



# 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/alp2022](http://www.aberdeencity.gov.uk/alp2022)

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](mailto: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	SCOTT LEITCH
Organisation (if relevant)	HALLIDAY FRASER MUNRO
On behalf of (if relevant)	MACTAGGART & MICKEL HOMES 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](mailto: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

<p>Which document(s) are you commenting on?</p>	<ul style="list-style-type: none"><li>• Main Issues Report</li><li>• Strategic Environmental Assessment Environmental Report</li><li>• Monitoring Statement</li></ul>	<input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
---	---	---

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 find attached response to the Main Issues Report in respect of development bid B0108 Newton Croft, Bucksburn.**

**YOUR COMMENTS CONTINUED**

**ABERDEEN CITY LOCAL DEVELOPMENT PLAN  
RESPONSE TO MAIN ISSUES REPORT  
NEWTON CROFT  
BUCKSBURN  
B0108**

**MAY 2019**

On behalf of  
MACTAGGART & MICKEL HOMES LTD



HALLIDAY FRASER MUNRO  
CHARTERED ARCHITECTS & PLANNING CONSULTANTS



**HALLIDAY FRASER MUNRO**

CHARTERED ARCHITECTS & PLANNING CONSULTANTS

## **CONTENTS**

- 1. Introduction and Bid Summary**
- 2. MIR Bid Assessment Summary**
- 3. Housing Land Strategy**
- 4. Conclusion**

**Appendix 1 – Updated Bid Assessment**



# HALLIDAY FRASER MUNRO

CHARTERED ARCHITECTS & PLANNING CONSULTANTS

## 1. Introduction and Bid Summary

- 1.1. This report has been prepared by Halliday Fraser Munro, Town Planning Consultants and Chartered Architects, on behalf of Mactaggart and Mickel Homes Ltd. It is written in response to the Aberdeen City Local Development Plan Main Issues Report 2019 (MIR).
- 1.2. Mactaggart and Mickel Homes Ltd are one of Scotland's largest and long-established housebuilders.
- 1.3. At the 'Call for Sites' stage in May 2018, a development bid was lodged for a 4.7 ha area of land at Newton Croft, Bucksburn, immediately adjacent to the former Bucksburn Primary School and Howes Road, Bucksburn, Aberdeen. The land is currently grazing grassland.
- 1.4. The land has a north west facing aspect with strong defensible boundaries provided by a number of existing features: Howes Road (Core Path 44) and the former Bucksburn Primary School to the north; a pedestrian pathway, play park and playing fields to the east; a pedestrian pathway / access track serving the Auchmill golf club to south with woodland beyond, along with disused water reservoir currently being converted to a dwellinghouse and the existing Newton Croft buildings and mature woodland to west, along with a former quarry.
- 1.5. The site is well defined by the surrounding features and has good linkages through the existing path networks. It is directly adjacent to existing housing on Auchmill Road in Bucksburn, without being too close to the A96 road network.
- 1.6. The B0108 land is proposed to be allocated as a future housing site suitable for up to 80 houses along with appropriate infrastructure and public open space. The site was previously one of the Council's preferred allocations in the 2012 Proposed Local Development Plan. It was however removed at the PLDP stage by the Reporter due to concerns over establishing a defensible boundary along the south western edge of the site. The previous bid site was smaller than the current B0108 proposal and the southwestern boundary was a 'post and wire' fence. This fence was not considered to be a strong enough landscape feature to act as an adequate boundary to the housing site. The current LDP bid resolves this issue by covering a larger area and using the existing established mature tree boundary as the south western site boundary of the development, removing the previous reason for not allocating the site.
- 1.7. Although not subject to an LDP bid at the 'call for sites stage', we understand that the adjacent land comprising the former Bucksburn Primary School, between the B0108 site and the A96 has been promoted by NHS Grampian as a suitable site for 'housing, healthcare and other compatible uses.' This is noted in the MIR (page 10) as an Officers' preferred ('desirable') development proposal to be included in the Proposed LDP. Our client supports this as a sensible redevelopment of the former school site, however due to small nature of the site (0.94ha), suggests that the directly adjacent B0108 site should also be allocated for housing as a complimentary and compatible use, as set out





# HALLIDAY FRASER MUNRO

CHARTERED ARCHITECTS & PLANNING CONSULTANTS

through the B0108 bid. This would increase the deliverability of development on the school site, particularly when considering the issues presented through the retention and conversion of the existing granite buildings.

