addition to the buildings, the NRHE records one historic asset within the ISA, and the Aberdeenshire and Aberdeen City Sites and Monuments Records (SMRs) record four. These comprise four boundary stones which mark a historic version of the Aberdeen city limits and the site of a post-medieval cottage recorded on historic Ordnance Survey mapping. The cottage no longer survives as visible remains.

Within the OSA, the SMR records a further six historic assets. Again, these comprise post-medieval features such as boundary markers, farmsteads and industrial buildings. None of the non-designated features within the ISA and OSA are considered to be of more than local importance and any potential impact caused by development can be adequately mitigated.

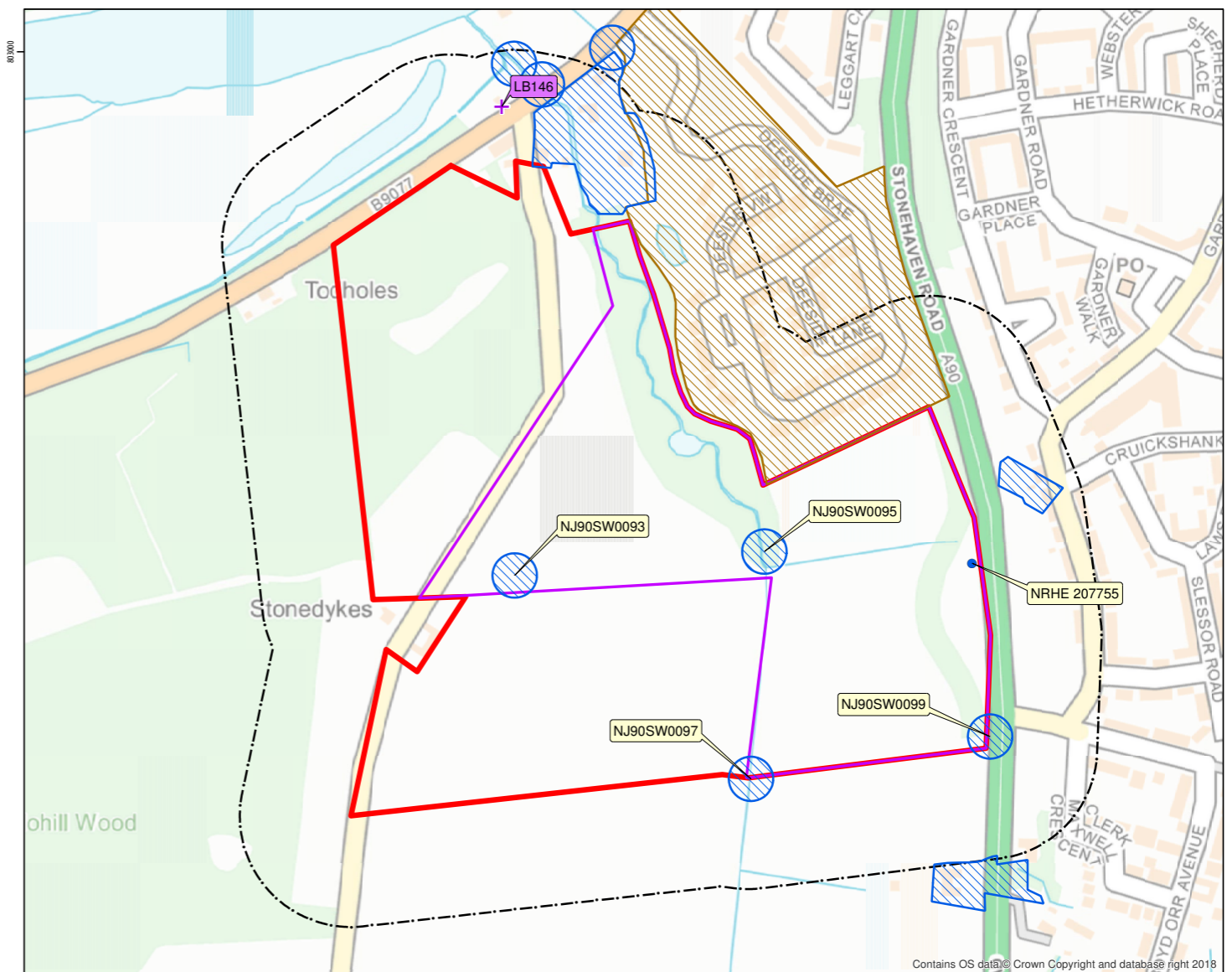
There is a low potential for unknown archaeological features to survive within the ISA. The SMR records one trial trenching evaluation carried out in advance of the construction of houses on Leggart Terrace/Deeside Brae immediately adjacent to the eastern edge of the ISA. Several features representing post-medieval agricultural activity (drains and plough marks) were identified, but nothing of archaeological significance was recorded.

Impacts on any archaeological features that may survive within the ISA can be successfully mitigated through a programme of archaeological works.

**There are no features or assets of cultural heritage significance likely to be adversely impacted upon by the proposed development. Cultural heritage is not considered to be a matter that would preclude the proposed development from coming forward in the emerging Local Development Plan.**



- NRHE Entry
- SMR Entry
- Previous Investigation (from SMR)
- Royal Devenick Park
- Leggart Brae
- Outer Study Area





# Site Context

## 4.3 Ecology








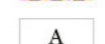





Northern Ecological carried out a survey Preliminary Ecological Appraisal in April 2019. The site boundary and study area encompasses the Den of Leggart Local Nature Conservation Site (LNCS). This feature is recognised as Aberdeen City Council as a fine example of an incised, wooded burn valley. The burn supports otters, one of the notified species of the River Dee Special Area of Conservation (SAC).

The proposed development at Leggart Brae recognises the conservation and amenity value of the core area around the Burn of Leggart, and accordingly, as shown on the indicative site layout plan, the form of development that could be advanced here would retain the Den LNCS intact, enhancing this site with the area of new parkland described above. The burn corridor at the southern end of the park would be enhanced by the retention of a landscaped riparian corridor, and new habitat corridors in the form of woodland planting could be formed along the southern edges of the site.

Masterplanning for the site, in respect of site design, landscaping, habitat creation and construction planning, will pay due regard to the notified features of the river Dee SAC, ensuring that good water quality in the river is maintained and, through a long-term management plan for the Den of Leggart LNCS, that the riparian system comprising the Dee and the Burn of Leggart tributary is protected for its long term amenity and its wildlife populations.

Natural Heritage features, and potential for habitat on and around the site have been examined and are not considered to be matters that would preclude the proposed development from coming forward in the emerging Local Development Plan.

