

Aberdeen Local Development Plan Review Main Issues Report Response Form 2019

Aberdeen City Council has published a Main Issues Report (MIR) which is part of the process of preparing a new Local Development Plan. It is designed to gather views on specific proposals and sets out options for dealing with the key planning matters facing Aberdeen over the next 20 years such as the location of new housing and employment development, the future of retailing and the City Centre, housing needs and tackling climate change. It also includes a number of potential new policies which would be used in the determination of planning applications.

The MIR has been published alongside a Monitoring Statement and Environmental Report. Copies are available to view at Marischal College, Broad Street. Aberdeen. These, and other supporting documents, are available at: - www.aberdeencity.gov.uk/aldp2022

Everyone now has the chance to comment on the report and associated documents. All comments received will be considered and used to inform the preparation of the Proposed Aberdeen City Local Development Plan. There will be a further opportunity to comment on the Proposed Plan when it is published in early 2020.

The consultation runs from 4 March 2019 to 13 May 2019.

Responses to the published documents can be:

- made online at:- http://consultation.aberdeencity.gov.uk/planning/mir2019;
- emailed to:-<u>Idp@aberdeencity.gov.uk</u>; or
- by post to:- Local Development Plan Team, Strategic Place Planning, Aberdeen City Council, Business Hub 4, Ground Floor North, Marischal College, Broad Street, Aberdeen, AB10 1AB.

Completed response forms should be with us no later than 13 May 2019.



YOUR DETAILS

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On behalf of (if relevant)	CALA HOMES (NORTH) LTD
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Thank you for taking the time to complete this response form. If you wish to be added to the LDP e-mailing list to be kept informed of our progress in producing the next Local Development Plan, please tick here



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YOUR COMMENTS

Which document(s) are you commenting on?	 Main Issues Report Strategic Environmental Assessment Environmental Report Monitoring Statement
	ent and the specific Issue, Question, Site, Policy, Map or Table you are vide your comments below and explain your reason for supporting, opposing fic part of the document.
Please see attached respo	nse on the following Issues and questions:
Question 15 - Percent for A Main Issue 4 - Minimum Int Question 16 - External Spa Question 17 - Natural Envir Question 18 - Food Growin Main Issue 5 - Electric Veh Question 20 - Digital Infras Question 21 - Developer O Main Issue 6 - Low and Zer Main Issue 7 - Heat Networ Question 24 - Supporting B Main Issue 8 - West End O Question 25 - Affordable He	Art ternal Space Standards for New Residential Development ace Standards ronment ag hicle Charging Infrastructure structure bligations and Infrastructure Delivery ro Carbon Generating Technologies and Water Efficiency rks Business and Industrial Development office Area

YOUR COMMENTS CONTINUED



ABERDEEN CITY LOCAL DEVELOPMENT PLAN RESPONSE TO MAIN ISSUES REPORT

POLICIES

MAY 2019

On behalf of CALA Homes (North) Ltd







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1. Introduction

- 1.1 This representation has been prepared by Halliday Fraser Munro, on behalf of CALA Homes (North) Ltd. (hereafter referred to as CALA) in response to the Aberdeen City Main Issues Report 2019. The following main issues and questions are addressed in this representation:
 - Question 15 Percent for Art
 - Main Issue 4 Minimum Internal Space Standards for New Residential Development
 - Question 16 External Space Standards
 - Question 17 Natural Environment
 - Question 18 Food Growing
 - Main Issue 5 Electric Vehicle Charging Infrastructure
 - Question 20 Digital Infrastructure
 - Question 21 Developer Obligations and Infrastructure Delivery
 - Main Issue 6 Low and Zero Carbon Generating Technologies and Water Efficiency
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A separate representation has been submitted on behalf of CALA homes (North) Ltd in relation to 'Housing Land and Strategy', which covers question 1 'New Housing Sites' and Question 2 'Housing Allowances beyond 2032' and Question 6 'City Centre Masterplan Intervention Areas'.

2 Question 15 - Percent for Art

- 2.1 The MIR poses the question whether developments with construction costs of £1 million or over be required to allocate at least 1% of construction costs for the inclusion of art projects in a publicly accessible place. This question is posed under the 'Aberdeen City Centre' section of the report, but it is not made clear if this proposal would relate only to developments within the city centre, and to which type of developments it would relate. The proposed draft policy in Appendix 1 of the MIR states that 'all developments...' are required to contribute towards this policy.
- 2.2 CALA do not support the introduction of a policy which requires all developments of a construction cost of over £1m to contribute at least 1% of construction costs on public art. There is already a significant strain on developer contributions, and if the 1% for art were introduced, it is likely to affect other contributions such as open space, core paths and affordable housing. If a policy on art is required, CALA would suggest that it is brought in on a voluntary basis, with the developer encouraged to include public art within larger scale developments. It is also suggested that this type of contribution would be more suited to commercial development and city centre developments.

3 Main Issue 4 - Minimum Internal Space Standards for New Residential Development

3.2 Main Issue 4 is identified as a main issue on the basis that recent residential developments have been providing inadequate levels of internal floor space. CALA would question this assertion, as developers will





deliver what the market demands. CALA consistently deliver high quality residential developments which are far in excess of U.K. space standards.

- 3.3 There are three alternative options put forward in the MIR, and CALA would strongly support Option 1 which allows the flexibility demanded by the market. CALA do not believe that the current space standards are unnecessarily low, and note that the size of a residential unit is relevant to its location and site conditions. This is buyer led, if there is a market for smaller sites, there should be an option for developers to deliver these.
- 3.4 Finally, CALA would request that if there is to be additional guidance this should be published at the same time as the Proposed Plan to enable full and meaningful consultation on the document. Additional policy requirements should not be introduced through Supplementary Guidance.

4 Question 16 – External Space Standards

- 4.2 This question is included in the MIR as it suggested that there has been a degree of inconsistency in the quality and quantity of private amenity space in recent years. CALA are not aware that there is an issue with the provision of private amenity space, as they consistently deliver high quality space at a scale appropriate to the location and needs of the homeowner.
- 4.3 CALA agree that there should be an aspiration to deliver high quality space which is of a quantity relevant to the proposed development. Not all locations and developments have a need for large areas of private amenity space such as large gardens. There are some instances, such as elderly purchasers, who do not want the burden of a large garden and would prefer something of a more manageable scale. We would also encourage ACC to do as other Councils have done to include balcony and terrace space as private amenity as in a flatted development it can be a more meaningful for private use than communal open space. It is therefore difficult to see how a specific space standard in a policy approach could meet all the various site characteristics and needs of buyers.
- 4.4 Whilst CALA do not object to guidance that puts forward a suggested standard, we would request a flexible approach that takes into account the quality of the space, the requirements of the development given the site context and characteristics. There needs to be flexibility to take into account the market. The MIR notes that amenity spaces needs to be considered at an early stage in the design process. CALA agree with this position, and therefore suggest that amenity space would be best considered under the design policy.

5 Question 17 – Natural Environment

- 5.2 In principle, CALA are supportive of the consolidation of natural environment policies. However, CALA reserve the right to comment on the detail of the policies. CALA also note that there are substantial issues with the current policy approach to 'Trees and Woodlands'. CALA suggest these issues will need to be addressed through the proposed policy NE3 'Protecting our Natural Assets'.
- 5.3 CALA agree that trees and woodlands are important, and make a positive contribution to their developments. CALA have a record of dealing positively with trees on site, and seek to retain trees wherever possible, as there is a recognition that trees add significant value to development sites. CALA work closely with arboriculturists and ecologists in this regard. However, the existing policy NE5 'Trees





and Woodlands' and its associated Supplementary Guidance (SG) is causing concern given the weight placed on the potential future impact on trees. Trees and development need to co-exist, the two do not need to be mutually exclusive. The current policy approach seems to be seeking to remove trees within any distance of development for fear of a potential future impact. CALA would promote a more flexible and pragmatic approach to tree management that can enable trees and development to co-exist.

5.4 The issues with the existing policy NE5 and its associated Supplementary Guidance are outline in more detail below.

NE5 'Trees and Woodlands' and 'Trees and Woodland Supplementary Guidance'

- 5.5 Policy NE5 policy presumes against any development that results in a loss or damage to trees that contribute to nature conservation, landscape character, local amenity or climate change adaptation and mitigation. There is no additional clarification supplied within the associated SG on these types of trees. This policy therefore goes over and above the requirements of Scottish Planning Policy (SPP) which seeks to protect and enhance semi-natural woodland, native or long-established woods, hedgerows and individual trees with high nature conversation or landscape value. There is no clarification in SG on what a tree that contributes to 'climate change adaption and mitigation' would constitute. This could be said to be all trees and hence the policy is not compliant with SPP.
- 5.6 The aim of the Trees and woodlands Supplementary Guidance (hereafter referred to as the SG) is to 'inform' developers on 'incorporating' existing trees and woodlands within new developments, and outline the information required to smooth the planning process. The SG also suggests that a competent professional arboriculturists should be hired as integral part of the design team, and notes that 'the guidance is not a substitute for the knowledge and expertise of a professional arboriculturalist'. However, in CALA's experience, the guidance has been taken in precedence of professional advice. CALA would encourage positive and programmatic early discussions to secure the best future development of the sites.
- 5.7 Section 8 of the SG outlines the requirements for surveys, plans and assessments under the following headings:
 - Land survey (topographical survey)
 - Tree survey (including reference, species, height, stem diameter, crown spread, crown clearance, age, class, physiological condition, management recommendations, estimated remaining contribution and category grading)
 - Tree Constraints Plan (TCP) to inform proposed layout of the development (including constraints above and below ground)
 - Arboricultural Impact Assessment (written statement to accompany TCP)
 - Construction within RPA structure should be outwith RPA unless overriding justification
 - Proximity of Structures and Infrastructure to Trees this section refers to section 5.3 of BS 5837: 2012 and suggests that the ultimate height, canopy spread and rooting environment of existing and proposed trees needs to be considered. Section 8.4.2 suggest that buildings and associated infrastructure including garden ground should be outwith the 'zone of influence' of existing and proposed trees (ZOI is the distance from the bottom of the tree equal to the mature height of the tree).
 - Tree Protection Plan and Method Statement (protection of trees during construction).





- The SG finally notes that conditions may be used to control the development in relation to trees.
- 5.8 The majority of this SG is therefore in line with best practice as contained with BS5837:2012. However, section 8.4.2 of the report relates to the 'Zone of Influence' (ZOI) which has introduced a policy requirement that is restricting a significant amount of development in the city. The 'Zone of Influence' is defined as 'generally the distance from the bottom of a tree that is equal to the mature height of an existing or proposed tree'. This policy therefore has the potential to sterilise a significant number of sites within the city. Professional advice from a number of arboriculturists has suggested that the Council's 'ZOI' is not one recognised by industry standards goes above and beyond the requirements of the BS5837:2012 standard. Professional arboriculturists have stated their concerns that the practical application of this ZOI guidance, with no compromise or parameters, could result in pre-emptive felling of trees due to perceived impacts and therefore should be seen as an environmental negative. This could ultimately lead to increased loss of trees, entirely contrary to what policy NE5 is trying to achieve.
- 5.9 The current situation in relation to trees and development is unmaintainable. There are numerous examples within the city where developments are being refused due to impact, or perceived impact on trees. Whilst the impact on trees is an important consideration in planning applications, it is not the only consideration. There are a number of applications which have been considered at appeal in which policy NE5 was a reason for refusal. In a number of cases, the Reporter has not supported the Council's position on trees and woodlands:
 - PPA-100-2075 impact on trees not considered significant enough to warrant refusal of the application on its own.
 - PPA-100-2079 the reporter attached more weight to the experience of the arboriculturalist and agreed there would be no impact on the trees.
 - PPA-100-2093 the potential future impact on trees was not significant "I do not agree with the
 council's view that the proximity of houses and gardens would be subject to "significant"
 overshadowing throughout the year, thereby causing "poor levels of outdoor amenity for
 residents", even though the trees are located to the south of the properties and would be in
 leaf for much of the year."
 - PPA-100-2092 loss of trees would not have an adverse impact on protected area and local amenity of the area.
- 5.10 CALA would support a more pragmatic approach to trees in development, and seek to discuss the best way of mitigating against tree loss with Planning Officers. The current position on trees is having a significant impact on the economic growth of Aberdeen and is stalling developments. It is also resulting in significant additional costs which could be put towards other beneficial improvements. CALA request a review of this policy and the supporting SG, and would suggest it would be beneficial for this to include input and advice from a panel of professional arboriculturists.
- 5.11 A more general comment in relation to supplementary guidance is that it should not introduce new policy requirements that are not addressed in the LDP. CALA note that the current portfolio of SG was consulted on from 16th December 2016 to 30th January 2017, and in response to over 40 pieces of SG, only 21 responses were received. CALA would request that going forward, there should be more rigorous and targeted consultation on proposed SG.





6 Question 18 – Food Growing

6.1 This question is included in the MIR as it suggested that there has been an increased focus on food growing and that the LDP should support the 'Food Growing Strategy' due to be adopted in 2019. CALA would seek further clarification on what food growing would encompass, and would suggest that flexibility would be required to take account of the circumstances and scale of each individual site / development. CALA would issue caution on a further requirement of developers to provide food growing infrastructure. However, the opportunities for food growing could be something that housebuilders make new purchasers aware of in residential welcome packs.

7 Main Issue 5 - Electric Vehicle Charging Infrastructure

- 7.1 CALA are broadly supportive of new technologies which could reduce carbon emissions and agree that the LDP should encourage changes in transport technologies. However, CALA do not support the preferred option as outlined in the MIR to increase the requirement for electrical vehicle charging infrastructure for all new developments that provide parking. There is no legislative requirement for this type of technology. SPP suggests that development plans should support the provision of infrastructure necessary for transport technologies, but does not necessitate all developments to enable this form of technology.
- 7.2 There is serious concern across the industry about the capacity of the electricity grid to enable this kind of infrastructure. This technology is at a fairly early stage, and the infrastructure is not yet in place to enable the full roll out of electric charging in all homes and businesses. There are a number of unknowns in relation to grid capacity, and also the potential battery capacity, given that it is expected battery life will continue to improve as research continues. Whether every home will ultimately need charging infrastructure is unknown. It is noted that the Power Networks Demonstration Centre based at Cumbernauld are currently researching electric vehicles as part of their ongoing research on power networks. Until there is more certainty around grid capacity it is too soon to be considering installation of electric charging and hydrogen refuelling.
- 7.3 The planning system should not facilitate electric charging infrastructure independently from other measures. There is not currently a wider electric or hydrogen charging infrastructure in place, and therefore new development shouldn't be expected to provide this. CALA therefore would strongly resist an approach to introduce anything other than an informal encouragement for this kind of charging infrastructure until there is more certainty around this technology.

8 Question 20 – Digital Infrastructure

8.1 CALA would be concerned about a policy requiring high speed broadband in all residential developments of over 5 units. This is an issue which is not within the control of a housebuilder and hence could unnecessarily constrain developments. CALA recognise the benefits posed by high speed broadband, and seek to ensure that this is available to new homeowners where ever possible, as this is something that prospective purchasers will look for. CALA suggest that the market will dictate the need for high speed broadband and there is no policy requirement. The Council should seek to engage with digital infrastructure providers to ensure that the infrastructure is in place for new developments, and in particular for large masterplan areas.





9 Question 21 – Developer Obligations and Infrastructure Delivery

- 9.1 The approach to developer obligations is not per se an issue. However, CALA would request that greater clarity and transparency is needed to demonstrate where and why contributions are taken. Before a contribution is taken, there should be a clear and agreed strategy in place to demonstrate what contributions are needed for. For example, contributions will be taken towards a core path when there is no strategy or document that outlines current deficiencies and why additional money is needed towards paths. It is a similar situation for community facilities and sports and recreation.
- 9.2 The viability of a development also needs to be taken into account when identifying developer contributions. The weight of the contribution versus the additional benefit of new homes/affordable homes has got to be considered to ensure developer contributions do not have an effect on the viability of a development. The flexible approach to Developer Obligations taken in the city centre to help facilitate development is encouraged.

10 Main Issue 6 - Low and Zero Carbon Generating Technologies and Water Efficiency

- 10.1 CALA are committed to sustainable development and tackling climate change and support measures to do so where appropriate. However, CALA strongly object to the preferred option (option 2) as outlined in the MIR which would require developments to achieve platinum standard of Building Standards Sustainability Labelling. The wording of the preferred option should be clearer as to what is proposed, rather than requiring cross reference to the existing Supplementary Guidance. This could be seen as misleading.
- 10.2 The full impact of the proposed platinum rating cannot be considered at this point in time as only one aspect of the platinum sustainability rating has been published. This itself means that the Council are intending on introducing a policy for which they don't know what the implications are. It is estimated that the additional cost of constructing a home to platinum standard will be in excess of £75,000. This is a cost that neither the landowner nor prospective purchaser are going to be able to tolerate, in particular when considering the viability of a development in the current economic climate. This cost is in addition to the other financial requirements such as developer obligations, affordable housing, open space etc., and subsequently is likely to significantly diminish land values to the point that landowners may not wish to sell land for development. The impact on delivery of affordable housing is also likely to be significant, and the proposed policy could have an adverse impact on delivery of affordable housing if it were to be taken forward. One further point of note is that surveyors do not currently recognise the additional renewable requirements in property values.
- 10.3 Sustainability labelling is not routinely required by other planning authorities, and there is serious concern that continuing with the preferred policy approach would simply stop housebuilding in Aberdeen. This would reduce housing delivery rather than augment it, contrary to what Scottish Planning Policy is seeking to achieve.
- 10.4 CALA are of the view that sustainability labelling is already covered by Building Regulations, and it is misusing planning resources in trying to assess this issue twice. In addition, Planners are not suitably qualified to assess energy statements. The Building Regulations Handbook 2017 outlines the requirements for buildings to meet carbon reduction targets. This document is currently updated about





every 2 years, meaning that planning can't keep up with the rate of change as required by Building Regulations. It is also likely that the fabric of a building may change between a grant of planning permission and development commencing on site, which is not normally an issue as it is dealt with by Building Standards.

10.5 CALA suggest that carbon reduction in buildings is best dealt with through Building Regulations. This is an alternative way of meeting the requirements of the Climate Change (Scotland) Act 2009. Alternatively, CALA would support option 1 which would maintain the current policy approach.

11 Main Issue 7 - Heat Networks

11.1 CALA recognise that a more coherent approach might be required for heat networks but would caution against a requirement for developments to connect to a heat network (options 3). There is further research and evidence required to provide more detail on the viability of heat works including what type of development they would be envisaged to serve, how they would be funded and who would maintain them. CALA support option 1 (current approach), that heat networks should not be a requirement but that there is support for them where they are brought forward. The MIR suggests that there is a policy in Appendix 1 but that doesn't appear to be there, so it is not possible to comment on the proposed policy.

12 Question 24 – Supporting Business and Industrial Development

- 12.1 CALA are supportive of the allocation of a range of sites for employment and business land. However, CALA suggest that Policy B1 'Business and Industrial Land' should be modified to permit alternative uses on business and employment sites under specific circumstances, and subject to predefined criteria.
- 12.2 Not all land zoned for business and employment uses will be developed for employment uses, this could be due to a sites' poor location, or there being no market for employment development. CALA are of the view that if a site has not come forward for employment uses, but is well located for residential development, then this use should be considered on the site, subject to conformity with identified criteria. As allocated sites there is an expectation that these sites will be developed, so permission of alternative development on employment sites is preferable to development on unallocated land.
- 12.3 A permitted change to use class 9 would only be appropriate where a site is well located for this use, such as adjacent to an existing settlement. Residential development on an employment site could not prejudice any existing or proposed employment development.
- 12.4 It is noted that this type of change of use has been accepted in the past within Aberdeen City. A site at Abbotswell Road was granted permission for a residential development on the grounds that the surrounding land uses meant it was more suitable for residential development. A site at St Machar Road in Tillydrone was also granted consent for residential development on the grounds that there was low demand for industrial premises in combination with the circumstances of the site being suitable for residential uses. Whilst these sites were taken forward as departures from the LDP, it would be preferable that there is a policy approach within the plan to allow this type of development. It also allows a mechanism of delivering additional housing land should the housing land supply not be met.





13 Main Issue 8 - West End Office Area

13.1 CALA support option 2 (preferred option) that would support a mix of uses in the west end. This seems entirely logical, and the current policy approach seeking a single use of offices in this area is outdated. A pragmatic approach should be taken to design etc. in considering change of use applications given the type of buildings in the west end office area. There is a long-term risk to the viability and vibrancy of the West End if a more flexible policy approach is not taken here.

14 Question 25 - Affordable Housing

14.1 CALA agree that the current approach should be rolled forwards. This approach is compliant with SPP. CALA do suggest that there could be more flexibility in the delivery of affordable housing, and suggest that developers and Aberdeen City Council should work together to find innovative solutions to deliver affordable housing.

15 Main Issue 9 - Inclusive Housing Mix (Housing for the Elderly and Accessible Housing)

15.1 CALA are not supportive of the preferred option (Option 2) as outlined in the MIR. CALA suggest that any policy should simply note that the mix of housing should reflect the current market needs, and the local characteristics. A flexible policy approach is required. If a definitive policy approach set a minimum requirement or was too specific, it could quickly become outdated, and there is no opportunity to review this in between plan reviews.

16 Conclusion

- 16.1 This representation has set out CALA's position on policy issues identified in the Main Issues Report. CALA would respectfully request that their comments are given due consideration when modifying polices in the Proposed Plan.
- 16.2 Concerns about the current approach to Supplementary Guidance are outlined above. CALA note that the monitoring report proposes that most of the existing supplementary guidance will become non-statutory planning guidance. CALA would fully support the reduction in Supplementary Guidance as it should not be used to introduce new or updated policy positions. Policies should be contained within the LDP. CALA would request that any Supplementary Guidance is published for consultation alongside the Proposed Plan to enable a full and thorough consultation.





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YOUR COMMENTS

Which document(s) are you commenting on?	 Strategic Environmental Assessment Environmental Report Monitoring Statement 					
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Main Issues Report

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ABERDEEN CITY LOCAL DEVELOPMENT PLAN RESPONSE TO MAIN ISSUES REPORT

SITE B0309, DERBETH, KINGSWELLS

MAY 2019

On behalf of CALA Homes (North) Ltd







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1.0 Introduction

This response to the Main Issues Report (MIR) has been prepared by Halliday Fraser Munro on behalf of CALA Homes (North) Ltd, to support the allocation of land at Derbeth in Kingswells. The site was submitted as a bid for development and is identified as site B0309 in the MIR.

The site sits to the west of Kingswells, a suburb about 4 miles to the west of Aberdeen. The site is located between the C89C Chapel of Stoneywood to Fairley Road, and the Aberdeen Western Peripheral Route (AWPR). To the south of the site is the Prime Four Business Park and the AWPR Kingswells North junction is located to the north of the site. The site extends to 62 hectares and is proposed for approximately 700 dwellings, open space, and a mix of uses to support a sustainable community including a primary school.

CALA have a vision to create a high quality sustainable urban expansion of Kingswells, which would allow the C89C to be integrated into Kingswells and its function changed to a 'street', improving connectivity to the west of Kingswells. The development would deliver much needed housing and a mix of uses including residential, a primary school, and a farm shop/small-scale retail.

The site is immediately deliverable with no constraints or impediments to delivery. Kingswells has one allocation for 120 houses which is forecast to be complete by 2020. Therefore, additional development is needed in this area to satisfy local demands and sustain local services. Kingswells has its own neighbourhood centre, a primary school, a business park, and hotel.

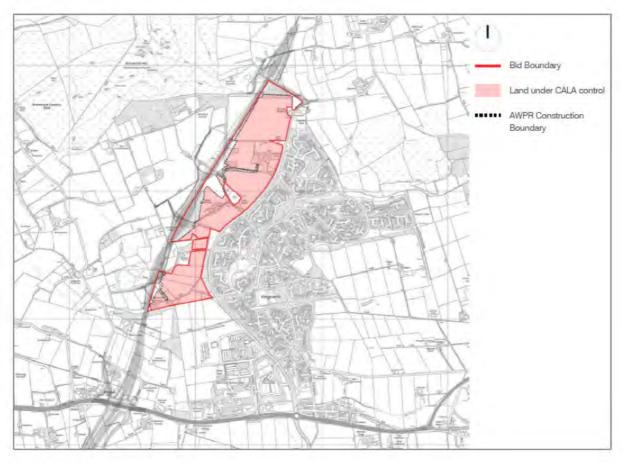


Figure 1: Site Location





The site is being promoted by CALA, an award winning five-star house builder with their heritage firmly placed in Aberdeen, having been established in 1875 as the City of Aberdeen Land Association. CALA remain focused on delivering high quality developments in the best locations over 140 years on. CALA have become one of the fastest growing housebuilders in the UK today, which is testament to the strength and ambition of the team, the quality of their homes and first-class approach to customer service. CALA have the backing of Legal & General, and working together, this enables CALA to build upon the delivery of fantastic new communities and quality family homes. CALA have a strong track record of delivering development in this area and are currently on site in seven locations across the city and shire. Table 1 below demonstrates that, once allocated, CALA quickly take forward sites for development, gaining planning approval between 1-3 years from the date of allocation. CALA are therefore committed to investing in the area, promoting sites through the local plan process and, and delivering homes and infrastructure to meet the demand in the area.

Site Name	Site First Allocated	PPiP Approval	First Phase Approval	First Unit Completed	Site Completed
Oldfold, Aberdeen (OP48)	2012	2015	2015	2016	Ongoing
Friarsfield, Aberdeen (OP41)	2012	2012	2012	2013	Ongoing
Grandhome, Aberdeen	2012	2015	2017	2018	Ongoing
Dubford, Aberdeen (OP10)	2012	2013	2014	2015	Completed
Balgownie Road, Aberdeen	2012	N/A	2014	2015	Completed
Craibstone, Aberdeen (OP20)	2012	2017	2018	2019	Ongoing
Woodside (Persley Den), Aberdeen (OP25)	2012	2015	2018	2019	Ongoing
Conglass, Inverurie (OP1)	2012	N/A	2018	2019	Ongoing

2.0 Settlement Strategy: Housing Allowances

A separate representation on strategy and housing need has been submitted and CALA have also responded to the Proposed Strategic Development Plan on housing requirements and housing strategy. These representations will be considered by a Reporter in due course, but are also relevant to this MIR response. In summary, CALA believe that additional housing land needs to be allocated to meet identified shortfalls. We have identified a shortfall in housing of around 250 homes per year to account for the cumulative under delivery of Housing Land Audit predictions, and at least 682 homes to account for the over calculation of available brownfield land.

CALA also believe that additional housing sites need to be identified to ensure that the planning authority are confident that a range of sites can be brought forward within the plan period as required by Scottish Planning Policy (SPP).





In response to Question 1 of the MIR, CALA believe that site B0309 at Derbeth should be allocated to meet this shortfall, and specifically meet the housing needs of Kingswells. Sections 3 and 4 below provides justification as to the suitability of the site.

3. Site B0309: Site Appraisal

3.1 MIR Question 1: "Are there any other sites that would be suitable for housing?"

CALA Homes (North) Ltd. disagree with the preferred housing sites identified in the Main Issues Report, and suggest that bid site B0309 at Derbeth should be allocated for housing and mixed use development. CALA do not believe that sufficient land has been allocated to meet the housing requirement as identified in the Proposed Strategic Development Plan.

This response considers the benefits of the site at Derbeth and outlines why this site should be allocated.

3.2 Development Options Assessment Report – Site B0309

The site assessment process undertaken by Officers comprised an assessment of sites against a sustainability checklist, and used the outcomes of the strategic environmental assessment to inform the decision on whether a site was suitable. These assessments are contained within appendix 3 of the MIR. Site B0309 has been assessed and identified as 'undesirable', with a checklist score of 47 out of 63, with key constraints being green belt, landscape and primary school capacity. CALA strongly disagree with the sites' identification as 'undesirable' and suggest that the site assessment, as included within appendix 3 of the Main Issues Report, is overly negative and does not take account of information provided within the supporting masterplan document submitted with the bid.

A detailed review of the site assessments is included at Appendix 1 of this report, and a detailed analysis of these issues is considered below.

3.3 Green Belt

The site is within the existing green belt designation. The purpose of green belt is to direct development the most appropriate locations, protect and enhance the character, landscape setting, and identity of the settlement, and protect and provide access to open space (paragraph 49 of Scottish Planning Policy). The Aberdeen green belt wraps around the city and extends to its boundary with Aberdeenshire Council. A green belt review has not been undertaken for either of the previous two Local Development Plan review processes, but instead land was released where considered appropriate through a review of proposed development sites. This is in line with paragraph 50 of SPP which states that in identifying the most sustainable locations for longer-term development, planning authorities should review the boundaries of the greenbelt where necessary.





'Appropriate Location'

The land at Derbeth no longer serves the purposes of the green belt, and should be released to allow the sustainable expansion of Kingswells, securing the future of the village. The planning officer's justification suggests that the green belt status has been considered appropriate by the 2017 LDP Examination Report. This may have been the case at that time, however due to the creation and opening of the AWPR and the establishment and growth of Prime Four circumstances have changed, and this should not be applied to the current proposal. We would note that whilst the Examination Report did consider the green belt status appropriate, it also noted that there was very little scope to allocate additional greenfield land given the housing land requirement had been met. There is now a need for additional housing to meet the requirements of the Proposed Strategic Development Plan, and Derbeth provides a fantastic opportunity to deliver a new sustainable expansion of Kingswells.

The site is clearly appropriate, being located just to the north of the Prime Four business park which has substantial employment opportunities, and located close to the village centre at Kingswells. The Reporter acknowledged this fact in the 2017 Examination Report noting that: "the success of the Prime Four business park strengthens the case for further housing development in Kingswells" (page 94).

'Character, Landscape Setting and Identity' of Kingswells

The site is located within area 15 of the SNH's Landscape Character Assessment for Aberdeen (SNH, 1996). This document notes that the urban settlement of Kingswells dominates the character area, and that the settlement has an abrupt urban edge in places. Since this character assessment was carried out, both the Prime Four business park and the AWPR have been constructed which have had significant impact on the land use and character of the area.

Kingswells is visually separated from the City of Aberdeen, as the land rises to the east of the settlement. Land at Derbeth slopes down to the east towards Kingswells and is related to the village. The AWPR now provides a strong visual boundary to the west of the settlement, a fact recognised by the 2017 Examination Report. Whilst the C89C road is currently an obvious western boundary, this road would be integrated into the village through this proposal.

Kingswells has been incrementally expanding to the north and south and this linear focus takes development further from the village centre. The proposed development at Derbeth would strengthen the identity of Kingswells. The landscape setting, character and identity of Kingswells would therefore be retained if this site was developed.

'Access to Open Space'

Access to open space would be enhanced through this proposal, see indicative landscape proposal below (figure 2). The open space strategy has been designed in line with Aberdeen City Council's Open Space Guidance. Existing woodland assets would be augmented with additional tree planting. Page 44 of the supporting masterplan document provides more detail in relation to the landscaping strategy.





There is an aspirational core path (AP7) through the site, which connects to Brimmond Hill Country Park. This path could be formalised through this development (as shown by figure 2). With this path connection, all proposed houses would be within 1500m of Brimmond Hill Country Park.



Figure 2: Landscape Concept, showing core path link in purple hatched line.

The site is therefore clearly not required to meet the functions of the green belt, and as a sustainable location for long term development, should be released from the green belt, as shown by figure 3 below.





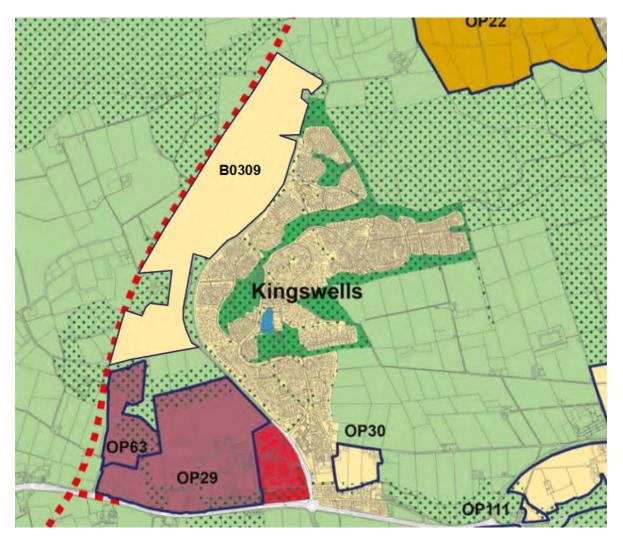


Figure 3: Extract from Aberdeen Local Development Plan 2017 with site B0309 removed from the green belt and shown as an allocation.

3.4 Landscape

Ian White Associates (IWA) Landscape Architects have been advising CALA throughout the design concept stage. IWA have carried out a landscape and visual appraisal of the site which is contained within the masterplan bid document from pages 19-31. The landscape character is one of undulating agricultural fields, subdivided by stone walls, woodland and farm buildings. However, Prime Four to the south of the site and the AWPR to the west of the site have changed the landscape character and detached the site from the green belt and green network to the west, northwest and south of the site. The site's visibility varies depending on the location within the site, but the proposal aims to mitigate any negative impact through retention of woodland, introduction of new specimen tree planting and woodland planting, and a spine of street trees running centrally through the development (see figure 4 below).

The site is well connected to Kingswells and would continue to contribute to the setting of Kingswells as a high-quality urban extension. Whilst there are two connections remaining to the west via the new overbridges, fundamentally, Derbeth is now disconnected from the landscape to the west.







Figure 4: Landscape Proposal

3.5 Core Paths

Connectivity has been at the heart of the design concept. The retention and formulation of core path AP7 is a key link that is of benefit to not only the proposed development but existing residents of Kingswells. Key to achieving this is changing the character and role of the C89C between the proposed site and the existing village.





The paths from the site would ultimately connect to core path 91 which is a high-quality active travel route into Aberdeen City. The Bucksburn and Kingswells Valley paths and the Newhills Church path have recently been upgraded and a recently completed new path from Kingswells to the Urban Village Hotel at Prime Four provides access to the facilities here.

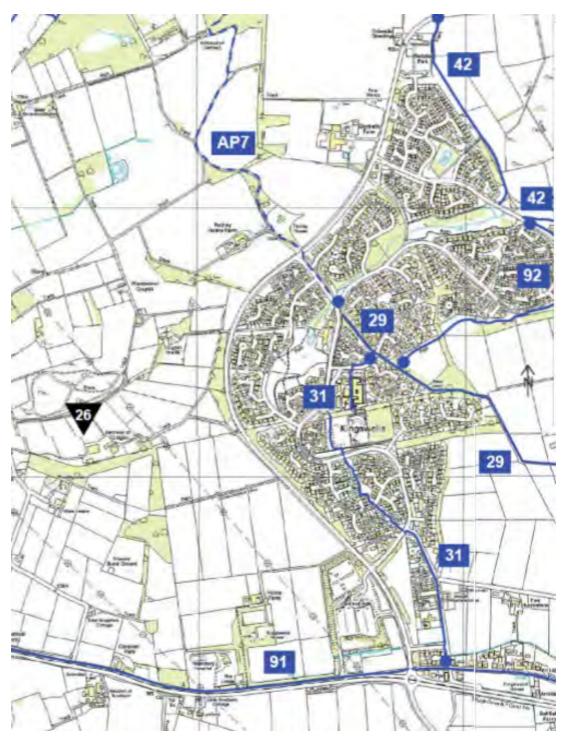


Figure 5: Extract from Aberdeen City Council's Core Path Plan





3.6 Education

An Education Impact Analysis has been carried out to identify viable solutions for Early Learning and Childcare (ELC) provision, primary provision and secondary provision (this report has been resubmitted with this response). This analysis has identified that given the constraints on the existing site at Kingswells Primary School, an additional primary school would be required. The supporting masterplan document identifies a location for a new primary school in the centre of the site.

The site is within the zone for the new Countesswells Academy, but in the interim is within the Bucksburn Academy catchment area. It is anticipated that a new Academy at Countesswells would be in place to serve the development.

It is also understood that Aberdeen City Council will be undertaking a review of the school estate strategy during 2019, the recommendations of which are due to be presented to Committee in September 2019.

There are therefore options to delivering the education provision to serve Derbeth. As Aberdeen City Council review their school estate, it may be that additional options come to light. The detailed education solution would be identified at detailed planning stage, but it is important to note that given the scale of the development proposed here, the site can support the provision of new education infrastructure

3.7 Built Heritage

The site has minimal impact on built and vernacular heritage. There are two listed buildings within the site; Fairley House (C) and Cloghill House (B), as shown in figure 6 below. Cloghill also has separate listings for the sundial (B) and office (C). The setting of these buildings would be retained, as shown by the indicative layout on page 42 of the supporting masterplan document.







Figure 6: Listed Buildings within the site

3.8 Benefits to the existing community

There have been a number of smaller development sites built in Kingswells over the last two plan periods, and this proposal offers the opportunity for a longer-term expansion, securing future growth and investment in Kingswells. The site would deliver 25% affordable housing (around 175 affordable homes), and without mainstream housing delivering affordable housing it is unclear how this would be provided for in Kingswells.

The opportunity to integrate the C89C into the village, and improve connectivity to the west for the existing residents is of clear benefit. The proposal includes a clear street hierarchy to create a strong sense of place, aid movement and promote safety.

The development would support existing services and facilities in Kingswells, and would provide additional facilitates such as a farm shop.

3.9 Housing Need

There is only one site allocated in Kingswells in the current plan. Site OP30 (West Huxterstone) was allocated in the 2017 LDP for 150 units. 100 units have been completed on the site to date, with 54 remaining to be built out. It is scheduled to be completed by 2021.





2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026+
18	48	21	20	20	14	0	0	0	0	0

Figure 7: Extract from Draft Housing Land Audit 2019

Therefore, if no additional allocations are made in this LDP review, there will potentially be no development in Kingswells until 2027, given that is when the next LDP review will take place.

Kingswells Market

Kingswells is a suburb of Aberdeen which consists of approximately 2000 homes, and has a population of 5000. Kingswells is an affluent area, with a higher than average income, and almost 80% of the housing stock is owned. The majority of the residents have lived in the settlement for over 11 years, and there is a fairly low turnover of housing stock.

The average house price in Kingswells is £282,938, which is £42,000 above the local authority average (Experian 2017). If additional houses are not allocated, the house prices are likely to rise even further, making Kingswells more unaffordable. The settlement has less than 10% social housing, and the proposed development would provide 25% affordable housing, making a significant contribution to the number of low-cost homes available in the area. This would mean that there is significantly more housing available to those on lower incomes, and would enable younger people to remain in Kingswells.

3.10 Proposed Strategic Development Plan

CALA have made representations to the Proposed Strategic Development Plan (PSDP) in relation to vision, strategy, and housing requirement. The Proposed SDP will be examined by an independent reporter in due course and so is subject to change. CALA suggest that the MIR should ensure that it meets the requirements of the SPD and allocates sufficient housing land rather than using the PSDP to justify the failure to allocate sufficient land.

Reliance on brownfield land has been discussed at length in a separate response on housing land supply. That response notes that over reliance has been placed on brownfield land, and realistic approach needs to be taken which will require the identification of additional housing land.

CALA are of the opinion that the Proposed SDP is incorrect in its position that only small-scale allocations are required, and a separate case has been made to the SDP on this basis. Kingswells has had incremental development which has brought housing but little else to the village. A visionary development that seeks to improve the village setting should be considered positively.





4. Conclusion

There are no more suitable sites than this to meet future housing needs for Kingswells, and meet the housing requirements of the PSDP. The site is highly sustainable, there is a large high-quality business park to the south of the site, a park and ride, and good core path access into the city. The site also offers the potential for an improved bus service. The site is well related to the existing village, and integrating the C89C would give the village a better sense of place and identity.

To date, small scale allocations have been 'added onto' Kingswells extending the village on a north-south basis and taking development further from the village centre. This proposal seeks to consolidate the settlement, and ensure the village has a heart. The integration of the C89C would be highly beneficial for the existing village, and improve access to the west and Brimmond Hill Country Park. The realignment of the C89C would be similar to that carried out at Countesswells where the former distributor road has become part of the new neighbourhood. The development of Derbeth would support existing services and facilities in Kingswells and would deliver 175 affordable homes, as well as market housing to meet local demand. Kingswells remains a very popular place to live, and will become unaffordable if additional housing is not allocated.

The site is imminently deliverable, and there are no serious infrastructure constraints to overcome. CALA have a track record in delivering high quality developments, promoting sites from green fields to desirable communities, and this site would be no different. CALA homes are currently on site in eight locations across Aberdeen city and shire. Once sites are allocated, CALA have delivered these sites quickly and effectively, creating popular housing locations that provide both high quality housing and a high amenity development. Derbeth provides an excellent opportunity to be a well thought out development integrated with the local community and providing enhanced facilities for the wider area of Kingswells.





APPENDIX 1

Development Options Assessment Report on the Pre-Main Issues Submissions 2018 (Appendix 3 to the Main Issues Report)

The site assessment process undertaken by Officers comprised an assessment of sites against a sustainability checklist and used the outcomes of the strategic environmental assessment to inform the decision on whether a site was suitable. Site B0309 has been assessed and identified as 'undesirable'. The tables below provide a review of the officer's assessment, and reconsider the site scoring of the site at Derbeth. The table includes the score given by Officers, and an 'Updated Score' reflecting the additional justification provided in the table.

The following tables are included below:

Table 1 - Review of 'Justification'

Table 2 - Sustainability Checklist Review Assessment

Table 3 - Strategic Environmental Assessment Review

Site B0309 'Justification'

Officer's 'Justification'	CALA Response
Derbeth has been considered during the 2012 and 2017 LDP Examination during which the reporter concluded that the green belt status of the site is appropriate, the site occupies rising ground between Kingswells and the AWPR. The C89C forms a strong green belt boundary.	The site is currently located in the green belt; however, we would suggest that this designation is no longer appropriate for this area. Greenbelt is not sacrosanct, and as no green belt review has been undertaken or is proposed, we would suggest that the LDP review provides an opportunity to review the green belt boundary. The construction of the AWPR bypass means that the green belt needs to be altered to redirect development to the most suitable locations.
	The C89C provided a strong boundary at the time of the previous examination, however, since this was last reviewed, the AWPR has been constructed and the nature of this area has significantly changed. The AWPR is a strong defined boundary to the west of the site. The nature of the C89C road has significantly changed, and the proposed development at Derbeth would help cement the change of the C89C to a safe, central thoroughfare for Kingswells.
	This site currently has little amenity value to the wider public and its development would in fact increase the available green space and create parks and links to Brimmond Hill.
	Green belt is considered in more detail in Section 3.3 below.
The rising agricultural land to the west (Derbeth) makes a clear contribution to the landscape setting of Kingswells.	Ian White Associates Landscape Architects have been advising CALA on the landscape impact of the proposed





development. A detailed landscape and visual appraisal is contained within the supporting masterplan document from pages 19-31.

The land rises to the west and is abruptly dissected by the cutting for the Aberdeen Western Peripheral Route (AWPR). The character of the area has also been altered by the development of the Prime Four business park to the south of the site. Therefore, whilst the land is of an agricultural nature, its setting is one of an urban character.

The potential visual impact of development will range from minimal / negligible particularly to the northern end of the site; to moderately visible from the middle area; to very visible from the south looking toward the southern end of the site that is very open in form with a woodland backdrop. Substantial woodland planting is proposed to mitigate against any landscape impact.

The landscape impact of the development is discussed in section 3.4 below.

There is no primary school capacity at Kingswells.

An independent Education Impact Analysis has been carried out in support of the development bid. The findings of this report are that given the capacity and site constraints of the existing Kingswells Primary School, a new primary school would be required. It should be noted that a new school would be required to serve any new development in Kingswells given the capacity issues faced by the existing primary school.

