



# 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](http://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](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	Claire Coutts
Organisation (if relevant)	Ryden LLP
On behalf of (if relevant)	Stewart Milne Homes
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"/>
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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 refer to attached Paper Apart

**YOUR COMMENTS CONTINUED**

## **PAPER APART**

### **Representations to the Aberdeen City Local Development Plan 2019 Main Issues Report on behalf of Stewart Milne Homes in relation to Site No. B03/02 at Gillahill, Kingswells, the Settlement Strategy and Question 1.**

On behalf of Stewart Milne Homes objection is made to the settlement strategy within the Aberdeen City Main Issues Report.

Paragraph 2.1 deals with housing allowances and states that the MIR puts forward new housing and employment allowances in line with the Proposed Strategic Development Plan 2018, which sets out a total allowance of 13,598 houses over three plan periods. This comprises 4168 in the period 2020-2032; 4500 in the period 2033-2035 and 4930 in the period 2036-2040. Any sites not identified as being 'effective' in the 2016 Housing Land Audit could be counted towards the 4168 allowances for 2020-2032. This includes 2449 constrained greenfield sites identified in the 2016 HLA; 120 greenfield sites in the current ALDP but not in the 2016 HLA; and 3048 brownfield sites. Aberdeen City Council have discounted the 2449 constrained greenfield sites as most are part of larger sites and may not be all be delivered in that period. That leaves 3528 units towards the 4168 allowances, leaving a shortfall of 640 units to be met through new allocations.

However, the general consensus of house builders in the region, as argued by Homes for Scotland in their response to the Proposed Strategic Development Plan (Appendix 1) is that the Council should take a more ambitious approach to growth and the housing supply target, housing land requirement and housing allowances.

The MIR provides a more positive approach to the delivery of new homes in later periods, through the identification of larger housing allowances in the periods 2033-2035 and 2036-2040. However, it is argued that the plan should be more aspirational in the first plan period, rather than increasing housing to later periods where delivery is less certain. This will support the recovery of the city following the recent downturn in the oil industry and boost economic growth.

The Council fail to acknowledge the significant value the delivery of new homes makes to the City Region and it is therefore argued that additional allocations should be identified in the Proposed Local Development Plan, particularly in the period 2020-2032. This will support the delivery of new homes, including affordable housing and should be in locations that people want to live, close to employment opportunities and infrastructure.

#### **Q1. Do you agree with our preferred housing sites? Are there any other sites that would be suitable for housing?**

On behalf of Stewart Milne Homes, objection is made to the preferred housing sites identified by Aberdeen City Council in the MIR. These are mostly brownfield sites or small scale greenfield sites. It

is argued that this does not provide an adequate range of sites as required by SPP, to enable a variety of scale and choice of location to promote sustainable mixed communities.

Objection is also made to Aberdeen City Council's recommendation to identify bid site B03/02 at Gillahill, Kingswells as undesirable. This site is suitable for a mix of uses, including up to 650 homes, a replacement primary school, civic space and cafe. This representation should be read in conjunction with the original bid submitted on behalf of Stewart Milne Homes at the pre-MIR stage which demonstrates, through the submission of supporting studies, that this area is suitable for development.

Aberdeen City Council Officer's assessment acknowledges that the site has scored well in most of the criteria and is well related to the wider Kingswells area. In fact, the site was historically earmarked for development having emerged through past Local Plans. Most notably as GB2 "Countryside Around Towns" in the adopted 1991 Local Plan, from which any longer term requirement for development land would be identified. It was then identified as "Strategic Reserve Land" in the Finalised Aberdeen City Local Plan 1999 and within the Finalised Aberdeen Local Plan 2004 for residential development in the period 2000-2010 and post 2010. The aim of that opportunity site was to create a more sustainable community, which was capable of supporting its own community facilities. Planning Officers subsequently made an indicative allocation of 170 houses against Phase 1 with a requirement for a joint masterplan with Phase 2 and Kingswells South. This included consideration of access and junction improvements; an infrastructure trust to contribute to facilities; land for the school expansion; access to community woodland; affordable housing and self-build units.