BANCHORY LEGGART PHASE 1 HABITATS

-  Broad-leaved semi-natural woodland
-  Coniferous plantation
-  Mixed plantation
-  Dense scrub
-  Mixed semi-natural woodland & scrub
-  Semi-improved grassland
-  Marshy grassland
-  Arable
-  Water course
-  Scrub
-  Tree
-  Target note & number
-  Indicative site boundary





# Site Context

## 4.4 Roads Infrastructure Statement by Transport Planning Ltd

### Road Network

The Leggart Brae site is conveniently located in terms of major and minor road links. To the east, the A92 runs north to south within the Aberdeen City boundary and would facilitate site connections. To the north, Leggart Terrace is available for further connections and the wider site also contains a network of minor rural roads. Post AWPR the A92 north of Charleston is no longer a trunk route. The desire to cross the A92 and examine opportunities to reprioritise some of the road space in favour of cyclists and/or public transport users (through re-marking of lanes) and consideration of the ability to cross the road at grade by pedestrians all suggest that the role, form and function of this stretch of road needs to be redefined – whether development occurs at Leggart Brae or not.

Additional connectivity is also offered southwards towards Portlethen (as part of the AWPR scheme a link towards Schoolhill has been provided) and also via an existing network of minor roads which cross the wider area and link it with other minor settlements. Employment opportunities are available in the Altens area and, via the A956, the city centre, accessible by travelling south from the development (against peak time morning flow) to Charleston and hence Wellington Road. Following the opening of the AWPR, by using the same ‘against peak time traffic flow’ approach, it is also possible to reach other employment opportunities via the new ring road.

### Site Accessibility – Pedestrians and cyclists

The proposed site area sits within an existing network of minor roads and tracks which currently link the area in all directions to external road and footway networks. Many of these are presently used for commuting and recreational purposes. For example, the site presently accommodates part of the ‘Causey Mounth’ road and it is anticipated that this historic drovers road (part of which is signed as a tourist route) would be retained as a feature of the site development allowing its

use by essential users, pedestrians and cyclists. Several existing core path linkages can be developed and expanded as the site emerges. Within Aberdeen City, core path connections exist to the north and east of the site.

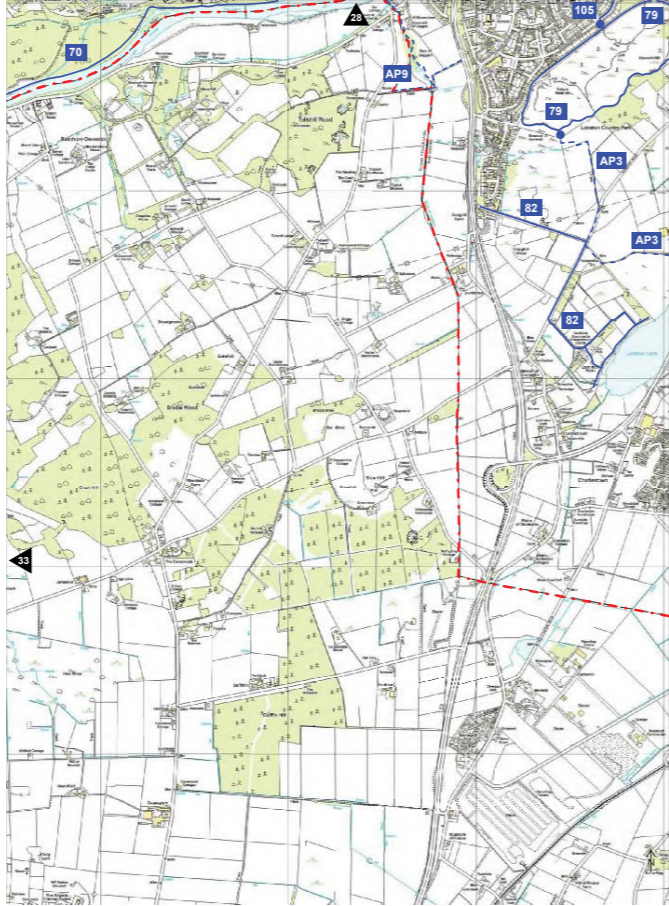


Figure 1: Aberdeen City Core Paths Extract

Within the subject area, the masterplan exercise which has already commenced will be required to establish the detail of pedestrian linkages and cycle connections. Direct connections within the site which shorten travel distances on foot and by cycle when compared with private car alternatives

will be planned, thereby shifting the balance of attraction to these sustainable modes for shorter internal development trips.

Pedestrian and cyclist connections would also be possible to the east towards the A92. Any reduction in traffic on this section of the A92 arising from the Aberdeen Western Peripheral Route (AWPR) may allow improved facilities to be provided for pedestrians crossing the A92. The new roads within any development on the proposed allocation site would have footways which will allow connections to the existing footway and footpath network to the south and west.

The major retail area at Garthdee lies some 1.5Km from what is anticipated to be the heart of the new development – within walking distances for access to local facilities as laid out in PAN75. Further afield, the ability to examine whether, post AWPR, a cycle lane can be accommodated on the shoulder of the A92 towards the Bridge of Dee is under consideration. As indicated above, other linkages across the A92 towards Kincorth and Loirston Loch can also be considered. Linkages to South Deeside Road and hence Leggart Terrace are also possible, which would help circumvent the A92 route. The character of that section of the A92 from Charleston to Kincorth and what its function is post AWPR are matters that will require consideration as development proposals in the wider area emerge.

A further consideration in addressing pedestrian and cycle connections will be the extent to which these are ‘adoptable’ – i.e. surfaced and lit, and the extent to which they remain recreational. Establishing an appropriate balance that caters for the needs of all users and can be accommodated within the landscape will be the key outcome.

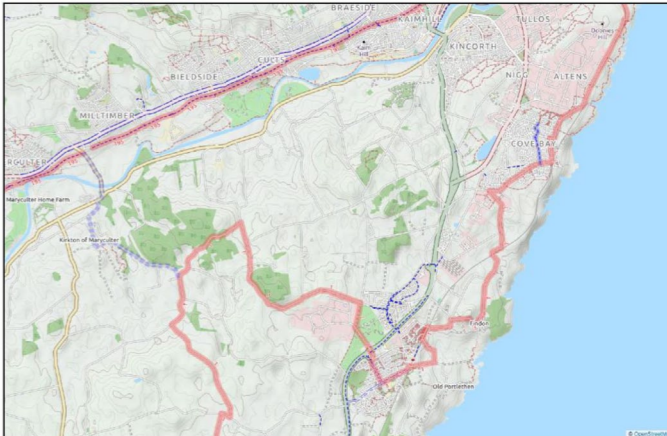


Figure 2: Open Street Map Extract

### Public Transport – Bus

Positive discussions have previously taken place with bus operators in the area to look at the potential for the site area to be serviced by extensions / diversions to existing services. Any dialogue with bus service providers would need to be updated with respect to likely development timescales, the intensity of development delivery, the type(s) of development and development phasing. However, previous discussions with Stagecoach and Aberdeenshire Council have revealed that several supported services operate in the area of the site at the present day. The A92 is also currently served by the 7 and 7B bus services, which typically provide two services an hour in each direction along the A92 linking Aberdeen city centre with Portlethen (the 7) and Stonehaven (the 7B). It is also served by the hourly X6 service linking Aberdeen with Portlethen and Stonehaven.