The Derbeth site is of a scale which can support and deliver a new school to the long-term benefit of Kingswells, and a site has been identified within the masterplan.

The site is within the Countesswells Academy zone, although the interim zoning is to Bucksburn Academy.

"The Proposed Strategic Development Plan asks the Local Development Plan to allocate a limited amount of housing land. These allocations should take place on brownfield sites and utilise the current "constrained" supply in the first instance Reducing travel distances and making walking, cycling and public transport more attractive to people will be important considerations, particularly for any new greenfield development sites that are proposed. In addition allocations

CALA have made representations to the Proposed SDP against these suggestions. The Proposed SDP will be examined by an independent reporter. The Proposed SDP states that new allocations should **consider** opportunities to reuse brownfield land and attempt to utilise the constrained supply. However, it notes that **some new development will need to take place on greenfield sites** (Paragraph 4.18).





should be small scale in nature, and should not be extensions to any existing, strategic, development sites that have been subject to a master planning exercise. Because of this, the allocation of this site is likely to be contrary to the

Proposed Strategic Development Plan."

It is unreasonable to suggest that the proposed site is therefore likely to be contrary to the Proposed SDP.

CALA are of the opinion that the Proposed SDP is incorrect in its position that only small scale allocations are required, and a separate case has been made to the SDP on this basis. A separate response on housing strategy has also been submitted to the MIR.

Table1: Review of Site Assessment 'Justification'

'Sustainability Checklist' Site B0309

Cuitania	Off:	Handake d	CALA Paragraph	
Criteria	Officers Score	Updated Score	CALA Response	
Exposure	2	3	Suggestion that the northern half of the site is more exposed to winds due to topography. The site is south-east facing and is well enclosed by woodland. Additional woodland planting is proposed which would create additional shelter. See Section 3.3 and 3.4.	
Aspect	3	3	The site is south east facing.	
Slope	2	2	Suggestion that there is a gentle slope running NE to SW with some steeper sections to the north. Page 32 of the supporting masterplan document	
			outlines that the topography of the site varies between 1%-10% (with some pockets of steeper ground.)	
Flood Risk	3	3	SEPA maps indicate no flooding on the site.	
Drainage	3	3	The site is well drained.	
Built/Cultural Elements	2	3	There are two listed buildings within the site. These buildings, and their setting would be retained.	
			There will be no loss or disturbance to archaeological sites or vernacular buildings and hence the site scoring is not justified.	
Natural Conservation	2	3	There are records of bats and other designated species in the area, and due regard to be given to the green space network policy.	
			A full protected species survey would be carried out at planning stage. Habitat enhancement and mitigation	





			would be identified and a landscape plan would fully consider green space network. There would be no loss or disturbance of wildlife habitat or species. CALA have a proven track record of enhancing the environment and working within areas which have a high ecological value.
Landscape Features	2	3	There are mature trees and stone walls, pockets of woodland, and landscaped areas within the site. The AWPR provides a definitive boundary to the west. The proposed development would retain existing woodland and stone walls where possible. Additional green spaces are proposed around existing woodland. There would be no loss or disturbance to landscape features. Page 38 of the supporting masterplan bid demonstrates the landscaping proposals. See Sections 3.3 and 3.4.
Landscape Fit	2	2	Suggestion that there are views from the C89C road, although parts of the site are obscured by trees and topography. The impact of the development on the landscape is not considered to be obtrusive. Pages 19-31 of the supporting masterplan document consider landscape and visual impact in more detail.
Relationship to existing settlement	1	3	Suggestion that the site is segregated from Kingswells due to barrier of C89C. The supporting masterplan document outlines the design approach to integrate the C89C into the development and change its nature from a distributor road to having a function of creating a sense of place. Reduced speeds on the C98C would enable safe crossing points. The proposed development would result in a more integrated settlement. The site is related to Kingswells as the land slopes to the east towards the settlement. The southern half of the site is all within 800 metres of Kingswells centre. The northern part of the site is up to 1.4 km from the centre, but this is no further than the existing development within Kingswells.
Land Use Mix / Balance / Service Thresholds	2	2/3	The development would consolidate Kingswells and provide some mix of uses. There is not a need for more employment land in Kingswells as there are future phases to come forward at Prime Four.





Accessibility	1	2	Suggestion that there are no bus routes within 400-
		-	800m of the site. Kingswells is currently served by an infrequent and subsidised bus service. The additional development proposed would result in an increased population which would enable an improved bus service. The bus service could loop through the site. The site is also within close proximity to the Kingswells Park and Ride (the southern part of the site being within 800m).
Proximity to facilities / shopping / health / recreation	1	2/3	Suggestion that local facilities are just over 800m from the centre of site. The majority of the site would be within 800m of Kingswells Village Centre. Additional services and a primary school are proposed within the site.
Direct footpath / cycle connection to community and recreation facilities and resources	3	3	The site has good existing provision. Core path 33 is just to the north of the site, and aspiration core path AP7 is within the site. The proposal would also enhance provision.
Proximity of employment opportunities	3	3	Prime Four offers a range of employment opportunities within 1.6km of the site.
Contamination	3	3	No known contamination.
Land Use Conflict	2	3	The AWPR to the west of the site is considered to cause potential conflict. The AWPR is to the west of the site but it is within a significant cutting, and a substantial landscape buffer is proposed to the west of the site so no conflict would arise. Figure 2 shows the proposed landscaping to the west of the site.





Physical Infrastructural Capacity	3	3	There is infrastructure capacity.
Physical Infrastructure Future	3	3	There is broadband on site. Low carbon elements will be incorporated through housing design. The scale of development is unlikely to be suitable for district heating.
Service Infrastructure Capacity	2	2	There are capacity issues at Kingswells Primary School, and a new Primary School is proposed within the site. In relation to academy provision, Countesswells Academy is expected to be built before 2025.
Other Constraints	2	2	Green Space Network runs through the site. GSN is not an absolute constraint. Additional green networks are proposed within the site which would mitigate against the loss of any GSN.
Score	47	56-58	

Table 2: Review of Sustainability Checklist Assessment

Strategic Environmental Assessment Site B0309

SEA Topic	Objective	B0910 'Site score'	CALA Response (including suggested score post mitigation)
	Direct impact on water environment	0	Agree that the scoring is neutral (0)
WATER	Public foul sewer	0	Agree that the scoring is neutral (0)
	Public/Private water supplies affected	0	Agree that the effect would be neutral (0)
BIODIVERSTY FLORA AND FAUNA	Biodiversity, flora and fauna	-	There are records of bats and other designated species in the area, and due regard to be given to the green space network policy. A full protected species survey would be carried out at planning stage. Habitat enhancement and mitigation would be identified at planning stage, and a landscape plan would fully consider green space network. Suggest site scoring should be neutral (0)





CLIMATE CHANGE	Carbon Emissions Impact	0	The assessment suggests that residential development would lead to an increase in energy use and consumption. This would be the case for any development. The site is of a scale for which additional services, and additional bus routes could be provided. Agree that the scoring is neutral (0)
AIR QUALITY	Air Quality Managed Area (AQMA)	0	Sustainable transport methods will be promoted within the site. Agree site scoring would be neutral (0)
	Education	0	Mitigation for education provision in the form of contributions towards a new primary school and towards Countesswells Academy. Agree site scoring would be neutral (0)
SERVICE INFRASTRUCTURE	Open Space	-	Development of the site will result in a change to the green space network, but the network of green spaces will be retained. Significant open space is proposed. Suggest site scoring should be positive (+)
SERVICE	Core Paths		The masterplan document shows the exiting core path (AP7) would be retained and enhanced. Suggest site scoring should be positive (+)
	Green network	+	Integrated green networks are proposed. Agree site scoring would be positive (+).
SOILS	Greenfield / brownfield	-	Greenfield site but short-term impact during construction. The effect is therefore temporary and score should be neutral (0)
DELIVERABILITY / SUSTAINABILITY	Delivered within LDP, Servicing Constraints	+	The site would deliver material assets in the form of homes and infrastructure. There are no servicing constraints. Agree site scoring would be positive (+)
DELIVEF	Site Aspect	0	The site is south east facing and woodland provides shelter. Suggest the site scoring should be positive (+)





	Vehicular Access	0	New access would need to be delivered. The site has the
	Access		opportunity to improve the C89C for local connectivity.
			Suggest the site scoring should be positive (+)
	Facilities		The lower parts of the site are within 800m of the village centre. The site is significantly closer to the village centre than recent developments in Kingswells. Additional development is more likely to enable facilities in this area including public transport.
			Suggest the site scoring should be positive (+)
LANDSCAPE	Landscape capacity		A masterplan has ensured the landscape framework remains at the heart of the proposed development. The woodland would be retained and the landscape has capacity for the development. The AWPR provides a defensible boundary to the west.
			Suggest that the site scoring should be neutral / positive (0/+)
ASSETS	Impact on waste management site?	++	Agree the site scoring would positive (++)
MATERIAL ASSETS	Compliance with waste locational criteria	0	The development would provide adequate provision for recycling. Suggest the site scoring would be positive (+)
CULTURAL HERITAGE	Effect on archaeological sites, scheduled monuments, listed buildings and	0	Cloghill House, its office and sundial are listed, and Fairley house is C listed within the site. The setting of these buildings would not be affected. There are some artefacts identified on the sites and monuments records, none of these will be lost or disturbed
CULTL	conservation areas		Agree the site score would be neutral (0)
POPULATION	Promote economic growth, social inclusion	+	Agree the site score would be positive (+)

Table 3: Review of Strategic Environmental Assessment





"The vision for Derbeth is to create a fully considered and integrated extension to Kingswells, which shares its identity and enhances connectivity to the wider area and local community"



VISION

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Purpose of Document

The purpose of this document is to support the Local Development Plan bid submission for Land at Derbeth, which has been prepared on behalf of CALA Homes (North) Limited by Halliday Fraser Munro Architects and Planning Consultants, with support from Fairhurst Engineers and Ian White Associates Landscape Architects.

The site at Derbeth offers an excellent opportunity to provide a considered, high quality extension to the existing settlement of Kingswells. This document will demonstrate that the land at Derbeth is ideally placed to deliver the following key benefits:

- Improve connectivity between Kingswells and the wider area
- Integrate proposed public open space with existing green spaces in Kingswells
- Deliver approximately 700 much needed private and affordable homes
- Accommodate a mix of uses to support a sustainable community
- Slow traffic on C89 and improve pedestrian links to the wider area
- Provide a welcoming approach and entrance to Kingswells
- Additional population to support local services

Project Team

The site is being promoted by CALA, who are a premium house builder with its heritage firmly placed in Aberdeen, having been established in 1875 as the City of Aberdeen Land Association. 140 years on CALA are focused on delivering high quality developments in the best locations. The principle focus being sourcing the best land opportunities and optimising value through high quality design and sought after living environments.

In March 2018, it was announced that L&G increased its shareholding in the CALA business to 100%, acquiring the 52.1% which it did not previously own. This marks an exciting new chapter for CALA, ensuring both consistency and stability of their operations through the continued backing of L&G; one of the most highly-respected, blue-chip investors in the UK, who share CALA's long-term vision for the business. This strong backing builds upon and allows the delivery of fantastic new communities and quality family homes ensuring proposals are viable, deliverable and will be acted upon.

CALA have commissioned the following multi-disciplinary team to carry out in depth investigations for this bid proposal:

Architect / Planning Consultant:: Halliday Fraser Munro

HALLIDAY FRASER MUNRO

Landscape Architect: Ian White Associates



Civil / Structural Engineer: Fairhurst



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SITE DESCRIPTION

Location

The site covers approximately 154 acres and is located on the western edge of Kingswells, about 4 miles from Aberdeen City Centre. It falls within the Kingswells Community Council catchment area.

Site Description

The site is located between the C89 and the Aberdeen Western Peripheral Route (AWPR, due to open in 2018), forming its east and west boundaries respectively. To the north, the site is bound by the road access to the AWPR underpass from the newly constructed roundabout on the C89. A field boundary marks the southern boundary, before it meets agricultural land north of Prime Four Business Park.

The west boundary of the site has been carved out by the construction works associated with the AWPR (indicated with a black dashed line on the adjacent diagram) however, it is expected that this land will revert back to the former landowner after completion of the AWPR.

The aerial on page 6 highlights key features of the existing site.





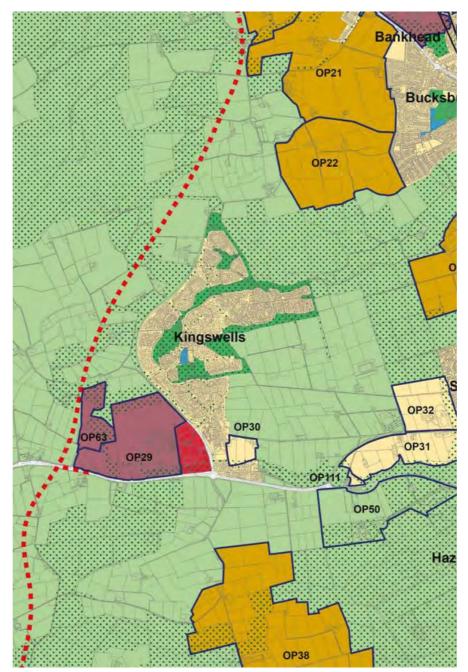
Local Development Plan and Strategic Development Plan Context

Aberdeen's Development Plan, comprising both the Local Development Plan (LDP) and Strategic Development Plan (SDP), is in the process of a full review. The LDP is at the call for sites stage. This stage not only aims to identify new potential development sites but also responses to some strategic questions on how the Council can improve housing delivery and quality of life.

The SDP is the City and Shire's high level strategic land-use document. It is seeking responses through the current consultation process on the future shape of the regional strategy and how that affects the allocation of land and policies taken forward by LDPs. In reviewing development strategies and potential development sites it is the future land use strategy that is more important that that set out in the soon to be replaced LDP and SDP.

LDP - Current and Future

The 2017 LDP allocates this site as a combination of Green Belt with some smaller areas of Green Space Network. This part of Aberdeen, however, is also an area of significant landscape change as a result of the AWPR and its construction requirements. The existing landscape, topographically and in its nature, has altered considerably since the last LDP review as will the nature and operation of the road network around Kingswells. The C89 has now altered from the main north-south connection between the A96 and A944 to a local distributor road. This proposal has reviewed the existing retained landscape features and new context in detail, the proposed landscape treatment post the AWPR on the land made available for the new road and historic east west GSN links. Given the significant changes locally the Council should no longer rely on historic zonings and should consider these anew.



Extract from LDP 2017

GSN does not rule out development but requires that it considers the character and function of the GSN in that area. This bid has carried out that review and considers that development can help maintain and enhance the function and character of the GSN.

Areas of green belt around Aberdeen have historically been identified as strategic reserve land, and considered as areas of search for new development. The zoning of these areas has changed over the years from green belt to other development related zoning to reflect the need for housing growth to support Aberdeen's economic growth. Examples of recent LDP reviews of land released from Green Belt zonings to allow for new housing are Countesswells (3,000 homes and 10Ha of employment land) and Oldfold, Milltimber (550 homes and 5Ha of employment land).

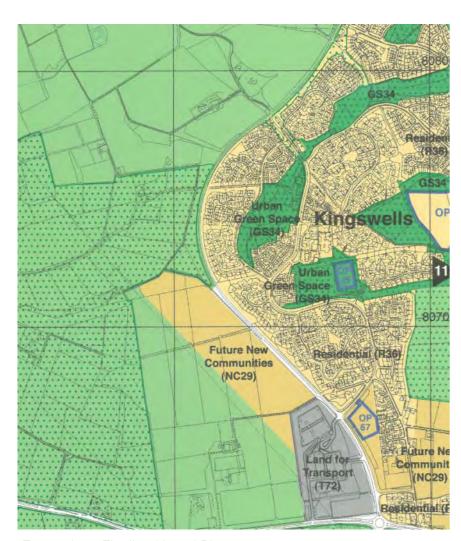
It should be noted that all greenfield land outside of the built-up area of the City will be Green Belt or a combination of that and Green Space Network. Green Belt and Green Space Network land will have to be rezoned in order to allocate enough development land to meet future housing needs.

Reviewing past LDPs has also shown that this part of the City was not always considered as GSN and that housing to the west of the C89 road was once considered as reasonable option.

The 2004 Finalised plan, written by officers, ratified by the Planning Authority and used as a key material consideration in planning decisions prior to the 2008 plan, identified land to the west of the C89 as Future New Communities (FNC) even before the AWPR was a committed piece of infrastructure or the full extent of its contextual impact was known (see plan below). That proposed plan clearly indicates that the officer's and Councillors' view was that development west of Kingswells was appropriate. The key constraint to how far west and north the FNC could extend at that time was the indicative

AWPR route. That route, however, has shifted westwards since 2004 with new development west of Kingswells now a real option.

The 2004 Finalised plan recognised the benefits in extending and consolidating an existing settlement and transport corridor compared to standalone greenfield development.



Extract from Finalised Local Plan 2004

The analysis behind this current bid has:

- * Reviewed the green space links and landscape nature of the site:
- Made the most of the remaining but limited green links crossing the AWPR east to west;
- * Retained the most appropriate green elements of the site; and
- * Incorporated links west to east from this site and into Kingswells to provide an integrated green space network approach that reflects the site's altered circumstances.

This creates a new development area that expands Kingswells westwards in a coordinated manner and avoids future coalescence to the east. Coalescence has been a concern of the Kingswells Community for some time. Previous iterations of draft and finalised local plans have considered eastern extensions to the village but have ruled these out at least partially for that reason.

Kingswells has already established itself west of the C89 (at Prime Four Business Park). With the AWPR proving a definitive boundary in this part of the City, westwards expansion is the best approach in terms of locating development close to existing jobs and services but also when considered against planning criteria.

Changing Context

The key contributor to the changing context at Kingswells is the AWPR. It effectively redraws the settlement boundary of Kingswells to the west and creates a physical and visual boundary to development. The AWPR embankments and cuttings tend to hide

the road itself but the limited crossing points help to create a distinct western boundary to this site. Kingswells sits to the east as one of Aberdeen's key residential suburbs with Prime Four business park and the Park & Ride to the south. The development of this site for residential use can therefore:

- Be considered as an integrated extension to an existing settlement;
- Support or complement the existing services in that area for wider community benefit;
- * Take advantage of its location close to Aberdeen's major high quality business park at Prime Four. This not only provides the opportunity for employment locally (Prime Four has been estimated to accommodate around 8,000 jobs when fully built out) but also recreational and leisure opportunities in the Fourcourt, the hotel, restaurant, sports and health spa and the Northern Park.
- * Offer a sustainable community where residents can walk or cycle to work or services locally.
- Help alter the current character of the C89 road from a fast bypass to an integrated access road through an expanded Kingswells.

The SDP MIR predicts a growth scenario for the City Region. That requires additional land for development if the City is to accommodate future housing growth. These sites will need to include new greenfield sites that not only provide a quality of life that the City and its population aspire to but also consider, in a thorough and pragmatic manner, site sensitivities and design issues. This site in particular can provide a well-designed and thought out extension to an existing community.

LDP Policies

A key policy to consider is the Green Belt policy (current policy NE2 in the 2017 LDP). It sets out that the aim of the Green Belt is to maintain the distinct identity of Aberdeen and the communities within and around the City. It sets out to safeguard the Green Belt to help avoid coalescence and sprawling development on the edge of the city, maintain Aberdeen's landscape setting and provide access to open space. The four questions raised in respect of Green Belt purpose are:

Does the development detract from the distinct identify of Aberdeen?

This area of Aberdeen has changed considerably over recent years. The AWPR, Prime Four and to some extent the planning consent for a new football stadium have altered the character of this area significantly. In reviewing the landscape character the Landscape Architects have identified that this area has changed from a rural character over 20 years ago to an urban character today.

Development of these sites is therefore simply an extension of an existing established settlement, has distinct boundaries, and should be considered as an extension of the agreed strategy for development in this part of Aberdeen.

Does it create coalescence and sprawling development at the edge of the City?

Coalescence requires that two distinct areas join as a result of development. It's quite clear that this would not be the case here. The boundary limitations of the site also make it impossible for this proposal to be considered as urban sprawl. Instead, as the approach in this bid demonstrates, the proposed development could enhance the existing settlement, remove the bypass nature of the C89 and provide an integrated and contained expansion area.

Does it undermine Aberdeen's landscape setting?

The landscape setting of Aberdeen in this locale is defined by rising topography, woodland belts and historically, arable and pasture farmland. Much of the farming land in particular has been repurposed in recent years with the development of the Prime Four Business Park, park and ride and new football stadium, alongside expanding new housing developments nearby, such as Countesswells.

The landscape setting at Derbeth would change in respect that existing farmland would become housing, however the rising topography and distinctive woodland belts would be retained and act as a strong landscape framework for the proposals to sit comfortably within. Significant areas of new mixed woodland belts proposed in parallel with the AWPR, parklands, footpaths and cycleway network connectivity within and around the site, and the public realm to the C89 frontage will be significantly enhanced with specimen trees and hedges.

The landscape setting to Aberdeen would be improved at Derbeth, in terms of expanding the diversity of habitats and visual cohesion within the wider landscape particularly from the additional woodland planting, as well as providing improved connectivity within the site.

Does it detract from providing access to open space?

As indicated the AWPR has already detached the Green belt and Green Space Network to the west of Kingswells permanently and significantly. Only two crossing points remain across the AWPR in this location. The proposed indicative masterplan makes the most of these retained crossings by linking directly with them. However, a much wider benefit that would allow increased and safer access to open spaces beyond this site, Brimmond Hill in particular, will be

achieved by the integration of open spaces and path networks with Kingswells to the east. This is central to the proposed approach. This development will therefore enhance access to open space.

Reviewing the four tests in relation to Green Belt show that the site's character has altered considerably. This suggests quite clearly that the development of this site would not undermine the role of Aberdeen's Green Belt as a whole and in fact could improve safe access to the wider countryside for existing residents.

Planning and Design

At a national level the Scottish Government are pursuing both a housing delivery and design quality agenda. On the latter they have and continue to promote the 6 essential qualities of place:

- Distinctiveness
- Welcoming
- Safe a pleasant
- Easy to move around
- Adaptable
- Resource efficient

CALA have adopted these design cues in all of their developments to ensure the delivery of quality places where people want to live. An essential part of quality of life is location and quality of the landscape that development is set within. To that end this bid offers an opportunity to continue to develop a quality and popular development area with improved integration and green links. A further advantage of the design-led approach is the opportunity to create a strong landscape framework that can help enhance the development setting, unify urban form, provide shelter, create local identity and promote biodiversity – all in line with the current LDP policy on Landscape D2.

Housing Strategy and Allocations

The joint SDP clearly identifies a housing need and allows for additional release of land across the City and Shire. Aberdeen remains the strategic centre for the City region and is the main focus for strategic growth of the economy and proposed new housing allocations. The City and Shire vision is to create and attractive, resilient, prosperous and sustainable European City Region and an excellent place to live. Choosing the best locations for new housing, in terms of proximity to services as well as setting, continues to be important. This site offers benefits on both fronts as well as being deliverable and a place where people would like to live.

The SDP Main Issues Report has set a target of 2,100 new homes every year between 2021 and 2025 and 2,200 new homes annually between 2026 and 2030. Beyond 2030 a further growth scenario is anticipated.

Table 6 of the SDP MIR is set out below.

Table 6: Proposed Allowances	
(land to be identified beyond the 2016 effective supply)	

(terra to be recruired be) one and 2010 encount capping					
	2016 to 2030	2031 to 2035	2036 to 2040	Total	
Aberdeen Housing Market Area	4,200	5,700	6,300	16,200	
Rural Housing Market Area	1,300	1,700	2,500	5,500	
Total	5,500	7,400	8,800	21,700	

Split as follows:

Aberdeen City Council	3,500	4,700	4,800	13,000
Aberdeenshire Council	2,000	2,700	4,000	8,700

Extract from 2018 SDP MIR - Table 6 - Proposed Allowances (Housing)

Based on anticipated housing delivery rates, using the Housing Land Audit 2016 as the base information, the Council's proposed housing allowance is for 13,000 new homes in the City over the next 22 years. This assumes that the delivery rate for new homes from existing allocations in the City will increase. Historical data analysis suggests that housing delivery rates have been significantly less than projected and required by the SDP. Further analysis has shown that the larger land allocations have taken much longer to deliver than was originally anticipated. If that remains the case then housing delivery will continue to fall short of housing need and alternative sites in locations where people want to live should be allocated.

Local Development Plans in 2012 and 2017 have allocated and continued to allocate large and complex sites. Their complexity has resulted in delays in the delivery of these sites. Two of the largest sites in the City (Grandhome and Countesswells) have required Government intervention to enable their delivery and although they are now underway the delay has created a backlog of housing need and demand that has remained unmet.

Although not at the same scale as the City's large existing housing allocations, when preparing this bid CALA have considered deliverability in detail, supported in that analysis by a professional team. This site, as a result of that in-depth review, is considered eminently deliverable.

The table over has reviewed the initial expectation of the major development sites allocated within the City against actual housing delivery over a 10 year period (source: Housing Land Audits). The emerging picture is that these sites are clearly taking longer to develop than anticipated. Infrastructure delivery has been a key element in that delay. The analysis shows that of the 11,150 houses

expected from these sites just over 2,000 have been delivered and in 2017 only just over 10% of the expected homes from these allocations have been completed.

Aberdeen City and Shire Councils have recognised this delay to some extent but the backlog remains. The recent SDP MIR papers suggest that the City and Shire have delivered 2,769 fewer homes than the SDP requirement and 3,000 homes short of the affordable housing need. In the City it's clear that the larger sites are now starting to be developed but the backlog resulting from this delay remains. Taken together with the general under-delivery across the region it is evident that more housing sites are now required to complement these larger allocated sites, fill the housing delivery gap and meet future housing need in an effective manner. Sites such as that proposed in this bid can continue to deliver as extensions to existing allocations. CALA have carried out this in depth review of Derbeth now to ensure that it can be delivered if allocated.

CALA are the first developers now developing at Grandhome and are active in developing their housing sites across the City. They focus on delivering quality development and work closely with stakeholders and agencies to ensure efficient delivery. The second table over identifies active or soon to be active CALA housing sites in the City. These sites deliver an average of 140 new homes every year and cumulatively will deliver over 1,500 new homes. This demonstrates CALA's commitment to Aberdeen and their ongoing strategy for delivering the best new homes for the City.

Planning Review Summary

This site now sits within a significantly altered landscape from previous LDP bids. The Park & Ride, the AWPR and Prime Four Business Park have all contributed to an urbanising effect of this part of the City. Prime Four has altered Kingswells from a village to the home of a global energy business hub. These also help to create a more sustainable location for new homes—close to employment, services and open spaces. This all contributes to a higher quality of life for those who will choose to make Derbeth their home.

Developing this will have wider benefits too. The character of the C89 can be altered from a fast bypass to an integrated road with far better opportunities for safe connections between Kingwells and the open space and walks to the west, particularly Brimmond Hill.

Regardless of their location all greenfield developments will require the development of land currently allocated as green belt. This site is therefore not unusual in that respect. However, to meet future housing requirements the Council should support development on sites that provide a range of benefits, are accessible, deliverable and will create places that people will want to make their home. These characteristics define Derbeth as a sustainable extension to the Kingswells.

Comparison of Major Housing Proposals in 2012 LDPs with outturn										
City	site	ref	2007-2016	Cumulative 2015	shortfall	Cumulative 2016	shortfall 2016	Cumulative 2017	shortfall 2017	
	Grandhome	OP 12	2600	0	2600	0	2600	0	2600	
	Dubford	OP 25	550	190	360	309	241	397	153	
	Stoneywood	OP 24	500	133	367	231	269	514	-14	
	Craibstone South	OP 28	750	0	750	0	750	0	750	
	Rowett South	OP30	1000	0	1000	0	1000	0	1000	
	Greenferns Landward	OP 31	750	0	750	0	750	0	750	
	Maidencraig	OP 43 & OI	750	5	745	24	726	60	690	
	Greenferns	OP 45	600	0	600	0	600	0	600	
	Countesswells	OP 58	2150	0	2150	4	2146	154	1996	
	Oldfold	OP 62	400	0	400	25	375	50	350	
	Loirston	OP 77	1100	0	1100	0	1100	0	1100	
	TOTALS		11150	328	10822	593	10229	1175	9054	
			percentage delivered	2.9%		5.3%		10.5%		

Major Housing Allocations vs Delivery - Aberdeen City

Ref	Site	Total Capacity (homes)	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025+
OP41	Friarsfield	200	29	25	26	25	25	25	25	Complete			
OP10	Dubford	76	27	26	23	Complete							
OP12	Balgownie Road	41	-	-	6	28	7	Complete					
OP20	Craibstone South A	700	-	-	-	-	35	40	40	40	40	40	465
OP48	Oldfold	550	-	25	25	25	35	35	35	35	35	30	270
		1,567											

Active CALA development sites - Aberdeen City

Wider Connectivity

Derbeth is ideally placed within an established network of employment centres, green space and infrastructure.

Aberdeen International Airport

Upon completion of the AWPR, the site will benefit from a direct link to the airport terminals (3 miles away) via the interchange at Craibstone, just south of Dyce.

Kingswells Park and Ride

The site is only a few minutes drive away from a strategic public transportation hub in the form of the Kingswells park and ride facility, to the east of Prime Four Business Park.

Employment Centres

Prime Four Business Park is located immediately south of the site, offering numerous office, leisure and support facilities. Additional strategic employment centres are located to the south of Westhill and west of Dyce, both within close proximity and accessible via the AWPR and A944.

Green Infrastructure

Two major protected green spaces are located within close proximity to the site, accessible via a well established network of pedestrian and vehicle links:

- * 'Three Hills' Local Nature Conservation Site;
- Bucksburn corridor



Wider Connectivity Plan

Land Use

The predominant land use west of the land at Derbeth, beyond the AWPR, is agricultural pasture with the protected landscape of Brimmond Country Park to the north.

The urban boundary of Kingswells marks the eastern edge of the site, beyond which a number of new developments are proposed within the City boundary.

This area will be subject to considerable change over the next decade, with the construction of the Coutesswells development and committed masterplans at Rowett South, Greenferns and Maidencraig. Contrary to the site at Derbeth, any new development east of Kingswells runs the risk of coalescence with the urban boundary of Aberdeen City.

Kingswells represents a well established urban settlement with a multitude of uses including a school, hotel, restaurant and shops. Given the proximity of the site to Kingswells and the two major junctions on the C89 (which terminate at the site), Derbeth is ideally placed to take advantage of these amenities and help enhance local facilities.

In summary, the site is extremely well located to provide a natural expansion to Kingswells, whilst ensuring that there is no coalescence with developments located to the north and east.



Land Use

Urban

Amenity

Zoned Land

Town Centre

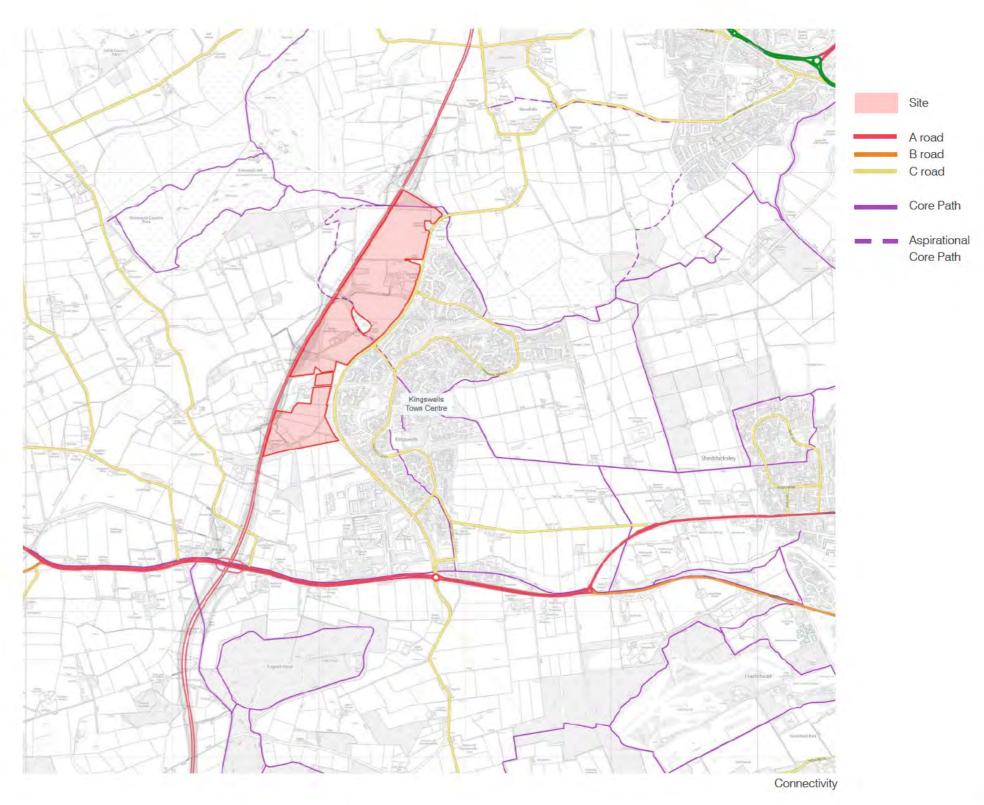
Agriculture / Other

Vehicular Connectivity

C89 lies to the east of the site. The route of the AWPR bounds the site to the west with an interchange located on the A944 to the south of the site. An additional Kingswells junction with north facing slip roads is located approximately 200m to the north east of the site.

On the wider road network the site's direct accessibility to the AWPR via the Kingswells North interchange will accommodate future movement demands in that direction. Movements towards the city centre would route via the A944 Kingswells Roundabout and Lang Stracht or Skene Road at the A944 / B9119 Bellfield junction. These roads afford access to the A90 Aberdeen to Peterhead road, and subsequently to the A96 Aberdeen to Inverness Trunk Road. To the west of Kingswells the A944 provides connections to the grade separated junction with the AWPR and the residential and employment areas of Westhill.

Recent improvements on the A944 corridor have eased previous constraints, such as at the Kingswells Roundabout and other identified bottlenecks. Further improvements are committed in connection with other approved development proposals on the corridor which can be expected to provide additional capacity, maintaining the benefits of the AWPR on the corridor.



Public Transport Connectivity

Kingswells is currently only served by a shuttle service that routes to the Kingswells Park and Ride and Aberdeen Royal Infirmary (ARI). The shuttle service is currently operated by Central Coaches and subsidised by Aberdeen City Council.

The shuttle service operates two services during the Peak (service X94) and Off-Peak (service 94) periods. Service X94 operates at a 15-minute frequency during the AM and PM peak periods and operates to and from the Kingswells Park and Ride only. From the Kingswells Park and Ride a connection with the Stagecoach X17 Aberdeen to Westhill service can be made. This also operates at a 15-minute frequency. Service 94 operates hourly from 09:00 to 16:00 and routes between ARI, Woodend, The Crematorium, Kingswells Park and Ride and Kingswells.

Kingswells' location on a principal transport corridor already served by established park and ride infrastructure and bus priority measures on the route to the centre of the city gives a firm basis for the development of further opportunities to enhance public transport services in the area. In particular the commitment to the establishment of a chain of park and ride sites around the AWPR provides an opportunity for the intensification of orbital services providing direct connections to major attractions such as Aberdeen Airport and adjoining employment destinations at Kirkhill and Dyce, which development at Derbeth would be well placed to access. The AWPR should allow for the provision of additional and enhanced services to other destinations to the north and south.

With full development of the Derbeth site and multiple accesses onto the C89, bus services could be enhanced within Kingswells and could be re-routed to pass directly through the site following an internal loop road network, maximising accessibility for future residents and employees. Some bus services could be developed and re-routed along the AWPR by accessing Kingswells via the Kingswells North junction, and thereafter continuing to route directly past or through the site from where services could be accessed within specified walk thresholds.

Through the development of the proposals for the site, opportunities for public transport accessibility for the initial and later phases of the development will be explored. Roads within the site would be designed to allow public transport access.

Changes to C89 as a result of the AWPR

C89 is a single carriageway connecting the A944 to the A96 via Bucksburn. It also provides a means of access to the employment land at Prime Four Business Park and further afield to destinations such as Westhill via the A944, and Kirkhill / Dyce via the A96. It is subsequently well used during weekday peak periods in particular.

The AWPR is due to be completed by the end of 2018. Studies show that flows on C89 are predicted to reduce by as much as 74% upon completion of the AWPR. Relevant sections of C89 are designed to a suitably high standard as a traffic route and the significant forecast reduction in existing traffic levels would counterbalance increased development traffic associated with the Derbeth site, even after the implementation of crossing facilities and priority controls proposed to enhance pedestrian accessibility.

It is anticipated that upon completion the AWPR will change the accessibility options for the settlements and developments along its route, which will open up opportunities for improved connectivity and public transport services. The site's direct accessibility to the AWPR via the Kingswells North interchange will accommodate future movement demands in that direction. The Derbeth site is extremely well placed to benefit from the future AWPR.



Photograph of the bridge over the AWPR (Aspirational Core Path)



Photograph of the footbridge over the AWPR (south west corner of site)



Photograph of the C89

Disruption of core path network by AWPR

The adjacent diagram illustrates the core path network in detail. The site offers an opportunity to deliver AP7, an aspirational path, which would enable Kingswells to retain its connectivity to the surrounding countryside including Brimmond Country Park. This is important, given that former routes, e.g. 33, have been permanently disrupted by the AWPR.

Pedestrian & Cycling Connectivity

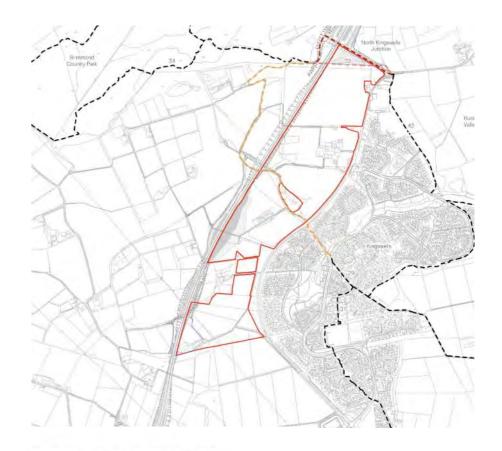
The existing Kingswells community has been established since the 1980s with a high quality network of footpath and cycle route provision to serve local needs and connect existing residential areas to attractions within the village such as the local village shopping centre and primary school. As well as routes alongside the road network there is a complementary network of off road routes and paths providing more direct connections in appropriate locations.

Existing cycling infrastructure largely replicates provision for pedestrians as many of the facilities are shared by pedestrians and cyclists. The nearby Aberdeen to Westhill cycleway runs along the north side of the A944 close to the site. The route facilitates east-west cycling opportunities from Hazlehead through Kingswells to Westhill. There are connections from the A944 dual use path to other routes on the core path network within Kingswells and beyond. There are also links to / from Bucksburn to the north and other Aberdeen City suburbs to the west.

As development continues at Westhill's Arnhall Business Park, additional cycle infrastructure is expected to be developed which will offer further segregated routes along the B9119 and towards Westhill town centre, linking with existing cycling infrastructure elsewhere in Westhill. This offers potential for improved cycleway links between this site and nearby major employment centres.

Beyond Kingswells, at the A944 Six Mile Fork junction to the east of Westhill, there is a Toucan Crossing which connects footway / cycleways on both sides of the A944, linking to the strategic Aberdeen to Westhill Cycleway. Additional facilities to aid cyclists at the Six Mile Fork junction include Advanced Stop Lines (ASL) on all approaches.

The site location offers an opportunity to encourage pedestrian and bicycle trips, and this would be enhanced through infrastructure improvements in connection with the site development.



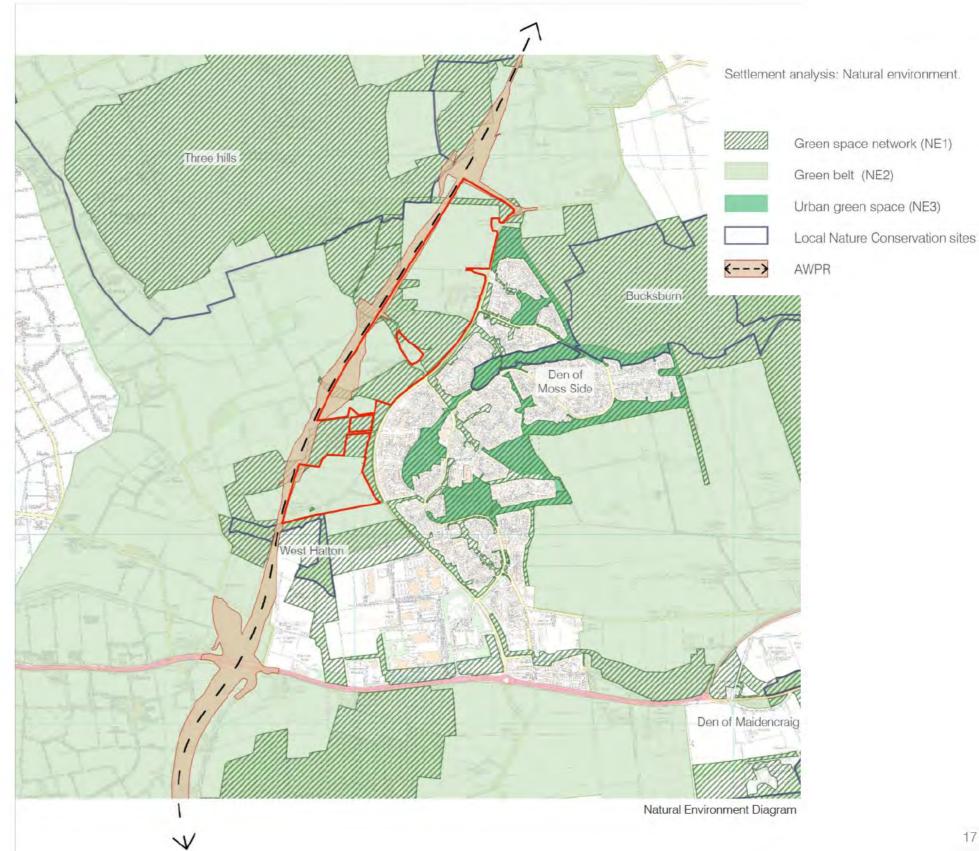
Settlement Analysis: Connectivity

- --- Core paths existing
- AP7- Aspirational Core Path as identified by Aberdeen City Council
- Existing Core Path 33 connection replaced by North Kingswells
- Junction Underpass as part of mitigation proposals

Natural Environment

The site lies within Green Belt land (ALDP Policy NE 2), and primarily through existing woodland and pasture forms part of the Green Space Network (ALDP Policy NE 1) where it did prior to the AWPR provide both recreational links and habitat connectivity between Three Hills (Brimmond Hill Country Park), Den of Moss Side/Bucksburn and West Hatton Local Nature Conservation Sites.

To the east Kingswells settlement has a strong network of Urban Green Space (ALDP Policy NE3). Until construction of the AWPR, this formed a strong landscape network bridging urban fringe with rural landscapes to the west and east for both people and nature.



Impact of AWPR

Since construction of this major piece of infrastructure, Green Belt land and the Green Space Network have effectively been severed, with the easterly section (Derbeth) now physically disconnected from the west, and to a large degree to the north with the AWPR off ramp road forming a boundary edge. Two new points of path / road connectivity have been introduced via over-bridges as part of the AWPR mitigation proposals, however the overall impact has been a fundamental bisection of the Green Space Network as a continuous interconnected landscape and habitat.

Consequently, the Derbeth landscape, whilst still providing an important pedestrian / cycle link westward to Brimmond Hill Country Park, predominantly has direct proximity and habitat connectivity to the east, via the Urban Green Spaces of Kingswells as well as the Green Network and Local Nature Conservation Sites of Den of Moss Side / Bucksburn.