This was followed by the submission of a planning application for 200 units in November 2000, comprising the first part of a proposed Phase 3 development. The Council failed to determine this and an appeal lodged. A duplicate application was submitted and discussions continued with the Council. In May 2004, the undetermined application was amended to reduce the site area and restrict Phase 3 (i) to 170 units and another appeal lodged due to non-determination. A draft Design Brief was prepared for the site at the request of the Council and as at September 2005 was awaiting consideration by the Council. As a result of this work, significant preparatory work has been undertaken which confirmed the development potential of the site.

The Council's assessment raises some issues to which we wish to respond.

### **Natural Conservation**

Aberdeen City Council, in their assessment state that there are several species of bat in the area and records of other designated species. A Phase 1 Habitat Survey was undertaken back in 2005 and although that report is now out of date, it provides some information on species. The Development Strategy prepared by OPEN and submitted at the pre-MIR stage contains further details, with no reference to the presence of bats on the site. There are no priority habitats present on the site although there is a varied habitat structure. This would be investigated in more detail at the planning application stage, however, this is not considered to be an impediment to development, particularly given the agricultural use of the land, confirmed by the Council's designation of the site for development.

The Council state that the area to the west is identified as Ancient Woodland with numerous Tree Preservation Orders. The Development Strategy submitted at the pre-MIR stage acknowledges this woodland and confirms that they provide a backdrop for the development and create a sense of place. Development would be formed around any significant mature trees. In terms of the access to the site, this required the removal of some trees to the north. However, this was a very small proportion of the trees in the area and agreement was previously reached with Aberdeen City Council in relation to this.

The main issue raised by Aberdeen City Council in their assessment of the site is the Green Belt designation which was considered to still be appropriate to prevent encroachment into the existing gap that separates Kingswells from Aberdeen. However, objection is raised to this.

This gap between the two areas is of significant size and the bid site is by no means the last remaining piece of land between Kingswells and Aberdeen. OPEN have prepared a response to this issue (Appendix 2), submitted with this representation, which addresses this matter through further commentary on the landscape and revised visuals. It concludes that the bid site is not prominent from Kingswells, there are no views of the site from the south or west, with views from the east restricted. Any views from the surrounding landscape would therefore be very localised and as a result the landscape setting of the area will not be significantly impacted.

Separation would be maintained between the site and the urban edges of Aberdeen and the report demonstrates that development of the site would not result in significant encroachment. The indicative layout demonstrates that new landscaping is proposed to the east of the bid site. This would create a defined edge to the site, providing a defensible boundary to the green belt and restrict any further development beyond.

If the aim of the green belt is to avoid coalescence and protect the landscape setting of the area, this will not be compromised by the development of bid site B03/02 at Gillahill. As such, it is considered that the green belt designation is not necessary on the site and should be removed and the site identified for development.

### **Landscape Features**

Aberdeen City Council state that the site is open farmland with stone walls marking the site boundary and separating fields within the site. These stone walls would be incorporated into the layout and design of the development. This is seen as a positive aspect of the site and will create a distinctive residential environment.

The Council further state that the east, west and northern boundaries are marked by a mixture of mature and semi-mature trees with further pockets of trees situated centrally within the site. As stated above, these features are considered in the original Development Strategy submitted with the bid at the pre-MIR stage. These will be retained and incorporated into the site layout to create an attractive backdrop to development. Existing tree belts would be strengthened and tree cover improved to provide opportunities for enhanced biodiversity.

The Council make reference to the Green Space Network (GSN) which bounds the site to the east, north and west. The site lies outwith this designation and will have minimal impact on it. Access to the site would require to be routed through the GSN to the north, however, this issue has already been considered by Aberdeen City Council. Of the 366 trees in this area, only 8 were required to be lost directly to the new road, and this was acceptable to the Council. Enhanced planting and shelterbelts within the site would enhance the GSN and mitigate any impact from the road.

### **Landscape Fit**

The Council's assessment highlights that the eastern section of the site is more elevated and lies adjacent to an area of semi-mature woodland, however, this results in no clear views into the site from the existing settlement. Longer distance views into the site can be obtained from the surrounding countryside to the east, however, OPEN's assessment of the site concluded that these were minimal and localised.

The Council's assessment goes onto state that the site helps to maintain the separate identities of Kingswells and Aberdeen. This is refuted and as argued previously, the site does not encroach significantly into the land between the two areas. There is significant areas of land remaining between Kingswells and Aberdeen, much of which is unsuitable for development. The separate identities of the areas will therefore not be affected by the development of bid site B0302.