# Site Context

## 4.4 Roads Infrastructure Statement (cont'd)

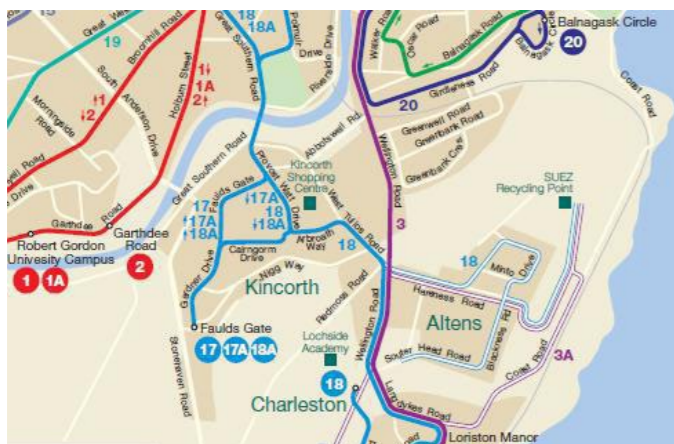


Figure 3: Extract from First daytime service map



Figure 4: Extract from Stagecoach service map

### Public Transport – Rail

The closest existing rail station to the Leggart Brae site area is at Aberdeen, approximately 3.5 km to the North East, with Portlethen station approximately 6 kilometres to the south. Portlethen is located on the East Coast Main Line (ECML) and primarily serves as a commuter station for Aberdeen, and is the only intermediate halt between Aberdeen and Stonehaven.

### AWPR

It is likely that AWPR opening will reduce traffic flow on the approaches to the Bridge of Dee.

Any site south of the river will have a traffic impact at the Bridge of Dee but the Leggart Brae site is best placed to enable walk/cycle and especially public transport travel options to mitigate these impacts.

### Leggart Terrace

A scheme of more minor importance than the AWPR is the previously proposed partial closure of Leggart Terrace to provide some relief to the southern Bridge of Dee roundabout (identified in the 'Access from the South' NESTRANS paper). This link, which would connect the South Deeside Road with the A92, could tie into any new junction on the A92 to the south of the Leggart site and would help facilitate not only development access but also connections to existing public transport services in Kincorth.

Leggart Brae is very well situated in relation to the existing transport network and is entirely deliverable. A series of existing paths and roads can be retained or upgraded as required. Development can take place providing links between development components together with informal recreational opportunities in leafy edge of settlement setting. Public transport services operate nearby offering bus travel opportunities. Vehicular access is able to be taken in an appropriately phased manner as the site matures. Walking and cycling opportunities and links exist within the site area and network improvements can be made to enhance travel by these modes, particularly given the detrunking of the A92. It is concluded that there are no transport reasons why the site should not be allocated.



# Site Context

## 4.5 Geotechnical Constraints analysis by MottMacDonald

**Legend**

- Indicative Site Boundary
- Watercourse
- Historical Land Use
- A Quarries
- B Mill Dams
- Wells

**Ground Conditions**

- Infilled Ground
- Alluvium
- Lochton Sands and Gravels
- Blairdaff Moraine Formation
- Banchory Till Formation
- Aberdeen Bedrock

NB: The site is entirely underlain by metamorphic psammite and semipelite of the Aberdeen Formation.

**Notes**

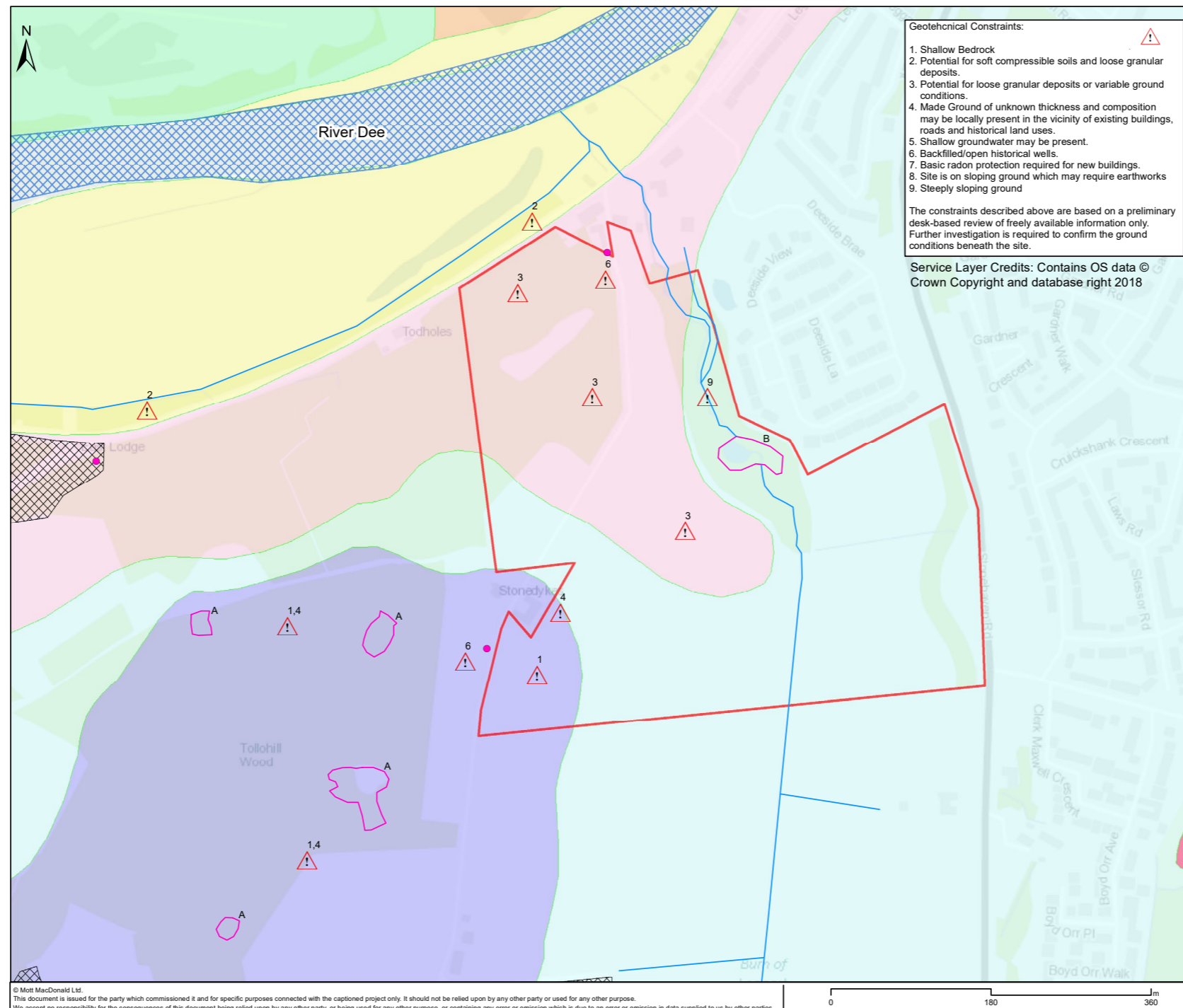
1. The extent of the potential geotechnical constraints and historical land use are indicative only.
2. UXO - Low risk from unexploded ordnance.