- 1.8. This provides the background context and justification for the housing allocation at Newton Croft as proposed through the B0108 bid.
- 1.9. Conversely however, the B0108 Newton Croft bid site is not an Officer's preferred option in the Main Issues Report. This is considered in more detail below.

## 2. MIR Bid Assessment Summary

- 2.1. The Main Issues Report (officer's summary and assessment of bid) states:

*'B0108 Newton Croft, Bucksburn*

*The site is in a relatively sustainable location, adjoining the urban edge of Bucksburn / Aberdeen, and there are a range of services and facilities in the local area with public transport access being quite reasonable. There is however no clear access point to the site for vehicular traffic due to the topography of the site. The site is on quite a steep slope with a gradient of 1:9, thus the topography may also present challenges for the site layout. Also, there may be restrictions over the height of buildings given the proximity of the airport and the site's location within 75m of the airport contour zone. There may need to be a suitable buffer along the southern boundary adjacent to the golf course. In terms of school capacity, both Brimmond Primary and Bucksburn Academy are due to be overcapacity by 2020.*

*This site was assessed as part of the extant Local Development Plan and Reporters concluded that it contributes positively to green belt objectives separating the site from Auchmill Golf Course. It is felt that at present the site still contributes to the landscape setting of Aberdeen and its development is not supported. Whilst officers favoured allocating the site in the 2012 LDP (it was removed by reporters), it should be borne in mind that the context was very different at that time with the requirement to identify 36,000 houses in the then 2009 Structure Plan. The housing allocations required for this Plan are much lower and there are better options elsewhere.'*

- 2.2. The Officers' view and associated issues can be broken down and will be examined in more detail below, however it is worthy of note that the site is described in positive terms as being in a sustainable location with access to a range of established services and facilities with good public transport. This is the case as the site is on the edge of the Bucksburn urban area benefitting from excellent access to frequent, wide ranging bus services on the A96 and core path links to the more rural area to the south west, and the range of established neighbourhood services in Bucksburn. This places the land in an ideal situation as a future housing development opportunity, more so given the preferred healthcare / housing use immediately adjacent.



## HALLIDAY FRASER MUNRO

CHARTERED ARCHITECTS & PLANNING CONSULTANTS

- 2.3. ***'There is however no clear access point to the site for vehicular traffic due to the topography of the site. The site is on quite a steep slope with a gradient of 1:9, thus the topography may also present challenges for the site layout.'***

The B0108 development bid submission includes an indicative layout plan illustrating how 80 houses could be built on the site. This is based on detailed topographical and engineering information. We understand that previous bid submissions for the site were not supported by this level of detail or analysis. The proposed new road access into the site from Howes Road has been designed taking account of gradient and visibility requirements. We are therefore unsure as to the reference to there being 'no clear access point' and do not consider that this represents a reason not to allocate the land for future development.

The indicative site layout plan has been designed to take account of the site topography. This creates scope for a landscaped open space area in the south western part of the site, in line with the green corridor to the west along the Howes Road. We consider that the layout is feasible and deliverable, based on engineering and architectural analysis.

- 2.4. ***'Also, there may be restrictions over the height of buildings given the proximity of the airport and the site's location within 75m of the airport contour zone. There may need to be a suitable buffer along the southern boundary adjacent to the golf course.'***

The site does not lie within the current airport noise contour zone or the airport safety zone. We note that the supplementary guidance available online contains the 2006 noise contours. In terms of the more up to date 2011 / 2013 contours, the 57dB noise contour is close to the western site boundary, but the bid site is not within it.