### **Accessibility**

The site is scored low on accessibility as Stagecoach Bus route 14 travels along Kingswood Drive more than 800m from the centre of the site. This issue is considered in more detail in OPEN's additional response to issues raised (Appendix 2). That bus route also travels along Kingswells Crescent, immediately north of the bid site. Existing bus stops are therefore within 400m of half of the site, with the remainder of the site within 800m. In addition to this, it is anticipated that the proposed development will facilitate a bus route through the site, ensuring that the entire site is within 400m of a bus stop. As a result, the site is considered to be accessible by sustainable means.

### **Land Use Mix**

The Council acknowledge that a mix of uses is proposed, however, state that as the surrounding area is predominantly residential already, it would only contribute a little towards a better mix of land uses. This is refuted. The bid proposes a range of housing, including affordable housing as well as land for a school, playing fields, community/civic space with opportunities for a café/shop. If the existing school moved to this new site, opportunities for the expansion of the village centre could be realised.

The site therefore contributes significantly towards a better mix of land uses, both directly on the site and indirectly in the wider area. The only use that is not proposed is employment, however, Prime Four is located to the west of Kingswells and provides a balance of uses in the area, without specifically identifying land for such uses on the bid site.



### **Service Infrastructure Capacity**

The Council provide school roll details for Kingswells Primary School, which is proposed to be operating at 98% of capacity by 2025. Although they acknowledge that provision is made for a primary school on the bid site, they don't acknowledge that the identification of this site could alleviate the issues that could affect the primary school in the future.

In terms of secondary provision, although pupils in Kingswells currently attend Bucksburn Academy, the site is included in the future Countesswells Academy catchment area. It is understood that the proposed Countesswells Academy will have 1100 pupil capacity, with housing at Countesswells accounting for approximately half of this. There would therefore be spare capacity for this development. It is also understood that Bucksburn Academy is due to have an extension built which could also provide capacity for additional development. If required, developer contributions would be agreed as part of any planning application process and this is not an impediment to development.

### **Conclusion**

To conclude, it is argued that the housing allowances identified for Aberdeen City should be increased, with additional sites identified for housing in the Proposed Local Development Plan. As such, bid site B03/02 should be identified as a mixed use development within the Proposed Local Development Plan.

The vision for Gillahill is of a natural, sustainable extension to Kingswells. It would be sensitively designed in a highly desirable location, with excellent connections to the City and other areas. This would provide a mix of housing, education provision, civic and commercial uses as well as improved access to woodland and open space.

It is not accepted that the site would significantly encroach into the landscape, or result in coalescence between Kingswells and Aberdeen. There would be minimal visual impact on the landscape and a defined edge to the Green Belt would be created through significant high quality landscaping. This would provide a defensible boundary to the settlement and Green Belt and restrict any further development beyond.

It is therefore respectfully requested that the Green Belt designation is removed from bid site B03/02 and the site identified as an Opportunity Site for development in the Proposed Local Development Plan.

## **Appendix 1**

### **Homes for Scotland response to Proposed SDP**

<b>What document are you commenting on?</b>	Proposed Strategic Development Plan <span style="float: right;">X</span>		
<b>HFS Issue 3</b>	DELIVERY OF NEW HOMES	<b>Paragraph(s)</b>	Paragraphs 4.9-4.10 and Table 1: Housing Supply Target

**What would you like to say about the issue?**

*(if you would like to write more than the box allows then please attach this form to any additional papers)*

Homes for Scotland (HFS) has significant concerns regarding the SDPA’s methodology and calculation of the housing supply target (HST), housing land requirement (HLR) and housing allowances. These issues are set out in separate issues for the purposes of the submission of representations, and all relate to one another so should be considered as a package.

Scottish Planning Policy (SPP) states that the HST is a “*policy view of the number of homes*” to be delivered (paragraph 115), and that “*wider economic, social and environmental factors*” should be taken into account. HFS considers that the HST must take an ambitious approach, recognising the significant economic and social value that the delivery of new homes will make to the City Region. To further promote economic recovery and growth in the City Region and meet the significant social challenge of delivering more affordable homes, an ambitious HST should be set by the SDP. To achieve the growth that the City Region aspires to, the SDP must be in line with this ambition and set bold targets to drive delivery of new homes.