A	05/04/19	AT	Geotech Constraints Plan	ED	CMcM
Rev	Date	Drawn	Description	Ch'kd	App'd

W mottmac.com

**M M**

**MOTT MACDONALD**



An identification of Geotechnical Constraints is outlined as follows:

1. Shallow bedrock
2. Potential for soft compressible soils and loose granular deposits
3. Potential for loose granular deposits or variable ground conditions
4. Made ground of unknown thickness and composition may be locally present in the vicinity of existing buildings, roads and historical land uses
5. Shallow groundwater may be present
6. Backfilled/Open historical wells
7. Basic radon protection required for new buildings
8. Site is on sloping ground which may require earthworks
9. Steeply sloping ground

## Site Context

### 4.6 Outline Flood Risk Assessment by Kaya Consulting

The Stage 1 flood risk assessment considers risks from:

- River Dee.
- Burn of Leggart and tributaries.
- Surface Water Runoff.
- Groundwater.
- Existing Drainage Systems

The report also comments on requirements for site drainage.

#### River Dee

The River Dee has a catchment of 2,080km<sup>2</sup> at the downstream end of the site (from the Flood Estimation Handbook (FEH) web-service). The banks of the river are at around 5m AOD (Above Ordnance Datum), with the B9077 sitting at around 9m AOD. The site levels rise from the road, with the top of Tollohill Wood (to the south-west of the site) at 88m AOD. Nearly all of the site sits above 15m AOD.

The SEPA Flood Maps for the River Dee show that the site is adjacent to a tidally influenced reach of the Dee and the site does not lie in the 1 in 1000 year river floodplain or coastal floodplain. Therefore, the site is not predicted to be at risk from direct flooding from the River Dee.

During the detailed planning application, it is recommended that further work is undertaken to obtain flood levels in the River Dee. However, at this stage direct flooding from the River Dee would not be considered as a constraint on development.

#### Burn of Leggart and Tributaries

The Burn of Leggart flows through the proposed development site. Within the southern part of the site the burn sits in a broad valley with the valley narrowing at the northern end of the site.

Land adjacent to the burn is likely to lie in the floodplain of the watercourse, and this is shown on the SEPA flood map. Ground levels rise from the banks of the river and flooding is not ex-

pected to extend far from the edge of the burn, e.g., around 10-15m. This is also shown on the SEPA maps where flooding is limited to land close to the watercourse. Detailed modelling of the burn will be required at the planning stage to accurately map the floodplain extent. However, flood risk would be able to be managed through avoidance of the flooded area (i.e., no development in the 200 year floodplain extent).

The catchment of the burn is 4.6km<sup>2</sup> and is shown in Figure 4.



Figure 1: View across broad valley of Burn of Leggart from south-east



Figure 2: Burn of Leggart. Photo taken upstream of site but looking north

The site drains land to the south and east of the site, with the catchment extending to the east of the A92 and including the overflow from Loirston Loch. A small tributary enters the site from the east. This drains land to the east of the A92. This flow pathway will need to be maintained in the developed site. However, flows entering the site will be constrained by the capacity of the culvert under the A90, so significant flood risk from this drain is not expected.

The bridge crossing of the B9077 to the north of the site is relatively large (approximately 1.5m by 1.5m arch opening see Figure 6) and there would not appear to be a risk of flooding of the road.

In the event of significant blockage of the culvert flood waters would flow onto the road and then into the River Dee. Figure 8 shows the road at the crossing and shows land rising to the north towards the site. In this case it would not be expected that the site would be at significant risk of flooding, but this would need to be investigated as part of a detailed flood risk assessment.

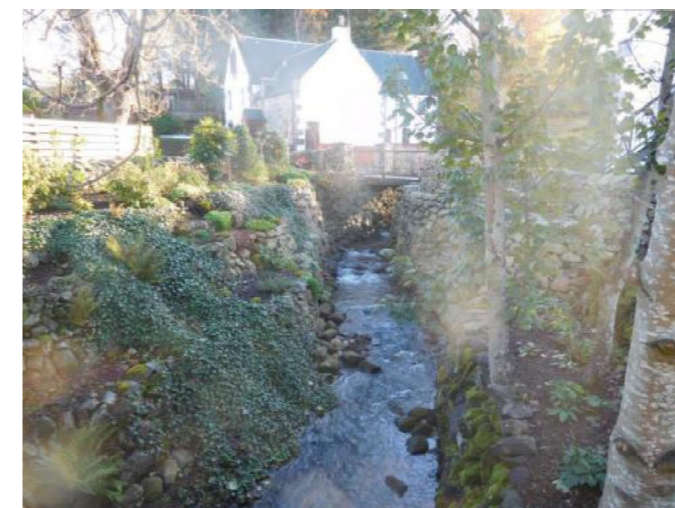


Figure 3: Burn of Leggart. Photo upstream from B9077 looking north

#### Surface Water Runoff

There is limited high ground bounding the site from which surface water runoff would enter the site. The SEPA surface water (pluvial) flood maps show areas of potential surface water ponding within the site, but these mirror the fluvial flood risk from the Burn of Leggart. Some care would need to be taken along the eastern edge of the site to manage surface water runoff from open ground and the A92 respectively, but risks would be expected to be managed through standard mitigation measures and as part of the detailed design of any Masterplan and site drainage strategy.

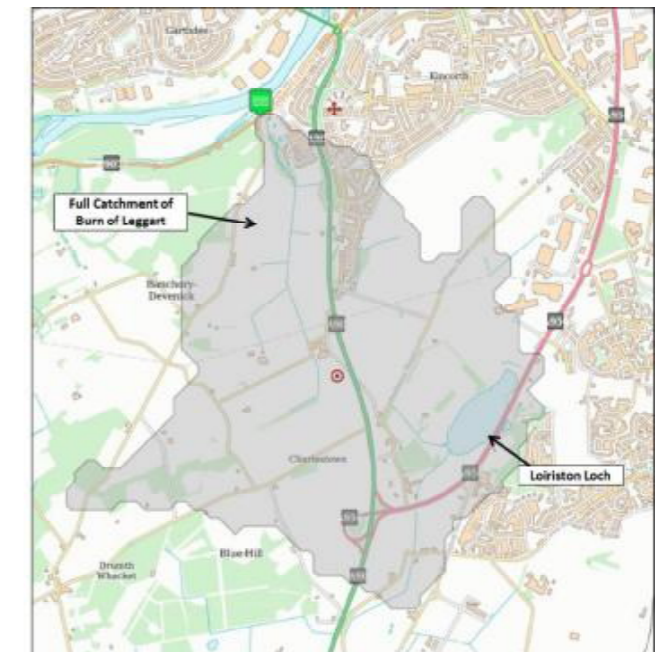


Figure 4: Burn of Leggart Catchment

#### Groundwater

Given the slope of the land and the likely control of regional groundwater levels by the River Dee, the site is not considered to be at significant risk of flooding with groundwater as a primary source. However, as the development proceeds site investigation work will identify local groundwater levels and more detailed hydrological and ecological assessments will