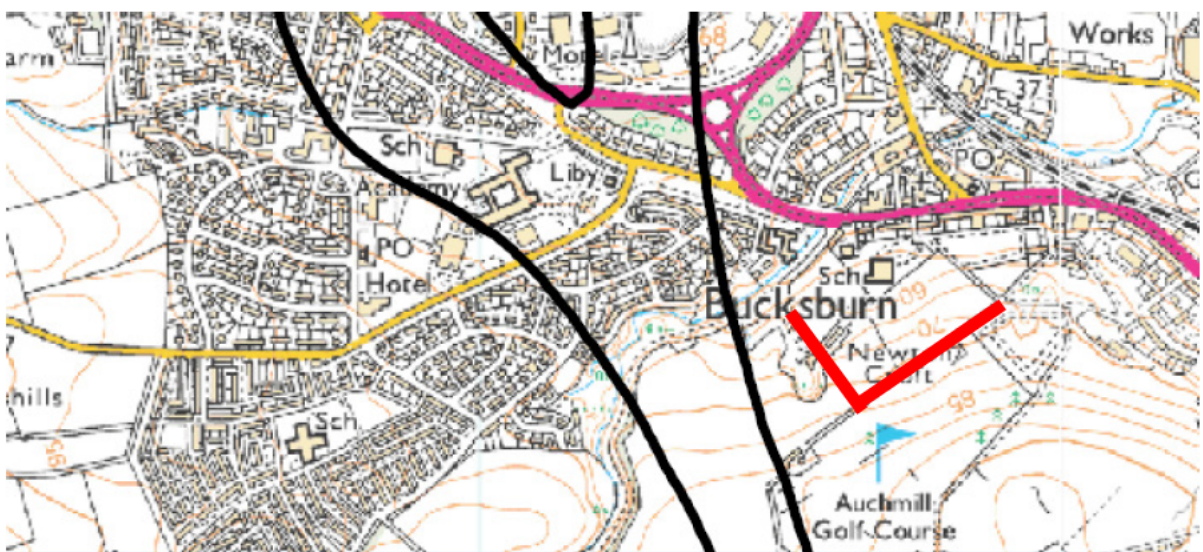


Figure 1: Extract from AIA noise contours – note black 57dB contour lies west of red line B0108 site boundary.



## HALLIDAY FRASER MUNRO

CHARTERED ARCHITECTS & PLANNING CONSULTANTS

The site's location is in line with much of the Bucksburn urban area. We do not therefore consider that the B0108 site, or indeed the 'preferred' adjacent former school site would be constrained by the Airport.

In terms of a buffer along the southern boundary to the Auchmill golf course, this is reflected on the indicative layout plan where houses are set back from the existing track. There is scope to emphasise this with additional landscape planting.

We do not therefore see that the distance from the Airport or the development's relationship with the nearby golf course represent reasons not to allocate the land for future development.

**2.5. *'In terms of school capacity, both Brimmond Primary and Bucksburn Academy are due to be overcapacity by 2020.'***

This statement applies to any new residential development in the area, including the 'desirable' sites at the former Bucksburn Primary School and the substantial new development allocation at Grandholme that lies within the same school catchment area. Impacts on school capacity can be offset through the provision of developer contributions from new developments in line with typical practice across Scotland. We are aware that the new development at Countesswells requires to provide a new secondary school. This will likely accommodate secondary pupils from Kingswells, freeing up capacity in Bucksburn. We do not therefore consider that school capacity represents a reason not to allocate the B0108 site.

**2.6. *'This site was assessed as part of the extant Local Development Plan and Reporters concluded that it contributes positively to green belt objectives separating the site from Auchmill Golf Course. It is felt that at present the site still contributes to the landscape setting of Aberdeen and its development is not supported. Whilst officers favoured allocating the site in the 2012 LDP (it was removed by reporters), it should be borne in mind that the context was very different at that time with the requirement to identify 36,000 houses in the then 2009 Structure Plan. The housing allocations required for this Plan are much lower and there are better options elsewhere.'***

The above statement somewhat oversimplifies the Reporter's reasoning not to carry the site forward as an allocation in the 2012 LDP. The site as a whole was not considered to make a valuable contribution to the Green Belt in this location, in separating the site from Auchmill Golf Course. The issue raised by the Reporter was in relation to the south western boundary of the bid site not being strong or defensible enough, and the concern that this would result in development having a negative impact on the Green Belt. This concern has been removed by the current development bid covering a larger area and using the existing established woodland along the golf course boundary and around Newton Croft.

In more general terms, the development on the site, along with suitable strategic landscaping would be considered as a lower density extension to the established Bucksburn neighbourhood, not an encroachment into the Green Belt. The Auchmill golf course provides separation between



# HALLIDAY FRASER MUNRO

CHARTERED ARCHITECTS & PLANNING CONSULTANTS

Bucksburn and Northfield / Heathryfold and the more strategic Green Belt objectives and landscape setting of the City. The B0108 site does not.