HFS acknowledges that all HNDA scenarios have declining trends towards the later years of the assessment. We understand that the SDPA has sought to reverse this to provide a more positive rising growth trend to the later years of the plan. HFS would note that the downward trajectories of all of the HNDA scenarios do not align with the home building industry’s aspirations, nor the City Region’s aspirations for growth. However, instead of providing a more aspirational approach to the later stages of the plan alone, the SDP has sought to modify the Principal Scenario, adjusting it to be lower in aspirations in the first few years of the Plan and growing towards later years of the Plan. Rather than achieving the positive modification that the SDPA set out to accomplish, the result is, in fact, negative.

SPP requires that the HST “*should properly reflect the HNDA estimate of housing demand in the market sector*” (paragraph 115), however HFS does not consider the HST set by the Proposed Plan properly reflects the HNDA as it inverts the curve of the Principal Scenario. Comparing the Modified Principal Scenario with the original Principal Scenario (see Appendix 1), the HST total from 2016-2032 in the Principal Scenario is 37,484, and in the Modified Principal Scenario is a lower total of 36,400. It is therefore clear that the result of the modification is to remove over 1,000 homes from the 2016-2032 plan period. That is 1,000 homes that are needed but are not planned for due to the change in the HNDA scenario. Those homes are pushed out to later years of the plan where there is far less certainty over deliverability. The period to 2032 is the key period for which allowances are made, with the period beyond

this only requiring an “*indication of the possible scale and location of housing land...*” (SPP, paragraph 118). LDPs are not required to make allocations in this later period post 2032. HFS therefore does not support the HST set by the Proposed Plan based on the Modified Principal Scenario due to a lack of ambition in the target, and a target which does not properly reflect the HNDA estimate.

SPP further requires the HST to be “*supported by compelling evidence*” (paragraph 115). HFS does not consider that compelling evidence has been provided by the SDPA in demonstrating its divergence from the HNDA scenario. The Methodology Paper does not explain the significant implications of the modification of the Principal Scenario for the SDP plan period 2020 – 2032, which is the key period over which the forthcoming LDPs will have to allocate land.

For example, paragraph 3.5 of the Methodology Paper lists factors which have been taken into account in setting the HST. These appear merely as a list and have no explanation provided to demonstrate what assumptions have been used, what conclusions have been drawn, and importantly how these factors have influenced the HST.

Further, Paragraph 3.110 of the Methodology Paper states that HSTs are “*realistic yet ambitious level of delivery given the city region’s historic levels of home completions and the current economic recovery*”. HFS believes that looking back to past completions trends is not an appropriate way to guide the future ambition of the city region’s growth. With the significant impact of the drop in oil price in recent years, looking back to recent years of home delivery gives a falsely negative view of the potential for the region to deliver in the future. Projected completions from the 2016 Housing Land Audit show increased levels of completions programmed than the actual completions from the past few years. HFS believes that the SDP should be looking forward and setting ambitious targets that drive the increased delivery of new homes, rather than looking back to previous lower levels of delivery.

Paragraph 3.7 of the Housing Methodology Paper shows the annual average homes per annum from each of the three HNDA scenarios. Whilst we are aware that the new HNDA and Plan both ‘reset’ the aspirations, need and demand for growth in the city region, it is still relevant to consider that the aspiration of the last SDP was to move towards the delivery of 3,000 homes per annum by 2020. Looking at projected completions from the most recent 2018 Housing Land Audit, the City Region will meet this aspiration by 2019, therefore demonstrating the ability and desire to achieve far higher levels of completions in the future.

HFS therefore supports the most ambitious HNDA scenario, the High Migration Scenario to strive towards significantly increasing the delivery of homes in the city region over time in line with need and demand, and positively supporting the recovery and economic growth of the region and delivery of affordable homes. For the avoidance of doubt, HFS would note that the High Migration Scenario is Scenario 3 from the HNDA, with the Principal Scenario being Scenario 1.

The Methodology Paper states that “*completions have only exceeded 2,000 homes per annum once in the period 2009-2016*” (paragraph 3.17, bullet 2), looking backwards at historic trends of completions. However, this is misleading as looking more recently, we know that completions last year in 2017 were over 2,000 homes and indeed the average number of completions over the past 5 years has been 2,003 homes per annum. Looking forward, projected completions are far higher than 2,000 homes per annum.