# Site Context

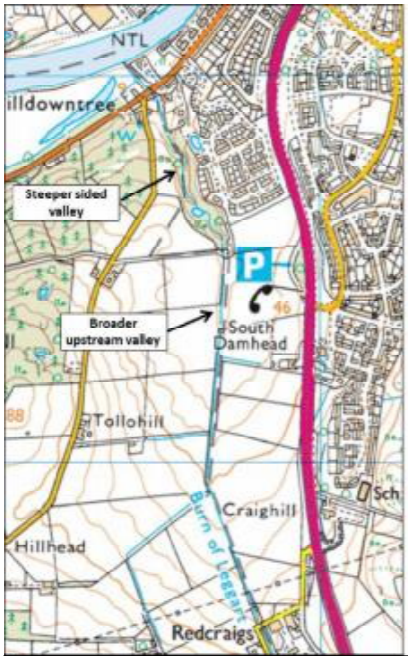


Figure 5: Burn of Leggart Topography

identify any areas with poorly drained ground or locally elevated groundwater tables. It is noted that Ordnance Survey mapping shows a well close to the northern boundary of the site. This would need to be considered during Site Investigation works.



Figure 6a: B9077 bridge crossing

### Existing Drainage Systems

Given the rural nature of the site, surface water is currently managed through land drainage. Existing drainage will need to be assessed as part of a planning application, but risks would be expected to be managed through standard mitigation measures and as part of the detailed design of any Masterplan and site drainage strategy.



Figure 6b: B9077 at bridge crossing

### Comment on Site Drainage

As the site is currently undeveloped, development has the risk of increasing runoff rates to watercourses. It is recommended that runoff rates are attenuated to greenfield rates before discharge and appropriate Sustainable Drainage Systems (SuDS) will be required. These measures will be developed as part of a site drainage strategy during the planning process and planning consents will not be provided until the site drainage has been designed to current standards. As a result, with appropriate measures in place the site is not expected to increase flood risk to others. However, given the slope of land, care will need to be taken in the management of surface water runoff during the planning process.

The site lies within the catchment of the Burn of Leggart, so

attenuated site runoff should be discharged to this watercourse.

### Mains and Waste Water (Mott McDonald)

Connection to wastewater network would need to be agreed through Pre-Development Enquiry procedure with Scottish Water, and would take place at an appropriate stage following allocation.

### Summary and Conclusions

This report has undertaken a Stage 1 flood risk assessment for the proposed development site. The assessment has covered all sources of flooding risk. Overall, flooding does not appear to provide a significant constraint on development.

The assessment identifies potential flood risks that will need to be considered through the planning process. However, given the local topography and the scale of the development these risks would be able to be mitigated with limited constraint on the proposed development. Mitigation measures would include;

1. Avoidance of development on the floodplain of the Burn of Leggart. Small areas of the site are predicted to lie within the 200 year floodplain of this watercourse. Flood modelling is recommended to support a planning application, to define the extent of the floodplain. These floodplain areas would be able to be avoided with limited constraint on the development.
2. Management of surface water runoff from adjacent land. As the site sits on sloping ground there may be local risks from surface water. These risks can be mitigated by maintaining existing drainage, avoidance of development in low areas with risks of surface water ponding and provision of appropriate site drainage infrastructure.
3. Management of site runoff. Runoff from within the development will need to be managed by SuDS with site runoff rates attenuated to greenfield rates, with water discharged to the Burn of Leggart. This work would be undertaken during the normal development of a site drainage strategy and drainage designs through the planning process.

There are no significant flooding risks that would be considered unusual and would not be able to be managed through the planning process. A full flood risk assessment report would be required to support a Planning Application in Principle (and future detailed planning applications for the site) for the site.



## Site Context

### 4.7 Education authored by Savills

The catchment schools serving the proposed development site would be Abbotswell Primary in Kincorth and Lochside Academy in Altens. Data on the school rolls going forward can be derived from Aberdeen City Council's 2017-Based Scholl Roll Forecasts, published in June 2018.

#### Primary Provision

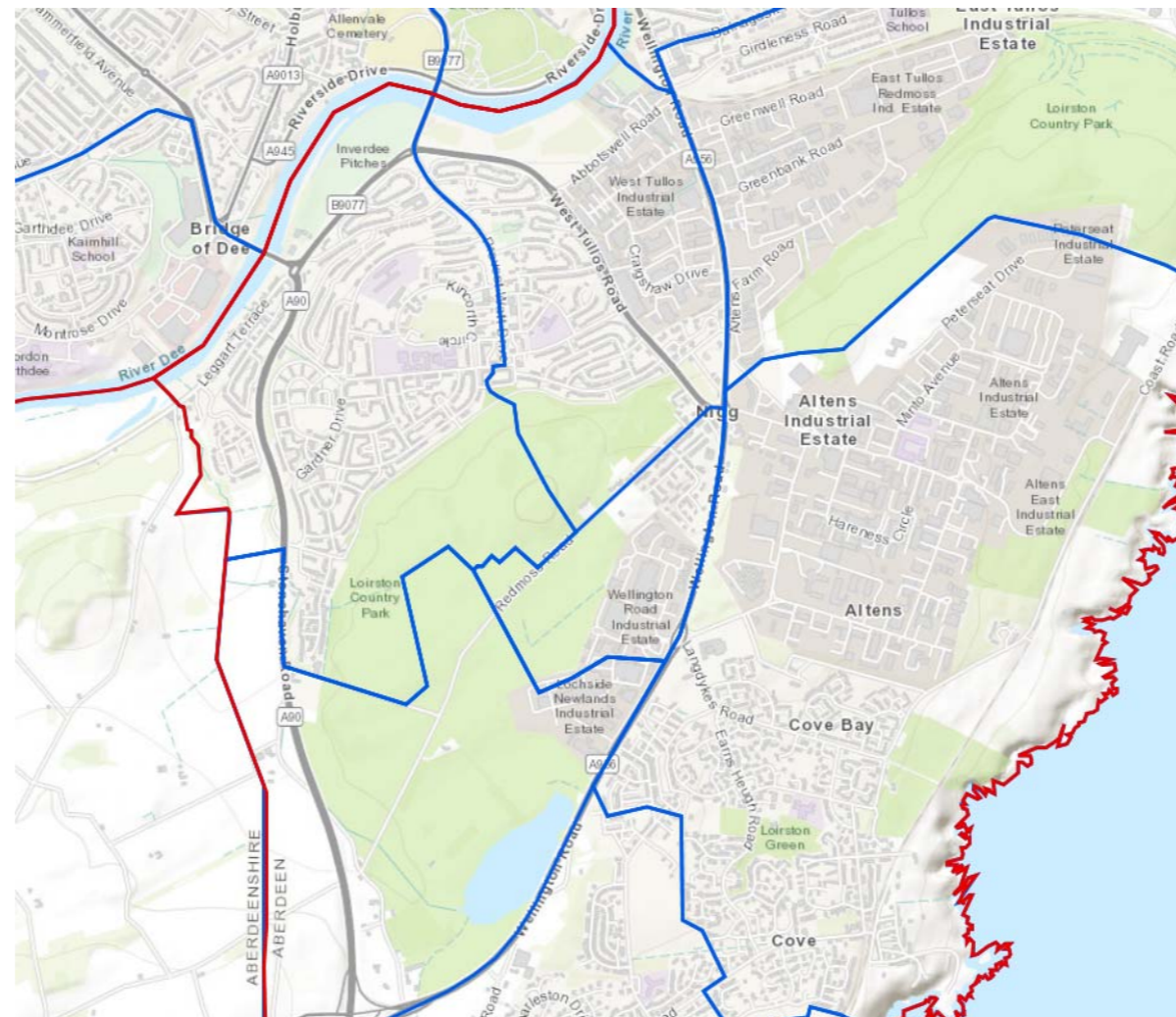
Abbotswell Primary is a 300 pupil capacity school. Aberdeen City Council's forecasts are that it will have a roll of 246 in 2025, falling from a roll of 278 in 2018. This means that there will be spare capacity of between 22 and 54 places between now and 2025 when the houses are anticipated to be built.