In terms of the requirement for housing allocations, there is still a need for new housing sites to be identified through the new LDP (see section XX below) and the B0108 Newton Croft site presents a measured, deliverable opportunity as a suitable extension to the established Bucksburn area.

2.7. In summary we do not believe that any of the issues raised through the MIR assessment of the B0108 site represent robust reasons not to allocate it.

2.8. The MIR includes a bid assessment summary, with the B0108 site being awarded a score of 49 out of a possible 63. We have reassessed the bid using the Council's criteria and would suggest that a scoring of 59 would be more appropriate. The detailed narrative and reasoning are contained in Appendix 1.

### **3. Housing Land Strategy**

The housing strategy contained within the 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. We do not believe that this approach will assist in halting the continued shortfall in housing delivery across the City and will not meet the housing delivery requirements of the Strategic Development Plan.

The MIR housing strategy is a continuation of the existing strategy that has now been in place for two LDPs. That existing strategy has not delivered the City's housing needs and in an economy where greater ambition is required to drive future success, we do not support a do-minimum housing strategy.

Our client has serious concerns about the range and scale of housing that can be delivered on the back of that do-minimum strategy, the practicality of relying on difficult 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 sets out requirements for LDPs 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 and to 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.



# HALLIDAY FRASER MUNRO

CHARTERED ARCHITECTS & PLANNING CONSULTANTS

The MIR is accompanied by a Brownfield Urban Capacity Study Update (BUCS Update -November 2018) but that does not identify whether the sites it contains are effective or constrained, which is a fundamental consideration. Many of the brownfield sites have been available for a number of years and have not been developed, likely due to a number of reasons such as remediation costs and land assembly. Relying on these sites as an integral element of housing land supply is uncertain and therefore inappropriate.

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 1 below).

The decaying confidence in housing predictions over time 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
<b>2019 HLA (draft)</b>									
Units delivered	684	795	833	1,174	1,173				
Units estimated									
<b>2018 HLA</b>									
Units estimated					1,314	1,529	1,610	1,641	1,189
<b>2017 HLA</b>									
Units estimated				1,274					
<b>2016 HLA</b>									
Units estimated			1,175						
<b>2015 HLA</b>									
Units estimated		1,086							
<b>2014 HLA</b>									
Units estimated	775								
<b>Difference between predicted &amp; actual housing delivery</b>	-91 (-12%)	-291 (-27%)	-342 (-29%)	-100 (-8%)	-141 (-11%)				



# HALLIDAY FRASER MUNRO

CHARTERED ARCHITECTS & PLANNING CONSULTANTS

<i>(averages -357 units/annum)</i>									
<b>5 year Average difference (-17%) applied 2019-2022</b>						1,269	1,336	1,362	987
<b>No. of Housing Units anticipated less than predicted</b>						-260	-274	-279	-202

**Table 1:** Housing Land Audit Actual Housing Delivery compared to Expected Housing Delivery (Aberdeen City part of AHMA)

Table 1 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.

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 clearly an issue for the LDP. Aberdeen City Council should recognise these low rates of delivery in addressing housing requirements. Table 2 over illustrates how larger sites have not delivered as expected over the years. Evidence suggest that this will continue to be the case. 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 including areas for future growth (Strategic Reserve).



# HALLIDAY FRASER MUNRO

CHARTERED ARCHITECTS & PLANNING CONSULTANTS

Many larger residential allocations haven't met their original allocated expectations for the period 2007-2016. The original expected delivery rates are set out in column 4 (2007-2016) from the Housing Land Audit 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-emphasises 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. Table 2 offers an Aberdeen City sites perspective.

<b>Example Major Sites in City AHMA (incl. 2012 LDP REF)</b>	<b>Allocation to 2018</b>	<b>Actual Delivered to 2018 (as per draft 2019 HLA)</b>	<b>Shortfall in delivery</b>
Greenferns OP45	740	0	740
Craibstone South OP29	850	0	850
Rowett South OP30	1,280	0	1,280
Greenferns Landward OP31	850	0	850
Loirston OP77	1,260	0	1,260
Grandhome OP12	3,440	32	3,408
Countesswells OP58	2,490	304	2,186
<b>Total</b>	<b>10,910</b>	<b>336</b>	<b>10,574</b>

**Table 2:** Delivery Rates for large sites – Aberdeen City (Source – Housing Land Audit Series and 2012 LDPs, Aberdeen City and Aberdeenshire Councils.)