The Methodology Paper (paragraph 3.17, bullet 3) states that “*the development industry may encounter difficulties in delivering such numbers given its current construction capacity*”, however to the contrary, it should be noted that during the most difficult period for home building in recent times, the industry managed to deliver an average of 2,000 homes per annum, therefore the future potential for delivery by the home building industry looks positive. In addition to the difficult economic climate, the industry

managed to deliver this consistent level of homebuilding through a period where the last Local Development Plans in the region largely provided significant strategic allocations. These take time to work through the planning and other consenting processes to delivery, and we are now seeing the delivery of some of these sites coming forward now and in the next few years, at varying rates.

While the SDPA states that “*an annual target of 2,768 new homes [...] is not considered achievable or realistic*” (Background Paper, paragraph 3.17, bullet 2), looking at the programmed completions in the joint Aberdeen City and Shire Housing Land Audit prepared by the Councils themselves, the programmed completions in the recent 2018 Audit and the 2016 Audit used as an evidence base for this plan show several years above the level of 2,768 homes, and other years far closer to this annual target than any other HNDA scenario.

Appendices 1 and 2 provide updated versions of Proposed Plan Table 1. These include the HST for the Principal and High Migration Scenarios, as well as an updated Modified Principal Scenario table to correct an error in calculation from the Proposed Plan table for use as a comparator. Despite the Housing Methodology Paper confirming that “*the Proposed Plan amends this percentage adjustment to 80% / 20% in favour of the Aberdeen Housing Market Area*”, on reviewing the table, the split between AHMA and RHMA for the first period from 2016-2019 is actually a 75% / 25% split. This is not explained anywhere in the Methodology Paper or the Plan. Appendix 1 updates the HST for the three scenarios to be 80% / 20% and Appendix 2 updates the HST for the three scenarios to an 85% / 15% split for comparison.

In conclusion, HFS does not believe that the approach of the SDPA in modifying the Principal Scenario is in accordance with SPP as it is not closely aligned with the HNDA, nor does the Methodology Paper provide compelling evidence to support the divergence from the HNDA. The result of pushing need and demand (amounting to over 1,000 homes) which is identified in the HNDA scenario out of the key plan period to 2032 will result in LDPs not being required to allocate land to meet this need. Furthermore, the approach lacks ambition and is not adequately planning for growth in the City Region.

## **What change would you like to see made?**

*(if you would like to write more than the box allows then please attach this form to any additional papers)*

HFS supports the High Migration Scenario. We request that this alternative HNDA scenario is used as the basis for the HST. We also request that Table 1 of the Proposed Plan is updated in line with a more ambitious evidence base, and Paragraph 4.10 of the Proposed Plan also updated accordingly.

HFS supports an 85% / 15% split between the Aberdeen Housing Market Area and Rural Housing Market area. Justification for this is explained fully under HFS Issue 5 – Housing Allowances. We request that Tables 1, 2 and 3 of the Proposed Plan are updated to take into account an alternative split and that paragraph 4.16 of the Proposed Plan is amended to include reference to an 85% / 15% split between the AHMA and RHMA.

HFS requests that Tables 1, 2 and 3 of the Proposed Plan are updated to ensure that a consistent split between AHMA / RHMA is used instead of the current 75%/25% split for 2016-2019 and then 80%/20% thereafter.

As stated above and throughout this representation, HFS supports the High Migration Scenario and an 85% / 15% split between the AHMA / RHMA, but would clarify that a secondary position to this would be

the Principal Scenario in lieu of the Modified Principal Scenario. The Modified Principal Scenario is not supported at all for the reasons set out within this issue and in other HFS representations that it is not closely aligned enough to the HNDA, it is not supported by compelling enough evidence, and despite positive intentions, does not provide a positive outcome for the delivery of homes in the City Region for the plan period to 2032.

**Appendix 2**

**OPEN Response to MIR**

# Gillahill, Kingswells

Response to Aberdeen City Council Local Development Plan: Main Issues Report

(in support of the Development Strategy originally submitted to the Aberdeen City Council in May 2018 in response to  
Local Development Plan Call for Sites)

**Client: Stewart Milne Homes**

**Date: April 2019**





# ➤ Introduction

## 1.1 Purpose of the Document

This document has been prepared in response to the Aberdeen City Main Issues Report (MIR) by Optimised Environments Limited, 'OPEN' on behalf of Stewart Milne Homes' (SMH).

