



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

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	
Organisation (if relevant)	
On behalf of (if relevant)	
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

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

YOUR COMMENTS CONTINUED

**ABERDEEN CITY LOCAL DEVELOPMENT PLAN
RESPONSE TO MAIN ISSUES REPORT
HILLHEAD OF PITFODELS
B0923**

MAY 2019

On behalf of
ROBERT GORDON'S COLLEGE



HALLIDAY FRASER MUNRO
CHARTERED ARCHITECTS & PLANNING CONSULTANTS



HALLIDAY FRASER MUNRO

CHARTERED ARCHITECTS & PLANNING CONSULTANTS

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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 Robert Gordon's College (RGC). It is written in response to the Aberdeen City Local Development Plan Main Issues Report 2019 (MIR).
- 1.2. Robert Gordon's College is an independent all through 3-18 years day school and educational charity founded in 1732 with its main teaching and administrative facilities at the Schoolhill city centre site. The charity is regulated by OSCR and has a public benefit commitment to the wider Aberdeen community. RGC has owned the land at Hillhead of Pitfodells since 1986 that has been the base for RGC's 'off-site' sports facilities since 1992.
- 1.3. At the 'Call for Sites' stage in May 2018, a development bid was lodged for a 6ha area of land at Hillhead of Pitfodells, on the edge of the established Airyhall residential area in the west of Aberdeen City. The land is currently sports pitches with ancillary buildings and structures. The area lies between Craigton Road and Countesswells Road and 'wraps around' a Scottish Water reservoir.
- 1.4. The land is flat with strong defensible boundaries provided by drystone walls, landscaping, existing housing and pavements. It has a different character to land to the west, being of a more 'manicured' nature related to its current use.
- 1.5. The B0923 land is proposed to be allocated as a future housing site suitable for up to 300 houses (phased) along with appropriate infrastructure and public open space. The boundary walls and tree planting, in addition to the adjacent reservoir and allotments, present strong landscape features defining the setting of the RGC site as currently 'transitional' between the established housing and open fields to the west.
- 1.6. The land is not subject to any environmental designations or technical planning constraints. Capital from the sale of the site for development as described would be directly reinvested by RGC into the provision of modernised sports facilities at both Schoolhill and on an offsite sports playing field facility elsewhere in Aberdeen.
- 1.7. 300 houses are proposed, to be delivered in three equal phases, allowing the phased transition from school sports facilities to housing and the gradual expansion of the residential area.
- 1.8. This provides the background context and justification for the housing allocation at Hillhead of Pitfodells as proposed through the B0923 bid.
- 1.9. Conversely however, the B0923 Hillhead of Pitfodells bid site is not an Officer's preferred option in the Main Issues Report. This is considered in more detail below.



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2. MIR Bid Assessment Summary

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

'B0923 Hillhead of Pitfodels

The proposal is for 300 units. The site is located within the greenbelt separating north of Cults and Aberdeen and is an open air recreational use which is appropriate in the green belt. The site is not particularly well connected to services and facilities and it is considered that its green belt role is justified and appropriate.

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

2.2. The Officers' view and associated issues can be broken down and will be examined in more detail below. It is however worthy of note that no insurmountable constraints are attributed to the B0923 bid site. The issues raised relate to the site's location and existing use. The second paragraph quoted above is a standard response used by Officers in the MIR to defend their view that no large scale greenfield housing allocations are required in Aberdeen. We do not agree with this approach to housing strategy and justify the reasons for this in section 3 below.

2.3. ***'The proposal is for 300 units. The site is located within the greenbelt separating north of Cults and Aberdeen and is an open air recreational use which is appropriate in the green belt.'***

The site is presently Green Belt in the current 2017 Local Development Plan. The land is however a well-used educational leisure facility comprising pavilion, stand, hardstanding, grass cricket pitches, sand-based and water-based hockey pitches and is used for athletics, cricket, hockey and rugby. West of the site entrance on Countesswells Road is the groundsman's dwellinghouse / office accommodation and a converted steading used for storage purposes.

The site is clearly defined by drystone dykes and 4m high mesh fencing, and its leisure use is clear. It is not a hidden, undeveloped greenfield or green belt site. The B0923 site's location bound by existing housing to the east and under construction housing to the north contributes to the character of the site being 'transitional' between the urban area to the east and north and open fields to the south and west. A well laid out, phased housing development in this location would not be detrimental to the function of the Green Belt between or the character of this part of Aberdeen. RGC have a strategy



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in place to rationalise the sports facilities on offer and do not require all of the land that exists within the B0923 site.

Numerous residential plots exist to the west, the former Woodlands hospital development (c. 100 houses) is directly opposite the south west corner of the site, the large Countesswells new community allocation is 1.4km west of the site (c. 3,000 houses), and the 300 house Pinewood / Hazlewood is adjacent to the northern site boundary. 390m west is the Friarsfield housing allocation in Cults. This confirms the character of the area as already having successfully accommodated appropriate housing development without detrimentally impacting on the setting of Aberdeen, Pitfodels or Cults. We believe this pattern can be continued with the B0923 allocation through an appropriate phased development of 100 houses as set out in the bid document. We do not therefore consider that the current green belt status of the site, or its locational context on the edge of the western Aberdeen represent valid reasons not to allocate the land for future development.