Photography of AWPR Works at Site Boundary



Aerial View of AWPR Works

LANDSCAPE CHARACTER

Landscape Character

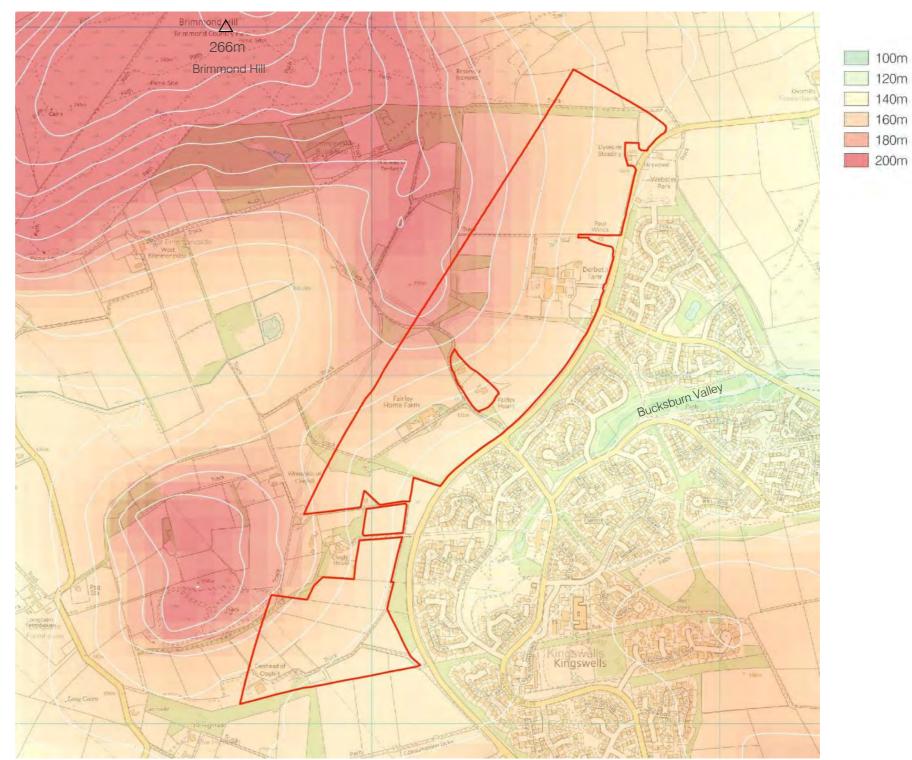
The site is within SNH's Landscape Character Assessment of Aberdeen No 80 (1996) and specifically is categorised as Wooded Farmland with the key landscape components of:

"undulating topography, high proportion of woodland cover neither as plantations, shelter belts or clumps of trees around traditional buildings, open farmland and stone dykes with sparse settlement patterns."

This is representative of Derbeth as the existing landscape character.

Contextually it lies between Kingswells urban area to the east, and the Hill Landscape Character Type, with the focus on Brimmond Hill with its smooth rounded landforms reaching a height of 266m and Elrick Hill, forming part of a distinctive curve of hills which encloses Aberdeen to the west. This predominantly moorland forms a landmark both from within the city and on approach, but is also a major recreational amenity as a country park.

The site lies within Landscape Character Area No.15 Kingswells. This is described as having varied topography (200m AOD to 140m AOD), a variety of woodland forms, and abrupt edge to Kingswells settlement adjoining the area and a degree of visual enclosure due to surrounding landform.



Topography Diagram

200m

LANDSCAPE CHARACTER

Sensitivity to Landscape Change is summarised as:

a small scale area with generally rural character, containing notable Consumption Dykes and adjacent to a discrete large settlement.

Guidelines advise:

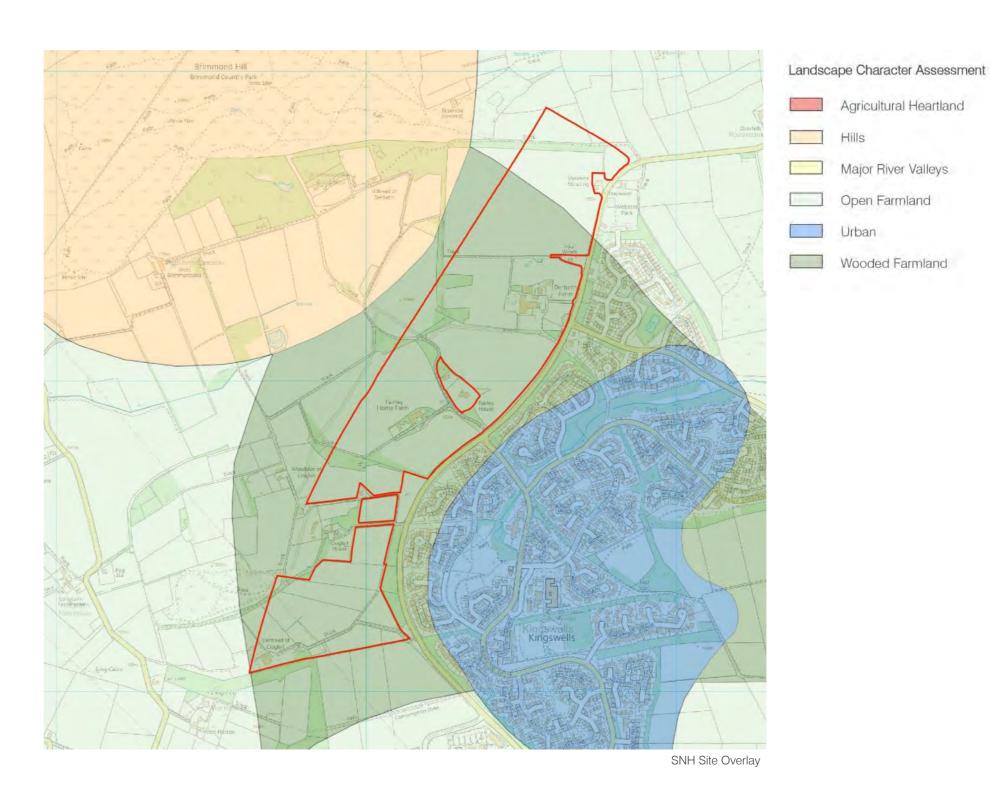
- maintain and manage woodland
- maintain stone dykes and
- increase structure planting around the settlement.

Although this guidance is still relevant to some extent, the SNH LCA was published over 20 years ago and in that time two significant changes to the landscape setting have occured:

What was open farmland has, in recent years been developed to the south, and is now dominated by an expansive business park, Prime Four Business Park and Park and Ride facility which has changed the character from a rural one to urban.

Secondly, the AWPR has been constructed (imminently operational). A significant piece of infrastructure running in a NE/SW alignment in cutting through the landscape for a large section this bisects Derbeth from Greenbelt land to the west.

These two significant developments represent irrevocable progression of urban expansion in the vicinity of Kingswells, and encroachment of urban character surrounding Derbeth from the south, west and east.



Agricultural Heartland

Major River Valleys

Wooded Farmland

Open Farmland

Urban

LANDSCAPE CHARACTER

Existing Landscape

An irregular, linear site lying between the existing settlement of Kingswells to the east, Consumption Dykes and Prime Four business park, park & ride to the south, and the newly constructed AWPR to the west.

The existing landscape is primarily agricultural land sloping from west to east, and to the southern end more gently undulating and south facing slopes.

Existing woodland shelter belts comprising mixed deciduous and coniferous species bisect the site in a broadly east / west alignment. Field boundaries are mostly delineated by traditional stone dykes and some mixed hedging along the C89.

Open pasture and arable fields dominate interspersed with isolated farm dwellings and private dwellings. An overhead electricity pylon corridor runs through the lower end of the site.



Existing Landscape Features

Existing woodland

Stone wall

Hedgerows

construction

Agricultural land, pastures

Overhead Pylon corridor

New landscape relating to AWPR

LANDSCAPE AND VISUAL APPRAISAL

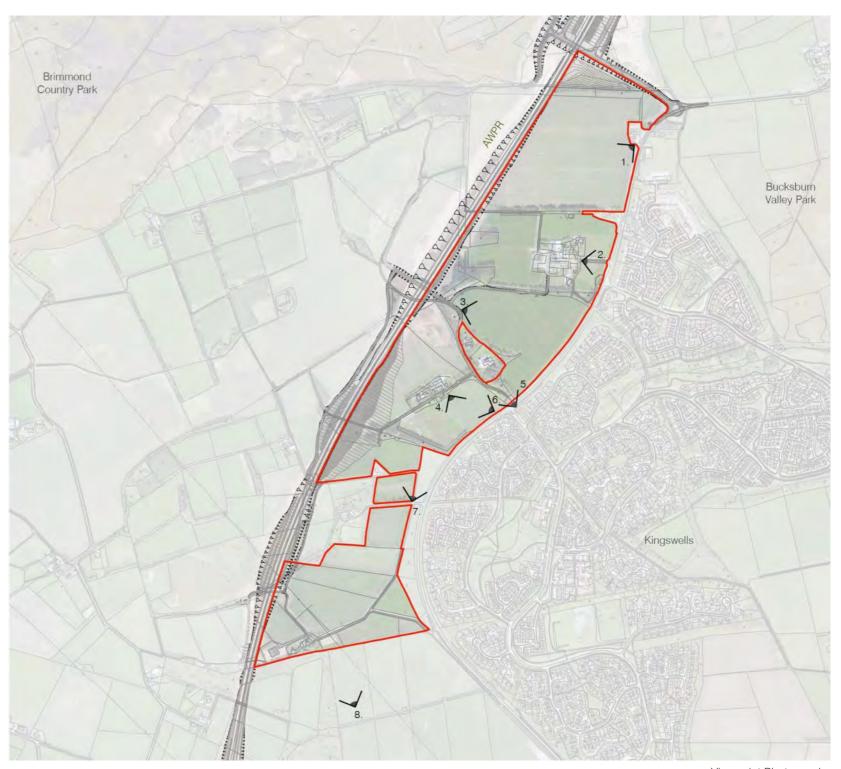
Viewpoints

The photographs on the following pages provide impressions of the landscape setting and illustrate some of the key site features and characteristics.

Viewpoints are listed below:

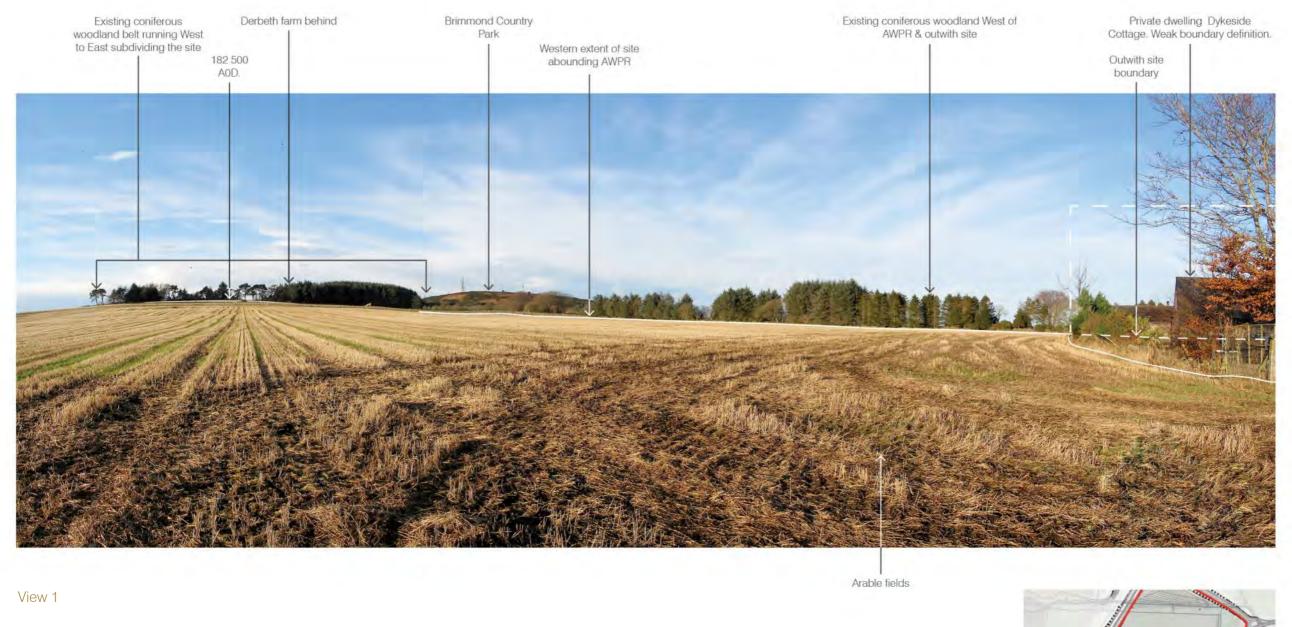
- 1. View from North East corner of the site
- View from Derbeth Farm looking East towards Fairley Road Access
- 3. Section of site south of Derbeth Farm looking Eastward
- 4. View from Home Farm Lane looking South towards Kingswells
- 5. View into access lane at junction with Kingswood Drive
- 6. Mid-section landscape around Fairley House Farm looking
- 7. Southern section of site looking North along Access Lane to Bonavista private dwelling
- 8. View from South at Consumption Dykes scheduled monument and Prime Four Business Park looking North

A summary of the landscape visual appraisal is included at the end of this section.



Viewpoint Photograph

1. View from North East corner of the site



Sloping arable field bounded on southern, western and northern edges by existing mixed woodland shelter belts with local high point of Brimmond Hill as backdrop. Area broadly visible from the C89.

2. View from Derbeth farm looking East towards C89 access



3. Section of site south of Derbeth farm, looking Eastward



4. View from Home Farm Lane looking South towards Kingswells



Mid section of site in closest proximity / visibility to Kingswells housing to the east, elevated from Road. Home Farm stone dyke in disrepair with grazing pasture to the C89 edge.

5. View into access lane at junction with Kingswood Drive



Access lane links with overbridge over AWPR linking to Brimmond Country Park is an Aspirational Core Path link AP7 as identified by Aberdeen City Council and provides a key link for Kingswells to Brimmond Country Park.

View 5

A winding tree lined access lane providing existing access to private dwellings, this is also identified as an Aspirational Core Path Link AP7 to connect Kingswells residents to Brimmond Hill Country Park. The intimate character of this lane would be retained for recreational access and any new vehicular access into Derbeth would be gained from other locations, in order to retain the rural charm of this lane.



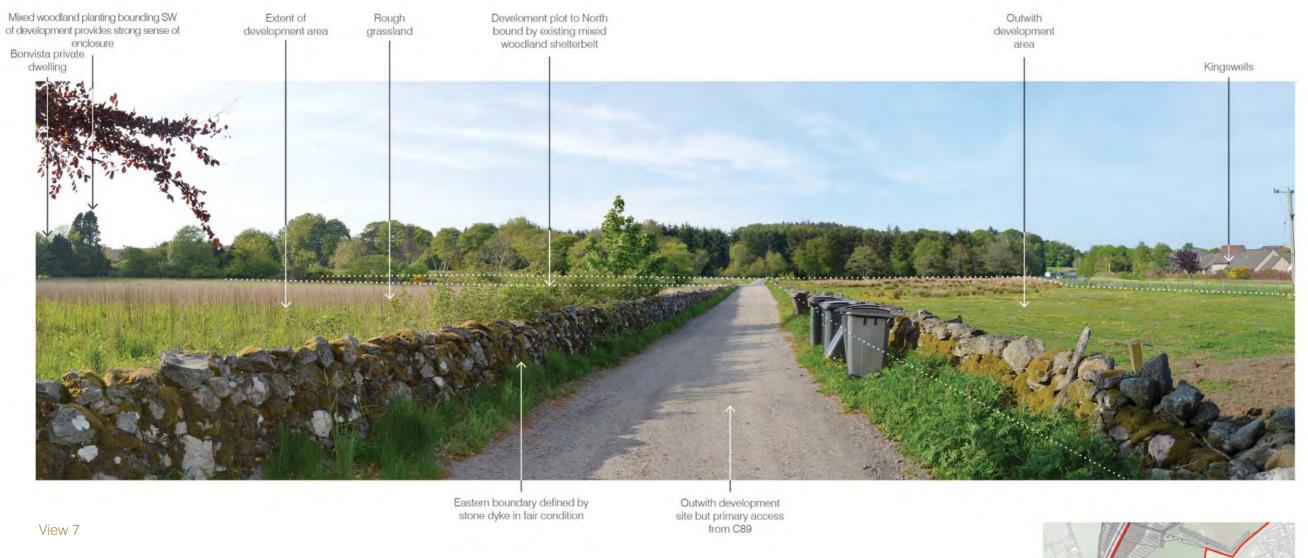


View 6

Gently sloping pasture bounded by mixed deciduous and coniferous species shelter belts, with Fairley Home Farm steading at the top of the field facing Kingswells and the C89.



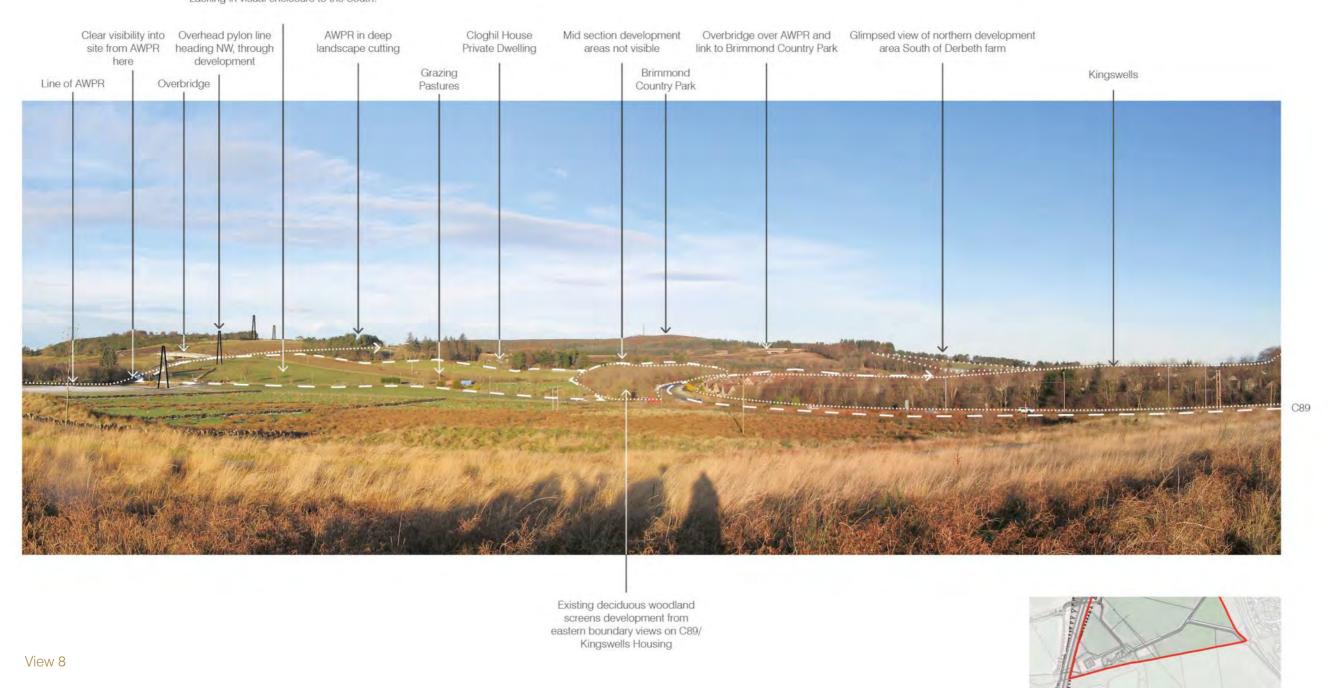
7. Southern section of site looking North along Access Lane to Bonvista private dwelling



A more intimate scale of grazing fields bounded by stone walls and woodland shelter belts with Kingswells to the east.

8. View from South at Consumption Dykes scheduled monument and Primefour Business Park looking North

Very open, gently sloping South facing aspect with woodland groupings as backdrop stone dyke subdividing fields. Lacking in visual enclosure to the South.



This area of the site is the most open and visually prominent, with gently undulating fields that face south toward Prime Four and Consumption Dykes. Pylon corridor visible at the left of the view with mixed woodland shelter belts and clumps enclosing other parts of the site.

LANDSCAPE AND VISUAL APPRAISAL

Summary

The existing landscape character at Derbeth is representative of the Landscape Character Type No15 Kingswells, with undulating agricultural fields subdivided by stone walls, woodland belts and clumps and individual farm house buildings. Nonetheless, the Prime Four Business Park with park and ride to the south of the site, and the construction of the AWPR forming the western boundary of the site have detached the Green Belt and Green Network permanently and significantly to the west, northwest and south.

The site is moderately visible, due to the undulating topography and mature woodland shelter belts, that both helps to enclose and screen large parts of the site, but also exposes parts of the site particularly at the highest elevations and to the more open southern end.

The potential visual impact of development will range from minimal / negligible particularly to the northern end of the site; to moderately visible from the middle area; to very visible from the south looking toward the southern end of the site that is very open in form with a woodland backdrop.

The landscape proposals aim to mitigate negative visual impact of development by the following measures:

- * retaining the existing woodlands and introduction of significant mixed woodland shelterbelt along the length of the western boundary with the AWPR and to the north;
- double avenue specimen trees and hedges to the southern and eastern boundaries:
- * a spine of street trees running centrally in a north south alignment through the centre of the development.

SITE ANALYSIS

Existing Site Features

The numbers below correspond with the adjacent diagram and highlight key site features, which have been considered in the development of a design concept and proposal for the site:

- AWPR A major new piece of roads infrastructure bounds the western boundary of the site. Although new land forming, landscape planting and fencing form part of this infrastructure currently under construction, the proposed new development at Derbeth could provide an additional layer of landscape structure planting to limit noise, visual impact and minimise physical access to the road network edge.
- 2. C89 A barrier to place making in its current form; with its sweeping road geometry, few access points into Kingswells and a lack of positive frontages addressing the road, this results in a vehicle dominated road, often at speed. It is not currently conducive to promoting best practice in place making, where the hierarchy of users are pedestrian led, then cycling, public transport with the car being the lowest in the hierarchy. The opening of the AWPR will begin to address some of these issues by reducing traffic. Further opportunities exists with the proposals at Derbeth to change the character of the C89 to create a safe and welcoming street. Two existing junctions into Kingswells lie adjacent to the Derbeth site.
- 3. EXISTING WOODLAND Any established woodlands need to be carefully integrated into a development layout. A tree survey will be undertaken at a future stage, in order to accurately map root protection areas. Adequate stand off distance from development will ensure that there is no damage to root protection areas as a result of construction. This has been considered in the development of the proposals.
- PRIVATE ROADS There are a number of existing roads to private dwellings throughout the site, which require to be respected in the development of the masterplan. This has been considered in the development proposals.

5. TOPOGRAPHY - The site in general slopes from west down to east. Predominantly the site falls at a gradient of between 1%-10% (1/100 – 1/10) but there are pockets of steeper ground throughout the site, most notable, on the boundary with the AWPR. Site platforming has been considered as part of the proposals for Derbeth, in terms of building positioning and road infrastructure, to tie into existing topography and existing woodland ground levels that are to be retained and integrated.

6. UTILITIES -

<u>Water</u> - An existing water main runs from a reservoir to the north, across the northwest corner of the site to a water main located east of Derbeth Farm. This runs southwest to service the dwelling around Fairley House. It runs down the private access for Fairley House and the verge of Fairley Road heading south. A connection comes off this main to service the Denhead of Cloghill dwelling. There are large diameter water mains running along the C89. New water mains would be provided within the proposed development site and these would be fed from the existing water supply network.

<u>Gas</u> - There is an Intermediate pressure gas main within the extents of the site, running parallel to the C89 and a gas connection for Derbeth Farm. New gas mains would be provided within the proposed development site and these would be fed from the existing gas supply network.

<u>Electric</u> – There are overhead high voltage cables crossing the south part of the site and the proposed development will respect the 15m standoff required from the outer cable. There are a number of high and low voltage overhead lines crossing the site and servicing existing properties. These will either be respected by the development layout or diverted. The existing electricity network will be extended through the development to service the site.

<u>Telecom</u> – There are various telecom connections to the existing dwellings within the site boundaries. These will either be respected by the development layout or diverted. It is understood that the existing telecoms network can be readily extended to serve the development.

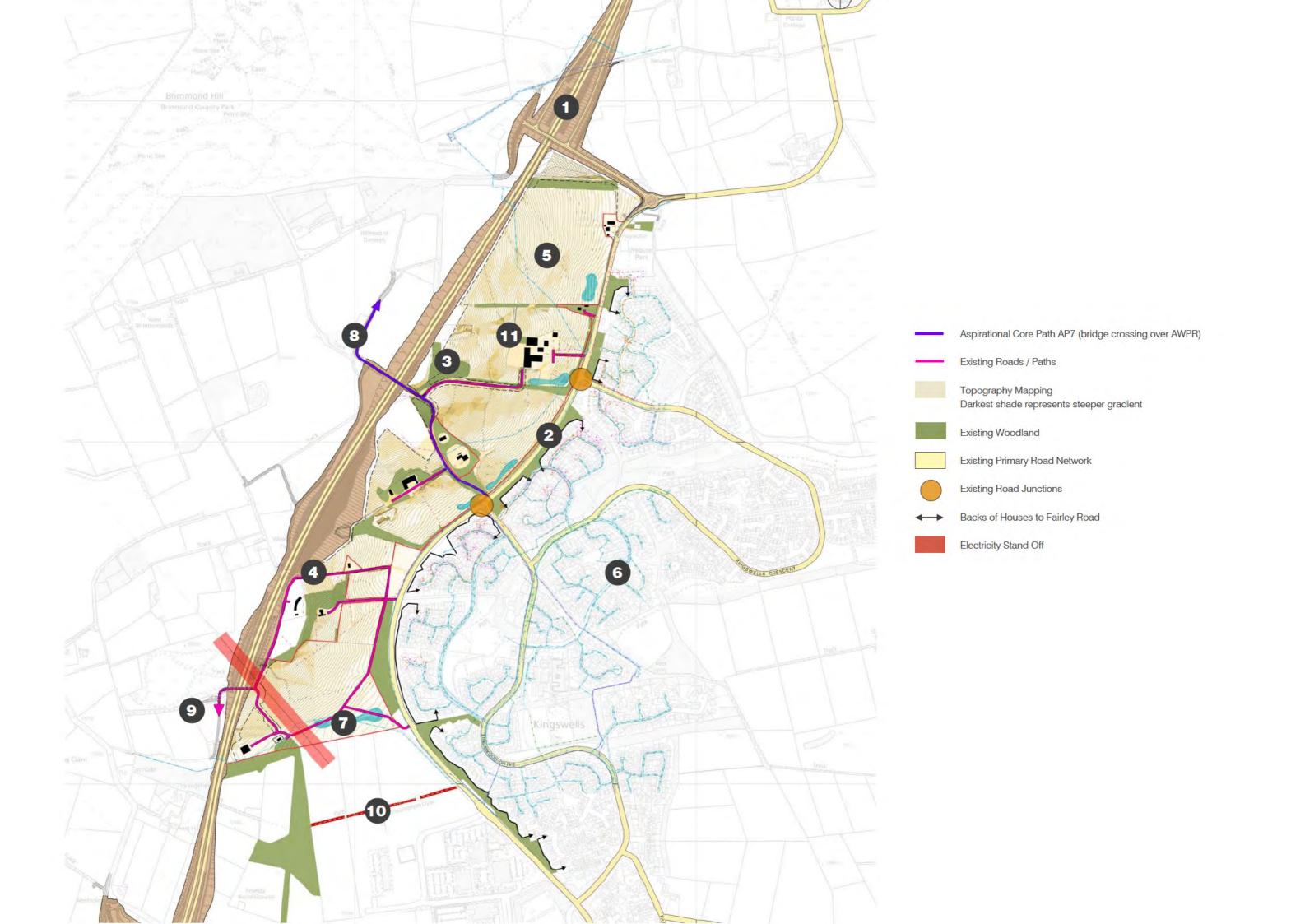
7. DRAINAGE -

<u>Wastewater</u> – There are existing foul sewers within the existing Kingswells settlement to the east of the site. New foul sewers will be provided, in accordance with Scottish Water's specification, throughout the proposed development. These sewers will discharge to the existing waste water network.

<u>Surface water</u> – There are existing surface water sewers within the existing Kingswells settlement, however these are unlikely to have capacity for flows from the proposed development. New surface water sewers will be provided, in accordance with Scottish Water's specification, throughout the proposed development. Sustainable Drainage System (SuDS) will be provided, including source control measures where practicable. Surface water sewers will discharge to a number of extended detention basins, which will provide treatment and attenuation of the surface water run-off. The basins will discharge at a controlled rate, to the Bucks Burn, which flows through existing Kingswells settlement around 250m from the site.

<u>Land drainage</u> – The existing land drainage system will be respected where practicable and diverted where necessary to ensure the surrounding land is unaffected and that the proposed development is adequately drained.

- 7. ASPIRATIONAL CORE PATH AP7 An aspirational core path provides a key link from Kingswells across the AWPR to Brimmond Country Park and the wider countryside.
- 8. AWPR FOOTBRIDGE A footbridge forms part of the AWPR works and provides a pedestrian link from the development site to the wider countryside to the west.
- 9. CONSUMPTION DYKE The consumption dyke located within the Prime Four Business Park's Northern Park, is a scheduled monument. It does not form part of this bid, but its setting has been considered.
- EXISTING BUILDINGS A number of existing buildings are located within the LDP boundary or share an ownership boundary with the same. The setting and privacy of each building should be respected within the masterplan proposals.



SITE OPPORTUNITIES

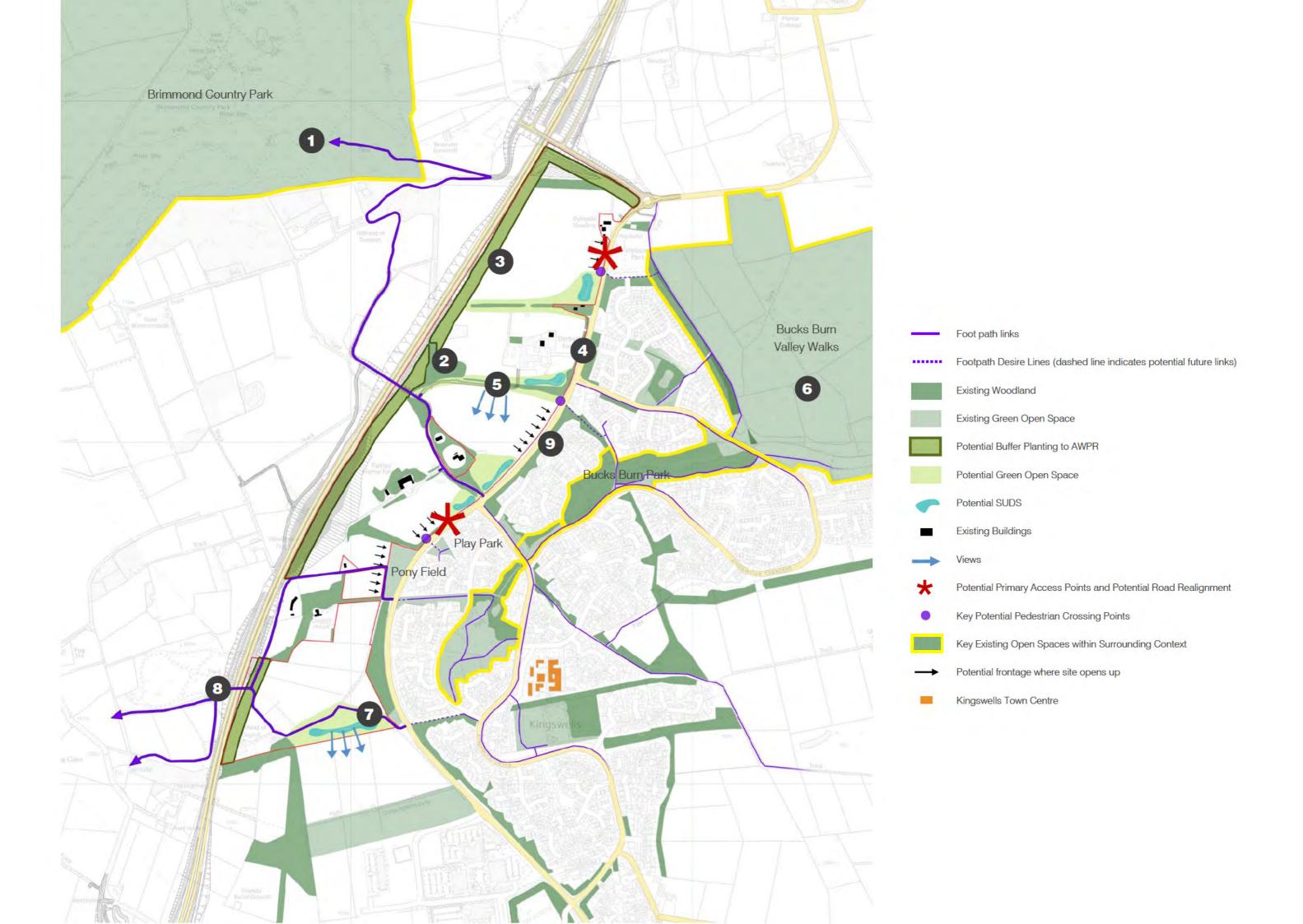
Key Opportunities

The numbers below correspond with the adjacent diagram and highlight key site opportunities, which have been considered in the development of a design concept and proposal for the site:

- 1. ASPIRATIONAL CORE PATH AP7 & SURROUNDING NETWORK / COUNTRY PARK Integrate within development and retain tree lined lane characteristics. Aberdeen City Council have identified the opportunity for this to become a Core Path, and it is currently labelled as an Aspirational Core Path AP7. This narrow, winding, tree-lined lane currently provides access from Fairley Road to two private dwellings that are out with the development proposals. It then continues west to cross the AWPR via a newly constructed overbridge. It could provide a strategically important part of the Green Space Network, offering the pedestrian / cyclist a connecting link between Brimmond Hill Country Park to the west, through the new community in Derbeth, onto the existing community in Kingswells and onward east to Bucksburn Valley Walks.
- 2. EXISTING WOODLAND A natural asset to be properly managed and responsibly integrated into new development. The existing woodlands provide a valuable habitat and amenity. They provide visual containment to much of the proposed development and are a useful way of subdividing the site into more discrete pockets.
- 3. TREE PLANTING Opportunities exist to introduce new woodland structure planting along the length of the boundary with the AWPR to reduce visual impact, noise and to act as a barrier between the development and a major piece of roads infrastructure.

- 4. C89 A street connecting two sides of a place rather than just a through road. Derbeth can be viewed as a natural extension of Kingswells with opportunities to improve C89 for the benefit of both groups of residents, one future, and one existing. In order to civilise C89, vehicle speeds need to be reduced. This offers an opportunity to realign the road geometry to slow vehicles, but also allows for new points of access that need to be taken into the Derbeth development. In addition it could also provide safe crossing points from Kingswells to the west. This road will change significantly when the AWPR opens.
- 5. VIEWS An excellent balance of prospect and enclosure. The site is split into broadly 3 groupings that offer a variety of openness, aspect and enclosure. The northern part of the site is the highest part and has long distance views toward Aberdeen and the coast. The mid part of the site is split roughly in half on a north/south axis with one half facing the housing at Kingswells to the east and the other facing westwards, toward Brimmond Country Park and the Aberdeenshire rural landscape beyond. The southern part of the site is more open with south facing aspect toward Prime Four Business Park, Consumption Dykes, with stone dyke field subdivision and a woodland backdrop as the land rises gently upwards towards the middle of the site. Opportunities exist to take advantage of these views in the design of the development proposals.
- 6. LINKS TO BUCKS BURN PARK, BUCKS BURN VALLEY WALKS AND KINGSWELLS TOWN CENTRE - There are a number of existing footpath links which connect the site with the amenities of Kingswells and the wider area, including Kingswells Primary School, Bucks Burn Park and Valley Walks. Opportunities exist to formalise existing and future desire lines across C89 to the land at Derbeth and onwards to Brimmond Country Park.
- 7. SUDS INTEGRATED INTO PUBLIC OPEN GREEN SPACES Opportunities exist to combine proposed public open spaces with existing woodland and SUDS features, to deliver an integrated and ecologically rich landscape.

- 8. POTENTIAL PEDESTRIAN CROSSING POINTS The site ties into two crossing points over the AWPR offering connections to the surrounding countryside. Existing and potential footpath links in Kingswells offer opportunities for improved and safe pedestrian crossing points across C89 and into the site at Derbeth.
- 9. OPEN LANDSCAPE TO C89 An otherwise heavily planted boundary to C89 opens up at key points across the length of the site, offering natural points for positive building frontages, tying into the wider ambition to change the character of this distributor road.





CONCEPT

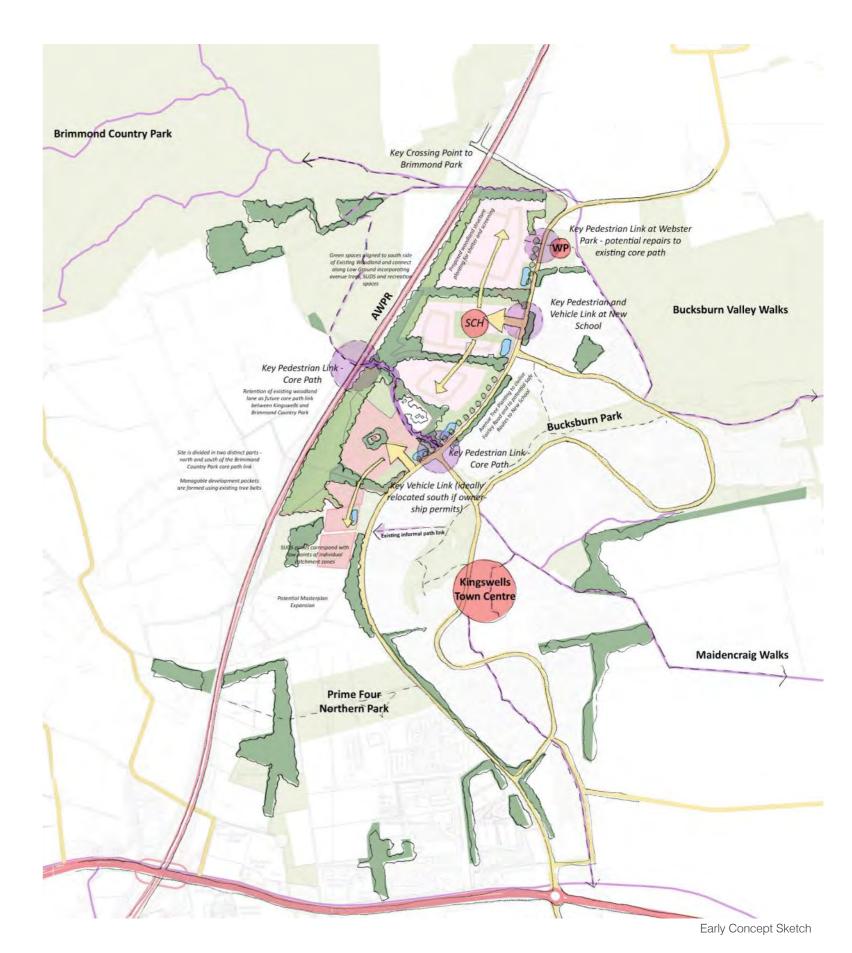
Concept Development

This illustration represents an early concept sketch for the land at Derbeth and denotes some key ideas which have developed throughout the design process:

- * Integration in terms of connectivity with Kingswells
- * Integration in terms of connectivity with the wider area, in particular between Kingswells and Brimmond Country Park
- Changing the character and civilising the C89
- * Enhancing existing landscape features
- * Creation of development pockets and neighbourhood scale open spaces
- * Provision of land for a new school

During the process of analysis and design development, the proposal evolved to strengthen the core objectives outlined above. Key decisions in this process included:

- * The primary school site is moved north to take advantage of close proximity to Webster Park and existing core path links to the Bucksburn Valley. However, it should be noted that the exact location would be discussed and agreed with the Council.
- * The re-alignment of the C89 at key points (Brimmond Country Park core path link and potential Primary School site) to slow traffic and enhance the arrival sequence into Kingswells.
- Creation of distinct character areas around the existing farm buildings at Derbeth, the steadings at Fairley Home Farm and the Livery at Denhead Cloghill.



DEVELOPING CONCEPT—LANDSCAPE

Landscape Objectives

The adjacent diagram represents the strategic landscape framework. This has developed from the following key objectives:

- * Retain existing woodland
- Retain characterful lane Aspirational Core Path AP7 as a footpath / cycleway link between Kingswells / Derbeth communities to Brimmond Hill Country Park to the west
- Provide robust landscape woodland buffer to AWPR
- Animate, enhance and formalise frontage to the C89 with a series of interconnected landscapes that seamlessly incorporate avenue trees, Suds (at lowest parts of the site), offroad path networks, play and parkland
- Green spaces are primarily aligned to south facing aspect of existing woodland to maximise favourable aspect, but also as a stand off from development and woodlands



DEVELOPING CONCEPT—CONNECTIVITY

Connections to Kingswells and the Wider Area

The design concept has developed from the principal of connecting the key assets of the site with the existing settlement of Kingswells, including an important link *through* the site to Brimmond Country Park.

Street Hierarchy

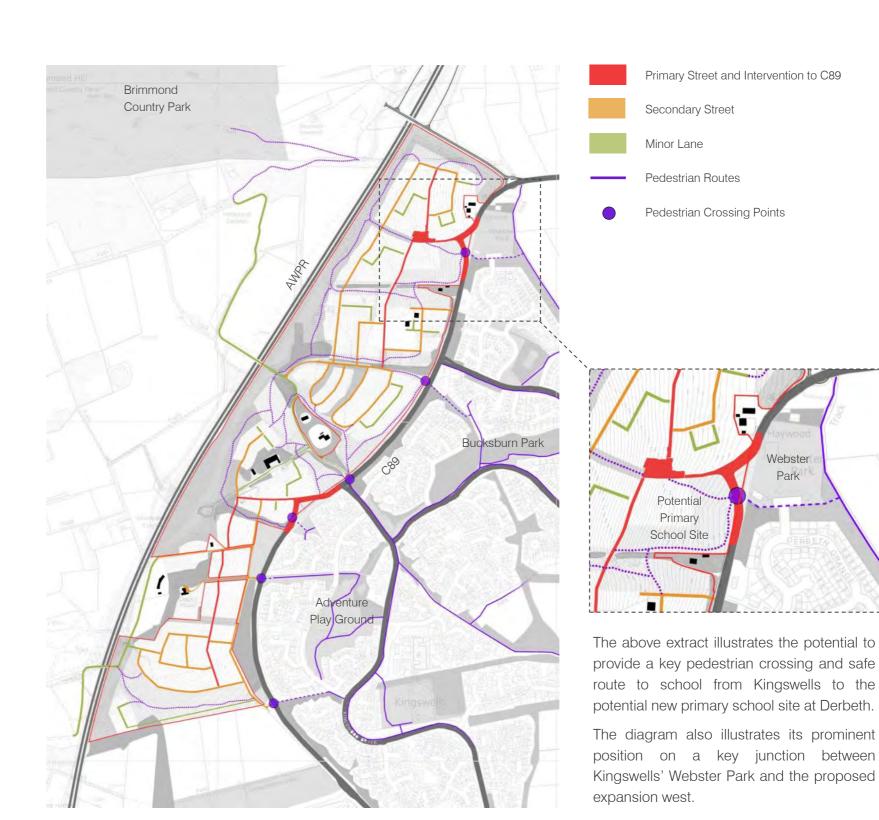
A clear hierarchy of streets will help create a strong sense of place and aid movement through the new development allowing for strategic north / south and east / west movements to be developed.