It has been arranged as an addendum to accompany SMH's Development Strategy, Response to the Aberdeen City Council Local Development Plan - Call for Sites submitted May 2018 and contains supplementary information to address the points raised in the MIR and further assist in demonstrating the effectiveness and appropriateness of land at Gillahill (MIR REF B0302) to accommodate around 650 units as part of a new mixed use allocation within the 2021 LDP.

## 1.2 Summary of main issues

The MIR notes that the site scores well in most of the selection criteria -'it is generally flat with reasonable shelter and is well related to the wider Kingswells area.', but lists its current green belt status as the main constraint to development *'its development would result in significant encroachment into the existing open gap that separates Kingswells from Aberdeen'*.

The information presented in this addendum seeks to address this matter through further commentary on the landscape and visual appraisal work contained in the original submission and a revised set of annotated visualisations to accompany these comments with the aim of providing reassurance that development of the site at Gillahill would not result in 'significant encroachment'.

Additionally the MIR mentions accessibility as an issue - stating that the existing bus route is more than 800m from the site. However, information contained at the end of this document demonstrates that this bus route also travels along Kingswells Crescent which is immediately to the north of the site and the existing bus stops here are within 400m of half of the suggested area of development and the rest are within 800m.

Furthermore, the proposals presented within the original Development Strategy document state that it is envisaged that the proposed development will facilitate a bus route through the site, ensuring that all development would be within 400m of a bus stop.

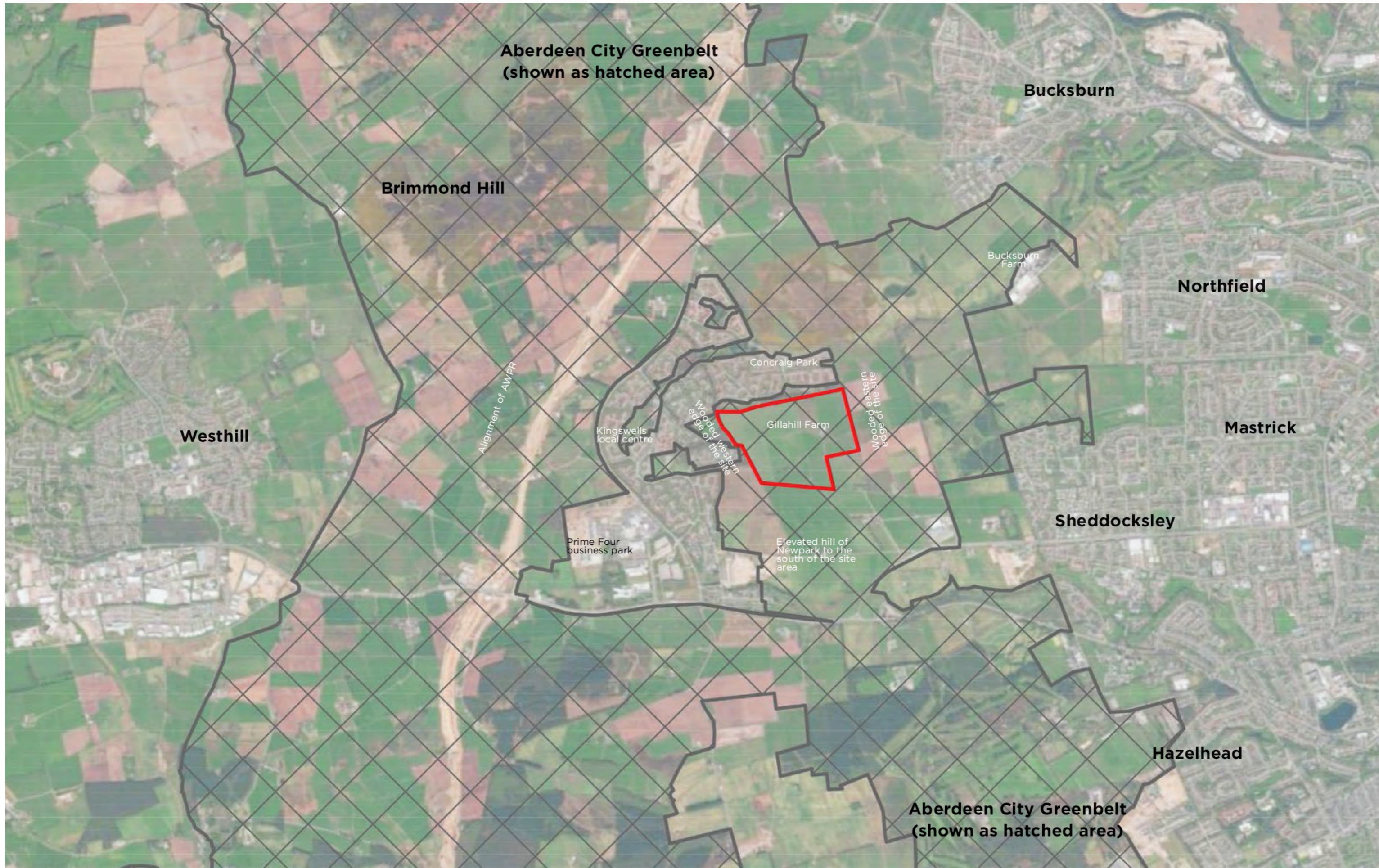
The information contained in this addendum should be read in conjunction with the MIR Response Form.