2.4. ***'The site is not particularly well connected to services and facilities and it is considered that its green belt role is justified and appropriate.'***

The site in its current form has the character of being on the edge of the established Airyhall residential area, adjacent to the Hazlewood housing development, and sandwiched between Countesswells Road and Craigton Road. In terms of services and facilities, and considering the future housing use, the B0923 site is:

- 990m from Airyhall / Countesswells neighbourhood centre (range of shops / bar / hotel);
- 700m from Airyhall Primary School / Community Centre / health centre;
- 900m from the James Hutton Institute, a major employer;
- 1.3km from Cults neighbourhood centre (wide range of shops / bar / hotel).

It is therefore clear that in current terms, there is a wide range of neighbourhood services and facilities available to future residents. This will expand further in the future through the Countesswells OP38 development, that will have its own services, facilities and schools, widening the offer in this area.

We would therefore suggest that there is a wide range of accessible services and facilities available to future residents at Hillhead of Pitfodels, in much the same way as the offer to Hazlewood residents, although Hillhead of Pitfodels will have a closer relationship to Cults. We do not therefore consider that this represents a reason not to allocate the land for future housing development.

The current sports facilities experience some conflict with the surrounding residential area, which is changing and growing with the new developments at Hazelwood and Countesswells. It is not an isolated green belt setting as is suggested in the Officers' assessment of the bid. Parking and noise impacts when events are on can cause issues with adjacent residential neighbours, confirming the



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existing suburban location. Residential use as proposed through the bid would remove these conflicts.

The B0923 land does not perform a 'Green Belt' role as such. It comprises educational sports facilities on the edge of an established residential area.

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

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 3 below) and the B0923 Hillhead of Pitfodels site presents a measured, deliverable opportunity as a suitable extension to the Airyhall / Hazlewood residential area. We have concerns regarding the deliverability and effectiveness of many brownfield sites suggested for development in the MIR and propose that some greenfield housing allocations are necessary. Sites adjacent to existing residential areas offer the most sustainable options, such as B0923.

The phased nature of the proposed Hillhead of Pitfodels site allows a suitable scale of development to be delivered in three phases of 100 houses, each falling into the small-scale definition of residential development sought by the Council at the initial 'call for sites' stage. In terms of sustainable transport options, in addition to being adjacent to an established residential area, the B0923 site is:

- 160m from existing public bus services;
- 790m from higher frequency public bus services on North Deeside Road;
- Is within 800m walking distance of a range of services and facilities as outlined in para 2.4 above;
- Is adjacent to the existing Core Paths network between Pitfodels, Cults and Hazlehead.

This confirms the Hillhead of Pitfodels site as a location benefitting from a range of sustainable transportation options and therefore a sensible and effective location for a future housing allocation.

- 2.6. In summary we do not believe that any of the issues raised through the MIR assessment of the B0923 site represent robust reasons not to allocate it.

- 2.7. The MIR includes a bid assessment summary, with the B0923 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



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of 60 would be more appropriate. The detailed narrative and reasoning are contained in Appendix 1. Principally the increased scoring is related to the site's sustainable location adjacent to existing and under construction housing on the edge of the established Airyhall area with its range of services and facilities.

3. Housing Land Strategy

- 3.1. 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.
- 3.2. 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.
- 3.3. 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.
- 3.4. 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.
- 3.5. 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.
- 3.6. 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.



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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).

3.7. 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
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 between predicted & actual housing delivery <i>(averages -357 units/annum)</i>	-91 (-12%)	-291 (-27%)	-342 (-29%)	-100 (-8%)	-141 (-11%)				
5 year Average difference (-17%) applied 2019-2022						1,269	1,336	1,362	987
No. of Housing Units anticipated less than predicted						-260	-274	-279	-202

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



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3.8. 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.

3.9 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 3 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).

3.10. 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 4 over offers an Aberdeen City sites perspective.



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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
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
Total	10,910	336	10,574

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

- 3.11. 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.
- 3.12. 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).
- 3.13. 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 it 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.
- 3.14. 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 balanced approach and likely to fail. On top of that at least 50% of the MIR preferred sites are also brownfield taking the



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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.

- 3.15. 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.

- 3.16. 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, we believe that the future development proposed at Hillhead of Pitfodels will deliver a range of benefits to the local area and is ideally placed to accommodate a phased residential allocation in the forthcoming 2022 Local Development Plan. The site is within the single ownership of the site proposer and is not subject to any planning, environmental or technical constraints. Allocation of the site and its subsequent sale to a housebuilder will create capital to allow RGC to provide new modernised sports provision.
- 4.2. There are no serious constraints to development, concerns raised through the MIR assessment relate to the current planning status and use of the land rather than its future development use. The site should be regarded as an appropriate, effective opportunity in the 2022 Local Development Plan. There is no evidence available to suggest that this should not be done.
- 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 phased housing sites such as that at B0923 Hillhead of Pitfodels. We would ask that the site is included in the forthcoming Proposed Local Development Plan as set out in the original bid document.