The street network has been designed to work with the existing topography, which slopes steeply from east to west, linking all the key open spaces within the site. It has an equally important role in connecting the site to wider amenity spaces within Kingswells, such as the adventure play ground in Bucksburn Park, Brimmond Country Park, Webster Park and smaller local play areas.

Changing the Character of the C89

The C89 runs along the entire east boundary of the site and offers opportunities to integrate the development with Kingswells.

At present, although the opening of the AWPR will significantly reduce traffic on the C89, its gently curving geometry facilitates high speeds and pedestrian crossing is an issue. A move to re-align two minor sections of C89 is proposed to fundamentally change its character by slowing traffic, creating new junctions and crossing points. Similar interventions can be found in the recent Countesswells development.



Land at Derbeth, Kingswells / LDP Bid for CALA Homes (North) Limited

DEVELOPING CONCEPT—DEVELOPMENT POCKETS

Development Pockets

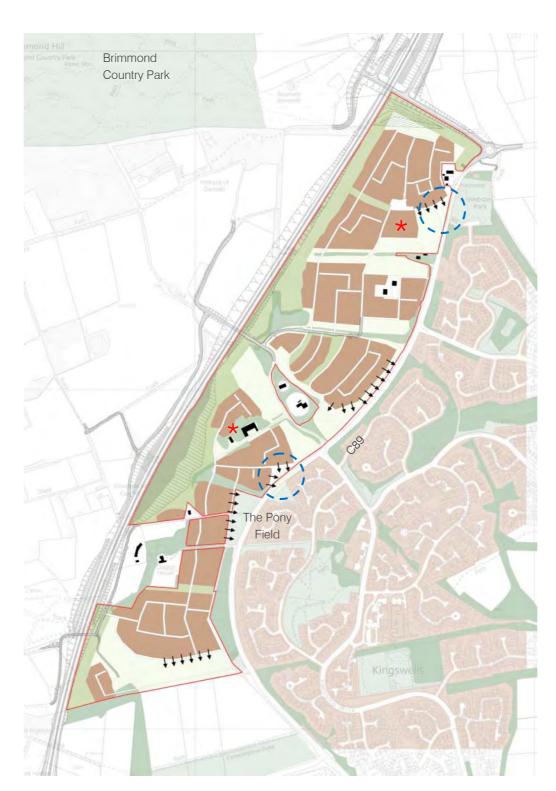
A series of development pockets are defined by the natural east/west pattern of existing woodland and proposed buffer planting to the AWPR. This helps visually break up the development, offers opportunities to tie into the existing green spaces within Kingswells and ensures that all residents benefit from a local shared public space.

The housing density of housing across the site relates to the predominant land use and street hierarchy. For example, higher density housing is proposed relative to the new school and along the primary vehicle routes through the site.

Positive Approach to Kingswells and Civilising the C89

As part of the overall ambition to alter the character of the C89, a strong building line has been established at key sections, where the site naturally opens up to the C89. This will help civilise the street to create a sense of place. Each frontage will have a distinct character associated with its development pocket. For example:

- * A strong building line will create a new urban boundary at each primary access point
- * A strong frontage will overlook the C89 and the proposed park leading to Brimmond Country Park.
- The Pony Field offers an attractive outlook for houses fronting the C89
- Development is set back from the southern boundary to acknowledge its role within the setting of the scheduled monument in the Northern Park. A positive frontage takes advantage of the southerly aspect.





DEVELOPING CONCEPT—CHARACTER AREAS



Character Areas

A series of character areas are defined by the site's unique characteristics, potential for mixed uses and proposed spatial hierarchy.

Four of these areas are explored in more detail in the Character Area studies, within this document.

Plan Key

- 1. Hilltop Park
- 2. Derbeth Square
- 3. Webster Park
- 4. Potential Site for New Primary School
- 5. Derbeth Park
- 6. Derbeth Farm
- 7. Derbeth Gardens
- 8. Brimmond Lane / Aspirational Core Path AP7
- 9. Fairley Park
- 10. Potential Site for Fairley Farm Shop
- 11. Exiting Play Park
- 12. The Pony Field
- 13. Cloghill Park
- 14. Denburn Livery

Schedule of Accommodation

Gross Site Area — Approximately 154 acres

No. of Residential Units—Approximately 700

Affordable Residential Units—25% of total unit no.

Potential Site for New Primary School

Potential Sites for Other Uses (for example, a farm shop, small retail unit)



PROPOSAL

Proposal

The adjacent illustration represents an indicative masterplan, which is based on a thorough analysis of the site and its opportunities as outlined in the previous sections of this document.

Integration and Identity

The Vision for Derbeth is founded on the principle of integration. It is intended that this new development will:

- Build upon the existing identity and aspirations of the local community
- * Provide much needed private and affordable housing
- Integrate, enhance and extend existing road, cycle and footpath networks to create a safe and sustainable environment for residents to live
- Integrate new open spaces into Kingswells' existing green network
- * Enhance connectivity between the existing settlement of Kingswells (e.g. Bucksburn Valley Walks and Kingswells Town Centre) and the wider area, in particular Brimmond Country Park, through the aspirational Core Path AP7
- * Re-align and civilise the C89, to provide safe crossing points for pedestrians and create a positively addressed central thoroughfare through Kingswells
- * Provide space for other uses, to help sustain the growth of the community at Kingswells

Housing

The site offers much needed new housing on an immediately deliverable site. A full range of housing types and tenures could be accommodated, including private and affordable detached, semi-detached, terrace and flatted units. Affordable housing associated with private sector housing is one of the main mechanisms for its delivery. To be able to meet housing needs (all tenures) more deliverable housing sites are required.

Mixed Use

Space has been allocated to accommodate a mix of uses, including small scale retail, a new primary school and farm shop for example. These could support and build upon Kingswells' wide range of local amenities and employment opportunities (for example Kingswells Town Centre and Prime Four Business Park) allowing it to function as a sustainable settlement.

Distinct Character Areas

The unique characteristics of the site, in particular the sloping topography and mature landscape shelter belts, would be retained and enhanced to create a distinctive series of development pockets. These are described in more detail in the following Character Study section of the document.

Education

A separate Education report, by School Estate Planning, has been prepared to support this bid. A summary of this document is included below.

Viable solutions do exist for Early Learning and Childcare (ELC) provision, primary education provision and secondary education

provision associated with this proposed development at Kingswells/Derbeth over time.

The development of the Derbeth/Kingswells site will require a new primary school with associated Early Learning and Childcare (ELC) facilities. A minimum site area of 1.3 hectares would be appropriate for a 2 stream primary school facility with up to 80 pupils (40:40) nursery pupils, if that is deemed to be required.

Aberdeen City Council will need to consider which zone this new Primary School would be located in. One obvious option is to locate it within the new "Countesswells Academy" school zone. A suitable approximately two stream school with associated Nursery could be sited within the Derbeth / Kingswells site on land provided by the developer of the site. At the time of writing this report the proposed development is within the newly established secondary school zone of "Countesswells Academy".

Drainage

The site will be drained to respect the natural catchments as far as possible, with each catchment being provided with SuDS measures, including a basin located at the lowest point. Surface water will be discharged to the Bucks Burn at a controlled rate no greater than the current greenfield run-off rate.

Foul flows will be discharged to the existing sewer network within Kingswells.

PROPOSAL—LANDSCAPE

Landscape and Open Space

Derbeth has been designed with reference to ACC'S Open Space Supplementary Guidance (SG) which sets out the type, quantity, quality and accessibility of open space to be provided by new developments.

Proposals

The proposals aim to augment existing woodland assets with additional woodland and tree planting to provide a landscape framework for the development to sit comfortably within.

A new tree lined avenue provides a robust boundary treatment to the southern boundary, acting as a backdrop to Consumption Dykes and visually containing the development as it rises with the slope heading north. Avenue tree planting can formalise safe routes to the new school and subdivide development areas with landscape that follows the contour line. Avenue trees can be used to enhance the C89 and offer a more attractive frontage.

Formal tree lined avenue with houses positively fronting onto the street will further enhance and support the idea of this as an attractive landscaped place.

Identify / value / retain existing landscape assets

The masterplan has been developed from the principal of retaining the most valuable landscape assets of the site, namely the existing mixed woodland which:

- protects a rich habitat and landscape resource, whilst supporting biodiversity
- * provides a strong landscape framework that subdivides the site
- * enables the new development to comfortably sit within the landscape

Multifunctional Blue/Green Infrastructure

The Green Infrastructure for the site has been developed from this starting point and a multifunctional landscape has been developed to provide:

- a diverse habitat of woodlands, hedgerows, specimen & orchard trees, wet and dry meadow and amenity grassland, wetlands and ponds
- recreational and playful landscapes
- a network of off-road pedestrian and cycle connectivity growing spaces and gardens
- positively integrated management of surface water within the landscape

Open Space Standards

The Landscape Strategy has been developed to provide a high quality, well connected and accessible series of multifunctional landscape spaces distributed evenly across the whole site.

Spaces are assigned a type according to scale:

- Major
- Neighbourhood
- * Local

And a category according to use:

- Play
- Outdoor sport
- Natural Greenspace & Green corridors
- * Allotments / Community gardens

Every proposed residence will be within 1500m of Brimmond Hill Country Park. Similarly there are existing outdoor sports provision within Kingswells within the 1200m guidelines. Across the site SuDS have been included within the provision of open spaces as they will be designed to be seamlessly integral to the open space.

Full cognisance of ACC's Supplementary Guidance series for Landscape, Heritage and Trees & Woodlands, has been taken.



PROPOSAL—TRANSPORTATION

Access and Alterations to C89

The masterplan illustrates how the Derbeth land could be accessed by vehicles and developed to integrate with the existing settlement of Kingswells.

The C89 currently forms the western boundary to the residential parts of the Kingswells settlement and its primary function is one of movement, supporting significant volumes of vehicles on a daily basis as they pass between north and south Aberdeen. When the AWPR opens in Autumn 2018 it will become the primary route facilitating vehicle movement around Aberdeen. This is expected to result in a vast reduction in traffic using the C89 and will reduce its importance as a distributor road. The opportunity will exist to alter the character of the C89 to give more priority to Active Travel and Public Transport. Development of the site at Derbeth would allow opportunity for local realignment of the C89 which would help to change its function from one of movement more towards one of place making. In doing so the potential severance effect that the C89 could have would be removed and development at Derbeth could be integrated with existing residential areas of Kingswells.

A 'primary street' through the site creates a new link accessed from two new junctions on the C89 Kingswells Distributor Road. This street will be designed to allow for the potential provision of a new bus route through the site, improving bus accessibility throughout the community. The primary street has been designed to give the site a sense of arrival and place, passing through a series of core spaces and key junctions.

Whilst C89 is well used during weekday peak periods this situation will fundamentally change following completion of the AWPR. Forecast traffic flows, undertaken by Transport Scotland / AWPR team, on C89 north of the village are predicted to reduce by 74%

following diversion of existing traffic to the AWPR. It is anticipated that the dramatic traffic reduction will lead to improved junction performance, releasing capacity for additional development traffic from the Derbeth site.

New Pedestrian Crossings and Links to Kingswells and the Wider Area

The site at Derbeth is of such a scale that it will justify the provision of significant new path infrastructure to serve the needs of future residents, employees and visitors. An appropriate network of foot and cycle paths would be provided within the site to prioritise use of these modes particularly for internal journeys between residential and employment areas and the local centre. Such proposals would be developed further through the master planning process aimed at providing connections as directly as possible in order to encourage use of these modes, with the obvious advantage of 'designing-in' such provision from the outset.

There would be an opportunity to integrate the site with the existing settlement at Kingswells. Although the C89 runs between the two there are significant opportunities to link the areas through existing and proposed footway connections and crossings. The significant reduction in traffic predicted on Fairley Road following completion of the AWPR will significantly reduce the severance effect currently caused by high traffic flow at peak times.

Access to the site would be provided at existing access points from the C89 and via a new junction to the north east of the site. The vehicular access envisages the provision of at least two principal accesses to the residential area and local centre from junctions opposite Kingswells Crescent and Kingswells Drive. Both locations would incorporate priority crossings for pedestrians and cyclists interlinking with suitable extensions to the existing network of

roadside and off road paths within the village.

Potential Public Transportation Links

With full development of the Derbeth site and multiple accesses onto the C89, bus services could be enhanced within Kingswells and rerouted to pass directly through the site following an internal loop road network, maximising accessibility for future residents and employees. Development of the Derbeth site will allow for viable bus services to operate and new service routes to be developed. Some bus services could be developed and re-routed along the AWPR by accessing Kingswells via the Kingswells North junction, and thereafter continuing to route directly past or through the site from where services could be accessed within specified walk thresholds.

Adaptable and Resource Efficient

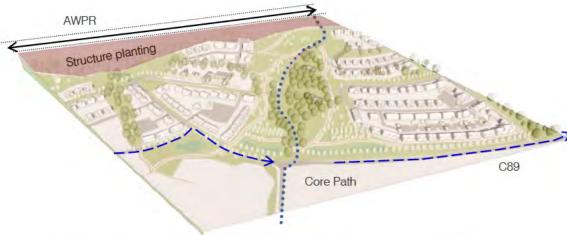
A clear hierarchy of streets will help create a strong sense of place and aid movement through the new development allowing for strategic north / south and east / west movements to be developed. Good street design can promote a better quality of living for everyone. At all times street design has aimed to consider place before movement, with the needs of pedestrian, cyclists and public transport considered before those of other vehicles.

Street layout has been considered in tandem with land use and in addition to the core streets there will be further streets, lanes and shared surfaces within the development areas which will be designed in accordance with 'Designing Streets' policy and appropriate standards/requirements of Aberdeen City Council.

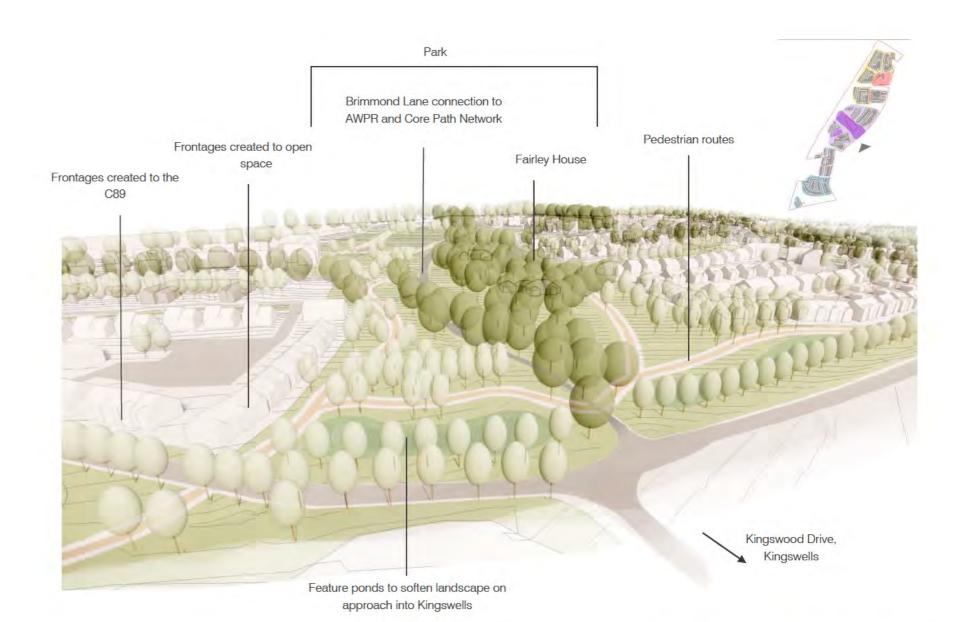
Traffic analysis and transport design aspects including those described above would be detailed in a future Transport Assessment once development proposals are refined.

Brimmond Lane—Key Characteristics

- * Enhancing connections between Kingswells and the wider open space networks (e.g. Brimmond Country Park, Bucksburn Park)
- * Feature pond creates a focal point on approach into Kingswells
- Realignment of the C89 to slow traffic speeds and to create a sense of place and arrival
- * Brimmond lane is an existing rural road which could form a focal point for the community. Reserved for access to private dwellings and pedestrians and cycles, it provides an attractive and safe route to the wider countryside
- Mature tree belts are retained and new open spaces proposed to enhance the unique characteristics of the site
- Positive frontages are created towards the C89 and to newly extended open space/ parks
- The privacy and setting of existing dwellings and the grounds off Brimmond Lane are respected
- Use of informal paths to enhance connectivity from neighbourhoods within existing residential areas of Kingswells
- * Street orientation works with existing topography
- * Integrated SUDs areas within parkland and open space



Aerial view of proposed Character Area - Brimmond Lane connection to AWPR and Core Path Network.





Alternate view of feature pond on arrival to Kingswells showing realignment of the C89.



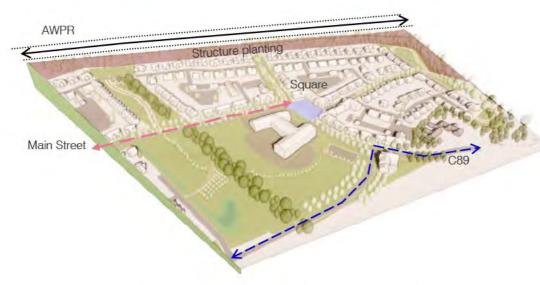
Proposed SUDS basins/ wetland meadow surrounded by informal paths.



Photograph showing current rural road at Brimmond Lane.

Derbeth Park and Primary School Site—Key Characteristics

- Existing woodland areas are retained and extended to create predominantly south facing urban parks / open space, forming breaks in the urban pattern
- Creation of focal point with a site for a new school at a key junction into the site. Opportunities to link the school site with Webster Park.
- Realignment of the C89 to slow traffic speeds and to create a sense of place and arrival
- Positive frontages employed on Main Street and Derbeth Park
- The existing buildings of Derbeth Farm provide an opportunity to preserve the unique character of the area and create a distinct urban pattern
- SUDS strategy incorporated with open space in the form of wet meadows habitat surrounded in wetland vegetation
- Provision of new safe crossing at school site
- Creation of urban square as a community meeting place next to the school



Aerial view of proposed Character Area - School site and main street connection with Square.





Alternate aerial view of Derbeth Farm looking towards the school along the Main street.



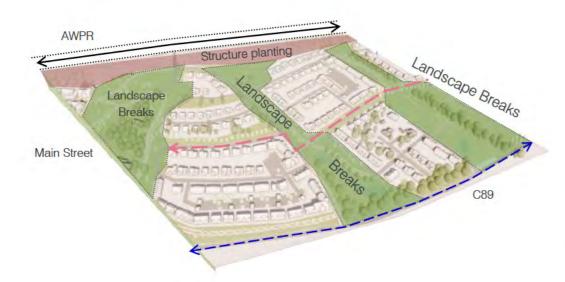
Informal parkland created with playful mounds, Examples of natural playgrounds. vegetated swale and orchard trees.



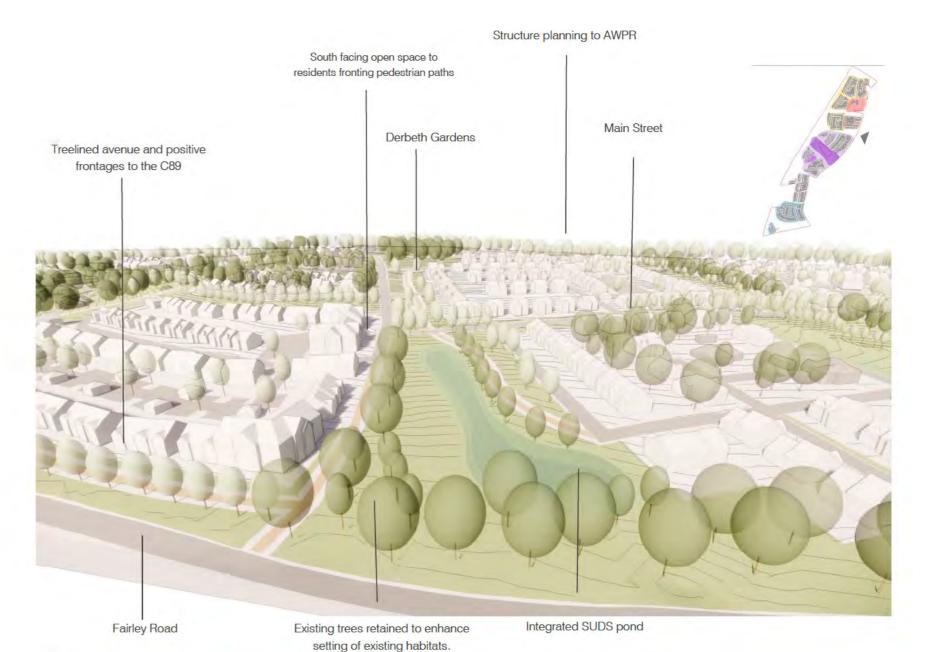


Derbeth Gardens—Key Characteristics

- Existing mature trees are retained and enhanced to create green corridors to alleviate the urban pattern and naturally delineate each character area
- Positive frontages to south facing open space with dwellings fronting pedestrian/cycle lanes
- Residential blocks and vehicular streets work with the natural topography as it slopes upwards towards AWPR
- SUDS strategy incorporated with open space in the form of wet meadows habitat surrounded with softer edges of wetland vegetation
- A formal tree lined avenue along the C89 influences the changing character of the street and creates a positive and welcoming space
- Informal pedestrian paths cross Derbeth Gardens connecting to nearby residential neighbourhoods in Kingswells



Aerial view of proposed Character Area - Showing Derbeth Gardens and pedestrian connections to open space.





Photograph showing example of CALA houses with positive frontages to open space.

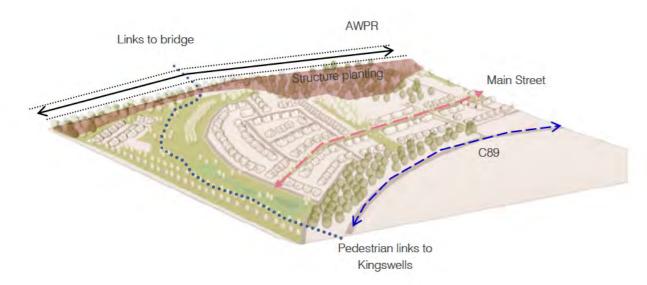


Swale pond surrounded in soft wetland vegetation Photograph of formal path through parkland. as proposed for integrated SUDS ponds.



Cloghill Park—Key Characteristics

- Provides new visual setting on approach to Kingswells, which respects the Consumption Dykes scheduled monument within Prime Four's Northern Park to the south
- Provides links to footbridge over AWPR, linking the existing and proposed communities of Kingswells with the wider countryside
- Houses overlook a south facing open space, with integrated SUDS, play and community growing spaces
- Privacy and character setting maintained to existing dwellings
- Courtyard housing in south west corner creates private cluster in addition to the existing dwelling out with the site
- Existing mature trees and proposed structure planting to AWPR creates attractive green setting to rear of development pocket



Aerial view of proposed Character Area - Showing Cloghill Park and new approach to Kingswells.



Example of allotments.

Cloghill Park offers a large usable open space for

community use.

Land at Derbeth, Kingswells / LDP Bid for CALA Homes (North) Limited

Footpath connections lead to pedestrian bridge

over AWPR

PHASING AND DELIVERY

Phasing

The site presents the opportunity for initial development in two key locations (primary junctions). This would allow land to the south to deliver housing developing from the Prime Four development northwards and for land to the north to be developed in conjunction to allow for delivery of the primary school, potential mixed use areas and integration with Webster Park. Any phasing strategy could be developed with input form the Council and the local community.

CALA Homes

Over the past five years, under the ownership of Patron Capital Partners and Legal & General Group (L&G), CALA has reached new heights. CALA have doubled the size of the business in terms of new home volumes over this period and become one of the fastest growing housebuilders in the UK today, which is testament to the strength and ambition of the team, the quality of our homes and our first class approach to customer service. Working together, CALA will build on the strong momentum they have achieved in recent years while strength ensuring their position as the UK's most upmarket major homebuilder.

This strong backing builds upon and allows the delivery of fantastic new communities and quality family homes ensuring proposals are viable, deliverable and will be acted upon. CALA are committed to Aberdeen and having successfully got Milltimber, Craibstone and Friarsfield through the LDP and masterplanning process and on site, Derbeth is the next to be taken forward etc.

SUMMARY

CALA Homes (North) Limited are a leading housebuilder, not only in the North East of Scotland, but nationally. CALA consistently deliver high quality homes, and in the last 12/24 months have developed across 5 sites in Aberdeen City and have added a further three sites to this portfolio in 2018. The fact there is a developer behind this site with a track record of delivering housing, emphasises the deliverability of the site.

A combination of this site being located in a very desirable and established location and CALA's unmatched track record of delivering high quality development in the North East of Scotland, and importantly also in the immediate area, mean that the land at Derbeth should be seriously considered for inclusion in the next Local Development Plan.

Kingswells will require additional housing to meet future demand. This is the only site locally where that housing can be delivered efficiently and in a controlled manner, without running the risk of coalescence to the east.

The planning authority has previously considered land west of the C89 as appropriate for development. Having considered the site afresh, this bid document confirms that, in respect of location, use, changing context and landscape fit, Derbeth can deliver a sustainable, integrated extension to the existing Kingswells community.

Key Benefits:

- Integration of new community with existing settlement of Kingswells
- Area of limited landscape impact
- Logical expansion west of Kingswells
- Enhances existing connections to Kingswells and between Kingswells and Brimmond Country Park
- Changing the character of the C89 to create a sense of place and arrival, slow traffic and provide safe routes to school
- Space for a new school and community facilities
- Mixed use development
- A variety of sheltered, south facing public open spaces provided within short walking distances
- Retention of existing tree planting provides visual screening and shelter
- Variety of house sizes and tenures
- 25% affordable housing







Aberdeen Local Development Plan Review Main Issues Report Response Form 2019

Aberdeen City Council has published a Main Issues Report (MIR) which is part of the process of preparing a new Local Development Plan. It is designed to gather views on specific proposals and sets out options for dealing with the key planning matters facing Aberdeen over the next 20 years such as the location of new housing and employment development, the future of retailing and the City Centre, housing needs and tackling climate change. It also includes a number of potential new policies which would be used in the determination of planning applications.

The MIR has been published alongside a Monitoring Statement and Environmental Report. Copies are available to view at Marischal College, Broad Street. Aberdeen. These, and other supporting documents, are available at: - www.aberdeencity.gov.uk/aldp2022

Everyone now has the chance to comment on the report and associated documents. All comments received will be considered and used to inform the preparation of the Proposed Aberdeen City Local Development Plan. There will be a further opportunity to comment on the Proposed Plan when it is published in early 2020.

The consultation runs from 4 March 2019 to 13 May 2019.

Responses to the published documents can be:

- made online at:- http://consultation.aberdeencity.gov.uk/planning/mir2019;
- emailed to:- ldp@aberdeencity.gov.uk; or
- by post to:- Local Development Plan Team, Strategic Place Planning, Aberdeen City Council, Business Hub 4, Ground Floor North, Marischal College, Broad Street, Aberdeen, AB10 1AB.

Completed response forms should be with us no later than 13 May 2019.



YOUR DETAILS

Name	SARAH GRAHAM
Organisation (if relevant)	HALLIDAY FRASER MUNRO
On behalf of (if relevant)	CALA HOMES (NORTH) LTD
Address	
Postcode	
Telephone	
E-mail	

Thank you for taking the time to complete this response form. If you wish to be added to the LDP e-mailing list to be kept informed of our progress in producing the next Local Development Plan, please tick here



If yes, please provide an e-mail address

PRIVACY STATEMENT

As part of the review of the Local Development Plan, Aberdeen City Council (ACC) will offer you several opportunities to submit your views and comments. These opportunities will range from the current consultation stage, the Main Issues Report, where we will ask you to comment on specific proposals and alternatives to the Proposed Plan stage where the set view of ACC has been established.

ACC are legally required to consult at this stage and at Proposed Plan stage. This is set out in the Town and Country Planning (Scotland) Act 1997 (as amended) and supporting regulations. The Environmental Assessment (Scotland) Act 2005 also requires us to consult on a Strategic Environmental Assessment Environmental Report.

By submitting a response to the consultation, you understand that ACC can use the information provided in this form, including personal data, as part of the review of the Aberdeen City Local Development Plan. ACC will not share or disclose any personal data about you to any organization or person unless it is authorized or required to do so by law.

The data controller for this information is ACC. We understand our legal basis for processing this information as Article 6(1)(c) of the General Data Protection Regulation as this is an activity we are legally required to carry out under the Town and Country Planning (Scotland) Act 1997 (as amended) and supporting regulations and The Environmental Assessment (Scotland) Act 2005. The data on the form will be used to inform the preparation of the Proposed Aberdeen City Local Development Plan 2022. At the end of the consultation, where contact details have been provided, the Local Development Plan team will provide you with a respondent number. You may also be contacted about the comments you have made and, as obliged by the Town and Country Planning (Scotland) Act 1997 (as amended) and supporting regulations, the Local Development Plan team will contact you to inform you of the publication of the proposed Aberdeen Local Development Plan in early 2020. If you chose not to provide your contact details, your comments will still be valid but we will not be able to contact you in the future.

Responses will be collated, redacted, summarised and stored electronically or in locked cabinets in Marischal College. All redacted responses will be published, alongside the respondents name (if provided), on the Aberdeen City Local Development Plan website. Contact details will not be made public, but your name and respondent number will be published.

Aberdeen City Council will only keep your personal data for as long as is needed. Data will be kept until the emerging Local Development Plan is itself replaced – this is likely to be around 5 years following its adoption in 2022 – so 2027. Following this, data will be disposed of in a secure manner.

YOUR DATA, YOUR RIGHTS

You've got legal rights about the way ACC handles and uses your data, which include the right to ask for a copy of it, and to ask us to stop doing something with your data. Please contact the Council's Data Protection Officer by e-mailing DataProtectionOfficer@aberdeencity.gov.uk or writing to Data Protection Officer, Aberdeen City Council, Governance, Level 1 South, Marischal College, Broad Street, Aberdeen, AB10 1AB. More information is available at: - https://www.aberdeencity.gov.uk/your-data

YOUR COMMENTS

Which document(s) are you commenting on?	 Main Issues Report Strategic Environmental Assessment Environmental Report Monitoring Statement
	nt and the specific Issue, Question, Site, Policy, Map or Table you are ide your comments below and explain your reason for supporting, opposing ic part of the document.
Please see attached statem - Question 1 'New Housing - Site B0910 (Friarsfield No	
Please also find enclosed: - Friarsfield LDP Bid Maste	erplan

YOUR COMMENTS CONTINUED



ABERDEEN CITY LOCAL DEVELOPMENT PLAN RESPONSE TO MAIN ISSUES REPORT

SITE B0910, FRIARSFIELD NORTH, CULTS

MAY 2019

On behalf of CALA Homes (North) Ltd







CONTENTS

- 1. Introduction
- 2. Settlement Strategy
- 3. Site B0910: Site Appraisal
 - 3.1 Development Options Assessment Report Site B0910
 - 3.2 Detailed Analysis of Perceived Constraints
- 4. Conclusion

Appendix 1: Site Assessment Tables

Table 1: Craigbank Site Assessment Review

Table 2: Corbie Site Assessment Review

Table 3: Newton Site Assessment Review

Table 4: Site Assessment Justification

Table 5: Strategic Environmental Assessment Review





1.0 Introduction

This response to the Main Issues Report (MIR) has been prepared by Halliday Fraser Munro on behalf of CALA Homes (North) Ltd, to support the allocation of land at Friarsfield North. The site was submitted as a bid for development and is identified as site B0910 in the MIR. In total the site measures 21.9 hectares and proposes a total of approximately 280 homes. The site can be split into three separate 'parcels' as follows;

- Craigbank (8.8ha) Approx. 115 houses
- Corbie (5.4ha) Approx. 65 houses
- Newton (6.3ha) Approx. 100 houses

Each of these areas should be considered as individual housing allocations, as well as being an option as one complete development.

The site sits to the north of the existing Friarsfield development in Cults, about 5km west of Aberdeen City Centre. The site sits on the boundary between urban development and agricultural land. The land is currently in use as grazing for equestrian uses, and the central part of the site is currently vacant.

The site is immediately deliverable with no constraints or impediments to delivery. The site is well defined, by Craigton Road to the north, existing development by CALA to the south and by woodland and residential development to the east. A new link road alleviating pressure on 'Jacob's Ladder'/ Friarsfield Road is currently under construction to the south of the site, and this development would make use of this significant piece of new road infrastructure. The new link road should not be left as one-sided infrastructure which is wasteful of resources and inefficient.

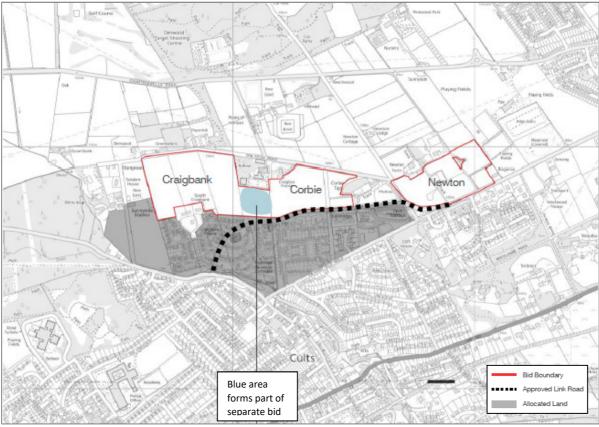


Figure 1: Site Location





Additional housing is needed in Aberdeen to ensure the housing land supply is met and to ensure a range and choice of housing sites are available within the city. The development to the south of the site (allocated as site OP41 in the Aberdeen Local Development Plan 2017) is forecast to be complete by 2021. Additional development is needed in this area to satisfy local demands and sustain and improve local services. Cults is a suburb within Aberdeen City, which has its own neighbourhood centre, and both a primary school and secondary school.

The site is being promoted by CALA, an award winning five-star house builder with their heritage firmly placed in Aberdeen, having been established in 1875 as the City of Aberdeen Land Association. CALA remain focused on delivering high quality developments in the best locations more than 140 years on. CALA have become one of the fastest growing housebuilders in the UK today, which is testament to the strength and ambition of the team, the quality of their homes and first-class approach to customer service. CALA have the backing of Legal & General, and working together, this enables CALA to build upon the delivery of fantastic new communities and quality family homes. CALA have a strong track record of delivering development in this area and are currently on site in eight locations across the city and shire, as demonstrated by table 1 below. CALA are therefore committed to investing in the area, taking sites to the market, and delivering homes to meet the demand in the area.

Site Name	Site First Allocated	PPiP Approval	First Phase Approval	First Unit Completed	No. of Units delivered (by 1st Jan 2019)	Site Completed
Oldfold, Aberdeen (OP48)	2012	2015	2015	2016	75	Ongoing
Friarsfield, Aberdeen (OP41)	2012	2012	2012	2013	128	Ongoing
Grandhome, Aberdeen	2012	2015	2017	2018	32	Ongoing
Dubford, Aberdeen (OP10)	2012	2013	2014	2015	109	Completed
Balgownie Road, Aberdeen	2012	N/A	2014	2015	85	Completed
Craibstone, Aberdeen (OP20)	2012	2017	2018	2019	0	Ongoing
Woodside (Persley Den), Aberdeen (OP25)	2012	2015	2018	2019	0	Ongoing
Conglass, Inverurie (OP1)	2012	N/A	2018	2019	18	Ongoing

2.0 Settlement Strategy

2.1 Housing Strategy

A separate representation on strategy and housing need has been submitted in response to the MIR and CALA have also responded to the Proposed Strategic Development Plan on housing requirements and housing strategy. These representations will be considered by a Reporter in due





course, but are also relevant to this MIR response. In summary, CALA believe that additional housing land needs to be allocated to meet identified shortfalls. CALA Homes have identified a shortfall in housing of around 250 homes per year to account for the cumulative under delivery of Housing Land Audit predictions, and at least 682 homes to account for the over calculation of available brownfield land.

CALA are of the view that the brownfield sites identified in the Brownfield Urban Capacity Study update should not all be counted towards meeting the housing requirement. In addition, the deliverability of new sites identified in the MIR is questioned. 96% these are under the ownership of Aberdeen City Council (60%), NHS (29%) or Aberdeen University (7%). CALA note that sites in institutional ownership consistently take significantly longer to deliver due to organisational procedures. This can demonstrated through a review of the brownfield sites identified in table 1 of Appendix 1 of the 2017 Local Development Plan. Of the 40 sites identified, we are only aware of three of these being delivered, and one of these was for student accommodation which does not count towards housing requirements. 60% of these sites are in the ownership of Aberdeen City Council.

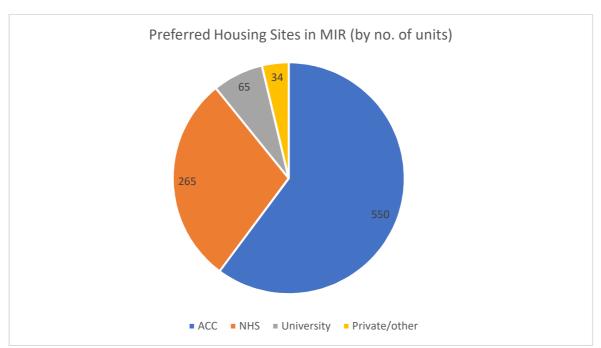


Table 1: Preferred Sites in MIR by landowner

CALA also believe that additional housing sites need to be identified to ensure that the planning authority are confident that a range of sites can be brought forward within the plan period as required by Scottish Planning Policy (SPP).

In response to Question 1 of the MIR, CALA do not agree with the preferred housing sites identified and believe that the three parcels of land at Friarsfield north (B0910) are suitable for housing, and are needed to meet the housing shortfall. Section 3 below provides justification as to the suitability of the site.





3.0 Site B0910: Site Appraisal

3.1 Development Options Assessment Report – Site B0910

Site B0910 has been identified as 'undesirable' in the Options Assessment Report on the basis that green belt, landscape impact and an 'unsustainable location' are constraints to the development of the site. CALA strongly disagree with this assessment and suggest that the site assessment as included within appendix 3 of the Main Issues Report is overly negative and does not take account of information provided within the supporting masterplan document submitted with the bid. The sustainability scoring checklist reviews proposed sites against twenty-one different criteria, and scores them from 1-3. The Officers assessment scores the three sites as 45 out of 63 (71%). However, on reviewing the assessment, we would suggest that all three parcels of land score 56 out of 63 (almost 90%). A detailed review of the site assessments is included at Appendix 1 of this report. Section 3.2 below provides a detailed justification as to why land at Craigbank, Corbie and Newton should be allocated, and the perceived constraints do prohibit development.

3.2 Detailed Analysis of Perceived Constraints

3.2.1 Green Belt

The site is within the existing green belt designation. The purpose of green belt is to direct development to the most appropriate locations, protect and enhance the character, landscape setting and identity of the settlement, and protect and provide access to open space (paragraph 49 of Scottish Planning Policy). The Aberdeen greenbelt wraps around the city and extends to its boundary with the neighbouring authority. A green belt review has not been undertaken for either of the previous two Local Development Plan review processes, but instead the review of development sites was undertaken, and sites were released where it was considered appropriate.

The land at Friarsfield North is appropriate for development, and is not required to protect the character, landscape setting and identity of Aberdeen. The justification for site B0910 outlines that 'the greenbelt acts as green backdrop to existing development at Friarsfield and to Aberdeen as a whole' and is 'part of an area which serves to maintain the separate identities of Cults, Countesswells and Aberdeen'. This would remain the case if Friarsfield North was developed, there would remain a green backdrop to Friarsfield North as demonstrated by figure 2 below. The site, when viewed from the south has a backdrop of mature woodland and would simply be viewed as a continuation of the existing settlement pattern.



Figure 2: View of site from south side of River Dee





The site has a strong boundary to the north with a high (6 ft) stone wall, the land slopes away from this to the south and it is therefore a logical boundary to the north of Cults. Figure 3 below highlights this robust boundary.



Photograph taking looking west along Craigton Road

Photograph taking looking west into 'Corbie' site

Figure 3: Photographs showing strong boundary to north of site

There remains significant separation between both the site and Aberdeen City, and Countesswells as shown by figure 4 below. This point, in addition to the strong northern boundary of the site means that there is no reason the green belt boundary should not be revised.

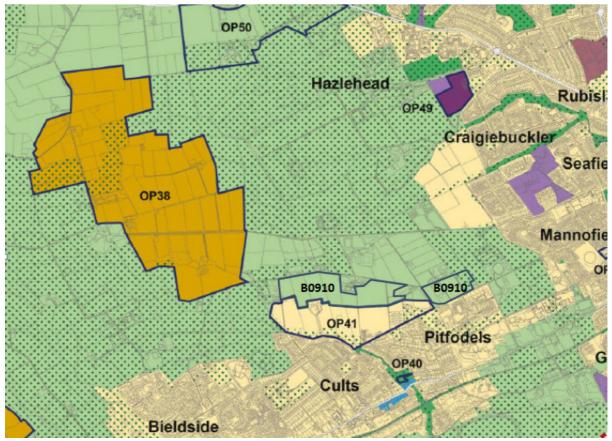


Figure 4: Extract from Proposals Map (2017) – showing greenbelt in relation to Cults, Countesswells and Aberdeen City (site B0910 identified by blue line).





No review of the Green belt has been undertaken to assess the suitability of the green belt in this location, nor is one proposed. Paragraph 50 of Scottish Planning Policy (SPP) notes that Planning Authorities should identify the most sustainable locations for longer term development and where necessary, review the boundaries of any green belt. In the past, the LDP review has released land from greenbelt zonings and therefore this is not a valid reason against allocating the site. The last LDP review carried out in 2017 released multiple new zonings from the green belt, including the following locations:

- Countesswells (3000 homes and 10ha of employment land),
- Oldfold (550 homes and 5ha of employment land)
- Grandhome (2100 homes, 5ha of employment land)
- Rowett South (1940 homes)
- Craibstone South (1000 homes)
- Greenferns (1350 homes and 10 ha of employment land)
- Loirston (1500 homes, 11 ha of employment land)

CALA therefore suggest that this LDP review is an opportunity to reconsider the green belt boundary and make important strategic decisions about the future growth of the area. If no additional land is allocated at Cults there will be no new housing in Cults for almost 10 years given that the next plan review would not take place until 2027. The greenbelt cannot be treated as an absolute constraint to development as almost all land outwith the built-up area of the city is designated as green belt. The site has also previously been identified by Aberdeen City Council as a suitable location for residential development, given it was partially allocated and partially identified as future land in the Finalised 2004 Aberdeen Local Plan (see section 3.2.5 below). Green belt cannot be considered a valid constraint to the development of the site given that the LDP review offers an opportunity to review this designation.

This site is in a prime location for development, it is contiguous with development at Friarsfield (zoned as site OP41), and would extend development naturally to the north of the existing residential development, making use of the new Friarsfield link road. The link road is a substantial piece of infrastructure which should be utilised. Craigton Road to the north of the site would be the logical location for the greenbelt boundary, in line with Paragraph 51 of SPP which suggests that greenbelt should have a clearly identifiable visual boundary. The high stone wall provides a strong boundary to the north of the site, and with Craigton Road sitting to the rear of this, it is a logical location for the green belt boundary. Figure 5 below shows the suggested green belt boundary.