### Illustrative plan

The illustrative plan from the original representation document has been included here for clarity. Whilst this is not a definitive plan for the site and demonstrates one possible interpretation of the development framework, it provides a realistic and reliable base which has been utilised for testing the site. It is included again to provide further assurance that development at Gillahill would be well related to the Kingswells area and can be developed in a manner that is appropriate and well connected to both the immediate locale and the wider context, presenting a viable opportunity for a well considered, sustainable extension to Kingswells.



The vision for Gillahill is of a natural, sustainable extension to Kingswells. Sensitively designed development in a highly desirable location, offering a countryside setting with excellent connections to the city and other areas. Local facilities and walkable neighbourhoods, coupled with a range of housing typologies in a characterful setting, will bring a vibrancy to Kingswells whilst creating a new and distinctive community.



# > Green Belt

## 1.3 Additional LVA Commentary

In relation to the MIR comments describing the potentially resulting 'significant encroachment' of the Gillhill site within the Green Belt, the following additional commentary is provided.

The 2019 MIR Appendix 3 (1) reiterates the reporters conclusion from the 2016 LDP examination report (2), that the green belt status was appropriate, and also that Gillahill would result in 'significant encroachment into the existing open gap that separates Kingswells from Aberdeen'. The 'significant encroachment' described in the 2019 MIR Appendix is described more fully in the 2016 LDP examination report, where the reporters conclusions state - 'Gillahill is much less prominent from Kingswells due to its landform and the presence of tree belts. This site consequently has less of a role in the setting of the settlement. Development would result in a significant encroachment into the existing open gap between Kingswells and Aberdeen, but the extent to which this would be readily apparent from viewpoints on the ground would require further study.'

The appraisal within the Development Strategy originally submitted to the Aberdeen City Council in May 2018 for Gillahill also found that the site is not 'prominent' from Kingswells drawing similar conclusions to the reporter. There are no views of the site area from the south or west due to the screening of Newpark Hill and views from the east are very restricted due to the screening of Fernhill Reservoir. The original appraisal concludes that the proposal site is not as visible in the landscape as the existing settlement that makes up the current pattern of housing at Kingswells and that views of the proposal from the surrounding landscape would be very localised. The appraisal found that although the proposal would result in localised change from rural to urban that this change would not be experienced from the surrounding landscape in a substantive manner due to surrounding topography, which limits potential visibility and further by established woods and tree belts which additionally screen the proposal site in areas of potential visibility. It is considered therefore that the proposal site would not be 'readily apparent from viewpoints on the ground' and that the appraisal presented in May 2018 illustrates this and should be regarded as a key document of 'further study' advocated by the reporter in his conclusions. For further clarity on this matter annotated visualisations showing the extent of the proposal site visible from Brimmond Hill and Newhills are included on the following pages.

Furthermore, views that contain urban elements of Aberdeen City and that also contain simultaneous views of the proposal site are also limited to Brimmond Hill and Newhills to the north of Kingswells. In these views, the proposal site would appear to add to the existing settlement of Kingswells (particularly in the context of Conraig Park). Separation would be maintained between the proposal site and the urban edges of Aberdeen and the extent of this separation is conspicuous from both Brimmond Hill and Newhills. In relation to encroachment, therefore, the appraisal did not find that Gillahill would result in 'significant encroachment' and it is clearly demonstrated from the visualisations presented in May 2018 and again here as part of this response that this is not the case.