The overall capacity equates to that which would be generated by 180 houses by 2025 (using a standard ratio of 0.3 pupils per unit and assuming a build out rate of 33 per annum).

#### Secondary Provision

Lochside Academy is a new 1350 capacity school that is forecast to grow from a starting roll of 80% capacity in 2018 up to 96% capacity by 2025. This is the period during which the proposed development will take place.

According to the Council's forecasts, the quantum of spare capacity available at the school throughout this period will vary between 60 and 215. The lowest spare capacity of 60 is forecast for 20125 and equates to that which would be generated by 200 houses (using a standard ration of 0.3 pupils per unit and assuming a build out rate of 33 per annum).



- ▭ Academy School Catchments
- ▭ Primary School Catchments

#### Conclusion

The above has shown that there is education capacity at Primary and Secondary Schools for the 150 unit allocation proposed at Leggart Brae.

While education is acknowledged as a matter that can constrain development, the measured approach taken to scale and density on this site, means that Education issues would not preclude the proposed development from coming forward in the emerging Local Development Plan.



# 5.0 | Planning Context

# Planning Context

## Principle of Development

This Development Framework identifies the means by which the site can provide highly deliverable residential development on a site that is supported by market analysis as being one that will be desirable for new purchasers and will consequently contribute to the short term housing supply. Paragraphs 84 and 85 of SPP recognises that the extension of existing settlements is a sustainable, logical and supported development strategy principle, and the means by which the majority of housing land requirements will be met. This is a view that is echoed in both the Adopted and Proposed Strategic Development Plans which both identify Aberdeen City and its immediate hinterland as being a Strategic Growth Area where 75% of development in the region is anticipated going forward. The development of the subject land for residential purposes would therefore provide a high quality, natural and logical extension to Aberdeen City within one of the Strategic Growth Areas already recognised in the Region-wide Strategic Development Plan.

Development on the scale proposed also aligns with prescriptions in the emerging Strategic Development Plan that Local Development Plan allocations on greenfield sites are appropriate for 'small scale' development, should have limited impacts on the environment and infrastructure, and should not be extensions to existing sites identified in the Aberdeen LDP 2017. The scale of development here has been informed by studying the successfully completed development at Deeside Brae that assimilates well in scale and form with both the existing built development on Leggart Terrace, and with the landform of the Leggart Burn catchment. This document has sought to demonstrate that there will be no adverse impact on the environment and infrastructure, and it will not be simply an extension to a site allocated in the 2017 Plan.

## Effective Housing Sites

Over and above matters of location, scale, form and market acceptability, the Scottish Government's PAN 2/2010 sets out qualifying criteria as to what constitutes an effective housing site. Taking each in turn:

- **Ownership** – The wider Banchory Leggart Estate is in the single ownership of The Comer Group, who will exclusively develop the proposed residential development at Leggart Brae. There are no third party land ownership issues that would prevent access to the site or its development.
- **Land Use** – the site is currently greenfield is located within the broad, indicative Strategic Growth Area located around Aberdeen City and also lies adjacent to the Aberdeen to Laurencekirk (A90) growth corridor (Aberdeen City and Shire Strategic Development Plan). The site also has the potential to enhance access to open space. Paragraphs 84 and 85 of SPP reinforce the established planning principle, that where growth outwith the existing urban area is required, development should focus on the urban edge. This site offers a logical extension to housing development to the North and East and should continue to be sustainable through its relationship to transport corridors.
- **Physical** – the site can utilise the landscape features of the Leggart Burn catchment to create a place that is distinctive, safe and pleasant, easy to move around, welcoming, adaptable and resource efficient, all in line with the Scottish Government's Designing Streets document. Sensitive design solutions would be investigated at the appropriate detailed stage to ensure that these potential qualities can be optimised. As set out elsewhere in this document, Following initial site investigations and technical inputs the site is also free from adverse physical constraints which would preclude its development. These include geotechnical matters / ground conditions, topography, landscape character and impact, archaeology, ecology and flood risk.
- **Contamination** – there is no known contamination at the site, with a prior history of only farming and/or existing woodland across the site.
- **Deficit Funding** – no public funding would be required to

make the site viable and enable it to be brought forward for development.

- **Marketability** – As outlined elsewhere in this document, the site is considered to be highly marketable. The modest scale of the development proposed means that the proposals can be delivered during the plan period. The site is under the ownership of The Comer Group, who boast an excellent track record in delivery.
- **Infrastructure** – Owing to the simplicity of ownership here, any required infrastructure can be provided by the developer to service the scale of development proposed here. Further detail on this is provided within each of the relevant technical sections of this Development Framework.

In supplementing the above, it is also key to provide the following commentary on delivery and viability considerations:

## Delivery of an Inclusive Community

As detailed in the market analysis forming part of this document, sites in single ownership that are developer-led can be delivered faster and therefore offer more certainty to Planning Authorities. Leggart Brae will be developed exclusively by the Comer Group. The Comer Group are committed to delivering their exciting vision for the development of Leggart Brae as quickly as possible. It is anticipated that the scale of development proposed means that this site of 150 houses could commence within 6 months of securing all technical consents.