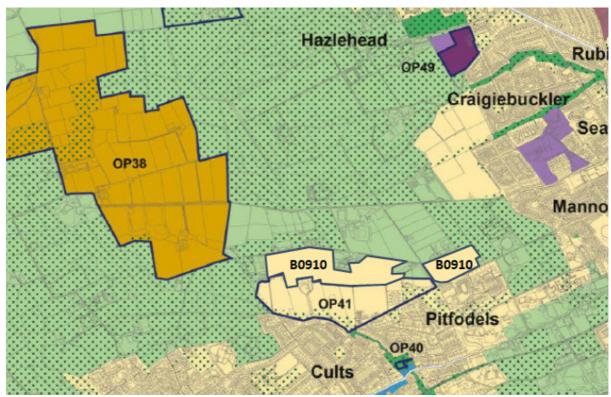


Figure 5: Proposed greenbelt boundary with site B0910 shown as an allocated site

The site would have no impact on access to open space, but has the opportunity to enhance existing path provision as shown by figure 6 below.

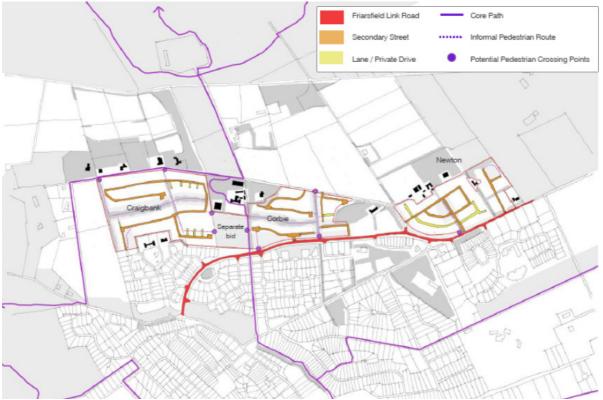


Figure 6: Connectivity concept showing proposed and existing paths





In summary, the site is not required to meet the functions of the green belt, and is an appropriate location for development, given its proximity to existing development, and opportunity to utilise new road infrastructure. There would be no impact on the landscape setting, character or identity of the city, and no impact on access to open space. Craigton Road to the north of the site offers a clearly identifiable green belt boundary, as required by SPP. The tall stone wall to the southern side of Craigton Road further emphasises the strong boundary along the north of the site. The opportunity for residential development on this site has been previously identified by the Council and given there is a need for small scale housing sites, this site should be allocated. Figure 5 above shows the suggested revised green belt boundary.

3.2.2 Landscape and Visual Impact

The site justification outlines that 'development will have significant impacts on landscape and would be highly visible from the south'. CALA strongly disagree with this assessment as the site has 'discreet' visibility and would fit within the exiting landscape framework.

CALA have been working with Ian White Associates Landscape Architects (IWA) on this site who have carried out an assessment of landscape impact (see pages 14-29 of the supporting masterplan document). IWA have considered the existing landscape character and carried out a visual appraisal from key locations, which can be found on pages 14 – 29 of the supporting masterplan document. IWA have assessed the existing landscape character in line with SNH's landscape character assessment of 'wooded farmland'. The character is one of undulating topography, woodland cover, stone dykes, open areas and suburban edges. It is noted that given the development of Friarsfield the landscape has already changed from a rural to a suburban one.

The visibility of the site from the south is considered on page 17 of the supporting masterplan document. The site is not visible from north or south Deeside Road (A93 or B9077) as vegetation and topography obscure the site. A viewpoint from an unclassified road to the south of the River was identified, given that there are no direct views from the north or south Deeside Roads. This viewpoint shows that the proposed development sites sit comfortably below the wooded ridgeline and follows the existing pattern of housing (see figure 2).

Locally, views are limited due to the undulating topography, woodlands, and housing developments. The site is found to be only 'discreetly visible', and development would be constrained by existing woodland to the west and east and ridgeline woodland, stone walls and hedging to the north. New blocks of woodland planting are proposed to subdivide development areas and soften the visual impact further. Figure 7 below provides an indicative landscape concept diagram, showing that additional tree planting would be part of future development. Tree planting is proposed to divide the area into development pockets and give a formal landscaped approach when viewed from outwith the site.





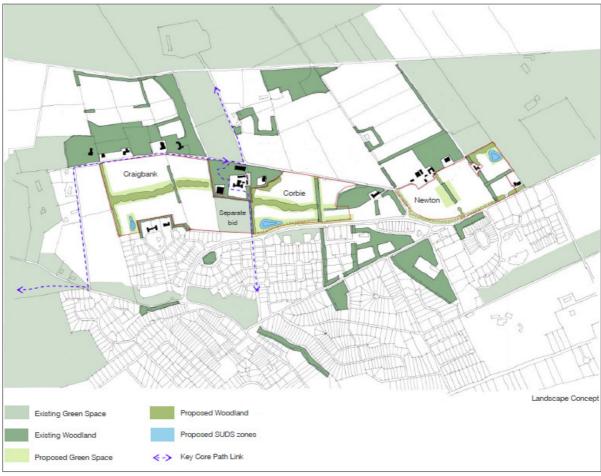


Figure 7: Landscape Concept

In relation to 'Newton', the character of the area is being changed by the construction of the new link road (planning reference 170307/DPP). Figure 8 below demonstrates the impact of this development, which changes the character of the area into a predominantly urban one. The area does have existing residential development to the south side of Craigton road, and there is low density housing to the north. The site offers the opportunity to create a new arrival into Cults from Craigton Road.





Photograph taken 5.1.18

Photograph taken 30.4.19

Figure 8: Photographs taken from Craigton Road looking north west showing the change in landscape at 'Newton' with the construction of the new link road





90m Contour

The site assessment justification notes that settlements along Deeside are contained within the 90m contour line and that this development would go beyond this. CALA note that there is no policy or guideline that restricts development beyond 90m contour and suggest that any such arbitrary line would not be appropriate as each development site needs to be considered on its merits. The statement is also incorrect as there are areas where development breaches the 90m contour;

- Cults Primary School
- Hillview Community Church
- Parts of Earlspark Avenue and Earlspark Crescent
- The far northern parts of The Meadows in Milltimber.

The reference to a 90m contour is therefore unjustified and does not constrain the development. Furthermore, figure 2 above shows that the site sits below the skyline.

3.2.3 'Unsustainable' Location

The site is located in Cults, which is a suburb of Aberdeen, located 5km to the west of Aberdeen City Centre. Cults neighbourhood centre (as defined in the Aberdeen City LDP 2017) is a thriving centre, home to over 30 businesses (retail units and services). The centre is just over 800m from the site, and additional development would help to sustain the existing businesses and services located in Cults. The site is also accessible for employment opportunities, being only 3 miles from Aberdeen city centre, 3 miles from Prime Four Business Park, 1 mile from the proposed business land at Countesswells., and only 3.5 miles from the recently completed Aberdeen Western Peripheral Route (AWPR). The AWPR opens up a range of other employment opportunities such as Dyce and Aberdeen South.

Public Transport Provision

The nearest bus service is currently located on North Deeside Road, which is 900m from the site. However, the construction of the Friarsfield link road will enable bus services to operate along it and the new road road includes provision for two bus stops (north and south). The link road which is due to be complete in December 2019 will enable bus service 15 to loop along Craigton Road. The exisitng road configuration at Jacob's Ladder prevents busses from using this road. The site will therefore be within 400m of the bus stops on the Friarsfield link road.

Core Paths

The site is readily accessible in relation to footpaths and cycle paths (see figure 9 below). Both Craigbank and Corbie are located adjacent to core path 63. The site at Newton is not adjacent to an existing core path but has good existing pedestrian access to the south. The developments both have good links to core path 66 (Deeside line) which is a segregated walking/cycling route into Aberdeen City Centre.







Figure 9: Extract from Supporting Masterplan Document showing Core paths (purple

In summary, the site is located in a sustainable location, which currently has good public transport connectivity and will have excellent provision on completion of the link road. The site is located in Cults which offers local retailing opportunities. The site also has excellent pedestrian and cycling connectivity through core path provision. The site will act as a continuation of development and create a strong ridgeline to the north preventing the sprawling of Cults, whilst ensuring the continued supply of residential homes.

3.2.4 School Capacity

An independent education review was carried out in support of the development bid. This report found that viable solutions do exist for Early Learning and Childcare (ELC) provision, primary education provision and secondary education over time. Whilst both Cults Primary School and Cults Secondary School are forecast to be operating over capacity, this would be reversed by the Countesswells catchment area review.

There are two new primary schools proposed in the area which will offer additional capacity. A replacement two stream Milltimber Primary School has been approved, which will offer additional primary school capacity once it is completed. Countesswells will include a new primary school and a new secondary school, and once these are completed, it will free up capacity in neighbouring schools. The phasing of development at Friarsfield North would be phased to match the capacity in schools.





It also noted that the Cults Primary School site is large enough to accommodate a primary school more than three streams (more than 21 classrooms), and indeed in 2017 the school operated with 22 classrooms.

3.2.5 Other Considerations

Affordable Housing

The site would comply with Aberdeen City Council's policy requirements and would deliver 25% of the housing as on-site affordable housing. The site would deliver around 70 affordable homes, which there is a significant need for in this area.

2004 Finalised Aberdeen Local Plan

Part of the site has previously been allocated for development. The 2004 Finalised Aberdeen Local Plan (Green Spaces New Places), which was used by the Council as a key material consideration in planning decisions prior to the 2008 Aberdeen Local Plan, identified a much larger area of Friarsfield for development (see figure 10 below). The thinking at this time was that development was appropriate in this area, and the benefits of consolidating an existing settlement were recognised. There is no reason as to why the site would now not be considered suitable for development. As discussed above, the green belt designation is not required in this area.

The proposed development at Newton is also now appropriate for development given the change in character of the area introduced by the new Friarsfield link road (see figure 8). The site offers an opportunity to create a new northern edge to Cults, and utilise the significant infrastructure being constructed.





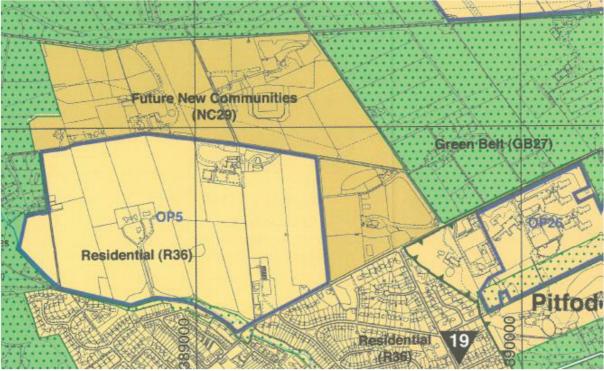


Figure 10: Extract from Finalised Local Development Plan 2004

Need for Development

Development is needed in Cults to sustain services and facilities. As previously discussed, Cults neighbourhood centre sustain a variety of shops and services. There are no other sites allocated in Cults to provide for local housing need once site OP41 is built out, which is scheduled to be in 2021. If allocated, this site would be developed within the first phase of the new LDP (so by 2026), and would be expected to be completed over a period of 10 years. If no additional land is allocated, there is unlikely to be additional affordable housing in Cults. This site would deliver 25% affordable homes early in the development if allocated.

Proposed Strategic Development Plan 2018 (PSDP)

The PSDP sets out housing requirements, and whilst it is stated that there is sufficient housing land available to meet the housing land requirement at current rates of completion, it is noted that a considerable proportion of current allocations are strategic and if they failed to come forward the housing land supply may not be maintained. CALA Homes have continually suggested that the deliverability of strategic sites needs to be more realistic, and the inflated delivery rates as identified in Housing Land Audits should not be relied upon. The separate response on housing land covers this issue in more detail, but in summary the over-inflated Housing Land Audit predictions equates to 250 homes per year.

The PSDP identifies the need for additional allocations, and strategic reserve housing land. However, Aberdeen City Council have only identified a small number of brownfield sites which are not likely to maintain the housing land supply. Concerns in relation to the brownfield supply are outlined in section 2.1 above, but in summary brownfield sites take longer to develop than greenfield sites. The





majority of brownfield sites identified to contribute to the housing requirement are in the ownership of Aberdeen City Council which means they take even longer to deliver and have increased complexities around bureaucratic requirements.

The PSDP notes that development locations should seek to reduce travel and make active travel a more attractive option. This is the case at Friarsfield where the site is adjacent to core paths and will be adjacent to bus routes once they reroute along the new link road. The Deeside corridor is also identified within the PSDP for 'Improved Cross City Connections for Active Travel'. A 'Cross City Transport Connections Study' is due to be undertaken to inform opportunities and enhance accessibility to more destinations by public transport.

The PSPD also notes that allocations should be small scale in nature and should not be extensions to any existing strategic development sites. This is the case at Friarsfield, were the site is immediately deliverable, is well advanced, is under control of a single developer, and utilises infrastructure already delivered by the developer. The site is to the north of the existing development at Friarsfield which has been delivered by CALA within the LDP timeframe. The proposed site is of a scale which is can be easily delivered and can come forward on a phased basis, in line with the development pockets of Craigbank, Corbie and Newton. The site has the potential to make a significant contribution to housing land supply.

The site at Friarsfield north therefore fits with the proposed strategy outlined in the Proposed Strategic Development Plan.

4. Conclusion

There is a requirement to identify additional housing land to meet the shortfall in provision, and to meet the requirements of the PSDP. There is also a need to deliver housing in Cults to meet both demand and the needs of the area, in particular in relation to delivery of affordable housing. The land at Friarsfield North is extremely well located in relation to its proximity to existing development, and its ability to utilise new transport infrastructure.

There will be very few sites that are more ready to deliver high quality homes in a sustainable and desirable location than this site. There are no impediments to the delivery of the site, CALA have a full team of technical advisors preparing supporting information to inform the development of the site. As outlined, there are no infrastructure capacity issues to overcome for this site.

CALA are of the view that the Officer's site assessment was overly negative (scoring 45 or 70%), and the sites would in fact score 56-58 (90%) in the sustainability checklist. A full review of the assessment is contained within Appendix 1. The sites were marked down unnecessarily in relation to; slope, landscape features, landscape fit, relationship to settlement, land use mix, accessibility proximity to facilities, proximity of employment opportunities, physical infrastructure future and service infrastructure capacity. This response demonstrates that the area is not needed to contribute to the greenbelt in this location, and separation between Cults and Countesswells can be catered for by the remaining greenbelt. The site does not have an adverse landscape impact and does not breach the skyline. The proposed development would enhance the landscape setting with substantial additional tree planting.





The site is in a highly sustainable location, walkable to Cults neighbourhood centre and to both the primary and secondary school. The site is close to an active travel route in Aberdeen City centre, in an area where active travel routes are promoted by the PSDP.

The site would deliver much needed market and affordable housing for Cults. 25% of the site would be delivered as affordable housing, helping to address a key issue for the community.

The deliverability of this site cannot be overstated, not only are there no infrastructure constraints, the track record of CALA in delivering housing in the north east speaks for itself. CALA homes are currently on site in eight locations across Aberdeen city and shire. Once sites are allocated, CALA have delivered these sites quickly and effectively, creating popular housing locations that provide both high quality housing and a high amenity development. Friarsfield north would be an extension of the high-quality development to the south and would make use of the link road being constructed. This is a substantial piece of road infrastructure which would be left underutilised if additional development is not allocated at Friarsfield North.





APPENDIX 1: DEVELOPMENT OPTIONS ASSESSMENT REPORT

Development Options Assessment Report on the Pre-Main Issues Submissions 2018 (Appendix 3 to the Main Issues Report)

The site assessment process undertaken by Officers comprised an assessment of sites against a sustainability checklist and used the outcomes of the strategic environmental assessment to inform the decision on whether a site was suitable. Site B0910 has been assessed and identified as 'undesirable', with key constraints being school capacity and landscape. The tables below provide a review of the officer's assessment, and reconsider the site scoring of the development pockets at Friarsfield North. The table includes the score given by Officers, and a 'Proposed Score' reflecting the additional justification provided in the table.

The following tables are included below:

Table 1 - Craigbank Sustainability Checklist Review Assessment

Table 2 – Corbie Sustainability Checklist Review Assessment

Table 3 – Newton Sustainability Checklist Review Assessment

Table 4 - Strategic Environmental Assessment Review

Table 5 – Review of 'Justification'

Table 1: Craigbank Sustainability Checklist Review Assessment

Criteria	Officers Score	Proposed Score	CALA response
Exposure	3	3	The site is sheltered.
Aspect	3	3	The site is south facing.
Slope	1	2	Suggestion that the site is steeper than 1 in 12.
			Page 30 of the supporting masterplan document outlines that the topography of the site varies between 1/100-1/10 (with some pockets of steeper ground.) Therefore the scoring is not justified.
Flood Risk	3	3	SEPA maps indicate no flooding on the site.
Drainage	3	3	The site is well drained.
Built/Cultural Elements	3	3	No loss or disturbance to archaeological sites or vernacular buildings.
Natural Conservation	3	3	No loss or disturbance of wildlife habitat or species.
Landscape Features	2	3	Suggestion that the stone wall, field boundaries and tree field boundaries could be lost or disturbed due to development.
			The proposed development would retain the high wall and field boundaries and repair these, except for openings for access (see masterplan document page 36). Therefore the scoring is not justified.





Landscape Fit	1	2	Suggestion that development would have a visual impact locally from Kirk Brae / Kingswells Road and Lower Deeside as development would risk breaching the skyline. The development would not breach the skyline (see page 17 and 29 of the masterplan document). The development is contained within existing landscape features, and extends existing development meaning its visual impact would be minimal. Therefore the scoring is not justified.
Relationship to existing settlement	1	3	Site would sit to the north of OP41 and south east of OP38. Area is zoned as green belt which provides a setting to Cults and the city as a whole. The site is well related to the existing settlement with development contiguous along the southern boundary. Green belt is not a constraint to development (see Section 2.3), and a more logical green belt boundary would be Craigton Road. Therefore the scoring is not justified.
Land Use Mix / Balance / Service Thresholds	1	2	Suggestion that the development would not contribute to a better mix of landuse. The site is promoting residential development which could result in the additional critical mass to attract services to this area. The context of the site is also important and it is located in a residential area. Therefore the scoring is not justified.
Accessibility	1	2/3	The closest bus stop is over 800m from the site at North Deeside Road. The site is not significantly more than 800m from a bus stop, and development at Friarsfield is already over 800m from the bus stop. However, the new Friarsfield link road which is under construction will enable bus services to route past the site, meaning the site will be within 400m of a bus stop. Therefore the scoring is not justified.
Proximity to facilities / shopping / health / recreation	1	2	Suggestion that there are no facilities within 800m of the site. Cults Medical Centre is said to be 950m away. Cults neighbourhood centre and Cults Medical Centre are slightly more than 800m from the site.





Direct footpath / cycle connection to community and recreation facilities and resources	3	3	Cults neighbourhood centre is a well-established centre with around 30 established businesses and services. The quality of the provision at this location should also be taken into consideration. Therefore the scoring is not justified. The site has good existing provision with 2 core paths adjacent to or within the site. The proposed development would provide additional footpaths.
Proximity of employment opportunities	1	2	Suggestion that there are no significant employment opportunities within 1.6km of the site. The score is not justified. Whilst there are no significant employment opportunities within Cults, itis well placed for access to employment opportunities being located only 3miles from the city centre, and 3 miles from Prime Four Business Park. There are 10ha of business land proposed at Countesswells which is only 1.6km from the site.
Contamination	3	3	No known contamination.
Land Use Conflict	3	3	No known land use conflict.
Physical Infrastructural Capacity	3	3	There is infrastructure capacity.
Physical Infrastructure Future	2	3	There is broadband on site. Low carbon elements will be incorporated through housing design. The scale of development is unlikely to be suitable for district heating. Therefore the scoring is not justified.
Service Infrastructure Capacity	1	2	Cults Primary School is over capacity and Cults Academy is forecast to be over capacity by 2021. Both Cults Primary and Secondary School are forecast to be at or over capacity in the short term, but additional development is needed in the longer term to sustain schools. Cults Primary School site could facilitate a school larger than 3 streams given the size of the site. Cults Academy school roll is forecast to decline over time in response to the Countesswells catchment area (zone) review. The proposed housing could be phased to match that decline.
Other Constraints	3	3	Therefore the scoring is not justified. No known other constraints.
other constraints	45	56/57	TO MICH CONSTITUTION





Table 2: Corbie Sustainability Checklist Review Assessment

Criteria	Officers Score	Updated Score	CALA response
Exposure	3	3	The site is sheltered.
Aspect	3	3	The site is south facing.
Slope	1	2	Suggestion that the site is steeper than 1 in 12.
			Page 30 of the supporting masterplan document
			outlines that the topography of the site varies between
			1%-10% (with some pockets of steeper ground).
			Therefore the scoring is not justified.
Flood Risk	3	3	SEPA maps indicate no flooding on the site.
Drainage	3	3	The site is well drained.
Built/Cultural	3	3	No loss or disturbance to archaeological sites or
Elements			vernacular buildings.
Natural	3	3	No loss or disturbance of wildlife habitat or species.
Conservation			
Landscape	2	3	Suggestion that the stone wall, field boundaries and tree
Features			field boundaries could be lost or disturbed due to
			development.
			The proposed development would retain the high wall
			and field boundaries and repair these, except for
			openings for access (see masterplan document page 36).
			Therefore the scoring is not justified.
Landscape Fit	1	2	Suggestion that development would have a visual impact locally from Kirk Brae / Kingswells Road and Lower
			Deeside as development would risk breaching the
			skyline.
			The development would not breach the skyline (see
			pages 19 and 29 of the masterplan document). The
			development is contained within existing landscape
			features, and extends existing development meaning its visual impact would be minimal. Therefore the scoring is not justified.
Relationship to	1	3	The site is well related to the existing settlement with
existing settlement			development contiguous along the southern boundary. Therefore the scoring is not justified.
Land Use Mix / Balance / Service	1	2	Suggestion that the development would not contribute to a better mix of landuse.
Thresholds			The site is promoting residential development which could result in the additional critical mass to attract services to this area. The context of the site is also
			important and it is located in a residential area. Therefore the scoring is not justified.





Accessibility	1	2/3	The closest bus stop is over 800m from the site at North
,			Deeside Road. The site is not significantly more than 800m from a bus stop, and development at Friarsfield is already over 800m from the bus stop. However, the new Friarsfield link road which is under construction will enable bus services to route past the site, and possibly along Craigton Road meaning the site will be adjacent to a bus route. Therefore the scoring is not justified.
Proximity to facilities / shopping / health / recreation	1	2	Suggestion that there are no facilities within 800m of the site. Cults Medical Centre is said to be 950m away. Cults neighbourhood centre and Cults Medical Centre are slightly more than 800m from the site. Cults neighbourhood centre is a well-established centre with around 30 established businesses and services. The quality of the provision at this location should also be taken into consideration. Therefore the scoring is not justified.
Direct footpath / cycle connection to community and recreation facilities and resources	3	3	The site has good existing provision with 2 core paths adjacent to or within the site. The proposed development would provide additional footpaths.
Proximity of employment opportunities	1	2	Suggestion that there are no significant employment opportunities within 1.6km of the site. There are limited employment opportunities within Cults, but no business parks or large employers. Cults is well located being only 3miles from the city centre, and 3miles from Prime Four Business Park. There are 10ha of business land proposed at Countesswells which is only 1.6km from the site. Therefore the scoring is not justified.
Contamination	3	3	No known contamination.
Land Use Conflict	3	3	No known land use conflict.
Physical Infrastructural Capacity	3	3	There is infrastructure capacity.
Physical Infrastructure future	2	3	There is broadband on site. Low carbon elements will be incorporated through housing design. The scale of development is unlikely to be suitable for district heating. Therefore the scoring is not justified.
Service Infrastructure Capacity	1	2	Cults Primary School is over capacity and Cults Academy is forecast to be over capacity by 2021. Both Cults Primary and Secondary School are forecast to be at or over capacity in the short term, but additional development is needed in the longer term to sustain





			schools. Cults Primary School site could facilitate a school larger than 3 streams given the size of the site.
			Cults Academy school roll is forecast to decline over time in response to the Countesswells catchment area zone review. The proposed housing could be phased to match that decline.
			Therefore the scoring is not justified.
Other Constraints	3	3	No known other constraints.
		56/57	

Table 3: Newton Sustainability Checklist Review Assessment

Criteria	Officers Score	Updated Score	CALA response
Exposure	3	3	The site is sheltered.
Aspect	2	3	The site is gently sloping to the south east and has mature trees to the north. Therefore the scoring is not justified.
Slope	3	3	The site has gradients of between 6%-15%, with some pockets of steeper ground.
Flood Risk	2	3	SEPA maps indicate no flooding on the site. Therefore the scoring is not justified.
Drainage	3	3	The site is well drained.
Built/Cultural Elements	2	3	There would be no loss or disturbance to archaeological sites or vernacular buildings. There is a B listed 'march stone' opposite the site, and the Pitfodels conservation area is opposite the site but development would not affect these. Therefore the scoring is not justified.





Natural Conservation	3	3	No loss or disturbance of wildlife habitat or species.
Landscape Features	2	3	Suggestion that the stone dyke field boundaries and tree belts may be lost or disturbed due to development. The proposed development would retain the field boundaries and repair these, except for openings for access (see masterplan document page 36). Note that the previously approved link road (170307/DPP) will result in the loss of some existing stone dykes along the western site boundary. Therefore the scoring is not justified.
Landscape Fit	2	2	Suggestion that development would slightly intrude into the surrounding landscape. The development extends development northwards, but this is an area which has a developed character.
Relationship to existing settlement	1	3	The site is well related to existing development, with recent housing developments opposite the site on Craigton Road. Therefore the scoring is not justified.
Land Use Mix / Balance / Service Thresholds	1	2	Suggestion that the development would not contribute to a better mix of landuse. The site is promoting residential development which could result in the additional mass to attract services to this area. The context of the site is also important and it is located in a residential area. Therefore the scoring is not justified.
Accessibility	2	2/3	The closest bus stop is over 800m from the site at North Deeside Road. The site is 800m from the bus stop on North Deeside Road (via Abbotshall Road). In addition, the construction of the new Friarsfield link road will enable bus services to use this road, and probably connect with services along Craigton Road meaning the site will be adjacent to a bus route. Therefore the scoring is not justified.
Proximity to facilities / shopping / health / recreation	1	2	Suggestion that there are no facilities within 800m of the site. Cults Medical Centre is said to be 1km away. Cults neighbourhood centre and Cults Medical Centre are slightly more than 800m from the site. Cults neighbourhood centre is a well-established centre with around 30 established businesses and services. The quality of the provision at this location should also be taken into consideration. Therefore the scoring is not justified.





Direct footpath / cycle connection to community and recreation facilities and resources	1	3	There are no core paths adjacent to the site, but the development of the site would improve footpath connectivity. The site is on Craigton Road which has footpath access to Airyhall to the east. The site has good access to North Deeside Road via Abbotshall Road via existing footpaths. Therefore the scoring is not justified.
Proximity of employment opportunities	1	2	Suggestion that there are no significant employment opportunities within 1.6km of the site. There are limited employment opportunities within Cults, but no business parks or large employers. Cults is well located being only 3miles from the city centre, and 3miles from Prime Four Business Park. There are 10ha of business land proposed at Countesswells which is only 1.6km from the site. Therefore the scoring is not justified.
Contamination	3	3	No known contamination.
Land Use Conflict	3	3	No known land use conflict.
Physical Infrastructural Capacity	3	3	There is infrastructure capacity.
Physical Infrastructure future	2	3	There is broadband on site. Low carbon elements will be incorporated through housing design. The scale of development is unlikely to be suitable for district heating. Therefore the scoring is not justified.
Service Infrastructure Capacity	2	2	This site is zoned to Airyhall Primary School and Hazlehead Academy. Both schools are forecast to be slightly over capacity by 2024. Both of these schools will be affected by the Countesswells catchment area zone review. The proposed housing could be phased to match that decline.
Other Constraints	3	3	No known other constraints.
	45	57/58	

Table 4: Site Assessment Justification

Officer's 'Justification'	CALA response
"The site is located in an area of green belt	The site is currently located in the green belt, however,
which acts as a green backdrop to the	we would suggest that this designation is no longer
existing development at Friarsfield and to	appropriate for this area. Greenbelt is not sacrosanct,
Aberdeen as a whole. It is part of an area	and as no greenbelt review has been undertaken or is
which serves to maintain the separate	proposed, we would suggest that the LDP review





identities of Cults, Countesswells and Aberdeen."	provides an opportunity to review the greenbelt boundary.
	Greenbelt is considered in more detail in Section 3.2.
"Development will have significant impacts on landscape and would be highly visible from the south. The settlements along Deeside are contained within the 90m contour line and this development would go beyond this."	Landscape Architects 'lan White Associates' have been advising CALA on the landscape impact of this development. The masterplan submitted in support of the bid includes a detailed landscape and visual appraisal on pages 14-29. An assessment of the visual impact from the south has been undertaken and has found that the site sits comfortably below the wooded ridgeline to the north and follows the existing pattern of housing set to the south.
	Using the 90m contour line as an absolute constraint is not reflective of local conditions. It is also noted that there are circumstances in Deeside where development does extend beyond the 90m contour. The 90m contour is not a policy position.
"The development is poorly located to public transport, community facilities and would be car dependent"	The development is adjacent to site OP41 which is currently being developed. Whilst the proposed site is slightly further north than site OP41, the distances to public transport and community facilities are very similar. The development is in more than the suggested 400-800m from public transport, but not excessively so. Whilst the public transport route is currently limited to North Deeside Road which is around 1km from the site, there would be opportunities to review this provision with transport operators, and additional development adds critical mass to improve the service. The site is around 1km from Cults Academy, and 1.5km from Cults Primary School which are walkable distances. It is 1-1.5 km to the neighbourhood centre, and the nearest bus stop on North Deeside Road, which is not an excessive distance.
The Proposed Strategic Development Plan asks the Local Development Plan to allocate a limited amount of housing land. These allocations should take place on brownfield sites and utilise the current "constrained" supply in the first instance Reducing travel distances and making walking, cycling and public transport more attractive to people will be important considerations, particularly for any new greenfield development sites that are proposed. In	CALA have made representations to the Proposed SDP against these suggestions. The Proposed SDP will be examined by an independent reporter. The Proposed SDP states that new allocations should consider opportunities to reuse brownfield land and attempt to utilise the constrained supply. However, it notes that some new development will need to take place on greenfield sites (Paragraph 4.18).





addition allocations should be small scale in nature, and should not be extensions to any existing, strategic, development sites that have been subject to a master planning exercise. Because of this, the allocation of this site is likely to be contrary to the Proposed Strategic Development Plan.

It is unreasonable to suggest that the proposed site is therefore likely to be contrary to the Proposed SDP.

CALA are of the opinion that the Proposed SDP is incorrect in its position that only small-scale allocations are required, and a separate case has been made to the SDP on this basis. A separate response on housing strategy has also been submitted to the MIR.

Development at Friarsfield north is required to utilise existing infrastructure. There is a new road being constructed to the south of the site, and it would be a waste of resources and infrastructure if this road is left single sided.

This is an eminently deliverable site, which can come forward in three separate phases in line with the suggestion that allocations should be small scale in nature.

Table 5: Strategic Environmental Assessment for Site B0910

SEA Topic	Objective	B0910 'Site score'	Comments (including proposed score post mitigation)
	Direct impact on water environment	-	Abstraction from the River Dee is an impact all development will face. This is not specific to this site and hence shouldn't be recorded as a negative issue. Suggest site scoring should be neutral (0)
WATER	Public foul sewer	0	Agree that the scoring is neutral (0)
	Flood risk	0	Agree that the development of the site will make provision for SUDS and post development impact is neutral. Agree that the effect would be neutral (0)





BIODIVERSTY FLORA AND FAUNA	Biodiversity, flora and fauna	-	It is suggested that all three 'pockets' are within the River Dee SAC catchment zone. However, Newton has no watercourse nearby, and hence doesn't have a direct route to the River Dee SAC. Run off from Craigbank and Corbie into the Cults Burn would be controlled. There would be no impact on the River Dee SAC. The suggested effect post mitigation for site OP41 to the south is neutral. It is unclear how the impact of this adjacent site would be different. Suggest site scoring should be neutral (0)
CLIMATE CHANGE	Carbon Emissions Impact	-	The assessment suggests that residential development would lead to an increase in energy use and consumption. This would be the case for any development. The site is within walking distance to schools, medical centre, the neighbourhood centre and bus stops (within 1km). Suggest site scoring should be neutral (0)
AIR QUALITY	Air Quality Managed Area (AQMA)	0	Agree site scoring would be neutral (0)
SERVICE INFRASTRUCTURE	Education	-	The Countesswells catchment area zone review will release capacity in both Cults and Airyhall Primary Schools, and Cults and Hazlehead Academies. The assessment for site OP41 adjacent to the site is neutral, and there is not considered to be a worse impact from this proposed development given the phasing. Suggest site scoring should be neutral (0)
SERVICE	Core Paths	+	The site would provide opportunities to enhance core paths. Agree site scoring would be positive (+)
	Green network	-	The site is not designated as green space network. The network would not therefore be severed.





			However, green links, strategic landscaping, new path connections and enhancement of existing provision are proposed. Suggest site scoring should be positive (+)
SOILS	Greenfield / brownfield	-	Greenfield site but short-term impact during construction. The effect is therefore temporary and score should be neutral (0)
	Delivered within LDP, Servicing Constraints	+	The site would deliver material assets in the form of homes and infrastructure. There are no servicing constraints. Agree site scoring would be positive (+)
AINABILITY	Site Aspect	+	Agree the effect would be positive (+) for all three sites. The sites are well placed to benefit from solar gain and shelter from tree belts. Agree site scoring would be positive (+)
DELIVERABILITY / SUSTAINABILITY	Vehicular Access	-	The site would not have significant road network issues. The site would utilise existing road infrastructure (including the new Friarsfield Link Road). The site is adjacent to OP41 which has been assessed as a neutral score. Suggest site scoring should be neutral (0)
	Facilities	-	The site is no further from existing facilities than adjacent development. Additional development is more likely to enable facilities in this area including public transport, and retail such as a corner shop. Suggest the site scoring should be neutral (0)
LANDSCA PE	Landscape capacity		Suggested impact from Kirk Brae and lower Deeside. The supporting masterplan document includes a landscape assessment in Section 1 (pages 14-29) which was informed by lan White Associates (qualified landscape architects). View 1

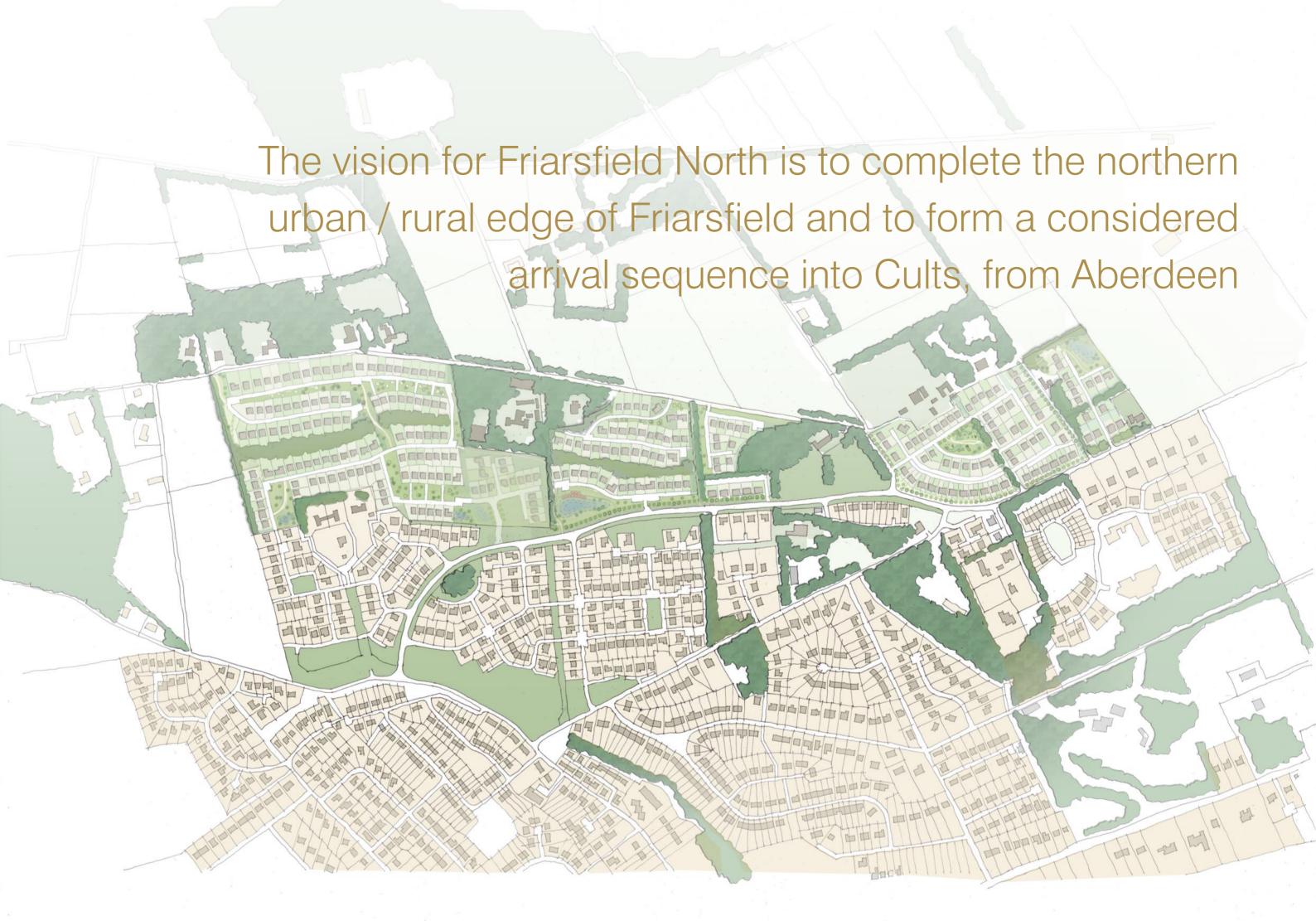




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VISION

Purpose of Document

The purpose of this document is to support the Local Development Plan bid submission for Land at Friarsfield North, Cults. It has been prepared on behalf of CALA Homes (North) Limited by Halliday Fraser Munro Architects and Planning Consultants with support from Fairhurst and Ian White Associates.

The site at Friarsfield North offers an excellent opportunity to provide a considered, high quality extension to the existing neighbourhood of Cults with a mix of private and affordable homes, new woodland and community parkland.

- Natural extension of existing Friarsfield neighbourhood
- Provides considered urban / rural edge to Cults
- Provides sense of arrival on approach from Aberdeen to Cults
- Delivering much needed private and affordable homes
- South facing gardens and open space
- Enhances wildlife habitats and green corridors
- New structure tree planting creates discreet development pockets

CALA History and Track Record

The site is being promoted by CALA, who are a premium house builder with its heritage firmly placed in Aberdeen, having been established in 1875 as the City of Aberdeen Land Association. 140 years on CALA are focused on delivering high quality developments in the best locations. The principle focus being sourcing the best land opportunities and optimising value through high quality design and sought after living environments.

Over the past five years, under the ownership of Patron Capital Partners and Legal & General Group (L&G), CALA has reached new heights. CALA have doubled the size of the business in terms of new home volumes over this period and become one of the fastest growing housebuilders in the UK today, which is testament to the strength and ambition of the team, the quality of their homes and first class approach to customer service.

In March 2018, it was announced that L&G has increased its shareholding in the CALA business to 100%, acquiring the 52.1% which it did not previously own. This marks an exciting new chapter for CALA, ensuring both consistency and stability of operations through the continued backing of L&G; one of the most highly-respected, blue-chip investors in the UK, who share CALA's long-term vision for the business.

Working together, CALA will build on the strong momentum they have achieved in recent years while strengthening their position as the UK's most upmarket major homebuilder. This strong backing builds upon and allows the delivery of fantastic new communities and quality family homes ensuring proposals are viable, deliverable and will be acted upon. CALA have a strong track record of developing sites similar to Friarsfield North throughout Aberdeen City, Aberdeenshire, Scotland and the UK and have conducted in depth investigations on this proposal.

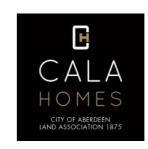
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HALLIDAY FRASER MUNRO





SITE DESCRIPTION

Location

The site covers approximately 54 acres and is located on the northern edge of Friarsfield, in Cults, about 5km west of Aberdeen City Centre. It falls within the Cults, Bieldside and Milltimber Community Council area.

Site Description

The site can be categorised into three distinct areas, which together, complete the northern edge of Friarsfield. The majority of land within the red line boundary is under control of CALA. The exception is the existing playing field located south of the former Waldorf School, which will form part of a separate bid, under a separate applicant.

Craigbank (21.7acres)

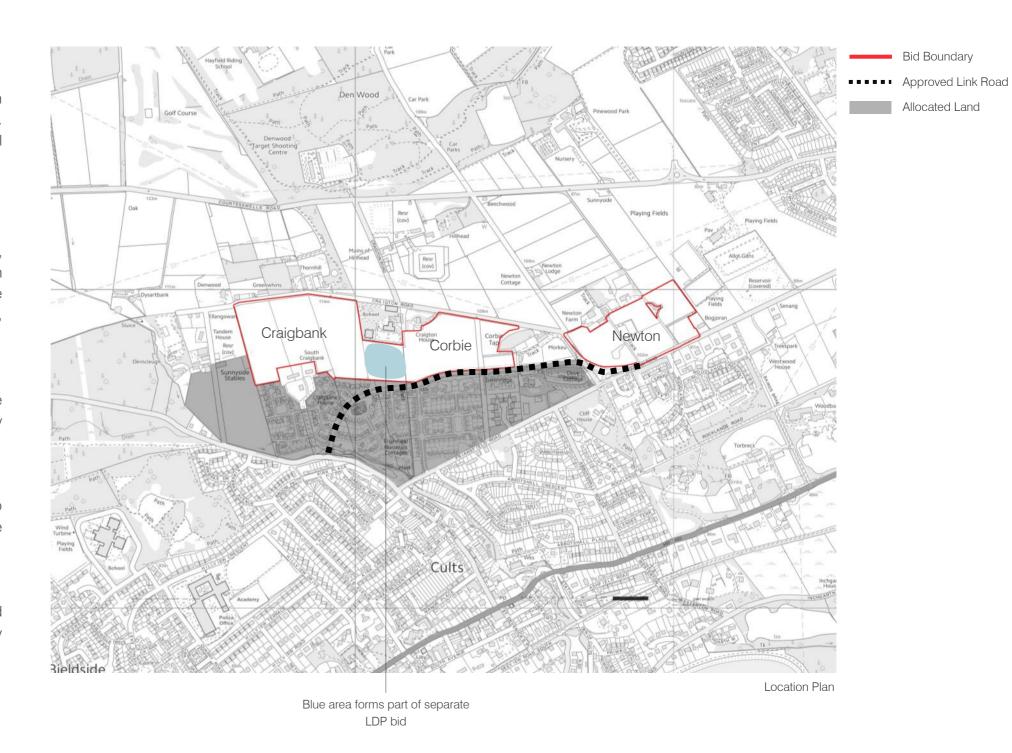
The Craigbank site is bound by Craigton Road to the north, by the CALA development under construction to the south and by agricultural field boundaries to the east and west.

Corbie (13.3 acres)

The Corbie site is bound by Craigton Road to the north, a core path to the west, woodland and existing dwellings to the east and the approved Friarsfield Link Road to the south.

Newton (15.5 acres)

The Newton site is bound to the north by Newton Farm and agricultural land, to the west by an existing road, to the south by Friarsfield Road and to the east by playing fields.