Table 2 above shows that of the seven large allocations considered only 336 homes have been delivered to date. 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.

Our client is also concerned that the MIR housing strategy relies far too heavily on a supply of brownfield housing sites and assumes delivery of 3,408 brownfield units between 2020 and 2032 (High Indicative Density Range - HIDR). These brownfield sites are set out in the November 2018 Brownfield Urban Capacity Study (BUCS).

The “effectiveness” of the list of brownfield sites is critical to their inclusion within the housing land supply figures. The BUCS has stated that site effectiveness has not been considered as the does not specify that brownfield sites have to be effective. The rationale behind that approach does not match the expectations 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 City’s housing allowances. If a site is not effective or capable of becoming effective then it is considered to be “constrained” and not counted. That test should be applied to any site and only effective sites should be included as a housing allocation.



# HALLIDAY FRASER MUNRO

CHARTERED ARCHITECTS & PLANNING CONSULTANTS

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 proposed new housing allocations is not a balanced approach and likely to fail. On top of that at least 50% of the MIR preferred sites are also brownfield taking the overall brownfield reliance up to 90% in the MIR additional housing allowances. On a purely proportional basis this is a clear over-reliance on brownfield sites.

Brownfield sites are more 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.

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.

In summary, our client believes that the Council should allocate additional housing land to meet the shortfalls specified in this response. Specifically:

- Additional housing land of around 250 homes per year (3,000 over the period 1 allowances 2020 to 2032) should be allocated to account for cumulative lack of delivery inherent in Aberdeen’s housing land audit predictions. A recent Scottish Government Study (Housing Land Audits 2019) identified this as an issue with a common feature of HLAs being “The decay of programming over time ... with short term projections difficult and “a significant degree of uncertainty” when programming completions beyond 2-3 years”;
- Brownfield sites should be discounted 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.

## 4. Conclusion

- 4.1 As set out in the preceding sections and the original Development Bid, the allocation of the land at Newton Croft, Bucksburn for up to 80 houses. We believe there are no serious constraints to development, any concerns raised through the MIR assessment are unfounded or can be mitigated and the land should be considered an appropriate, effective opportunity in the 2022 Local Development Plan. There is no evidence available to suggest that this should not be done.





# HALLIDAY FRASER MUNRO

CHARTERED ARCHITECTS & PLANNING CONSULTANTS

4.2 As set out above, we have serious concerns regarding the Housing Strategy set out in the MIR and suggest this needs to be addressed through the allocation of additional suitable sites such as that at B0108 Newton Croft.

4.3 B0108 was previously considered suitable for housing through the LDP process and we support this view. The preferred allocation of the adjacent former school site is also supported by our client and we believe that housing on the B0108 site would be complementary and assist in the delivery of the redevelopment of the former school site. We would respectfully request that the land put forward as bid site B0108 at Newton Croft, Bucksburn is included in the Proposed LDP as a housing allocation, in line with the B0108 development bid.

## APPENDIX 1

Criteria	Officers' Score	MIR Scoring Justification	Proposed Score	Justification
Exposure	2	Some shelter from northerly winds. Tree cover on the eastern edge of the site (steep, overgrown vegetation).	2	Agreed, the site has some more exposed parts, but also benefits from existing woodland belts that would be retained.
Aspect	2	The site is principally northwest facing, with shelter to the west and south provided by established woodland.	2	Agreed.
Slope	1	Southern part of site slopes steeply from north to south. Most of the site is on quite a steep slope, with a gradient of 1:9.	2	North western part of site is the slope, development is not proposed in this area.
Flood Risk	2	According to the SEPA indicative flood map, there is little risk of flooding on the site. There have been no recorded flooding incidents on the site. There is one watercourse (Bucks Burn) just outside the northern boundary of the site.	3	Agreed.
Drainage	3	The site appears freely drained.	3	Agreed.
Built/Cultural Elements	3	Bucksburn Church sits to the north of the site (254m away) and is Category C Listed. There are no sites and monuments records on the site.	3	Agreed.
Natural Conservation	2	The site sits within the Green Space Network (No. 26; Auchmill/Bucksburn Gorge). Additionally, the Bucksburn Local Nature Conservation Site	3	Unlikely that development would have a major impact on nature, the site is open field with low biodiversity value used for