The development will target a range of demand drivers and buyer profiles in order to create an inclusive and mixed community. As part of this, affordable housing is also a key component in the proposals. The Comer Group are a registered housing provider in England and intend to replicate this model at Leggart Brae, where the required 25% affordable housing can be delivered onsite.

## Viability

As detailed elsewhere in this document, the Comer Group has enlisted support from local development professionals and has carried out detailed viability assessments to ensure that the development of this site would be achievable. The appraisal reflects current market conditions and comparable new build sales data within the local market. Budget build and infrastructure cost assumptions are based on technical input from the wider professional team, and budget allowances have been made as part of the viability assessments for Developer Obligations.

**This Development Framework has identified an informed approach to allow for a proportionate but effective development of land within the Aberdeen City Strategic Growth Area. It is considered that such a development would be a logical way to sustainably utilise existing amenities and infrastructure. This approach is considered to align with the requirements of the Scottish Planning Policy (SPP) and the Adopted and emerging Strategic Development Plans, and would support the allocation of this site in the Proposed LDP.**



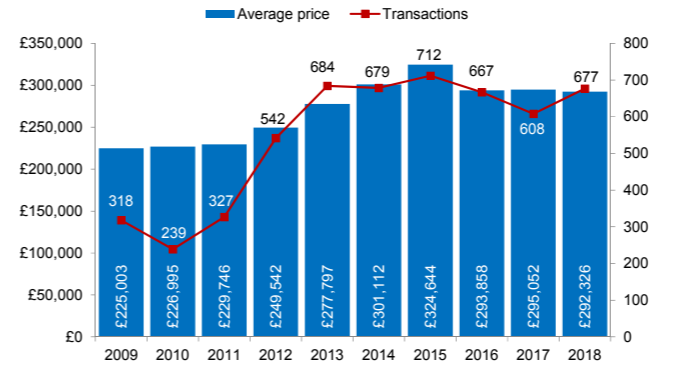
# 6.0 | Market Overview

Aberdeen’s residential property market has not been immune from the local economic trends and has experienced a fall in average pricing and transaction volumes since the boom period of 2013/2014. However, new build properties continue to perform well.

### New Build Market vs Second Hand Market

The number of new build residential transactions in Aberdeen City increased by 11% from 608 in 2017 to 677 in 2018. This is 24% higher than the 10 year annual average of 545. While average price fell slightly from £295,052 in 2017 to £292,326 in 2018, this remains 4% higher than the 10 year average and 5% higher than the average pricing achieved in 2013 when the market was performing well.

The following chart shows average new build prices and the number of new build transactions in Aberdeen City over the last 10 years.



Taking into account the second hand market, Aberdeen City the number of transactions in Aberdeen City fell by 3% from 3,987 in 2017 to 3,879 in 2018, 14% less than the 10 year average of 4,513 transactions. Average pricing fell by 2% from £200,977 in 2017 to £197,062 in 2018.

It is clear that the new build market has been more resilient, holding a strong average price which is higher than the 10 year average, and retaining transaction volumes equivalent to those achieved in 2013 and 2014. The new build market is func-

tioning at a level that can support readily deliverable sites such as Leggart Brae. Indeed, the market share of new build sales, relative to the whole Aberdeen Housing Area Market, has increased from 20% in 2013, to 22% in 2018.

The new build market benefits from the flexibility to react to market conditions by reducing target pricing and creating desirable places to live. In addition, housebuilders are able to offer incentives to purchasers. The use of incentives has been a major factor in the market since 2015 when the oil crash began in the local market. This has ensured that new build developments continue to perform and helped to distinguish new build properties from the second hand market.

In addition to the above, the market has seen a ‘flight to quality’ where purchasers are seeking a higher quality home for a reduced price. This is prevalent in the second hand market where homes that have been redecorated or present well to the market are seeing reasonable levels of interest and, in some cases, going to closing dates. The new build sector is able to cater for this market and offer a modern home where purchasers have little to no expenditure in the first 5 year from the date of purchase.

### Location & Comparable Sales Performance

Leggart Brae offers a desirable location to the South of River Dee. As a residential address, we know the location of Leggart Brae performs well, following Dandara’s successful completion of Deeside Brae. The development comprised three, four and five bedroom homes sold between December 2011 and July 2013 with prices ranging from £300,000 to £620,000. The average registered price was £435,000 with an average floor area of 1,730 sq ft (£251 per sq ft).

More recently, CALA have had great success along the Deeside corridor producing high quality 3, 4 and 5 bedroom homes in Cults and Milltimber. The developments are , from our research, achieving average pricing in the region of £579,496 and £650,817 respectively, reflecting an average of £301 and £299 per sq ft. Sales rates have been achieved in the region

## Market Overview

of 2.5 per calendar month. The above proves that sites that provide the right product, offer a good location and are readily deliverable will continue to perform well, particularly as the Aberdeen market continues to improve and the new build market remains resilient.

### Delivery

Looking beyond the new sites and brownfield sites that the Council has considered through the MIR, the broader picture in terms of housing delivery for the city must include already allocated sites, or sites where extant planning permissions are in place. The April 2019 Housing Land Audit shows that there is currently an effective land supply of 6950, while the Proposed Strategic Development Plan requires that there be an effective land supply of 6648. On the basis of this, the city is currently served by a 5 year effective housing land supply.

However, looking more closely at the data within the audit, there are a number of factors that that are worth considering in the context of delivery rates going forward. In each of the City areas considered in the Audit, each one relies on one or a small number of very large sites to deliver substantial parts of their housing supply. It is worth noting that in each of these areas except Peterculter the largest 'effective' sites have to date delivered either none, or very few completions.

In the Former City area the largest site is at Greenfold where an allocated site for up to 1470 units is referenced as being constrained owing to land ownership issues. Broadford Works is the second largest site where 460 units are anticipated. None of these units have to date come forward, and the site only enjoys a Planning Permission in Principle. In the Nigg area, the largest site is at Loirston where 1600 homes are anticipated, although it too has yet to start and only enjoys Planning Permission in Principle. At Grandhome work has begun on a site for up to 4700 units, although only 32 completions have taken place. Finally in the Newhills area, a trio of sites at Craibstone, Rowett South and Greenferns Landward collectively are anticipated to deliver 3700 units. However 1000

of these units are deemed non-effective due to ownership issues, and no start has been made on the other 2700.

Overall therefore the 7 largest sites identified in the audit contribute 11,930 units to the overall identified capacity of 20,114, yet 2 of these sites are non-effective and only 32 houses have so far been yielded from the remaining 5 sites.

Such analysis vindicates the approach taken in the Proposed SDP to allocate further land in each of the Local Development Plans for the City Region in the event that larger strategic sites do not yield the numbers expected of them. This latest audit, while demonstrating that a five year housing land supply is present, nevertheless demonstrates how precarious the supply will be if the current pattern of larger sites not delivering units continues.