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APPENDIX 1

Criteria	Officers' Score	MIR Scoring Justification	Proposed Score	Justification
Exposure	2	Some shelter to the north with boundary landscaping on Countesswells Road (outside of site).	3	The site is generally flat with existing trees and boundary landscaping. Existing housing to the east, north and reservoir to the south provides shelter.
Aspect	2	Gentle slope but contour lines indicate east facing.	3	The site is generally flat but has a more southern aspect rather than eastern.
Slope	3	Former playing field; slight east-facing slope. 3% gradient (1:30).	3	Agreed.
Flood Risk	3	There are some minor pockets of surface water flooding shown close to existing buildings.	3	Agreed, unlikely to impact on future development proposals.
Drainage	3	The site appears well drained.	3	Agreed.
Built/Cultural Elements	3	Disused school pavilion within site boundary. Drystane dykes to north, east and south.	3	The sports pavilion is in current use in line with RGC leisure activities. Agreed regarding dykes.
Natural Conservation	3	Site located in Green Belt and Green Space Network at present. Bat survey may be required. A number of Designated Species are recorded within 100m of the site boundary.	3	Site is used for educational leisure and sports activities. No protected species understood to be present however surveys can be provided at appropriate stage.
Landscape Features	3	Located in the 'Lower Deeside' Landscape Character Area. The area comprises formal playing fields and associated buildings.	3	Agreed. This does not give the land the character of 'Green Belt.'
Landscape Fit	1	Despite the formal nature of the playing fields this is an area of open space that serves to separate the communities of Cults and Airyhall, thus helping them to maintain their separate identities. This is a valuable green belt function.	3	The site is an intermediate area on the edge of existing housing, but does not serve to separate Airyhall from Cults or contribute to the Green Belt function.
Relationship to existing settlement	3	Located west of Airyhall area of City, accessed via Craigton Road. Development presents	3	Agreed. This provides a strong case for the allocation of the site.



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		continuation of development from west of City's built-up area at Airyhall.		
Land Use Mix / Balance / Service Thresholds	1	Limited land use mix in the area.	2	Additional housing as proposed will benefit services and facilities in the area.
Accessibility	2	Accessed primarily by vehicle via Craigton Road and Countesswells Road. Proposer indicates that access would be taken from the north and south. Nearest bus stop is 0.3 miles /480m east of site on Countesswells Road. Service no's 15/15A.	3	The nearest existing bus stop is 160m east of the site on Countesswells Avenue. Public bus services are likely to be increased / expanded in the area as a result of the Countesswells OP58 development.
Proximity to facilities / shopping / health / recreation	1	Closest facilities are south in District Centre of Cults, 1 mile/ 1.6km south of the site.	3	Incorrect. Closest facilities are found at Airyhall: 990m from Airyhall / Countesswells neighbourhood centre (range of shops / bar / hotel); 700m from Airyhall Primary School / Community Centre / health centre; 900m from the James Hutton Institute, a major employer.
Direct footpath / cycle connection to community and recreation facilities and resources	2	Core Path no.65 (Hazlehead to River Dee) is accessible by Countesswells Rd from the north, or Craigton Rd at the south.	3	Agreed, the site is well connected to the existing extensive core path network so should gain a higher score.
Proximity of employment opportunities	2	Limited employment opportunities within Cults (1 mile / 1.6km south), commuting distance from Aberdeen City (2.6 mile/ 4km east).	3	Incorrect. Employment opportunities area available at the James Hutton Institute and Airyhall neighbourhood centre, 700 - 900m east.
Contamination	3	Allotments and Reservoir highlighted for possible	3	Agreed as being outwith site but also unlikely to be subject to contamination.



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CHARTERED ARCHITECTS & PLANNING CONSULTANTS

		contamination (not within site boundary).		
Land Use Conflict	3	Site is currently playing fields located on the City's edge. Some dispersed housing in proximity.	3	The site is directly adjacent to the established residential area.
Physical Infrastructural Capacity	3	Proposer claims there is infrastructure capacity.	3	Agreed.
Physical Infrastructure Future	3	Proposer claims there is infrastructure capacity.	3	Agreed.
Service Infrastructure Capacity	1	Airyhall PS – 2019 92%, 2020 95%, 2021 95%, 2022 94% Hazlehead Academy – 2019 94%, 2020 99%, 2021 104%, 2022 106%	2	School capacities in the area will be revised in the near future with the provision of primary and secondary education facilities at Countesswells OP58. This will create additional capacity, freeing up space at Airyhall and Hazlehead and likely rezoning.
Other Constraints	1	Water main intersects site on east site from north to south (10m wayleave included in proposer's analysis). The site is used for recreation (playing fields and sports pitches) which is a green belt function.	2	Proposed bid and indicative layout plan takes account of water main. Green belt reference is not a constraint.
	49		60	