Friarsfield North / LDP Bid for CALA Homes (North) Limited

Local Development Plan and Strategic Development Plan Context

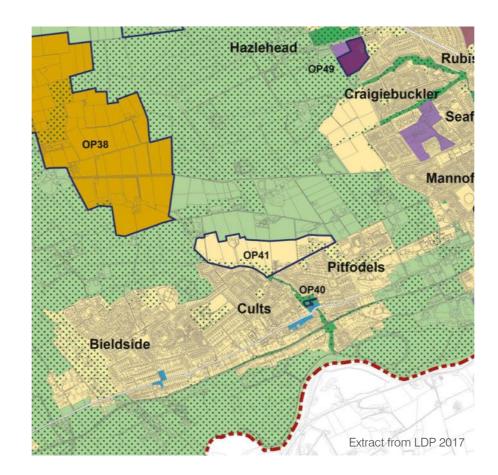
Aberdeen's Development Plan, comprising both the Local Development Plan (LDP) and Strategic Development Plan (SDP), is in the process of a full review. The LDP is at the call for sites stage. This stage not only aims to identify new potential development sites but also responses to some strategic questions on how the Council can improve housing delivery and quality of life.

The SDP is a the City and Shire's high level strategic land-use document. It is seeking responses through the current consultation process on the future shape of the regional strategy and how that affects the allocation of land and policies taken forward by LDPs. In reviewing development strategies and potential development sites it is the future land use strategy that is more important that that set out in the soon to be replaced LDP and SDP.

LDP - Current and Future

The 2017 LDP allocates Friarsfield as a development site (OP41—29.2 hectares for 280 homes). This established the Friarsfield area as a housing development zone in the current land use strategy for the City. The current land-use zoning for this bid site is Green Belt with only a small area of the bid area to the east also being identified as Green Space Network (GSN). GSN does not rule out development but requires that it considers the character and function of the GSN in that area.

Areas of green belt around Aberdeen have historically been identified as strategic reserve land, considered as areas of search for new development. The zoning of these areas have changed over the years from green belt to other development related zoning to relflect the need for housing growth to support Aberdeen's economic growth. Examples of recent LDP reviews of land released from Green Belt



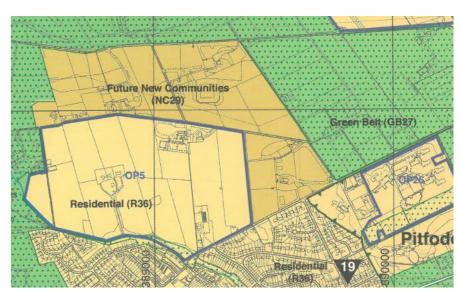
zonings to allow for new housing are Countesswells (3,000 homes and 10Ha of employment land) and Oldfold, Milltimber (550 homes and 5Ha of employment land). It should be noted that all greenfield land outside of the built-up area of the City will be Green Belt or a combination of that and Green Space Network. Green Belt and Green Space Network land will have to be rezoned in order to allocate enough development land to meet future housing needs.

Generally the land to the north, east and west of this site is allocated as Green Belt and Green Space Network but the land immediately adjacent to the south is zoned for residential purposes, including significant new road infrastructure. Site OP41 to the south is allocated for 280 houses and is presently being built out by CALA and is due to

be complete by 2021. Friarsfield is a popular development and the existing allocation will be completed as the 2021 LDP comes into effect.

Reviewing past LDPs has also shown that GSN was significantly reduced in this specific area in the 2012 LDP, quite clearly suggesting that its value as a network is not as significant as once thought.

The 2004 Finalised Aberdeen Local Plan (Green Spaces New Places), written by officers, ratified by the Planning Authority and used by the Council as a key material consideration in planning decisions prior to the 2008 Aberdeen Local Plan, identified a much larger area of Frairsfield for development (see plan below). That proposed plan clearly indicates that the officer's and Councillors' view (post analysis of the bids and their impact on the area) was that development in this area was appropriate and could be supported. The 2004 Finalised plan recognised the benefits in extending and consolidating an existing settlement and transport corridor compared to standalone greenfield development.



Extract from Finalised Local Development Plan 2004

The SDP MIR predicts a growth scenario for the City Region. That requires additional land for development if the City is to accommodate future housing growth. These sites will need to include new greenfield sites that not only provide a quality of life that the City and its population aspire to but also consider, in a thorough and pragmatic manner, site sensitivities and design issues. This site in particular can provide a well-designed and thought out extension to an existing community.

LDP Policies

The key policy to consider is the Green Belt policy (current policy NE2 in the 2017 LDP). It sets out that the aim of the Green Belt is to maintain the distinct identity of Aberdeen and the communities within and around the City. It sets out to safeguard the Green Belt to help avoid coalescence and sprawling development on the edge of the city, maintain Aberdeen's landscape setting and provide access to open space. The four questions raised in respect of Green Belt purpose, and therefore whether these are contradicted by this bid, are:

Does the development detract from the distinct identify of Aberdeen?

This area of Aberdeen has changed considerably over recent years. The land to the south is allocated for housing and a major new road will replace Jacob's Ladder as a route through the site and to the wider Cults area. Development of these sites is therefore simply a sensible extension of existing development areas, is well-screened with distinct boundaries, and should be considered as an extension of the agreed strategy for development in this part of Aberdeen.

As a result the proposed development would not detract from the distinct identity of Aberdeen. Officers and the Planning Authority agreed that the site was acceptable as a development site in the 2004 Finalised Local Plan when the whole site was identified for development.

Does it create coalescence and sprawling development at the edge of the City?

The sites do not create coalescence or sprawling development. Craigbank and Corbie are well contained with a strong ridgeline to the north defining the northern boundary with stone walling, mature hedges and specimen trees that are to be retained. These features limit visibility of the sites from the north and contain the development. Large existing woodland belts, west, centrally and to the east outwith the sites help to prevent a sense of any sprawl and contain the development areas within these.

Does it undermine Aberdeen's landscape setting?

The landscape setting of Aberdeen is not undermined by this proposal. Existing distinguishing landscape features including stone walls, mature trees and hedges are being retained and incorporated within the proposals. Pockets of new woodlands, specimen trees and wet and dry meadow are woven through the development areas to knit the housing into the surrounding landscape. The landscape setting through Pitfodels into / out of Aberdeen will be enhanced and improved with new stone walling, tree avenue and hedging to create a more formal approach.

Does it detract from providing access to open space?

There is already a strong network of linkages to open space surrounding the development area. The proposals will improve access to these linkages and indeed enhance a key route connecting north toward Den Wood.

The review has not identified any serious concerns in relation to the function of the Green Belt for these sites. This is especially so as the areas around these sites are protected as Green Space Network. The loss of these specific bid sites from the Green Belt would not undermine its overall purpose.

Planning and Design

At a national level the Scottish Government are pursuing both a housing delivery and design quality agenda. On the latter they have and continue to promote the 6 essential qualities of place:

- Distinctiveness
- Welcoming
- Safe a pleasant
- Easy to move around
- Adaptable
- Resource efficient

CALA have adopted these design cues in all of their developments to ensure the delivery of quality places where people will choose to live. An essential part of quality of life is location and quality of the landscape that development is set within. To that end the Friarsfield sites offer an opportunity to continue to develop a quality and popular development area with limited impact. A further advantage of these sites is the opportunity to create a strong landscape framework that can help enhance the development setting, unify urban form, provide shelter, create local identity and promotes biodiversity – all in line with the current LDP policy on Landscape D2.

Housing Strategy and Allocations

The joint SDP clearly identifies a housing need and allows for additional release of land across the City and Shire. Aberdeen remains the strategic centre for the City region and is the main focus for strategic growth of the economy and proposed new housing allocations. The City and Shire vision is to create and attractive, resilient, prosperous and sustainable European City Region and an excellent place to live. Choosing the best locations for new housing,

in terms of proximity to services as well as setting, continues to be important. This site offers benefits on both fronts as well as being deliverable and a place where people would like to live.

The SDP Main Issues Report has set a target of 2,100 new homes every year between 2021 and 2025 and 2,200 new homes annually between 2026 and 2030. Beyond 2030 a further growth scenario is anticipated. Table 6 of the SDP MIR is set out below.

Table 6: Propo		ces d the 2016 effe	ective supply)	
	2016 to 2030	2031 to 2035	2036 to 2040	Total
Aberdeen Housing Market Area	4,200	5,700	6,300	16,200
Rural Housing Market Area	1,300	1,700	2,500	5,500
Total	5,500	7,400	8,800	21,700
Split as follows	S:			
Aberdeen City Council	3,500	4,700	4,800	13,000
Aberdeenshi re Council	2,000	2,700	4,000	8,700

Extract from 2018 SDP MIR - Table 6 - Proposed Allowances (Housing)

Based on anticipated housing delivery rates, using the Housing Land Audit 2016 as the base information, the proposed housing allowance is for 13,000 new homes in the City over the next 22 years. This assumes that the delivery rate for new homes from existing allocations in the City will increase.

Historical data analysis suggests that housing delivery rates have been significantly less than projected and required by the SDP. Further analysis has shown that the larger land allocations have taken much longer to deliver than was originally anticipated. If that remains the case then housing delivery will continue to fall short of housing need and alternative sites in locations where people want to live should be allocated.

Local Development Plans in 2012 and 2017 have allocated and continued to allocate large and complex sites. Their complexity has resulted in delays in the delivery of these sites. Two of the largest sites in the City (Grandhome and Countesswells) have required Government intervention to enable their delivery and although they are now underway the delay has created a backlog of housing need and demand that has remained unmet.

Although not at the same scale as the City's large existing housing allocations, in preparing this bid CALA have considered deliverability in detail, supported in that analysis by a professional team. This site, as a result of that in-depth review, is considered eminently deliverable.

The table above has reviewed the initial expectation of the major development sites allocated within the City against actual housing delivery over a 10 year period (source: Housing Land Audits). The emerging picture is that these sites are clearly taking longer to develop than anticipated. Infrastructure delivery has been a key

element in that delay. The analysis shows that of the 11,150 houses expected from these sites just over 2,000 have been delivered and in 2017 only just over 10% of the expected homes from these allocations have been completed.

Aberdeen City and Shire have recognised this delay to some extent but the backlog remains. The recent SDP MIR papers suggest that the City and Shire have delivered 2,769 fewer homes than the SDP requirement and 3,000 homes short of the affordable housing need. In the City it's clear that the larger sites are now starting to be developed but the backlog resulting from this delay remains. Taken together with the general under-delivery across the region it is evident that more housing sites are now required to complement these larger allocated sites, fill the housing delivery gap and meet future housing need in an effective manner. Sites such as that proposed in this bid can continue to deliver as extensions to existing allocations.

CALA are the first developers now developing at Grandhome and are active in developing their housing sites across the City. They focus on delivering quality development and work closely with stakeholders and agencies to ensure efficient delivery. The table below identifies active or soon to be active CALA housing sites in the City. These sites deliver an average of 140 new homes every year and cumulatively will deliver over 1,500 new homes. This demonstrates CALA's commitment to Aberdeen and their ongoing strategy for delivering the best new homes for the City.

Friarsfield is under construction now and will be complete by 2021. Allocating additional land adjacent to the existing development site would allow continuity and should be considered eminently deliverable.

Planning Review Summary

These sites now sit within a much changed landscape from previous LDP bids. The sites to the south and Countesswells are now well under way and CALA are at the forefront of reliable and consistent housing delivery. Countesswells now offers services and employment land that previously hadn't been available. A new link road will run through the site and areas of allocated housing land has been developed to the south at Friarsfield. The proposed development pockets are extensions of allocated housing areas and make best use of the new infrastructure required to support the Friarsfield allocation to the south. Regardless of the location all greenfield developments will require the development of land currently allocated as Green Belt. If the Council is serious about providing appropriate land for new housing then these sites offer an immediately deliverable solution, on land that is significantly less sensitive than most of Aberdeen's Green Belt and in an area that has previously been supported by the Planning Authority as an obvious extension to Aberdeen.

	Comparison of Major Housing Proposals in 2012 LDPs with outturn										
			Compani	our or major mousin	g 110p03d1311120222						
City	site	ref	2007-2016	Cumulative 2015	shortfall	Cumulative 2016	shortfall 2016	Cumulative 2017	shortfall 2017		
	Grandhome	OP 12	2600	0	2600	0	2600	0	2600		
	Dubford	OP 25	550	190	360	309	241	397	153		
	Stoneywood	OP 24	500	133	367	231	269	514	-14		
	Craibstone South	OP 28	750	0	750	0	750	0	750		
	Rowett South	OP 30	1000	0	1000	0	1000	0	1000		
	Greenferns Landward	OP31	750	0	750	0	750	0	750		
	Maidencraig	OP 43 & O	750	5	745	24	726	60	690		
	Greenferns	OP 45	600	0	600	0	600	0	600		
	Countesswells	OP58	2150	0	2150	4	2146	154	1996		
	Oldfold	OP 62	400	0	400	25	375	50	350		
	Loirston	OP 77	1100	0	1100	0	1100	0	1100		
	TOTALS		11150	328	10822	593	10229	1175	9054		
			percentage delivered	2.9%		5.3%		10.5%			

Major Housing Allocations vs Delivery - Aberdeen City

Ref	Site	Total Capacity (homes)	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025+
OP41	Friarsfield	200	29	25	26	25	25	25	25	Complete			
OP10	Dubford	76	27	26	23	Complete							
OP12	Balgownie Road	41	-	-	6	28	7	Complete					
OP20	Craibstone South A	700	-	-	-	-	35	40	40	40	40	40	465
OP48	Oldfold	550	-	25	25	25	35	35	35	35	35	30	270
		1,567											

Active CALA development sites - Aberdeen City

Land Use

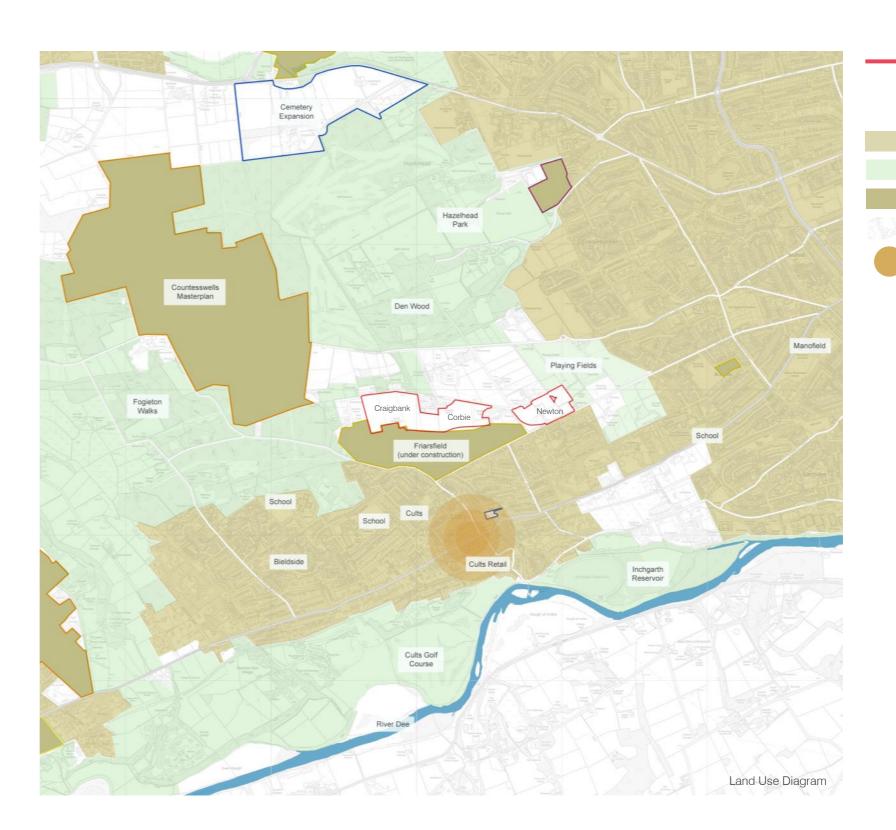
Friarsfield North sits on two distinct boundaries, which in simple terms can be categorised as rural to the north and urban to the south.

The well-established urban settlement of Cults lies directly to the south, including the new development at Friarsfield, which is currently being built out by CALA.

The emerging new settlement of Countesswells is located 0.5km to the north west and Aberdeen city's edge lies 0.5km to the east. Although in relative close proximity, both Countesswells and Aberdeen and also physically separated from the site in the form of a mature woodland and sloping land form, and sports grounds, respectively. Therefore minimising any risk of coalescence.

There are mature mixed woodlands to the north including Hazelhead Park / Denwood with adjoining golf course and shooting range and Foggieton Woods to the west, and The River Dee corridor lies to the south of Cults, with golf courses, reservoir and woodlands. All of these place this site in an ideal location in terms of provision of informal and formal recreational activities and sport uses.

At a closer scale, the site is primarily occupied by equestrian use, for grazing horses and ponies. The field to the south of the former Waldorf School is currently used as an informal sports pitch, however, it is expected that this land will form part of a separate development bid by the respective landowner.



Land Use

Key Amenity

Zoned Land

Urban Centre

Agricultural / Other

Urban

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Connectivity

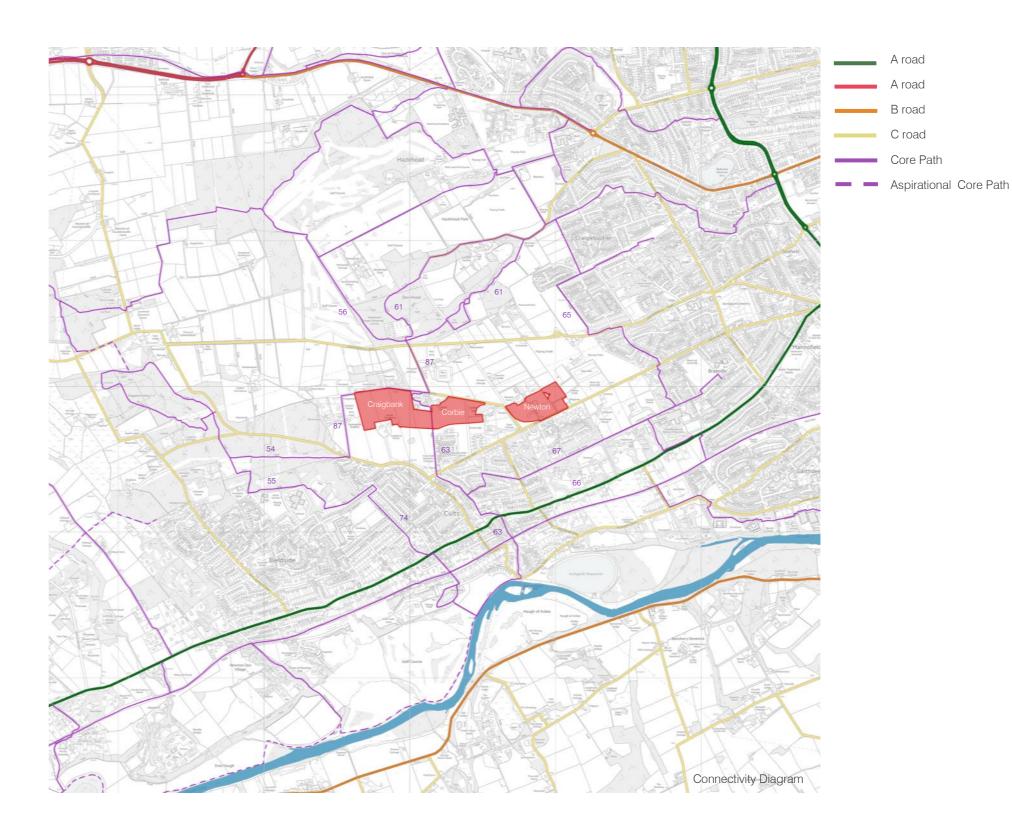
The site is part of a well connected road network with A, B & C category roads generally following an east west alignment into or out of Aberdeen city centre.

Pedestrian Network

There are a number of uncategorised roads and quiet lanes running north / south, some of these form the core path linkages, and are popular for walking, running, cycling and horse riding activities. These include core paths no 63, 56, 87 and 61. These paths link to the north through the major open space of Hazlehead Park, to the south through Cults, including a link to Cults Primary School and Cults Academy. To the south where core paths 54, 55, 74, 66 Deeside Way and 67 run in an east west alignment parallel to the Dee, also provide strong connectivity into the city centre approx 8km to the east, functioning not only as a recreational resource but also as part of the active travel network.

The existing Cults community contains a high quality network of footpath and cycle route provision to serve local needs and connect existing residential areas to attractions such as the local primary school, academy and convenience stores. As well as routes alongside the road network there is a complementary network of offroad routes and paths providing more direct connections.

The sites location offers an opportunity to encourage pedestrian and bicycle trips, and this would be enhanced through infrastructure improvements in connection with the site development.



Friarsfield North / LDP Bid for CALA Homes (North) Limited

Cycling Network

Existing cycling infrastructure largely replicates provision for pedestrians as many of the facilities are shared by pedestrians and cyclists. Route 195 of the National Cycle Network 'The Deeside Way' is located 1km to the south adjacent to the A93 North Deeside Road and provides a traffic free connection towards Peterculter and Royal Deeside settlements in the west and Aberdeen City Centre to the east. At a distance of approximately 8km, Aberdeen City Centre is well within the capability of an average cyclist. In addition to the existing road and footway networks, Core Path connections from the sites provide links to The Deeside Way.

The A93 North Deeside Road is also a popular route for cyclists and benefits from the provision of on road advisory cycle lanes along much of its length on both sides of the carriageway. Similar to The Deeside Way, this forms a direct route to the city centre and Royal Deeside settlements.

To the north of the site the existing network of Core Paths provide links towards Hazlehead Park, Countesswells, Kingswells and Westhill, all of which are within acceptable cycle distance.

Public Transport

The local area is currently served by regular bus services that operate along the A93 North Deeside Road corridor and includes First Services 19 (Culter to Tillydrone), 419 (Broad Street to Culter) and Stagecoach Services 201, 202 and 203 (Aberdeen City Centre to Braemar / Ballater / Banchory) and 119 (Peterculter to Union Square). All services are accessible from bus stops currently located within 1km walking distance from the site with services operating at a combined frequency of 6-7 services per hour or one service every 10 minutes.

All services identified within the vicinity of the site route to, or through, the City Centre and so offer interchange opportunities with several other bus services operating via Union Street. In addition, Union Square acts as an interchange point with bus and train services routing to local, regional and nationwide destinations.

As the consented Friarsfield development immediately to the south continues to be built out and on delivery of the Friarsfield Link Road, new public transport routes will be developed from Craigton Road with bus services accessible within 400m of the site. This is part of the strategy to unlock public transport provision to the Kirk Brae area and further enhance the accessibility of the existing North Cults area in line with policy objectives as development progresses.

Local Road Network

Craigton Road and the future Friarsfield Link Road provide access to the site. Friarsfield Road to the south continues eastwards at Craigton Road before forming a junction with the A93 Great Western Road. To the west, Friarsfield Road forms a priority junction with Kirk Brae which links to the A93 North Deeside Road to the south and to Countesswells and the A944 to the north.

The A93 North Deeside Road / Great Western Road routes between the City Centre and Peterculter before continuing westwards through Royal Deeside to Banchory, Aboyne, Ballater and Braemar. To the east it intersects with the A90 via a signalised junction, approximately 3.2km from the site. The A90 is a strategic Trunk Road which routes between Fraserburgh and Dundee and is currently the main route used by vehicles accessing Aberdeen from the South. The A90 routes north to south through Aberdeen City, serving Bridge of Don, Ellon and Peterhead to the north and settlements such as Stonehaven, Portlethen and Montrose to the south.

AWPR

The Aberdeen Western Peripheral Route (AWPR) will be a new orbital route around the west side of Aberdeen described as 'the most important infrastructure project taking place in the North East (which) will bring a range of substantial benefits to the region'. Its construction is anticipated to provide 'a much needed fast and safe route around Aberdeen which links with the existing major roads and key locations such as the airport, park and ride sites and the major industrial estates around the City'.

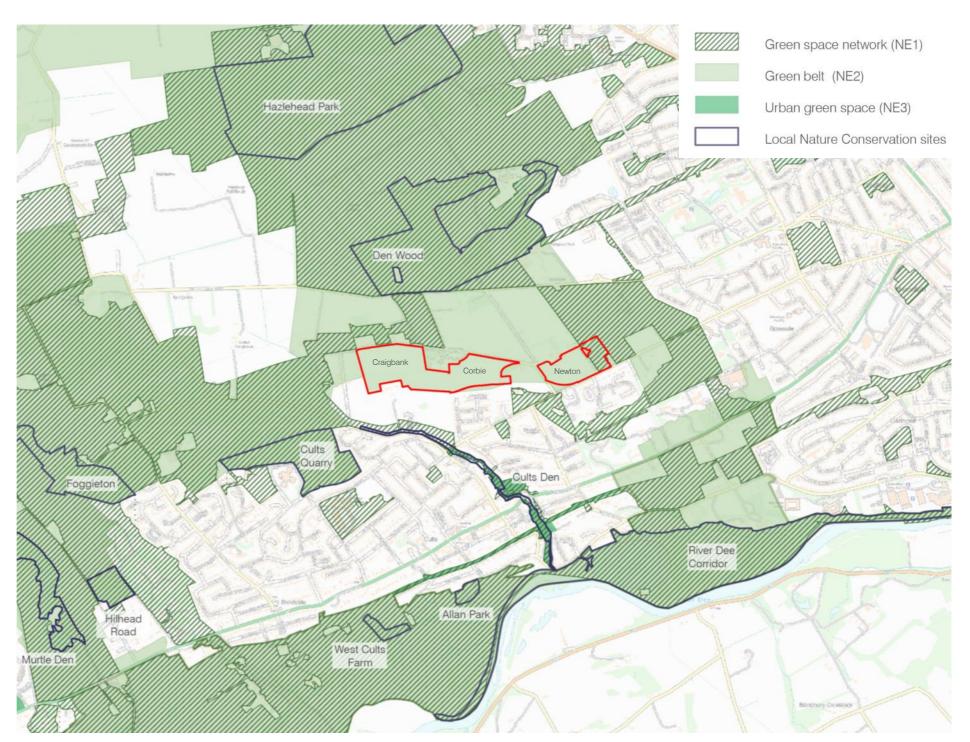
The AWPR is located 1km to the west of the sites and is due to open in Autumn 2018. It will become the primary route north to south past Aberdeen, linking residential zones to employment and education facilities. North Deeside Road is one of only two non-trunk primary distributor roads that will have a junction with the AWPR. North Deeside Road will therefore remain a primary route carrying traffic between the AWPR and the City Centre. One of the key benefits of the AWPR is the expected reduction of demand on use of the various minor orbital routes around western Aberdeen with traffic reverting to the A93 at levels less than are currently experienced. This includes routes such as Kirk Brae, Friarsfield Road, Craigton Road and Countesswells Road which all provide access to the sites. Reductions in flow along these routes will provide significant benefit to the existing and future developments.

It is anticipated that upon completion the AWPR will change the accessibility options for the settlements and developments along its route, which will open up opportunities for improved connectivity and public transport services. The sites are therefore extremely well placed to benefit from the future AWPR.

Natural Environment

On the fringe of the city but directly adjoining Cults, the site lies within Green Belt land (ALDP Policy NE 2), and the most easterly field forms part of the Green Space Network (ALDP Policy NE 1) with the remainder of the site excepting Cults and Countesswells, being surrounded by the Green Space Network. Cults Den to the south of the site is identified as Urban Green Space (ALDP Policy NE3).

There are several Local Nature Conservation Sites, out with the site. Den Wood and Hazlehead Park to the north; Cults Quarry to the west; and Cults Den, West Cults Farm, Allan Park and the River Dee Corridor to the south. None of these will be affected by the proposed development.



Natural Environment Analysis

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Friarsfield North / LDP Bid for CALA Homes (North) Limited

Landscape Character

The site is within SNH's Landscape Character Assessment of Aberdeen No 80 (1996) and is specifically categorised as Wooded Farmland with the key landscape components of:

undulating topography, high proportion of woodland cover neither as plantations, shelter belts or clumps of trees around traditional buildings, open farmland and stone dykes with sparse settlement patterns.

The site lies within Landscape Character Area No.21 Countesswells / Milltimber / Kennerty. The distinctive landscape features are:

- topographical variety
- extent and variety of woodland and trees resulting in a mix of woodland and open areas
- * suburban edges visually contained by planting
- * stone dykes as well as fences for field boundaries

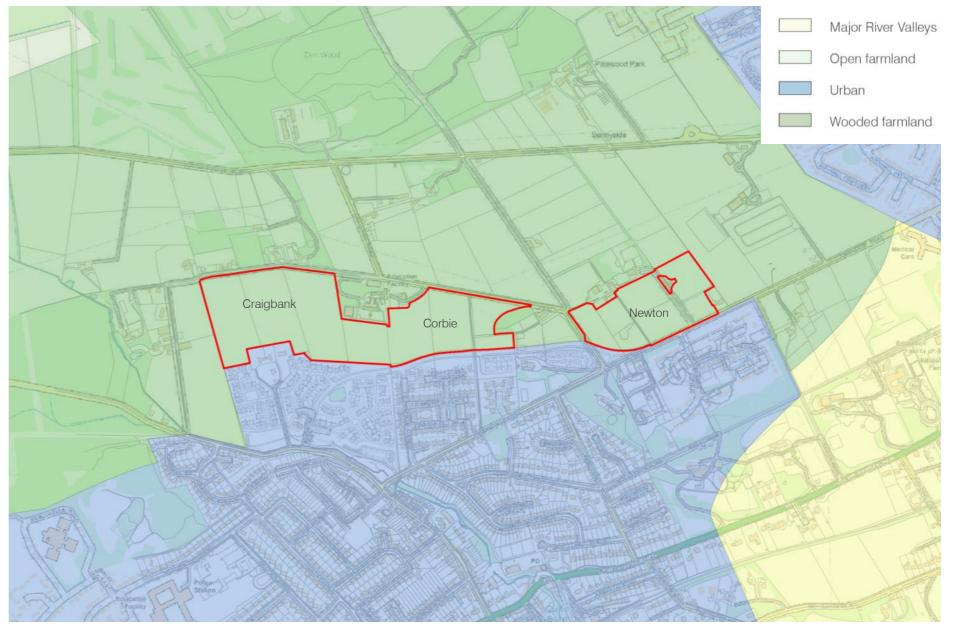
Sensitivity to Landscape Change is summarised as:

an area of agriculture, woodland and settlement of varying densities. The undulating ground limits the potential for further development, and the area has a rural character despite it's proximity to large residential areas.

Guidelines advise conserving and management of:

- woodland and shelter belts
- * maintain stone dykes and
- * management of avenue feature near Countesswells

Of most relevance to the Friarsfield site is the maintenance of stone dykes as field boundaries and conserving the limited areas of woodland. These features have been incorporated within the proposals for this site.



Landscape Character Assessment

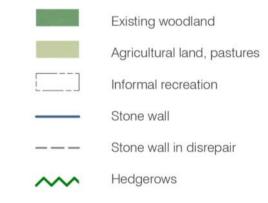
Existing Landscape

Comprising three areas, Craigbank and Corbie are currently sloping grazing pasture facing south. Newton to the east is also used for grazing but has a gently undulating topography and the southern edge bounds Craigton Road, a C category road linking Cults with Aberdeen City. The corner of this site will change with the consented new road alignment joining Craigton Road. Field boundaries are mostly delineated by traditional stone dykes but some are post and wire fencing.

The northern edges are on a ridgeline for Craigbank and Corbie with high stone walling and / or mature hedging with a backdrop of existing mature woodland and trees forming screening of the sites from the north. This robust landscape boundary and ridge line will contain the extent of the proposed development along the north edge and will not be broken.



Existing Landscape Diagram



Landscape Visual Appraisal

The photographs on the following pages provide impressions of the landscape setting and illustrate some of the key site features and characteristics.

Due to the undulating topography, woodlands and recent housing development, the site is only discretely visible; fully concealed in places and slightly more visible from others, for example, the Newton area.

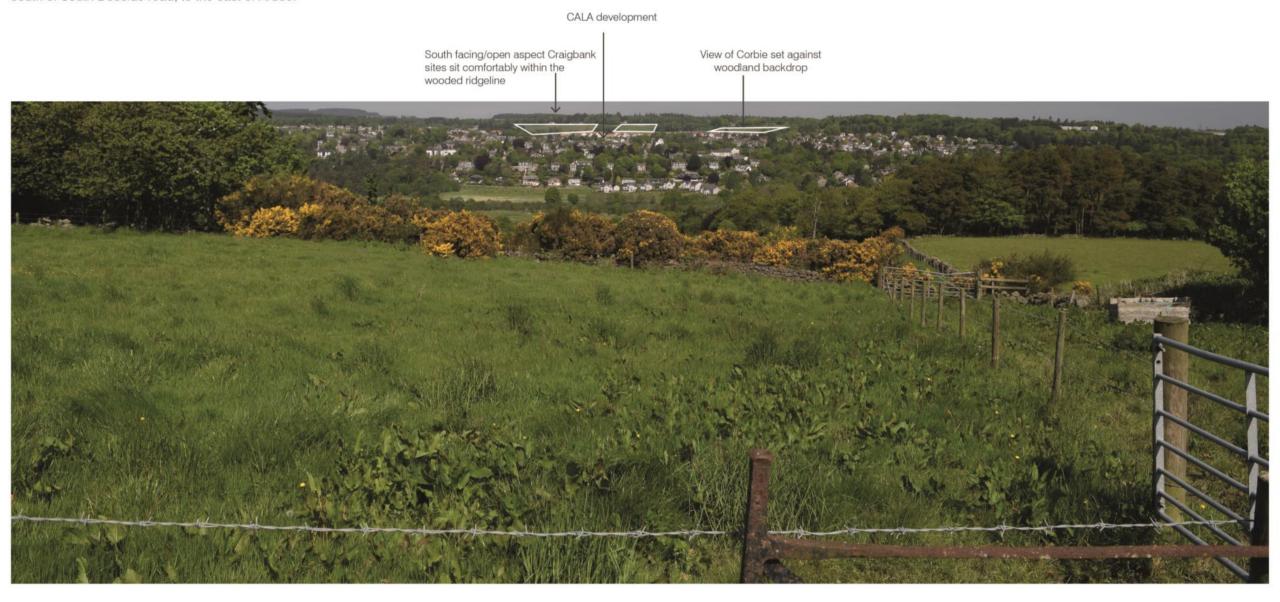
The following viewpoints have been chosen:

- 1. Longer View from south Deeside
- 2. View from Craigton private road looking south west
- 3. View from Craigton private road looking east along northern boundary
- 4. View South from Craigton Road down lane bisecting Corbie site into two
- 5. View east from lane at northern edge of the site
- 6. View west from lane at northern edge of the site
- 7. View along southern edge adjoining recently construction CALA housing
- 8. View to south east from Craigton Road
- 9. View from Craigton Road looking north west
- 10. View towards north east and Newton farm from Craigton Road
- 11. Looking east along Craigton Road
- 12. View west along Craigton Road



Viewpoints Key

1. Longer view of Craigbank and Corbie from unclassified road due south of site, south of South Deeside road, to the east of Ardoe.



View 1

The site at Friarsfield sits comfortably below the wooded ridgeline to the north and follows the existing pattern of housing set within woodland to the south.

This view is taken from an unclassified road from a sparsely populated area, with only a handful of dwellings. Views from busier roads, such as South Deeside Road are obscured due to existing vegetation to the road side but also due to existing topography on the rising slope towards Friarsfield. The site therefore has minimal visual impact to the southern Deeside valley.

2. View from Craigton private road looking South West



View 2

From private lane of Craigton Road, Corbie is visible in places but only when there is a break in the existing hedge / walling. The area forms the foreground view lying adjacent to some private residences and future phases of the current Cala development with Cults housing rising up the slope in the background with longer distance views curtailed by Foggieton Woods to the west.



3. View from Craigton private road looking East along northern boundary

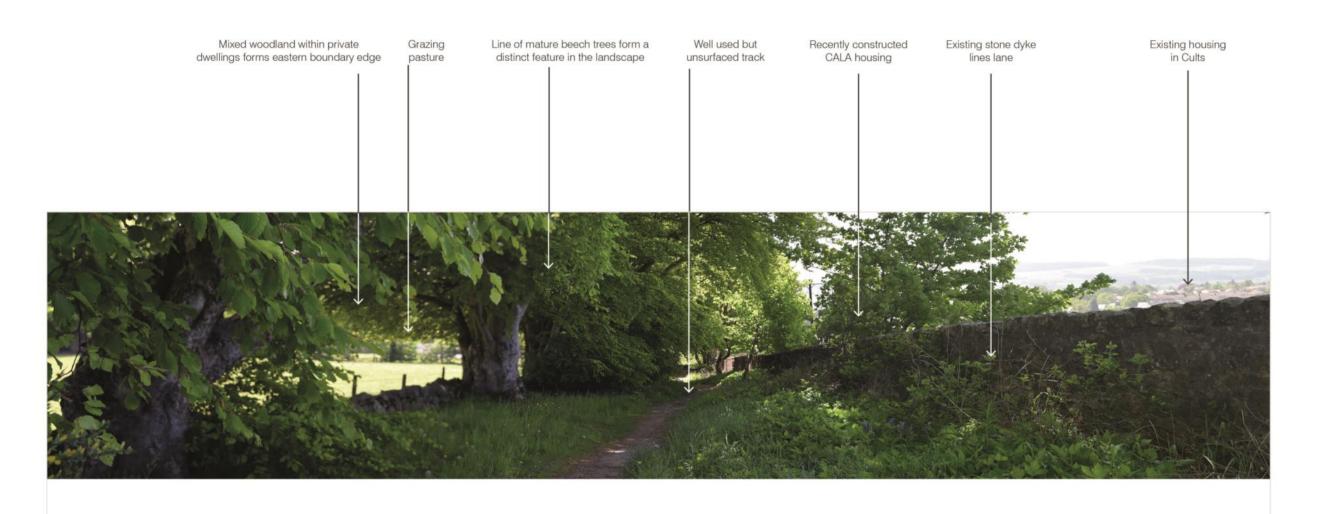


View 3

The existing stone wall and mature beech hedge form a very strong edge to the north of Corbie effectively screening the area the view from private dwellings directly to the north. The mixed woodland associated with the former Waldorf School encloses views to the east.

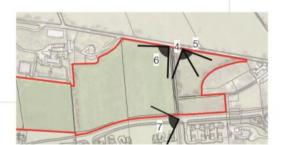


4. View South from Craigton Road down lane bisecting Corbie site into two halves

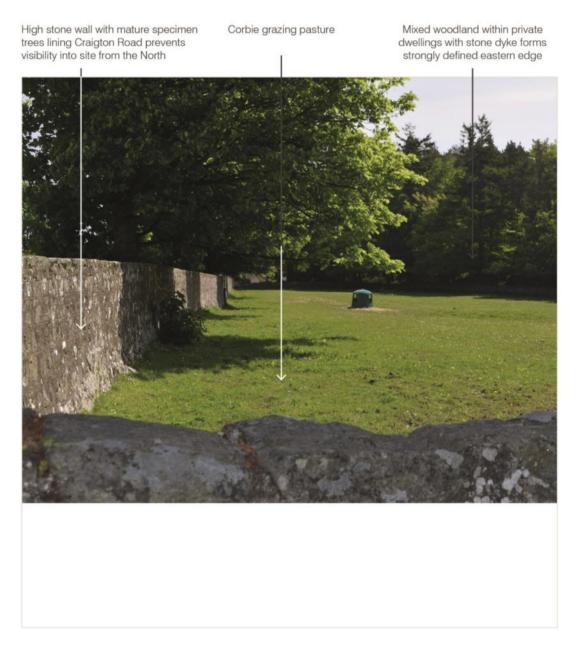


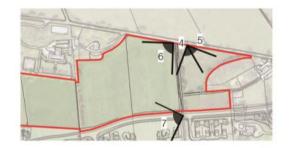
View 4

Corbie is bisected by a distinctive existing track bounded by stone walling and mature beech trees. Although not a core path this provides a key opportunity to form a continuation of the pedestrian / cycle path that runs through the Friarsfield development and extend connectivity from Cults to Den Woods / Hazlehead Park to the north.



5. View East from lane at northern edge of the site





6. View West from lane at northern edge of the site



View 6

Corbie is currently open pasture sloping southwards and overlooking recent Friarsfield housing by CALA and Cults beyond. Existing mature trees, woodland and stone walls form strong boundary definition to the north, west and east and provide visual enclosure to these edges.



7. View along southern edge adjoining recently constructed CALA housing



View 7

A temporary fence currently defines the southern edge of Corbie, but in due course the new link road will become the edge and the fence removed. Foggieton Woods provides visual enclosure to the west.

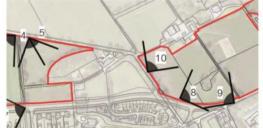


8. View to South East from Craigton Road



View 8

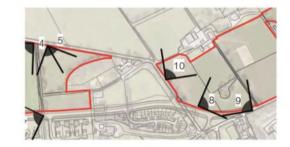
Newton is the most easterly of the sites, and this view illustrates the indicative line of the future road, the new housing fronting Craigton Road and existing mature mixed woodland on the southern side of the road enclosing this area.





View 9

There is an opportunity to enhance the approach into Cults with a strong landscape frontage.

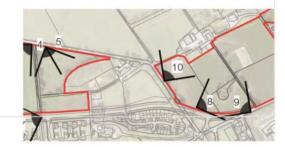


10. View toward North East and Newton farm from Craigton Road



View 10

Newton Farm and associated woodland defines the ridge line to the north of Newton, with the foreground pasture and stone walling. The character of this area has already evolved as new homes have been built and will evolve further when the new link road is completed.



11. Looking East along Craigton Road

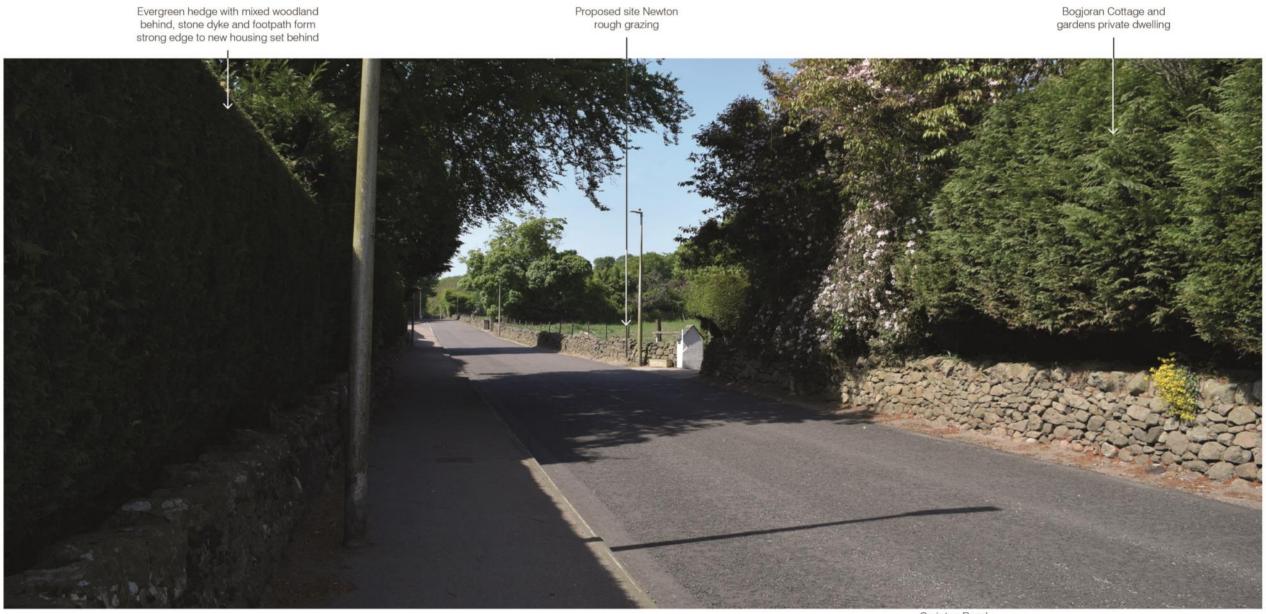


View 11

Stone dyke and post and wire fence to Craigton Road forms weak boundary edge

Looking eastwards along Craigton Road toward the city, the introduction of 2-3 dwellings next to Bogjoran cottage would be consistent with the existing character of the area, with detached properties within generous garden plots. New hedging and repair of the existing stone wall bounding the road, would strengthen the boundary edge to Craigton road. The mature conifer tree line bounding the field edge would be retained.