A small scale extension to the well-established urban settlement edge, on a site where there will be limited impacts on the environment and infrastructure would seem to be a prudent way to mitigate against any threat that the already identified housing sites will not deliver as anticipated.

### Successful Delivery

Savills Development Team has undertaken an in depth analysis of sites across Aberdeen to assess what key factors influence delivery and would conclude as follows:

- Allocated sites which are developer led are generally more successful at coming forward quicker and offer greater certainty over deliverability
- Developments in single ownership avoid unnecessary delays due to, for example, complex land assemblies and legal negotiations
- Sites adjacent to existing services and infrastructure are less costly to develop and therefore are more likely to be viable

Dandara's Stonewood site is a good example of a successful recent development. Dandara acquired this site as a strategic

opportunity in 2010 and secured an allocation. The site was allocated in 2012 and the site was launched to the market in March 2013. They have subsequently delivered a variety of housing product and the site is now drawing to a close with the last 24 houses to be delivered in 2019. The site was owned and led by Dandara and therefore there were no challenges in delivering the site proving that sites that are developer led, such as Leggart Brae, are generally more successful at coming forward quicker and offer greater certainty over deliverability.

While somewhat historic, we also note that Deeside Brae, lying adjacent to Leggart Brae was also delivered by Dandara. As discussed above, the site delivered 61 units and was launched to the market in December 2011. The site was delivered and all dwellings were sold out by July 2013 reflecting a delivery / sales rate of 3.21 per calendar month.

It is considered that the location, proposed size and density of Leggart Brae in addition to the landownership status, vision and appetite of The Comer Group will contribute to a quicker delivery than the majority of sites in Aberdeen. It is important to recognise that continuing to support larger strategic sites which have struggled to perform in the past, will restrict delivery of new build homes on readily deliverable sites such as Leggart Brae.

### Conclusion

**In summary, the land at Leggart Brae is owned by The Comer Group which has the appetite, funding and capacity to deliver homes immediately upon approval of planning consent. The new build market is outperforming the second hand market at present, and supporting sites which can be delivered quickly will continue to support the local housing market and meet purchaser demand for high quality homes.**

**Leggart Brae will produce family homes in a desirable location which, as proven by the success of Deeside Brae and, more recently, CALA at Cults Park / Milltimber, meets the demand of the market. Assessment of the current housing market has not identified any issues that would preclude this site from coming forward in the Proposed LDP.**

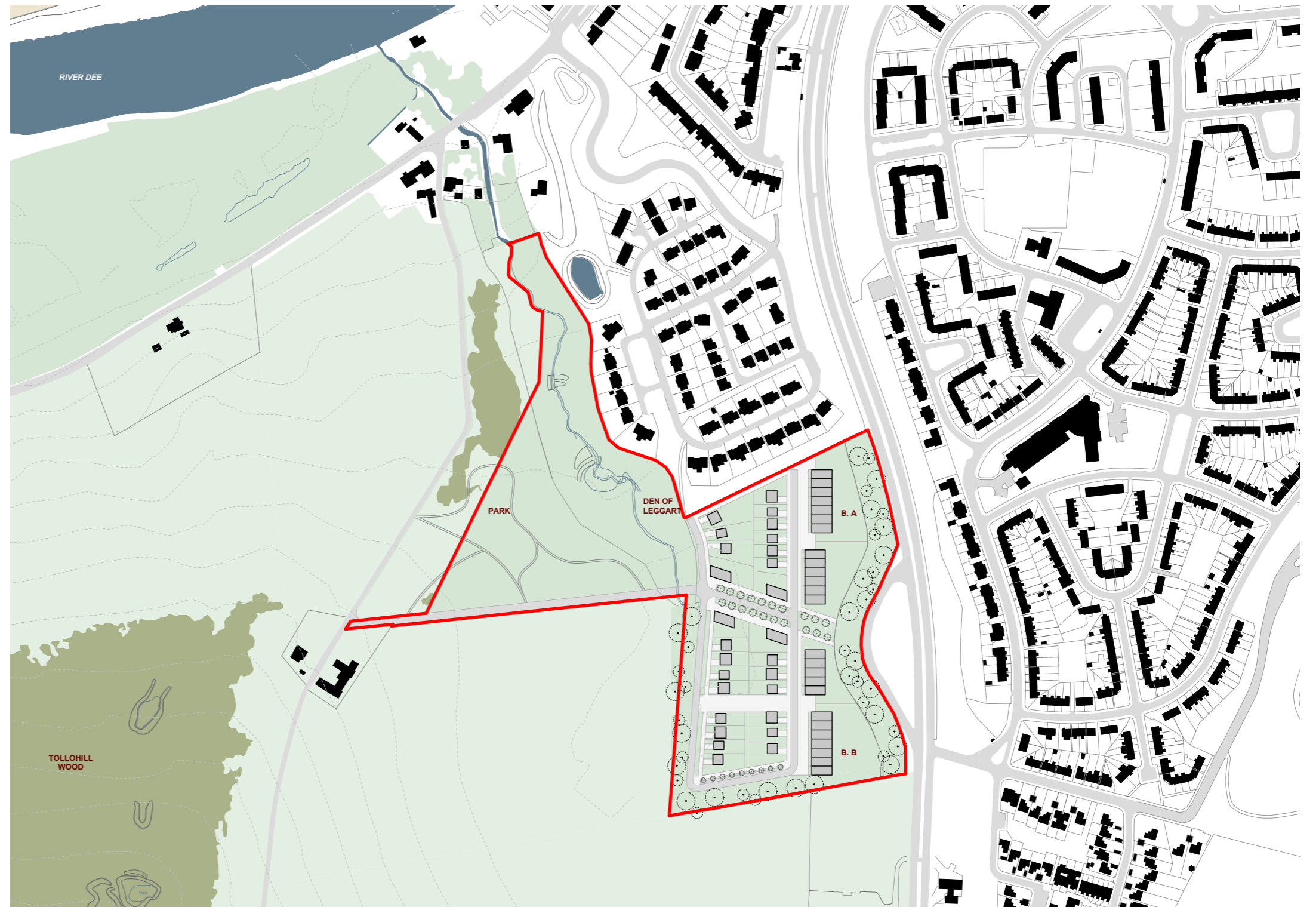


# 7.0 | The Masterplan

# The Masterplan

## Delivery and Implementation

It is anticipated that a development of c.150 homes would be delivered at a rate of 33 units per annum (2021-2023)



N  
Site Plan  
Scale 1: 4000



## Appendix 1

In April 2019 Savills submitted representations to the Aberdeenshire LDP Main Issues Report on behalf of Comer Homes. These representations were made in respect of subject lands just to the west of the current proposals site. For completeness, the final Masterplan image for this submission is shown to the right.

For the avoidance of doubt however, both sites can be developed entirely separately, and do not rely on any shared infrastructure that would preclude one coming forward without the other.



Site Plan  
Scale 1: 4000