# HALLIDAY FRASER MUNRO

CHARTERED ARCHITECTS & PLANNING CONSULTANTS

		(Site No. 33) is just to the west/south west of the site (214m away). According to NBN Atlas, there have been recordings of a small number of grey squirrels on site. Pipistrelle bats have been recorded on site and a bat survey may need to be carried out.		grazing. Established wooded areas adjacent to more sensitive areas would be retained and enhanced.
Landscape Features	2	Site currently used for agricultural grazing land. There is overgrown vegetation and some mature tree belts which would potentially be lost if the site is developed. There is a rubble boundary wall through the center of the site.	3	Established wooded areas adjacent to more sensitive areas would be retained and enhanced.
Landscape Fit	2	The development is not likely to intrude significantly into the surrounding landscape – much of the surrounding area already contains residential development. It will be seen from Auchmill Road however and would result in the loss of the green backdrop to properties fronting the road. Auchmill Golf course lies to the south and west of the site.	3	Agreed, but scoring should be 3 due to unlikely landscape impact.
Relationship to existing settlement	3	The development is located in the residential area of Bucksburn. The development is slightly isolated from the denser parts of Bucksburn; cut off by the A96 and Howes Road. However, there are some residential uses near to the site to the north and southeast of the site where there is currently a caravan park. The proposed development would be reasonably well related to the existing settlement.	3	Agreed.
Land Use Mix / Balance / Service Thresholds	2	Bucksburn is already quite an established residential area, and housing will not add greatly to the mix. The scale of the development (80no. houses) is	3	Additional housing as proposed will benefit services and facilities in the area.



# HALLIDAY FRASER MUNRO

CHARTERED ARCHITECTS & PLANNING CONSULTANTS

		not likely to attract further services or facilities.		
Accessibility	3	There is a bus stop 194m away from the site at Howes Road. Stagecoach services 10, 10A, 37, 35, 117, 305, 420, 727, N37, X20 and X37 all stop here. First Services 17, 17A, 17B, 18A, N17 and N18 all stop here too.	3	Agreed, the site benefits from excellent connectivity and proximity to public transport services.
Proximity to facilities / shopping / health / recreation	3	There is a good range of local facilities within 800m of the site: Lloyds Pharmacy is 247m away from the site and Lidl Bucksburn is within 530m of the site. Bucksburn Medical Practice is also within 530m of the site. Brimmond Primary School sits 918m away from the site and Bucksburn Academy is 638m away. Bucksburn Neighborhood center is less than 200m of the site.	3	Agreed.
Direct footpath / cycle connection to community and recreation facilities and resources	3	Core Path No. 44 (Newhills Avenue to Auchmill) Road and Deveron Road) runs along the north western boundary of the site. Along the south eastern boundary of the site, there is a dual use path/pavement part of the 2015 Cycle Network (Bonnyview Road to Newton Terrace).	3	Agreed.
Proximity of employment opportunities	3	Employment opportunities are available at the business/industrial area at Muggiemoss. This is within 660m of the site. Other opportunities are also available at the business parks at Dyce Drive (D2 and ABZ).	3	Agreed.
Contamination	2	A small area of the western edge of the site is identified as being potentially contaminated land (Site Name: Froghole Quarry).	3	The former quarry is outwith the site and is already used for commercial purposes.
Land Use	2	Western boundary of site lies	3	The site is outwith the



# HALLIDAY FRASER MUNRO

CHARTERED ARCHITECTS & PLANNING CONSULTANTS

Conflict		close to the 57dB LAeq Aberdeen Airport Noise Contours zone which may cause conflict with residential use of the site.		noise contour zones.
Physical Infrastructural Capacity	3	No known constraints.	3	Agreed.
Physical Infrastructure Future	3	No known constraints.	3	Agreed.
Service Infrastructure Capacity	1	Site lies within Brimmond Primary and Bucksburn Academy catchment areas. Brimmond Primary School is forecast to go over capacity in 2025, with overall capacity at 180%. Bucksburn Academy is forecast to go over capacity in 2025, with overall capacity at 135%.	2	Developer Obligations would assist in contributing to increased school capacity.
Other Constraints	3	No known constraints.	3	Agreed.
	<b>49</b>		<b>59</b>	