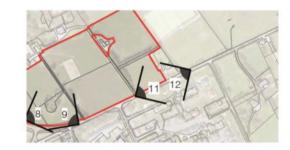




Craigton Road

View 12

As an approach from Aberdeen toward Cults and Friarsfield, this C category road is one of the key routes. On the fringes of the city this area is a mix of isolated dwellings, agriculture and pockets of new housing developments. Stone walling in mixed condition, with specimen trees, and evergreen hedges are a key characteristic of this road edge. This character would be continued adjacent to Bogjoran cottage in the foreground, and then become a more formal edge to the road with repaired stone walling consistent and new hedge and avenue tree planting, signifying the arrival into Cults and reflect character of new housing on the southern side of Craigton Road.



Summary

The existing landscape character at Friarsfield North is representative of the Landscape Character Type No21 Countesswells / Milltimber / Kennerty. The distinctive landscape features of topographical variety, stone dykes, a mix of woodland and open areas and suburban edges visually contained by planting are still relevant.

With the expansion of Cults as a settlement to the north through the Friarsfield development, the adjoining landscape has already changed from rural to suburban in character. Any expansion of Friarsfield to the north would be visually contained by existing woodland to the west and east and ridge line woodland / stone walls and hedging broadly to the north. In addition, to further mitigate any negative visual impact of development, new blocks of mixed woodland would subdivide development areas and help to take up the changes in level across the sites, and the introduction of informal tree groupings around the housing would soften the visual impact further.

For the Newton area the site would change from existing semi-rural / suburban character to suburban. When constructed, the new road associated with consented development, will further urbanise the character of this area as has already begun to happen with the introduction of housing on the opposite side of Craigton Road. Landscape improvements to Craigton road with specimen tree planting, hedges and repair of stone walling would mitigate the visual impact of development within this area, and enhance what is currently a degraded edge, into an attractive approach into Cults.



SITE ANALYSIS

Site Features

The numbers below correspond with the adjacent diagram and highlight key site features, which have been considered in the development of a design concept and proposal for the site:

- 1. TOPOGRAPHY Craigbank and Corbie fall north to south at gradients between 1%-10% (1/100 1/10) with some pockets of steeper ground. The Newton site phase falls west to east with gradients ranging between 6% to 15% (1/16 1/7) similarly, with some pockets of steeper ground. Opportunities exist to work with the existing topography with a meandering street layout and sloped landscape breaks.
- PRIVATE ROADS A number of existing private roads run though or are adjacent to the site. A means of access to all private dwellings must be respected in the development of the site layouts. This has been considered in the development proposals.
- 3. ACCESS Access to all three of the sites will rely upon the completion of the Friarsfield Link Road which is expected to be constructed and operational by XXXX. The Corbie site will require additional access from Craigton Road to the north and will require to be upgraded accordingly. Sections of Craigton Road to the north of the Craigbank site are under private ownership, therefore opportunities for access and upgrade are limited.
- 4. EXISTING WOODLAND Any established woodlands need to be carefully integrated into a development layout. A tree survey will be undertaken at a future stage, in order to accurately map root protection areas. Adequate stand off distance from development will ensure that there is no damage to root protection areas as a result of construction. This has been considered in the development of the proposals.

- VIEWS FROM WIDER DEESIDE VALLEY The existing settlement areas of Cults and Pitfodels, along with the existing topography and woodland limit views and visibility of the sites from the wider Deeside Valley, in particular the Corbie site.
- OWNERSHIP The Newton site contains a private lane leading to dwellings south and west of Newton Farm. This forms a natural break in the site. Similarly, an existing woodland belt divides the Corbie site in two.
- EXISTING DWELLINGS Although there are no existing dwellings located within the site, a sensitive approach is required at any shared boundaries. For example, dwellings at Craigbank, Craigton House, Newton and Bogjoran.
- 8. CORE PATHS Two Core Paths, identified by Aberdeen City Council, sit adjacent to the site. Core Path 87 runs along the northern boundary of Craigbank, heading west to Foggieton Walks, whilst Core Path 63 runs parallel with the west boundary of Corbie, heading north through the former Waldorf School to Den Wood or south to Cults and the River Dee corridor.

APPROVED FRIARSFIELD LINK ROAD - The Friarsfield Link Road is to be delivered as part of the consented Friarsfield development to the south which is currently under construction. The link road routes in an east-west direction between Craigton Road and Kirk Brae. The entire Link Road is to be delivered and fully operational prior to the completion of the 161st unit on the consented Friarsfield development site. There are currently approximately 100 houses occupied and the Link Road is expected to be completed by January 2020.

10. UTILITIES -

<u>Water</u> – There are existing water mains in Craigton Road and Friarsfield Road around the perimeter of the site. There are also mains within the residential areas to the south of the Friarsfield Link Road. New water mains would be provided within the proposed development sites, fed from the existing water supply

network.

<u>Gas</u> - There are gas mains within the residential areas to the south of the Friarsfield Link Road. New gas mains would be provided within the proposed development sites, fed from the existing gas supply network.

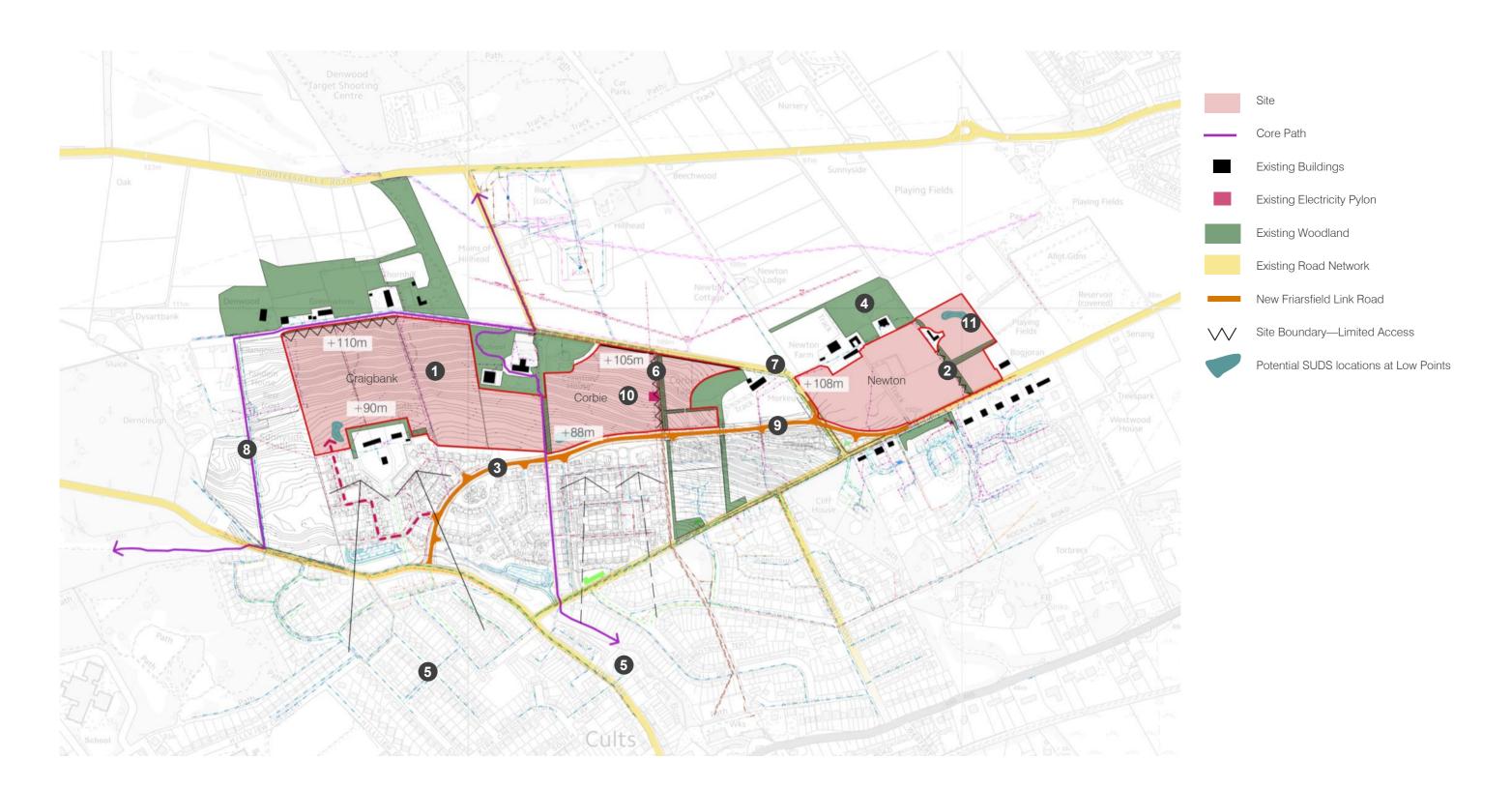
<u>Electric</u> – There is a high voltage cable running north / south between the Craigbank and Corbie sites and a high voltage cable running north / south through the Corbie site. These will either be respected by the development layout or diverted. The existing electricity network could be extended through the development to service the site.

<u>Telecom</u> – There are various telecom connections to the existing dwellings within the site boundaries. These will either be respected by the development layout or diverted. It is understood that the existing telecoms network can be readily extended to serve the development.

11. DRAINAGE -

<u>Sewers</u> - There are existing foul and surface water sewers within the residential areas to the south of the Friarsfield Link Road and Craigton Road. New foul and surface water sewers will be provided, in accordance with Scottish Water's specification. It is understood that capacity will be available within the existing foul sewers for foul flows from the proposed sites.

<u>Land drainage</u> – The existing land drainage system will be respected where practicable and diverted where necessary to ensure the surrounding land is unaffected and that the proposed development is adequately drained.



SITE OPPORTUNITIES

Key Opportunities

The numbers below correspond with the adjacent diagram and highlight key site opportunities, which have been considered in the development of a design concept and proposal for the site:

- 1. IMMEDIATELY DELIVERABLE SITE The CALA Friarsfield neighbourhood is now well established, fully serviced and proving to be very popular with strong sales. It follows that if this additional land is allocated within the next LDP that it will be developed quickly.
- 2. PRIVATE HOUSING The Cults area of Aberdeen continues to be a very popular location for home owners. All indications are that demand for new homes in the area will remain high and will help deliver the Council's new housing targets for the City.
- 25% AFFORDABLE HOUSING This site offers the opportunity for affordable housing to be provided in line with local authority standards and requirements. These much needed affordable homes will be provided quickly in line with strong private sales.
- 4. CREATION OF A CONSIDERED URBAN / RURAL EDGE TO FRIARSFIELD The existing edge of Cults, in this location, is formed by the approved new road linking Kirk Brae with Friarsfield Road. The site at Friarsfield North offers the opportunity to create a fully considered boundary to Cults, with an appropriate landscape strategy to emphasise the site's role in the transition from urban to rural land use.
- SOUTH FACING SLOPES The natural fall in the land to the south creates opportunities to place buildings in order to maximise passive solar gain to living spaces and gardens. Proposed tree belts will offer shelter and further break up views into the site.

- 6. LINKS TO CORE PATH NETWORK AND EXISTING DESIRE LINES
 - The two Core Paths, which run alongside the site boundaries of Craigbank and Corbie, offer opportunities to connect the new development into the surrounding area, in particular to the west to Foggieton Walks, to the north, to Den Wood and Hazelhead Park and to the south to Cults and the Deeside river corridor.
- 7. EXISTING AND PROPOSED WOODLAND A natural asset to be properly managed and responsibly integrated into new development. The existing woodlands provide a valuable habitat and amenity; they provide visual containment to development and are a useful way of subdividing the site into more discrete pockets. Opportunities exist to create a strong east west tree belt, which could connect Craigbank and Corbie and further break up long distance views of the site from Deeside.
- OPPORTUNITIES TO CREATE NEW ARRIVAL SEQUENCE INTO CULTS An opportunity exists to create an improved sense of arrival for Cults, heading west from Aberdeen City along Craigton Road. Due to the geometry of the new link road, the landscape character will change considerably, affording space for a robust new boundary treatment and positive building frontage.
- SUDS INTEGRATED INTO PUBLIC GREEN SPACE -Opportunities
 exist to combine proposed public open spaces with existing
 woodland and SUDS features, to deliver an integrated and
 ecologically rich environment.
- ACCESS OPPORTUNITIES Opportunities exist to provide vehicle access to the site from the approved Friarsfield Link Road and from Craigton Road to the north of the Corbie site.

SITE OPPORTUNITIES





CONCEPT

Concept Development

This illustration represents an early concept sketch for the land at Friarsfield North and denotes some key ideas which have developed through the design process:

- Creation of a considered urban / rural edge to Cults, by extending the existing Friarsfield development.
- * Creation of a robust east west landscape structure to help integrate the development into the landscape and create a new wildlife corridor.
- * Establish a sense of arrival and place into Cults, with avenue tree planting and building frontage, in contrast with the mature landscaped southern boundary of Craigton Road.
- * Establish a semi-rural, winding street network to work with the existing topography and limit earth displacement and retention.
- * Enhance pedestrian links to the wider area for both the existing and new communities of Friarsfield and Cults, for example, to Den Wood, Foggieton, Hazelhead and the River Dee.



DEVELOPING CONCEPT - LANDSCAPE

Landscape Objectives

The adjacent diagram represents the developing landscape, which follows the key objectives noted below:

- * Retain / repair existing stone walls except where openings need to be created to provide access
- * Retain characterful lane within Corbie as a recreational pedestrian / cycle route
- * Use planting to take up large level differences on the sloping topography, to help divide the development area into smaller pockets
- Creation of a formal landscaped approach into Cults from Aberdeen



DEVELOPING CONCEPT - CONNECTIVITY

Connections to Friarsfield. Cults and the Wider Area

The concept for Friarsfield North is to connect into the existing Friarsfield infrastructure and the historic network of paths, lanes and streets. The centre of Cults is only a short walk from the site where there are a number of local shops and services. Cults is also well served by an established cycle and bus network.

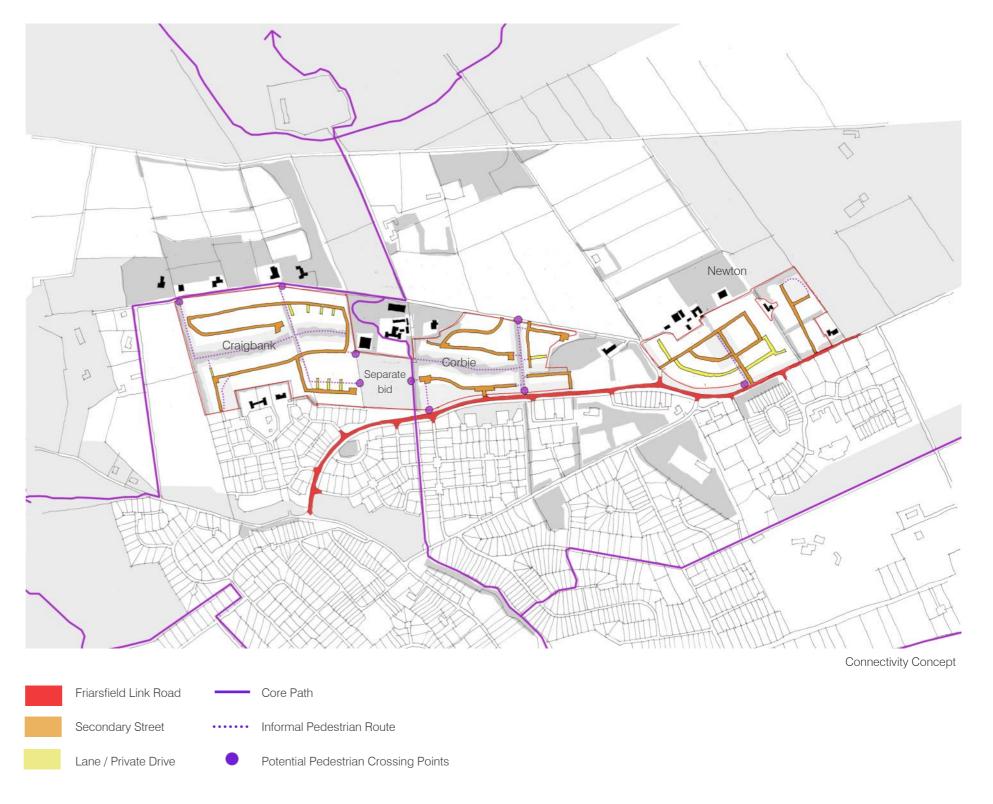
Street Layout and Hierarchy

The sloping site has many advantages including giving the site a distinctive character and improving outlook and solar gain to individual homes. A meandering street pattern set between landscape breaks helps to gently make up level changes across the site. A clear hierarchy of primary routes, secondary routes and lanes will help to build a strong sense of place and aid movement through the new development.

Access Opportunities

Access is generally taken from the existing Friarsfield development via the approved Friarsfield Link Road. Access points off Craigton Road are minimised, with the majority of traffic movement concentrated along the south boundary; the existing urban edge of the site.

The Friarsfield Link Road will greatly improve connections to the wider area, providing a central spine to the proposed development. This proposal will greatly enhance the edge of Cults by giving balance to the new road and by providing a clear gateway into Cults.



DEVELOPING CONCEPT - DEVELOPMENT POCKETS

Development Pockets

Friarsfield North is made up of a series of development pockets, each with their own unique features and characteristics. A combination of the Friarsfield development (currently under construction) and a new east west landscape belt stretching between Craigbank and Corbie, visually breaks up the development area and helps with level changes as the development moves up the hill.

To the west is Craigbank, the largest of the three development pockets. It connects naturally into the existing west end of Friarsfield, following the already established urban pattern, whilst also tying into the Core Path network along Craigton Road and the mature woodland setting of the former Waldorf School.

The central development pocket, Corbie, addresses the new link road and is accessed from the north and the south. It shares the gently sloping nature of Craigbank but is slightly smaller in scale. Small clusters of houses suit the area adjacent to the dwellings at Morkeu, with opportunities for frontages to Craigton Road and the existing tree lined avenue, which runs north south through the eastern half of Corbie.

The third development pocket to the east is called Newton. It sits higher up but is a flatter site with a generous sweeping frontage, owing to the curving geometry of the Friarsfield Link Road. This provides an opportunity to create a crescent of new homes with a south facing aspect. In combination with the existing dwelling at Bogjoran, the eastern edge of the Newton site is designed to gently but positively mark the arrival of Cults along Craigton Road.



DEVELOPING CONCEPT - CHARACTER AREAS

Character Areas

A series of character areas are defined by the site's unique characteristics and proposed spatial hierarchy. Three of these are explored in the following Character Study section of the document.





PROPOSAL

Schedule of Accommodation

Gross Site Area — Approximately 54 acres
No. of Units—Approximately 280.
Affordable Units—25% of total unit no.

Key Design Principles

The primary objective of the proposals is to fully integrate this new development with the existing settlements of Friarsfield and Cults and therefore build upon the existing identity and aspirations of the local community. Key design principles include:

- Integration and enhancement of road, cycle and path network to create a safe and sustainable environment for residents to live
- Creation of east west landscape belt to delineate individual development pockets and integrate new open spaces within the existing green network
- Meandering street pattern, which respects the existing topography and semi urban / rural site condition
- * Enhanced connectivity between the existing settlement of Cults and the wider area, in particular Den Wood, Hazlehead Park and Foggieton Woods
- Creation of positive, landscaped arrival sequence into Cults from Aberdeen City Centre

Proposed Transportation

A clear hierarchy of streets will help create a strong sense of place and aid movement through the new development. In addition to the core streets there will be secondary streets, lanes and shared surfaces, which will be designed in accordance with 'Designing Streets' policy and appropriate standards/requirements of Aberdeen City Council.

The adjacent proposal illustrates how the site could be accessed and developed to integrate with the consented Friarsfield site to the south and the existing settlement of Cults. Traffic analysis and transport design aspects including those described above would be detailed in a future Transport Assessment once development proposals are refined.

Pedestrian crossings will be provided on the Friarsfield Link Road at key crossing points to ensure safe connectivity with the surrounding developments and local facilities.

Utilities

There are existing utilities within and out with the site, which will facilitate the servicing of the utilities to the proposed development.

SUDS

The western phase drains to a basin in the south western corner of the site where it is discharged and piped down the existing western development to finally flow into the existing watercourse to the west at an agreed discharge rate with SEPA and Aberdeen City Council. The central phase drains to a basin in the south western corner of the site where it is discharged and piped down the existing western development to finally flow into the existing watercourse to the west

at an agreed discharge rate with SEPA and Aberdeen City Council. The eastern phase drains to the north east corner of the development.

Craigbank

Foul flows from this site can be drained to the sewers in the existing residential development immediately to the south west of the site.

Surface water run-off will be dealt with in accordance with the SuDS manual (C753). Flows will be directed to the south west corner of the site to suit the existing topography and treated and attenuated to greenfield run-off rates, before being discharged to the Cults Burn to the south of the site.

Corbie

Foul flows from this site can be drained to the sewers in the existing residential development immediately to the south west of the site.

Surface water run-off will be dealt with in accordance with the SuDS manual (C753). Flows will be directed to the south west corner of the site to suit the existing topography and treated and attenuated to greenfield run-off rates, before being discharged to the Cults Burn to the south west of the site.

Newton

Foul flows from this site would drain to the north east corner of the site and be pumped to the existing sewer network in the existing residential development immediately to the south of the site.

Surface water run-off will be dealt with in accordance with the SuDS manual (C753). Flows will be directed to the south west corner of the site to suit the existing topography and treated and attenuated to greenfield run-off rates, before being discharged to existing surface water sewers in Bairds Brae to the south east of the site to the south.

PROPOSAL—LANDSCAPE

Identify / value / retain existing landscape assets

Each of the three areas have some distinguishing landscape features, that are integral to the character and should be retained:

At Craigbank, stone walling acts as a boundary to the site with a large mature beech hedgerow bounding the northern edge and ridge line. At Corbie, a 2m high stone wall bounds the northern edge to Craigton road, with a lower height wall bounding the western side of the site. There is an existing lane in north / south alignment with a 2/1m high stone walls and beech trees. At Newton the stone wall to Craigton Road and existing planting, where possible will be retained / walls repaired.

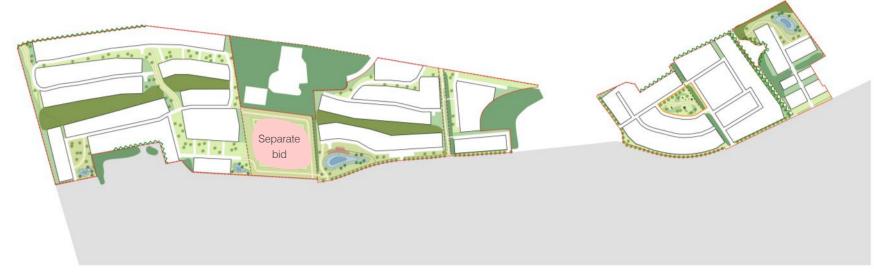
Multifunctional Blue/Green Infrastructure

The Green Infrastructure has been developed to provide:

- * a diverse habitat of woodlands, hedgerows, specimen & orchard trees, wet and dry meadow & amenity grassland, and wetlands where surface water is positively managed and integrated within the landscape
- playful spaces
- linkages to a network of off-road pedestrian and cycle connectivity

Open Space Standards

Applying ACC's Open Space Standards and consideration of the Green Space Network, the site will offer generous provision of Natural Green Space, and play particularly to the east of the proposed development.



Landscape Proposals

The site overall is exceptionally well connected to a network of core path and off-road pedestrian and cycle linkages. Within close proximity to the site there is easy access to a wide range of open space types:

- * Outdoor sports off Craigton Road
- * Allotments off Craigton Road
- Play areas within Friarsfield / Cults
- Local Nature Conservation sites of Cults Den, Den Wood and Cults Quarry
- * Recreational Woodlands and parks such as Den Wood / Hazledene Park to the north and Foggieton Woods directly to the west.

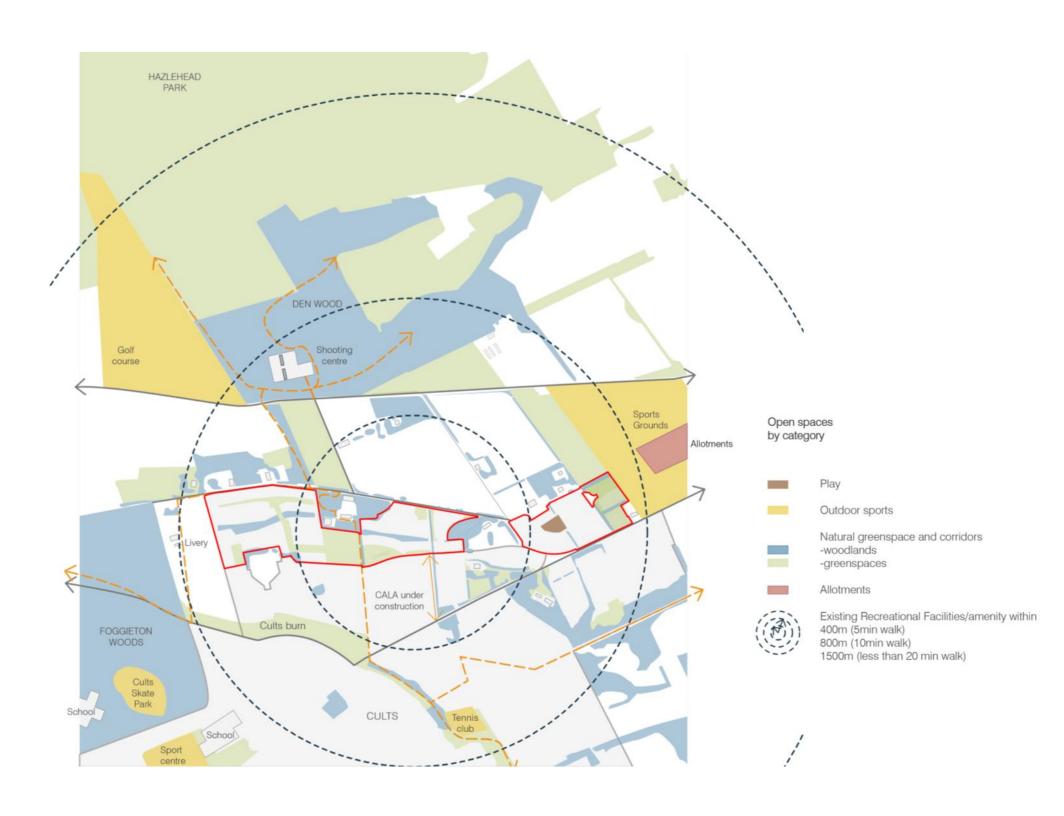
Every proposed residence will be within 1500m of Hazledene Park.

Existing good quality outdoor sports provision within Cults and west Aberdeen city are within easily accessible guideline distances. These include:

- * Cricket, rugby and hockey pitches
- * Cults Skate Park
- Cults Tennis courts
- * Den Wood Shooting Range, Golf course and Livery to the north and west

Across the site SUDS have been included within the provision of open spaces as they will be designed to be seamlessly integral to the open space.

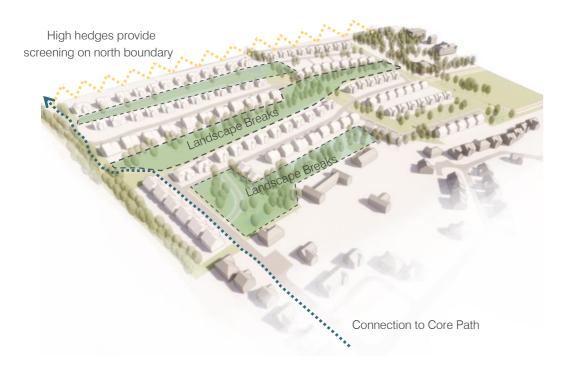
Cognisance of ACC's Supplementary Guidance series for Landscape, Heritage and Trees & Woodlands has also been taken.



CHARACTER AREA 1

Craigbank

- Strong east / west landscape breaks, including a structure tree belt through the centre of the site, help to break up the urban pattern
- * Structural tree belt functions as a wildlife corridor stretching between the west boundary of Craigbank, through the mature landscape of the Waldorf site, to the east boundary of Corbie.
- * Connections to Core Path Network incorporated, which connect the site with wider amenity space such as Foggieton Walks to the west and Den Wood to the north.
- Residential blocks, open space and street patterns are designed to work with the existing topography
- * SUDS incorporated with open space in the form of wet meadows habitat



Aerial view of proposed Character Area - Craigbank



Proposed tree belt to west boundary



Photograph showing example of houses with positive frontages to open space/ road.



Existing trees retained and rear gardens placed against tree belt

Existing buildings



Proposed SUDS basins/ wetland meadow surrounded by informal paths.



Aerial view showing existing properties at Craigbank....

CHARACTER AREA 2



Corbie

- Positive frontage created to Friarsfield Link Road, with south facing open space and integrated SUDS feature
- Strong east / west landscape break helps to break up the urban pattern and functions as a wildlife corridor stretching between the west boundary of Craigbank, through the mature landscape of the Waldorf site, to the east boundary of Corbie
- Connections to Core Path and Desire Line walking routes heading north to Den Wood and West to Foggieton Walks
- Residential blocks, street layouts and open spaces are designed to work with the natural topography of the site as it slopes down towards the existing CALA development at Friarsfield
- Existing woodland provides a mature landscape setting and provides screening and privacy to existing properties/ buildings



Aerial view of proposed Character Area - Corbie



Informal paths connecting to existing residential areas

Integrated SUDS pond



Alternate aerial view of looking east towards Friarsfield link road.



Informal path around pond surrounded in soft Examples of natural playgrounds. wetland vegetation as proposed for integrated SUDS ponds.





CHARACTER AREA 3

Newton

- Creation of strong landscaped edge on approach into Cults, with positive building frontages to Craigton Road and the new Friarsfield Link Road
- Avenue trees and hedges create formal frontage and subdivide the open development area
- Centrally located Park provides a play / meeting place for the community and is overlooked on all sides. Existing trees enhance the park setting.
- Proposed housing can be seen as an extension of existing developments on the south side of Craigton Road
- The Park located in the north east corner provides a second amenity space with integrated SUDS and open views to the east.



Aerial view of proposed Character Area - Newton







Photograph showing example of houses with positive frontages to open space.



Alternate view of character area overlooking green Examples of playgrounds in natural settings. space and integrated SUDs pond.



PHASING AND DELIVERY

Phasing

The existing Friarsfield site is due to be completed by the time the new plan is adopted in 2021. These sites could form a contribution of that development phased in such a manner to continue their delivery seamlessly.

The new access road now has consent. As it is built it will allow access to all proposed development areas and allow these to be constructed concurrently or in sequence.

The first housing would be developed within the first phase of the new LDP timescales (year 0-5) with the completed development expected over a period of 10 years.

Education

Viable solutions do exist for Early Learning and Childcare (ELC) provision, primary education provision and secondary education provision associated with this proposed development at Cults (Friarsfield) over time.

In December 2015 the Cults (Primary) School roll was forecast to decline over time in response to the Countesswells catchment area (zone) review. The proposed housing could be phased to match that decline.

The size of the current Cults (Primary) School site is such that it could facilitate a primary school larger than three streams (More than 21 classrooms). In 2017 academic year the school functioned with 22 classrooms if that was considered to be a viable option. In December 2015 Cults Academy school roll was forecast to decline over time in response to the Countesswells catchment area (zone) review. The proposed housing could be phased to match that decline.

Discussions with ACC Education will be required and further work considered upon the release of the up to date school roll forecasts.

SUMMARY

CALA Homes (North) Limited are a leading housebuilder, not only in the North East of Scotland, but nationally. CALA consistently deliver high quality homes, and in the last 12/24 months have developed across 5 sites in Aberdeen City and have added a further three sites to this portfolio in 2018. The fact there is a developer behind this site with a track record of delivering housing, emphasises the deliverability of the site.

A combination of this site being located in a very desirable and established location and CALA's unmatched track record of delivering high quality development in the North East of Scotland, and importantly also in the immediate area, mean that Friarsfield North should be seriously considered for inclusion in the next Local Development Plan.

Cults will require additional housing to meet future demand. This is the only site locally where that housing can be delivered efficiently and in a controlled manner. This is an area previously considered by the Planning Authority as appropriate for development. Having considered the site afresh, this bid document confirms that in respect of location, use, changing context and landscape fit, Friarsfield North can deliver a considered and integrated extension to the existing Cults community.

Key benefits of Friarsfield North:

- Natural extension of existing Friarsfield neighbourhood
- Provides considered urban / rural edge to Cults
- Provides sense of arrival on approach from Aberdeen to Cults
- Delivers much needed private and affordable homes
- South facing gardens
- Enhances wildlife habitats and green corridors
- New structure tree planting creates discreet development pockets







Aberdeen Local Development Plan Review Main Issues Report Response Form 2019

Aberdeen City Council has published a Main Issues Report (MIR) which is part of the process of preparing a new Local Development Plan. It is designed to gather views on specific proposals and sets out options for dealing with the key planning matters facing Aberdeen over the next 20 years such as the location of new housing and employment development, the future of retailing and the City Centre, housing needs and tackling climate change. It also includes a number of potential new policies which would be used in the determination of planning applications.

The MIR has been published alongside a Monitoring Statement and Environmental Report. Copies are available to view at Marischal College, Broad Street. Aberdeen. These, and other supporting documents, are available at: - www.aberdeencity.gov.uk/aldp2022

Everyone now has the chance to comment on the report and associated documents. All comments received will be considered and used to inform the preparation of the Proposed Aberdeen City Local Development Plan. There will be a further opportunity to comment on the Proposed Plan when it is published in early 2020.

The consultation runs from 4 March 2019 to 13 May 2019.

Responses to the published documents can be:

- made online at:- http://consultation.aberdeencity.gov.uk/planning/mir2019;
- emailed to:- ldp@aberdeencity.gov.uk; or
- by post to:- Local Development Plan Team, Strategic Place Planning, Aberdeen City Council, Business Hub 4, Ground Floor North, Marischal College, Broad Street, Aberdeen, AB10 1AB.

Completed response forms should be with us no later than 13 May 2019.



YOUR DETAILS

Name	SARAH GRAHAM
Organisation (if relevant)	HALLIDAY FRASER MUNRO
On behalf of (if relevant)	CALA HOMES (NORTH) LTD
Address	
Postcode	
Telephone	
E-mail	

Thank you for taking the time to complete this response form. If you wish to be added to the LDP e-mailing list to be kept informed of our progress in producing the next Local Development Plan, please tick here



If yes, please provide an e-mail address

PRIVACY STATEMENT

As part of the review of the Local Development Plan, Aberdeen City Council (ACC) will offer you several opportunities to submit your views and comments. These opportunities will range from the current consultation stage, the Main Issues Report, where we will ask you to comment on specific proposals and alternatives to the Proposed Plan stage where the set view of ACC has been established.

ACC are legally required to consult at this stage and at Proposed Plan stage. This is set out in the Town and Country Planning (Scotland) Act 1997 (as amended) and supporting regulations. The Environmental Assessment (Scotland) Act 2005 also requires us to consult on a Strategic Environmental Assessment Environmental Report.

By submitting a response to the consultation, you understand that ACC can use the information provided in this form, including personal data, as part of the review of the Aberdeen City Local Development Plan. ACC will not share or disclose any personal data about you to any organization or person unless it is authorized or required to do so by law.

The data controller for this information is ACC. We understand our legal basis for processing this information as Article 6(1)(c) of the General Data Protection Regulation as this is an activity we are legally required to carry out under the Town and Country Planning (Scotland) Act 1997 (as amended) and supporting regulations and The Environmental Assessment (Scotland) Act 2005. The data on the form will be used to inform the preparation of the Proposed Aberdeen City Local Development Plan 2022. At the end of the consultation, where contact details have been provided, the Local Development Plan team will provide you with a respondent number. You may also be contacted about the comments you have made and, as obliged by the Town and Country Planning (Scotland) Act 1997 (as amended) and supporting regulations, the Local Development Plan team will contact you to inform you of the publication of the proposed Aberdeen Local Development Plan in early 2020. If you chose not to provide your contact details, your comments will still be valid but we will not be able to contact you in the future.

Responses will be collated, redacted, summarised and stored electronically or in locked cabinets in Marischal College. All redacted responses will be published, alongside the respondents name (if provided), on the Aberdeen City Local Development Plan website. Contact details will not be made public, but your name and respondent number will be published.

Aberdeen City Council will only keep your personal data for as long as is needed. Data will be kept until the emerging Local Development Plan is itself replaced – this is likely to be around 5 years following its adoption in 2022 – so 2027. Following this, data will be disposed of in a secure manner.

YOUR DATA, YOUR RIGHTS

You've got legal rights about the way ACC handles and uses your data, which include the right to ask for a copy of it, and to ask us to stop doing something with your data. Please contact the Council's Data Protection Officer by e-mailing DataProtectionOfficer@aberdeencity.gov.uk or writing to Data Protection Officer, Aberdeen City Council, Governance, Level 1 South, Marischal College, Broad Street, Aberdeen, AB10 1AB. More information is available at: - https://www.aberdeencity.gov.uk/your-data

YOUR COMMENTS

Which document(s) are you commenting on?	 Main Issues Report Strategic Environmental Assessment Environmental Report Monitoring Statement
	nt and the specific Issue, Question, Site, Policy, Map or Table you are ide your comments below and explain your reason for supporting, opposing ic part of the document.
Please see attached, in res	ponse to the following questions:
Question 1 – New Housing Question 2 – Housing Allow Question 6 – City Centre M	

YOUR COMMENTS CONTINUED



ABERDEEN CITY LOCAL DEVELOPMENT PLAN RESPONSE TO MAIN ISSUES REPORT

HOUSING LAND AND STRATEGY

MAY 2019

On behalf of CALA Homes (North) Ltd





CONTENTS

- 1. Introduction
- 2. Housing Land Strategy Response
 - 2.1 Housing Land Supply
 - 2.2 Over-Reliance on Brownfield Sites
- 3. MIR Questions
- 4. Conclusion





1. Introduction

This report has been prepared by Halliday Fraser Munro, Chartered Architects and Town Planning Consultants, on behalf of CALA Homes (North) Ltd. It is written in response to the Aberdeen City Local Development Plan Main Issues Report 2019 (MIR). This specific response covers policy issues in relation to the MIR proposed housing strategy.

2. Housing Land Strategy Response

The housing strategy contained within the Aberdeen City Council Main Issues Report (MIR) relies heavily on existing allocated sites, additional brownfield sites coming forward over the lifetime of the plan and a very limited set of additional allocations. CALA Homes (North) Ltd is concerned that this approach will support a continued shortfall in housing delivery across the City and will not meet national or regional housing delivery requirements. They do not support the Housing strategy approach adopted in the MIR for reasons set out in this response.

The MIR housing strategy is a do-minimum intervention that will simply maintain the status quo. The City needs a far more ambitious strategy that can deliver housing numbers and quality new places that are appropriate to the City Council's vision to:

"... make the area even more attractive, prosperous, resilient and sustainable European city region and an excellent place to live, visit and do business." (MIR, p.5)

CALA Homes (North) Ltd has serious concerns on the range and scale of housing that can be delivered on the back of that do-minimum strategy, the practicality of delivering identified brownfield sites and the relationship between that strategy, the SDP in its final form when approved later this year and national policy on delivering more housing more effectively.

Scottish Planning Policy (SPP 2014) contains the key guiding principles for identifying enough housing land within development plans and relates closely to the requirements of the National Planning Framework (NPF3). NPF3 aims to facilitate new housing development, particularly in areas within Scotland's cities network where there is continuing pressure for growth, such as Aberdeen. House building is recognised for its important contribution to the Scottish economy and planning is expected to provide a "… positive and flexible approach to development".

Paragraph 110 of SPP 2014 specifically requires the planning system to:

- 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.





The latter emphasis on **deliverable housing sites** is essential in the LDP review process if the planning system is going to provide a positive, realistic and flexible approach to housing development required by SPP.

Land requirements can be met from a number of sources and according to SPP "... most notably sites from the established supply which are effective or expected to become effective in the plan period, sites with planning permission, proposed new land allocations, and in some cases a proportion of windfall development". In respect of the latter that expected contribution must be realistic and based on clear evidence of past completions and sound assumptions about likely future trends. SPP 2014 specifically requires that, in urban areas, this should be informed by an urban capacity study. The MIR is accompanied by a Brownfield Urban capacity Study Update (November 2018) but that does not identify whether the sites it contains are effective or constrained.

Paragraph 119 of SPP also requires that LDPs "... in city regions should allocate a range of sites which are effective or expected to become effective in the plan period to meet the housing land requirement of the strategic development plan up to year 10 from the expected year of adoption. They should provide for a minimum of 5 years effective land supply at all times. In allocating sites, planning authorities should be confident that land can be brought forward for development within the plan period and that the range of sites allocated will enable the housing supply target to be met". That calculation is generally based on annual Housing Land Audits (HLA) and although these can provide an element of certainty up to year 5, they are inherently inaccurate and over-optimistic the further from the base year that the housing delivery is forecast. This can be demonstrated quite clearly from an analysis of HLAs over a number of years (see Table 2 below). This demonstrates that Aberdeen City Council cannot have confidence that the scale of development required can be brought forward by just relying on predictions in HLAs. The planning authority should instead take a realistic view of historic delivery trends against that projected in HLAs and allocate enough land to take up any expected shortfall. The housing figures proposed in the current MIR instead make limited allocations that will not make significant difference to housing delivery in the area over the life of the plan.



	2014	2015	2016	2017	2018	2019	2020	2021	2022
2019 HLA (draft)									
Units delivered	684	795	833	1,174	1,173				
Units estimated									
2018 HLA									
Units estimated					1,314	1,529	1,610	1,641	1,189
2017 HLA									
Units estimated				1,274					
2016 HLA									
Units estimated			1,175						
2015 HLA									
Units estimated		1,086							
2014 HLA									
Units estimated	775								
Difference	-91	-291	-342	-100	-141				
between	(-12%)	(-27%)	(-29%)	(-8%)	(-11%)				
predicted &									
actual housing									
delivery									
(averages -357									
units/annum)									
5-year Average						1,269	1,336	1,362	987
difference (-17%)									
applied 2019-									
2022									
No. of Housing						-260	-274	-279	-202
Units anticipated									
less than									
predicted									

Table 2: Housing Land Audit Actual Housing Delivery compared to Expected Housing Delivery (Aberdeen City part of AHMA)

Table 2 above shows extracts from various HLAs and compares predicted housing delivery (in red) against actual housing delivery. It shows:

- An average of 17% reduction from the expected housing delivery set out in HLAs compared to actual housing delivery; and
- That applying a similar reduction from 2019 to 2022 shows an average delivery of 254 units per annum less over that period than anticipated in the most recent agreed 2018 HLA.

This evidence clearly points to:

- Housing delivery on currently allocated sites that falls below medium-term HLA predictions;
- Over-optimism on housing delivery that becomes less accurate the further in the future it predicts; and
- A need for a greater supply and range of housing allocations to supplement existing allocated sites and help deliver more housing over the life of the Plan.





The MIR strategy of limiting allocations therefore doesn't reflect historical trends in housing delivery. Evidence from HLAs indicates quite clearly that a realistic approach to deliver SDP housing requirements would need to allocate additional land in a variety of marketable locations.

Both Friarsfield, Cults (B0910) and Derbeth, Kingswells (B0309) are popular and marketable locations where additional sites proposed by CALA Homes (North) Ltd would contribute to highly deliverable and sustainable housing development at a settlement level. Housing completions in these areas are eminently deliverable. At Friarsfield the development would be a continuation of the CALA Homes (North) development. CALA are committed to delivering the sites they promote, evidenced by current allocations at Grandhome, Oldfold, Craibstone and Cults – all of which have been promoted through an LDP review, consented through planning applications and are now delivering new homes in Aberdeen.

2.1 Housing Land Supply

Halliday Fraser Munro has also made representation to the Proposed Strategic Development Plan (PSDP) on behalf of CALA Homes (North) Ltd. The PSDP is particularly important to the LDP as it sets the housing requirements for LDPs. We're aware of significant representations to the PSDP strongly suggesting that the adopted strategy on housing growth is not ambitious enough. That issue will be a key topic in its imminent examination. If those arguments are accepted, then the LDP may be required to allocate additional housing sites. The following issues therefore also relate to the LDP MIR and should be considered during the MIR review in more detail.

CALA Homes (North) response to the PSDP can be summarised as:

2.1.1 On the SDP Vision - CALA Homes (North) agree that the City and the Shire should be "an even more attractive, prosperous, resilient and sustainable European City Region". However, CALA Homes (North) believe that a continuation of the 2009 and 2014 SDP strategies is not ambitious enough to deliver that vision.

The PSDP vision is carried over into the MIR (Section 1.2). This vision of a prosperous and successful City region continues to be supported by CALA Homes (North) but needs to be more fully reflected in the Proposed Local Development Plan, especially in relation to allocating enough housing land in places where people want to live.

2.1.2 On Housing Requirements - CALA Homes (North) supported the proposed generosity margin of 20% for the plan period from 2016 – 2032 but also a more ambitious approach for the period between 2033 and 2040. This would ensure a generous supply of land is available for housing in the later stage of the PSDP as well as the earlier years. The area's aspirations for economic growth should be reflected in an ambitious housing supply target (the High Growth scenario) for the SDP area for the whole plan period and this should also be reflected in the Proposed LDP.

The PSDP Housing Strategy relied almost entirely on existing allocations in the early years of the plan, pushing some of the need identified in the HNDA to later years. It also relied on existing allocations to deliver more homes than they have been doing over the last few years. That over-reliance on an unrealistic delivery rate is also an issue for the LDP. Aberdeen City Council should recognise these low rates of delivery in addressing housing requirements. Table 3 below illustrates how larger sites have





not delivered as expected over the years. The original expected delivery rates are set out in column 4 (2007-2016) with the remaining columns reporting actual delivery as shown in respective Housing Land Audits. The cumulative shortfall in housing delivery over this period is 15,544 across both Council areas and both housing market areas. This substantial under delivery simply re-emphases the fact that reliance on large sites will not meet the housing delivery targets and does not provide the range of housing in a range of locations that people want to see. Evidence suggest that this will continue to be the case moving forward. Therefore, relying on sites that will deliver slowly over the years will exacerbate housing backlog issues. Increased delivery will only be achieved by allocating additional and deliverable housing sites.

	Comparison of Major Housing Proposals in 2012 LDPs with outturn								
City	site	ref	2007-2016	Cumulative 2015	shortfall	Cumulative 2016	shortfall 2016	Cumulative 2017	shortfall 2017
City	Grandhome	OP 12	2600	0	2600	0	2600	0	2600
	Dubford	OP 25	550	190	360	309	241	397	153
	Stoneywood	OP 24	500	133	367	231	269	514	-14
	Craibstone South	OP 28	750	0	750	0	750	0	750
	Rowett South	OP 30	1000	0	1000	0	1000	0	1000
	Greenferns Landward	OP31	750	0	750	0	750	0	750
	Maidencraig	OP 43 & O		5	745	24	726	60	690
	Greenferns	OP 45	600	0	600	0	600	0	600
	Countesswells	OP 58	2150	0	2150	4	2146	154	1996
	Oldfold	OP 62	400	0	400	25	375	50	350
	Loirston	OP 77	1100	0	1100	0	1100	0	1100
	TOTALS	0.77	11150	328	10822	593	10229	1175	9054
			2220	525	20022	222	1022	22.5	
			percentage delivered	2.9%		5.3%		10.5%	
			percentage delivered	2370		3.370		10.5%	
	site	ref	2007-2016	Cumulative 2015	shortfall	Cumulative 2016	shortfall 2016	cumulative 2017	shortfall 2017
hire	Banff	M1	140	0	140	0	140	0	140
illie	Banff	H1	100	0	100	0	100	0	100
	Fraserburgh	M1	350	0	350	0	350	10	340
	Fraserburgh	H12004	350	44	306	95	255	122	228
	Fraserburgh	H12014	350	0	350	0	350	0	350
	Peterhead	M1	575	0	575	0	575	0	575
	Peterhead	H1	180	0	180	0	180	0	180
	Mintlaw	M1	250	0	250	0	250	0	250
	Mintlaw	H1	300	48	252	73	227	86	214
	Ellon	M1	745	0	745	0	745	0	745
	Inverurie	M2	150	76	74	76	74	76	74
	Inverurie	M3	250	0	250	0	250	0	250
	Inverurie	H1	300	0	300	0	300	0	300
	Inverurie	H4	150	0	150	0	150	0	150
	Newmachar	M1	140	0	140	0	140	0	140
	Elsick/Chapelton	M1	1845	62	1783	107	1738	126	1719
	Laurencekirk	M1	485	0	485	0	485	0	485
	Edzell Woods	M1	150	0	150	0	150	0	150
	Inverbervie	H2	100	0	100	0	100	0	100
		n2	6910	230	6680	351	6559	420	6490
	TOTALS		69.10	230	0080	301	6009	420	0490
			narrantaga dalissas d	2.20/		E 20/		6.49/	
			percentage delivered	3.3%		5.3%		6.4%	

Table 3: Historical Delivery Rates for Larger Housing Sites in Aberdeen City and Aberdeenshire (Source – Housing Land Audit Series and 2012 LDPs, Aberdeen City and Aberdeenshire Councils)



Example Major Sites in City AHMA (incl. 2012 LDP REF)	Allocation to 2018	Actual Delivered to 2018 (as per draft 2019 HLA)	Shortfall in delivery
Grandhome OP12 **	3,440	32	3,408
Dubford OP25	550	397	153
Stoneywood OP24	574	550	24
Craibstone South OP29 **	850	0	850
Rowatt South OP30	1,280	0	1,280
Greenferns Landward OP31	850	0	850
Maidencraig OP43	825	92	733
Greenferns OP45	740	0	740
Countesswells OP58	2,490	304	2,186
Oldfold OP62**	550	75	475
Loirston OP77	1,260	0	1,260
Total	13,409	1,450	11,959

Table 4: Delivery Rates for large sites of 500 units or more – Aberdeen City (Source – Housing Land Audit Series and 2012 LDPs, Aberdeen City and Aberdeenshire Councils. Sites marked ** now being developed by CALA Homes (North))

Table 4 then shows major shortfalls in delivering housing land. It also shows those large sites marked with a ** where CALA are actively delivering new homes in the City. These include:

- Grandhome;
- Craibstone South; and
- Oldfold

Table 4 above shows that of the 11 large allocations considered only 1,450 homes have been delivered to date. CALA Homes (North), however, are active in taking over 1/3 of these sites from land allocations to actual developments and are committed to their delivery. Nevertheless, persistently relying on these large sites to deliver without recognising the longer lead-in times to their delivery will simply exacerbate under delivery of housing.

Taking the larger sites in Table 4 as examples and reviewing how their projected delivery has changed over the Housing Land Audit series will prove that large scale sites are more complex, will take longer to come forward than expected and that larger sites consistently push back expected completions.



2.2 Over-Reliance on Brownfield Sites

CALA Homes (North) Ltd are also concerned that the MIR housing strategy relies heavily on a supply of brownfield housing sites and assumes delivery of 3,408 brownfield units between 2020 and 2032 i.e. the High Indicative Density Range (HIDR). The sites are set out in the November 2018 Brownfield Urban Capacity Study (BUCS).

The 2018 BUCS:

- Assumes that all sites in BUCS are suitable for housing;
- Adopts an approach that includes constrained sites;
- Estimates potential housing yield based on two methodologies (Method 1 is evidence based and Method 2 is generic);
- Under Method 2 assumes certain densities but with no evidence base to support those assumptions;
- Under method 2 states that there are no rural sites so generic densities range from 35 units/Ha up to 95 units/Ha. No sites therefore have a generic density applied at 30-40 units/Ha;
- Identifies a potential capacity on BUCS brownfield sites with a range between 1,212 units and 2,184 units;
- Then adds in brownfield sites identified in the 2016 HLA and constrained sites with existing or lapsed consents (totalling 1,224) to create a new consolidated brownfield potential with a range between 2,436 and 3,408 units; and, finally
- Adopts that High IDR scenario (3,408 units) as the basis for housing land allocations.

This approach raises some serious concerns, especially as it is so critical in determining future housing allocations set out in the MIR. These concerns can be summarised under the following headings:

2.2.1 Site Context and End Use

Not all brownfield sites are suitable for housing. By their nature they are difficult to develop, their suitability for housing is influenced by their existing and surrounding uses and quite often require site assembly. A straight assumption that all of the sites in BUCS can be counted as housing sites is not realistic and a full and justified evaluation of appropriate uses on these sites should be considered prior to making that assumption.

2.2.2 Site Effectiveness

The effectiveness of the list of brownfield sites is critical to their inclusion within the housing land supply figures. The BUCS has stated that effectiveness has not been considered as the SDP is silent on the matter and does not specify that brownfield sites have to be effective. The rationale behind that approach does not match the general requirements set out in SPP or wider accepted methodologies for calculating a realistic and effective housing land supply. If brownfield sites are not effective, then





they simply should not be considered as part of the housing allowance. Brownfield sites should not be treated any differently to the approach undertaken towards greenfield sites. In the case of the latter if a site is not effective or capable of becoming effective then it isn't included.

The proposed SDP states "4.18 Local Development Plans must identify allocations for the period 2020 to 2032 which are deliverable within the timeframe of this period" and although it also suggests "New allocations should consider opportunities to reuse brownfield land and attempt to utilise the current "constrained" supply in the first instance..." it recognises that "...some new development will need to take place on greenfield sites in order to help deliver our Vision and future strategy for growth". In other words, the Plan must identify effective and deliverable housing sites but can consider brownfield and constrained sites if they meet the effective and deliverable criteria. The current strategy of relying on brownfield sites for at least 82% of the new housing allocations is not balanced approach and likely to fail. On top of that at least 50% of the MIR preferred sites are also brownfield taking that brownfield reliance up to 90% or above. On a purely proportionate basis this is an over-reliance on brownfield sites.

Brownfield sites are often difficult to develop, have complex servicing needs, have significantly greater contextual issues to overcome, can include more convoluted ownership and are proportionately more costly to develop. CALA have experience in bringing forward brownfield sites in the city, and they take significantly longer, and have a more complex planning process than greenfield sites. Constraining factors are generally more difficult to overcome but, with the right site-specific support from flexible planning policies, they can supplement the housing supply over time. However, relying on these sites to make up a significant proportion of the housing land allowance (around 82%) will undermine the PLDPs ability to increase the delivery of housing and therefore runs contrary to national and strategic requirements to focus on allocating deliverable housing sites. Brownfield development requires specific policy-based support such as the current but temporary relaxation of affordable housing contributions from such sites in the City Centre. Even with that relaxation brownfield sites are proving difficult to develop in a viable manner. Relying on such sites as a key element of the City's housing strategy is not appropriate.

The scale of the site will also make a huge difference to its deliverability. Many of the City's smaller housebuilders are no longer operating. Larger and national housebuilders have specific requirements when it comes to housing sites and many will simply not consider smaller sites. Of the full list of sites in BUCS 2018 15 (approximately 1/3) are under 0.5Ha, another 10 are between 0.5ha and 1ha. At that scale they are likely to be suitable only for flatted development. This doesn't meet the requirements of SPP to allocate a range if site (paragraph 119).

Brownfield sites cannot therefore be counted on to deliver much needed housing in the City. They should be included as an extra layer of flexibility to supplement more reliably deliverable housing allocations. SPP also considers (in Paragraph 123) the "annual housing land audit as a tool to critically review and monitor the availability of effective housing land, the progress of sites through the planning process, and housing completions, to ensure a generous supply of land for house building is maintained and there is always enough effective land for at least five years". More specifically it states "A site is only considered effective where it can be demonstrated that within five years it will be free of constraints and can be developed for housing".



2.2.3 Housing Density

The 2014 BUCS sets out more detail on brownfield housing densities. It also states that the availability of brownfield sites is unpredictable, and that the delivery of brownfield sites is supported by a buoyant housing market. Aberdeen's housing market is not buoyant, has not yet recovered and is unlikely to recover fully to previous highs. The focus on readily deliverable sites is therefore even more important.

BUCS density figures are based on examples between 1997 and 2011 when the housing market was generally much more buoyant than at present and flatted development was more prevalent. Flatted development now has much less market appeal resulting in lower density developments. Densities between 1997 and 2011 are therefore less relevant and should be revisited to reflect the last 10 years rather than the 10 years prior to that.

The second set of assumptions on density from the 2014 BUCS uses an English Planning Policy Statement 3 from 2005/2006 to set general density ranges. These, we suggest, are potentially not relevant to a Scottish City with Aberdeen's unique housing market. If generic housing densities are to be used, they should be based on Aberdeen, be up to date (the English figures are now well over 10 years out of date) and applied as a range to identify low and high site capacities.

2.2.4 Capacity Assumptions & Lack of Generosity Margin

Density leads onto assumed site capacities. The MIR adopts the highest possible site capacity for all identified brownfield sites and subtracts that from the required PSDP Housing Allowance. That simply will not yield a true reflection of the actual capacities of these sites or the real timescale for doing so. The MIR assumes an extreme best-case scenario for the brownfield site contribution to the housing allowances whereas the reality will be significantly less.

When identifying housing allowances, development plans should first identify the housing requirement and then add to that a generosity margin of between 10% and 20% to allow flexibility should sites not come forward. In simply assuming the best possible scenario for brownfield sites that inbuilt generosity margin in the SDP housing allowances is ignored. The MIR assumes 3,408 brownfield housing units can be delivered from the BUCS sites. As stated above that is a best-case scenario. Traditionally, to achieve a delivered housing figure of 3,408, a greater housing allocation would be adopted. If that was the higher generosity margin of 20% then the MIR would have to allocate a further 682 units. So even if brownfield sites remain a part of the Period 1 Housing Allowances, they can't be considered to deliver the full 3,408 units suggested but rather, at the most, 2,786 units.



Location	Ref	Site	Size (Ha)	Notes
Suburban	OP13	AECC Bridge of Don	13.15	Bids lodged to alter zoning to include commercial/retail, so housing numbers reduced
City Centre	N/A	96-126 John Street	0.4	Hotel consent granted
City Centre	OP130	Water Lane Granary	0.06	Small site, historic buildings constraints, amenity issues, long-term potential only
Urban	OP87	Pittodrie Stadium	6	Future timing tied in to delivery of new stadium
Urban	OP95	Triple Kirks	0.14	PRS not mainstream residential
Urban	N/A	Former PC World, Hutcheon Street	0.82	Now Lidl so not available for housing

Table 5 – Brownfield Sites Review (example sites where housing may not be suitable or available within appropriate timescales)



3.0 MIR Questions

Section 2 – Settlement Strategy

Question 1 – New Housing Sites

a) Do you agree with our preferred housing sites?

No, the MIR does not allocate enough housing land to meet the PSDP housing allowances and relies far too heavily on slow delivering large allocations and a difficult set of brownfield housing sites. The timescale for delivering the larger allocations should be recognised with their delivery spread out over a longer period. Brownfield sites should be considered as additional flexibility and windfall rather than an integral part of the housing allowances. Additional housing land allocations are therefore required to meet the Proposed Strategic Development Plan requirements (or amendments thereto as a result of the current review)

b) Are there any other sites that would be suitable for housing

Yes, Friarsfield (Ref: B0910) and Derbeth (Ref: B0309) offer deliverable and sustainable extensions to the existing urban area. CALA Homes (North) Ltd are committed to delivering these sites efficiently and within the Period 1 allowances if allocated.

Question 2 – Housing Allowances Beyond 2032

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

Yes, the PLDP should recognise the longer delivery period associated with large development sites and shift these proportionately into appropriate future allowance periods. The PLDP should also include Strategic Reserve Sites to bring these in line with Aberdeenshire's MIR and Proposed Local Development Plan.

Question 6 – City Centre Masterplan Intervention Areas

Do you agree that the City Centre Masterplan intervention areas should be identified as opportunity sites within the Local Development Plan?

No, not unless these have specific, deliverable and effective development solutions presently available. As brownfield sites they should be treated as windfall sites and considered as an additional layer of housing flexibility.





4.Conclusion

In summary, CALA Homes (North) Ltd. strongly support the need to allocate additional housing land to meet the shortfalls specified in this response. Specifically:

- Additional housing land of around 250 homes per year (300 over the period 1 allowances 2020 to 2032) to account for cumulative lack of delivery inherent in Aberdeen's housing land audit predictions. A recent Scottish Government Study (Housing Land Audits 2019) found "Where HLA forecast completions, these are reassessed annually. This reassessment may lead to the programming being adjusted. The decay of programming over time was highlighted, with short term projections difficult and "a significant degree of uncertainty" when programming completions beyond 2-3 years";
- The requirement to discount brownfield sites from the overall calculation of available housing land and instead treat them as windfall sites;
- Even if included, the brownfield figures used are an extreme best-case scenario and should be discounted heavily to reflect actual opportunity with additional housing land (at least 682 homes) to account for the lack of generosity within the brownfield land figures.



Aberdeen Local Development Plan Review Main Issues Report Response Form 2019

Aberdeen City Council has published a Main Issues Report (MIR) which is part of the process of preparing a new Local Development Plan. It is designed to gather views on specific proposals and sets out options for dealing with the key planning matters facing Aberdeen over the next 20 years such as the location of new housing and employment development, the future of retailing and the City Centre, housing needs and tackling climate change. It also includes a number of potential new policies which would be used in the determination of planning applications.

The MIR has been published alongside a Monitoring Statement and Environmental Report. Copies are available to view at Marischal College, Broad Street. Aberdeen. These, and other supporting documents, are available at: - www.aberdeencity.gov.uk/aldp2022

Everyone now has the chance to comment on the report and associated documents. All comments received will be considered and used to inform the preparation of the Proposed Aberdeen City Local Development Plan. There will be a further opportunity to comment on the Proposed Plan when it is published in early 2020.

The consultation runs from 4 March 2019 to 13 May 2019.

Responses to the published documents can be:

- made online at:- http://consultation.aberdeencity.gov.uk/planning/mir2019;
- emailed to:- ldp@aberdeencity.gov.uk; or
- by post to:- Local Development Plan Team, Strategic Place Planning, Aberdeen City Council, Business Hub 4, Ground Floor North, Marischal College, Broad Street, Aberdeen, AB10 1AB.

Completed response forms should be with us no later than 13 May 2019.



YOUR DETAILS

Name	SARAH GRAHAM
Organisation (if relevant)	HALLIDAY FRASER MUNRO
On behalf of (if relevant)	CALA HOMES (NORTH) LTD
Address	
Postcode	
Telephone	
E-mail	

Thank you for taking the time to complete this response form. If you wish to be added to the LDP e-mailing list to be kept informed of our progress in producing the next Local Development Plan, please tick here



If yes, please provide an e-mail address

PRIVACY STATEMENT

As part of the review of the Local Development Plan, Aberdeen City Council (ACC) will offer you several opportunities to submit your views and comments. These opportunities will range from the current consultation stage, the Main Issues Report, where we will ask you to comment on specific proposals and alternatives to the Proposed Plan stage where the set view of ACC has been established.

ACC are legally required to consult at this stage and at Proposed Plan stage. This is set out in the Town and Country Planning (Scotland) Act 1997 (as amended) and supporting regulations. The Environmental Assessment (Scotland) Act 2005 also requires us to consult on a Strategic Environmental Assessment Environmental Report.

By submitting a response to the consultation, you understand that ACC can use the information provided in this form, including personal data, as part of the review of the Aberdeen City Local Development Plan. ACC will not share or disclose any personal data about you to any organization or person unless it is authorized or required to do so by law.

The data controller for this information is ACC. We understand our legal basis for processing this information as Article 6(1)(c) of the General Data Protection Regulation as this is an activity we are legally required to carry out under the Town and Country Planning (Scotland) Act 1997 (as amended) and supporting regulations and The Environmental Assessment (Scotland) Act 2005. The data on the form will be used to inform the preparation of the Proposed Aberdeen City Local Development Plan 2022. At the end of the consultation, where contact details have been provided, the Local Development Plan team will provide you with a respondent number. You may also be contacted about the comments you have made and, as obliged by the Town and Country Planning (Scotland) Act 1997 (as amended) and supporting regulations, the Local Development Plan team will contact you to inform you of the publication of the proposed Aberdeen Local Development Plan in early 2020. If you chose not to provide your contact details, your comments will still be valid but we will not be able to contact you in the future.

Responses will be collated, redacted, summarised and stored electronically or in locked cabinets in Marischal College. All redacted responses will be published, alongside the respondents name (if provided), on the Aberdeen City Local Development Plan website. Contact details will not be made public, but your name and respondent number will be published.

Aberdeen City Council will only keep your personal data for as long as is needed. Data will be kept until the emerging Local Development Plan is itself replaced – this is likely to be around 5 years following its adoption in 2022 – so 2027. Following this, data will be disposed of in a secure manner.

YOUR DATA, YOUR RIGHTS

You've got legal rights about the way ACC handles and uses your data, which include the right to ask for a copy of it, and to ask us to stop doing something with your data. Please contact the Council's Data Protection Officer by e-mailing DataProtectionOfficer@aberdeencity.gov.uk or writing to Data Protection Officer, Aberdeen City Council, Governance, Level 1 South, Marischal College, Broad Street, Aberdeen, AB10 1AB. More information is available at: - https://www.aberdeencity.gov.uk/your-data

YOUR COMMENTS

Which document(s) are you commenting on?	 Main Issues Report Strategic Environmental Assessment Environmental Report Monitoring Statement 							
Please indicate the document and the specific Issue, Question, Site, Policy, Map or Table you are commenting on. Please provide your comments below and explain your reason for supporting, opposing or commenting on this specific part of the document.								
Please see attached MIR response (Friarsfield North)								

YOUR COMMENTS CONTINUED



ABERDEEN CITY LOCAL DEVELOPMENT PLAN RESPONSE TO MAIN ISSUES REPORT

LAND AT SUNNYSIDE NORTH, FRIARSFIELD NORTH, CULTS

MAY 2019

On behalf of CALA Homes (North) Ltd







CONTENTS

- 1. Introduction
- 2. Site Appraisal
- 3. Planning Context
- 4. Settlement Strategy
- 5. Proposals
- 6. Conclusion





1.0 Introduction

This response to the Main Issues Report (MIR) has been prepared by Halliday Fraser Munro on behalf of CALA Homes (North) Ltd, to support the allocation of land at Sunnyside North in Cults. The site was not put forward as a bid for development at the pre-Main Issues Report, however the site has now become available for development.

In total the site measures 2.5 hectares and proposes approximately 35 homes. The site could be considered as a further character area of bid site B0910 at Friarsfield North and would fit seamlessly into the masterplan area.

The site sits to the north-west of the existing Friarsfield development in Cults, about 5km west of Aberdeen City Centre. The site sits on the boundary between urban development and countryside. The land is currently in use as grazing for equestrian uses and an equestrian centre.

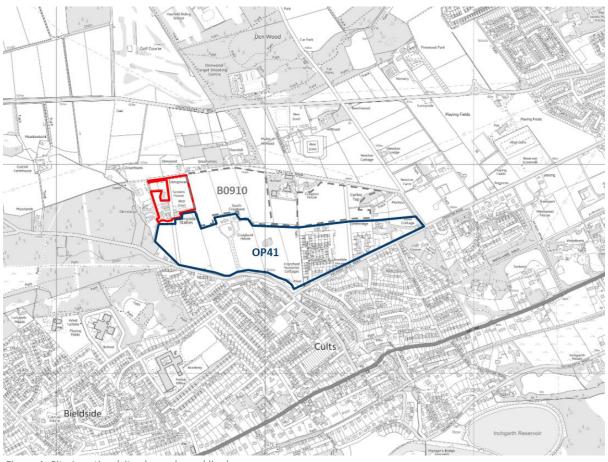


Figure 1: Site Location (site shown by red line)

The site is immediately deliverable with no constraints or impediments to delivery. The site is located to the north of site OP41 as allocated in the ALDP 2017, and to the west of the proposed bid site B0910. To the north of the site is the tree lined private driveway. The site is well defined by the woodland setting, and the land to the south will be developed for housing in due course.





Additional housing is needed in Aberdeen to ensure the housing land supply is met and to ensure a range and choice of housing sites are available within the city. The development to the south of the site (allocated as site OP41 in the Aberdeen Local Development Plan 2017) is forecast to be complete by 2021. Additional development is needed in this area to satisfy local demands and sustain and improve local services. Cults is a suburb within Aberdeen City, which has its own neighbourhood centre, and both a primary school and secondary school.

The site is being promoted by CALA, an award winning five-star house builder with their heritage firmly placed in Aberdeen, having been established in 1875 as the City of Aberdeen Land Association. CALA remain focused on delivering high quality developments in the best locations more than 140 years on. CALA have become one of the fastest growing housebuilders in the UK today, which is testament to the strength and ambition of the team, the quality of their homes and first-class approach to customer service. CALA have the backing of Legal & General, and working together, this enables CALA to build upon the delivery of fantastic new communities and quality family homes. CALA have a strong track record of delivering development in this area and are currently on site in seven locations across the city and shire. Table 1 below demonstrates that, once allocated, CALA quickly take forward sites for development, gaining planning approval between 1-3 years from the date of allocation. CALA are therefore committed to investing in the area, promoting sites through the local plan process and, and delivering homes and infrastructure to meet the demand in the area.

Site Name	Site First Allocated	PPiP Approval	First Phase Approval	First Unit Completed	No. of Units (delivered)	Site Completed
Oldfold, Aberdeen (OP48)	2012	2015	2015	2016	75	Ongoing
Friarsfield, Aberdeen (OP41)	2012	2012	2012	2013	128	Ongoing
Grandhome, Aberdeen	2012	2015	2017	2018	32	Ongoing
Dubford, Aberdeen (OP10)	2012	2013	2014	2015	109	Completed
Balgownie Road, Aberdeen	2012	N/A	2014	2015	85	Completed
Craibstone, Aberdeen (OP20)	2012	2017	2018	2019	0	Ongoing
Woodside (Persley Den), Aberdeen (OP25)	2012	2015	2018	2019	0	Ongoing
Conglass, Inverurie (OP1)	2012	N/A	2018	2019	18	Ongoing





2. Site Appraisal

The land at Sunnyside North is located to the north west of the allocated site OP41 at Friarsfield. The site is currently in use as grazing for equestrian uses, associated with Sunnyside Stables.

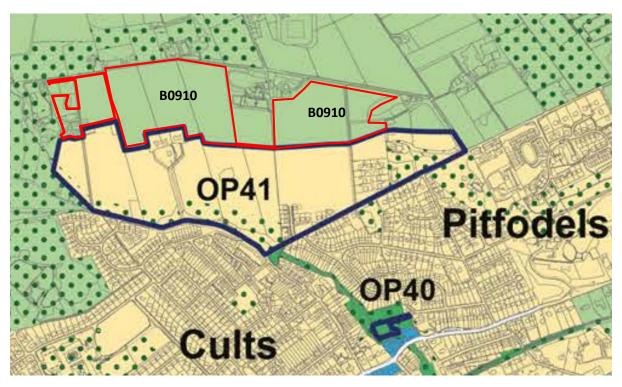


Figure 2: Extract from ALDP 2017 (site location shown by red line)

The site is well contained by woodland, trees and hedging to the north and west. The land slopes from north to south. To the north of the site is the private tree lined lane which serves a number of existing dwellings set within mature woodland, and creates a boundary for the development of Cults. This would remain and provides a woodland backdrop to the site. The site is within the 'Woodled Estates' landscape character which can be defined as an undulating landscape with mixed woodlands a key feature. Woodland planting would be retained and enhanced, to ensure the development fits within the landscape, and the visual impact is reduced.

The site is not visible from north or south Deeside Road (A93 or B9077) as vegetation and topography obscure the site, as shown by figure 3. Locally, views are limited due to the undulating topography, woodlands, and housing developments. Views of the site are limited by woodland to the north and west of the site. New woodland planting would help the site to integrate into the landscape.







Figure 3: View of site from south side of River Dee (note site is shown by red line)



Figure 4: View from north west corner of the site looking South-East towards Friarsfield Road

The site is well connected, with core path 87 running through the centre of the site. This existing road which runs through the centre of the development would be retained, and incorporated into the layout of the site. The site access would utilise that proposed at site B0910 to the east of the site.

A key feature of the site are views to the south, which the proposed development will need to utilise.

Figure 5 below provides an analysis of the key features of the site.







Figure 5: Site Analysis

3. Planning Context

3.1 Green Belt

The site is within the existing green belt designation. The purpose of green belt is to direct development to the most appropriate locations, protect and enhance the character, landscape setting and identity of the settlement, and protect and provide access to open space (paragraph 49 of Scottish Planning Policy). The Aberdeen greenbelt wraps around the city and extends to its boundary with the neighbouring authority. A green belt review has not been undertaken for either of the previous two Local Development Plan review processes, but instead the review of development sites was undertaken, and sites were released where it was considered appropriate.

The land at Sunnyside north is appropriate for development, and is not required to protect the character, landscape setting and identity of Aberdeen. The site, when viewed from the south has a backdrop of mature woodland and would simply be viewed as a continuation of the existing settlement pattern.

The site has a strong boundary to the north with the tree lined driveway and beech hedge. The land slopes away from this to the south and it is therefore a logical boundary to the north of Cults. Figure 6 below highlights this robust boundary.







Figure 6: Photograph of site looking east

There remains significant separation between both the site and Aberdeen City, and Countesswells. This point, in addition to the strong northern boundary of the site means that there is no reason the green belt boundary should not be revised.

No review of the green belt has been undertaken to assess the suitability of the green belt in this location, nor is one proposed. Paragraph 50 of Scottish Planning Policy (SPP) notes that Planning Authorities should identify the most sustainable locations for longer term development and where necessary, review the boundaries of any green belt. In the past, the LDP review has released land from green belt zonings and therefore this is not a valid reason against allocating the site. CALA therefore suggest that this LDP review is an opportunity to reconsider the green belt boundary and make important strategic decisions about the future growth of the area. If no additional land is allocated at Cults there will be no new housing in Cults for almost 10 years given that the next plan review would not take place until 2027. The greenbelt cannot be treated as an absolute constraint to development as almost all land outwith the built-up area of the city is designated as green belt. The site has also previously been identified by Aberdeen City Council as a suitable location for residential development, given it was partially allocated as future land in the Finalised 2004 Aberdeen Local Plan (see figure 7 below).





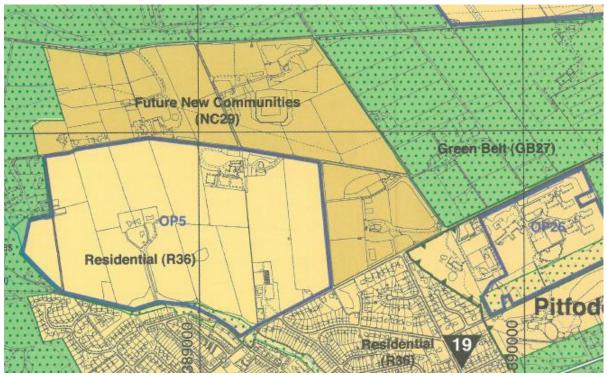


Figure 7: Extract from Finalised Local Development Plan 2004

In summary, the site is not required to meet the functions of the green belt, and is an appropriate location for development, given its proximity to existing development, and opportunity to utilise new road infrastructure. There would be no impact on the landscape setting, character or identity of the city, and no impact on access to open space. The road to the north of the site offers a clearly identifiable green belt boundary, as required by SPP. The woodland framework to the north of the site further emphasises the strong boundary. The opportunity for residential development on this site has been previously identified by the Council and given there is a need for small scale housing sites, this site should be allocated. Green belt cannot be considered a valid constraint to the development of the site given that the LDP review offers an opportunity to review this designation.

3.2 Landscape and Visual Impact - 90m contour line

It is noted that other site assessments in the MIR have been considered constrained by being above the 90m contour. There is no policy or guideline that we are aware of that restricts development above 90m. Indeed, there are areas in which existing development breaches the 90m contour;

- Cults Primary School
- Hillview Community Church
- Parts of Earlspark Avenue and Earlspark Crescent
- The far northern parts of The Meadows in Milltimber.

The reference to a 90m contour is therefore unjustified and does not constrain the development, and each development site needs to be considered on its merits.





3.3 Connectivity

Public Transport Provision

The nearest bus service is currently located on North Deeside Road, which is 1km from the site. However, the construction of the Friarsfield link road will enable bus services to operate along it and the new road road includes provision for two bus stops (north and south). The link road which is due to be complete in December 2019 will enable bus service 15 to loop along Craigton Road. The existing road configuration at Jacob's Ladder prevents buses from using this road. The site will be within 450m of the bus stops on the Friarsfield link road once complete.

Core Paths

The site is readily accessible in relation to footpaths and cycle paths (see figure 8 below). Core Path 87 runs through the site and would be retained in the proposed development.

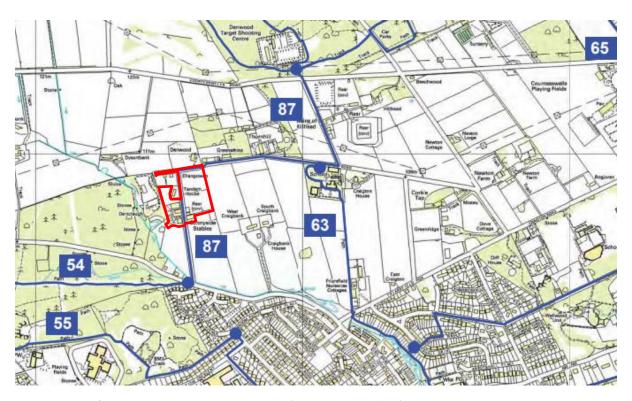


Figure 8: Extract from Aberdeen City Council Core Paths (site shown by red line)

In summary, the site is located in a sustainable location, which currently has good public transport connectivity and will have excellent provision on completion of the Friarsfield link road. The site is located in Cults which offers local retailing opportunities. The site also has excellent pedestrian and cycling connectivity through core path provision. The site will act as a continuation of development and create a strong ridgeline to the north preventing the sprawling of Cults, whilst ensuring the continued supply of residential homes.





3.4 School Capacity

It is noted that Aberdeen City Council will be conducting a review of the school estate in 2019, which it is understood is due to report to committee in September 2019. The site is within the catchment of Cults Primary School and Cults Academy, which are both forecast to be operating over capacity. However, the replacement of Milltimber Primary School with a larger two-stream school, and the development of a new primary school at Countesswells is likely to result in additional capacity being available. The phasing of the proposed development would match available school capacity.

It also noted that the Cults Primary School site is large enough to accommodate a primary school of more than three streams (more than 21 classrooms), and indeed in 2017 the school operated with 22 classrooms.

3.5 Other Considerations

Sustainability

The site is located in Cults, which is a suburb of Aberdeen, located 5km to the west of Aberdeen City Centre. Cults neighbourhood centre (as defined in the Aberdeen City LDP 2017) is a thriving centre, home to over 30 businesses (retail units and services). The centre is just over 800m from the site, and additional development would help to sustain the existing businesses and services located in Cults. The site is also accessible for employment opportunities, being only 3 miles from Aberdeen city centre, 3 miles from Prime Four Business Park, 1 mile from the proposed business land at Countesswells, and only 3.5 miles from the recently completed Aberdeen Western Peripheral Route (AWPR). The AWPR opens up a range of other employment opportunities such as Dyce and Aberdeen South.

Affordable Housing

The site would comply with Aberdeen City Council's policy requirement and would deliver 25% of the housing as on-site affordable housing of which there is a significant need for in this area.

Need for Development

Development is needed in Cults to sustain services and facilities. As previously discussed, Cults neighbourhood centre sustain a variety of shops and services. There are no other sites allocated in Cults to provide for local housing need once site OP41 is built out, which is scheduled to be in 2021. If allocated, this site would be developed within the first phase of the new LDP (so by 2026), and would be expected to be completed over a period of 10 years. If no additional land is allocated, there is unlikely to be additional affordable housing in Cults. This site would deliver 25% affordable homes early in the development if allocated.





4. Settlement Strategy

4.1 Housing Strategy

A separate representation on strategy and housing need has been submitted in response to the MIR and CALA have also responded to the Proposed Strategic Development Plan on housing requirements and housing strategy. These representations will be considered by a Reporter in due course, but are also relevant to this MIR response. In summary, CALA believe that additional housing land needs to be allocated to meet identified shortfalls. CALA Homes have identified a shortfall in housing of around 250 homes per year to account for the cumulative under delivery of Housing Land Audit predictions, and at least 682 homes to account for the over calculation of available brownfield land.

CALA are of the view that the brownfield sites identified in the Brownfield Urban Capacity Study update should not all be counted towards meeting the housing requirement. In addition, the deliverability of new sites identified in the MIR is questioned. 96% these are under the ownership of Aberdeen City Council (60%), NHS (29%) or Aberdeen University (7%). CALA note that sites in institutional ownership consistently take significantly longer to deliver due to organisational procedures. This can demonstrated through a review of the brownfield sites identified in table 1 of Appendix 1 of the 2017 Local Development Plan. Of the 40 sites identified, we are only aware of three of these being delivered, and one of these was for student accommodation which does not count towards housing requirements. 60% of these sites are in the ownership of Aberdeen City Council.

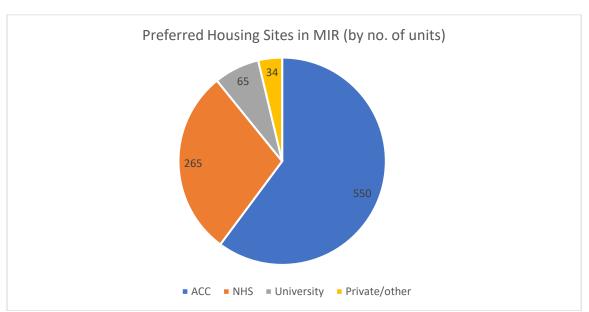


Table 1: Preferred Sites in MIR by landowner

CALA also believe that additional housing sites need to be identified to ensure that the planning authority are confident that a range of sites can be brought forward within the plan period as required by Scottish Planning Policy (SPP).





4.2 Proposed Strategic Development Plan 2018 (PSDP)

The PSDP sets out housing requirements, and whilst it is stated that there is sufficient housing land available to meet the housing land requirement at current rates of completion, it is noted that a considerable proportion of current allocations are strategic and if they failed to come forward the housing land supply may not be maintained. CALA Homes have continually suggested that the deliverability of strategic sites needs to be more realistic, and the inflated delivery rates as identified in Housing Land Audits should not be relied upon. The separate response on housing land covers this issue in more detail, but in summary the over-inflated Housing Land Audit predictions equates to 250 homes per year.

The PSDP identifies the need for additional allocations, and strategic reserve housing land. However, Aberdeen City Council have only identified a small number of brownfield sites which are not likely to maintain the housing land supply. The PSDP notes that development locations should seek to reduce travel and make active travel a more attractive option. This is the case at Sunnyside North where the site is adjacent to core paths and will be adjacent to bus routes once they re-route along the new link road. The Deeside corridor is also identified within the PSDP for 'Improved Cross City Connections for Active Travel'. A 'Cross City Transport Connections Study' is due to be undertaken to inform opportunities and enhance accessibility to more destinations by public transport.

The PSPD also notes that allocations should be small scale in nature and should not be extensions to any existing strategic development sites. This is the case at Sunnyside North, were the site is immediately deliverable, is under control of a single developer, and utilises infrastructure already delivered by the developer. The site is of a scale which is can be easily delivered.

The site at Sunnyside therefore fits with the proposed strategy outlined in the Proposed Strategic Development Plan.





5. Proposals



Figure 9: Proposed Masterplan

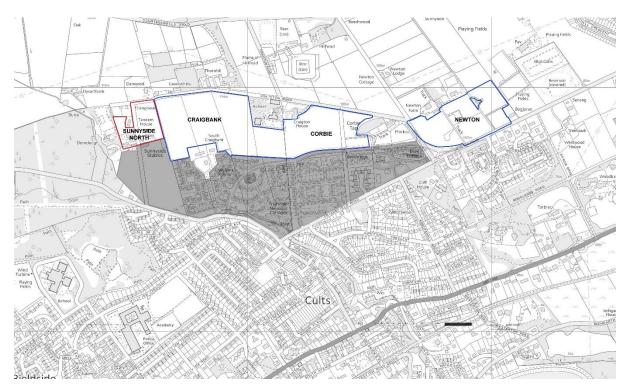


Figure 10: Context Plan





5.1 Concept

The proposed development concept has taken inspiration from:

- a considered urban/rural edge to Cults, as an extension of the Friarsfield development.
- creation of a robust east/west landscape structure to integrate the development into the landscape.
- Enhance pedestrian links.
- Make the most of views to the south and south facing slopes.

5.2 Landscape

The proposal has been developed to take advantage of views to the south. The landscape concept seeks to follow that proposed at Friarsfield North (B0910). The retention and repair of stone walls is proposed, with woodland planting proposed to take up level differences and provide visual containment. An area of open space in the centre of the site utilises the level differences, provides an open outlook for the existing dwelling.

5.3 Connectivity

The site will retain and enhance the existing core path which runs through the site. The proposed site would also connect to site B0910 opening up further connections, and a link to core path 63.

5.4 Delivery

The site would be delivered within the LDP timescales. Friarsfield is due to complete in 2021, and this site could contribute to that development in a phased manner which will enable the seamless delivery of homes at Friarsfield.

6. Conclusion

There is a requirement to identify additional housing land to meet the shortfall in provision, and to meet the requirements of the PSDP. There is also a need to deliver housing in Cults to meet both demand and the needs of the area, in particular in relation to delivery of affordable housing. The land at Sunnyside North is extremely well located in relation to its proximity to existing development, and could be delivered as a future phase of Friarsfield.

There will be very few sites that are more ready to deliver high quality homes in a sustainable and desirable location than this site. There are no impediments to the delivery of the site, CALA have a full team of technical advisors preparing supporting information to inform the development of the site. As outlined, there are no infrastructure capacity issues to overcome for this site.

This response demonstrates that the area is not needed to contribute to the greenbelt in this location, and separation between Cults and Countesswells can be catered for by the remaining greenbelt. The site does not have an adverse landscape impact and does not breach the skyline. The proposed development would enhance the landscape setting with substantial additional tree planting.





The site is in a sustainable location, walkable to Cults neighbourhood centre and to both the primary and secondary school. The site is close to an active travel route in Aberdeen City centre, in an area where active travel routes are promoted by the PSDP.

The site would deliver much needed market and affordable housing for Cults. 25% of the site would be delivered as affordable housing, helping to address a key issue for the community.

The deliverability of this site cannot be overstated, not only are there no infrastructure constraints, the track record of CALA in delivering housing in the north east speaks for itself. CALA homes are currently on site in seven locations across Aberdeen city and shire. Once sites are allocated, CALA have delivered these sites quickly and effectively, creating popular housing locations that provide both high quality housing and a high amenity development. Sunnyside North would be an extension of the high-quality development to the south.