1 - 2019 Main Issues Report (MIR) Appendix 3 - Development Options Assessment Report on the Pre-Main Issues Submissions 2018. <https://www.aberdeencity.gov.uk/sites/default/files/2019-02/MIR%20BidAssessmentsFULL.pdf>

2 - 2016 LDP examination report - Reporters report - issues 1-10. DPEA. [https://www.aberdeencity.gov.uk/sites/default/files/aldp2016\\_reportersreport\\_issue1\\_10.pdf](https://www.aberdeencity.gov.uk/sites/default/files/aldp2016_reportersreport_issue1_10.pdf)



Aerial view of Aberdeen showing location of Gillahill proposal site in relation to urban areas and Green Belt.

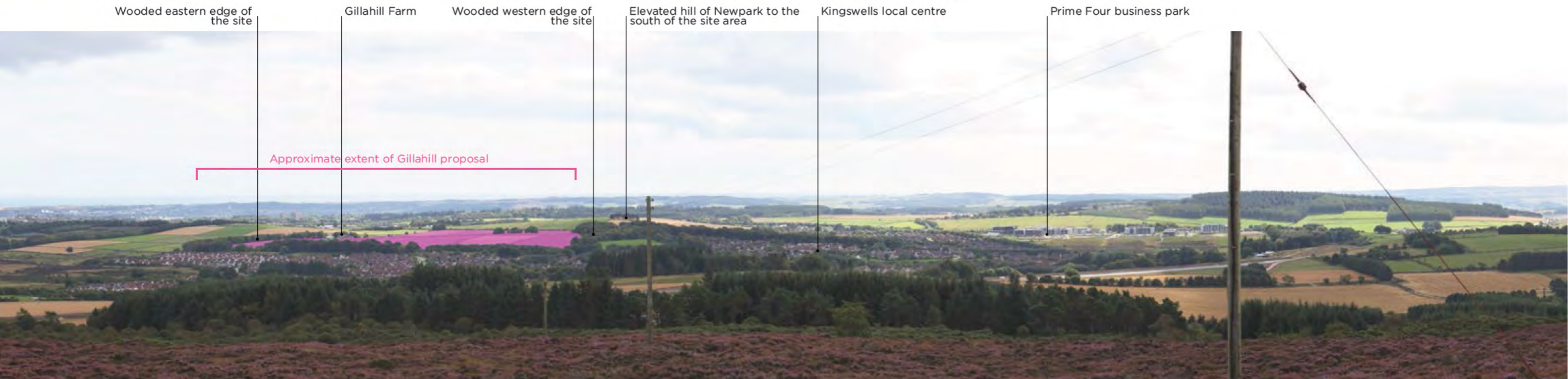
# > Annotated Visualisations



Viewpoint 1 - View from Brimmond Hill towards Kingswells to show the site area in the wider context.



Viewpoint 2 - View south east from Newhills Church.



 Potentially visible parts of the Gillahill proposal site highlighted in pink on visualisations

# › Accessibility

The MIR notes that Stagecoach Bus Route 14 travels along Kingswood Drive and this is more than 800m from the centre of the site. However, the extract from the Stagecoach website adjacent, demonstrates that this bus route also travels along Kingswells Crescent which is immediately to the north of the site and the existing bus stops here are within 400m of half of the suggested area of development and the rest within 800m.

Furthermore, the proposals presented within the document 'Gillahill, Kingswells - Development Strategy, Response to the Aberdeen City Council Local Development Plan - Call for Sites May 2018' states that is envisaged that the primary street will facilitate a bus route through the site ensuring that all development would be within 400m of a bus stop.

This diagram illustrates the potential development layout in the context of the existing bus stops and indicates the possible proposed future loop through the site for the Stagecoach route 14 from Kingswells Crescent, along with locations for future bus stops within the development. It also demonstrates that safe, direct pedestrian connections to existing stops can be readily achieved and that proposed stops will be fully integrated into the development at appropriate points, thereby ensuring that travel by public transport will be a convenient and attractive choice to residents of development at Gillahill.

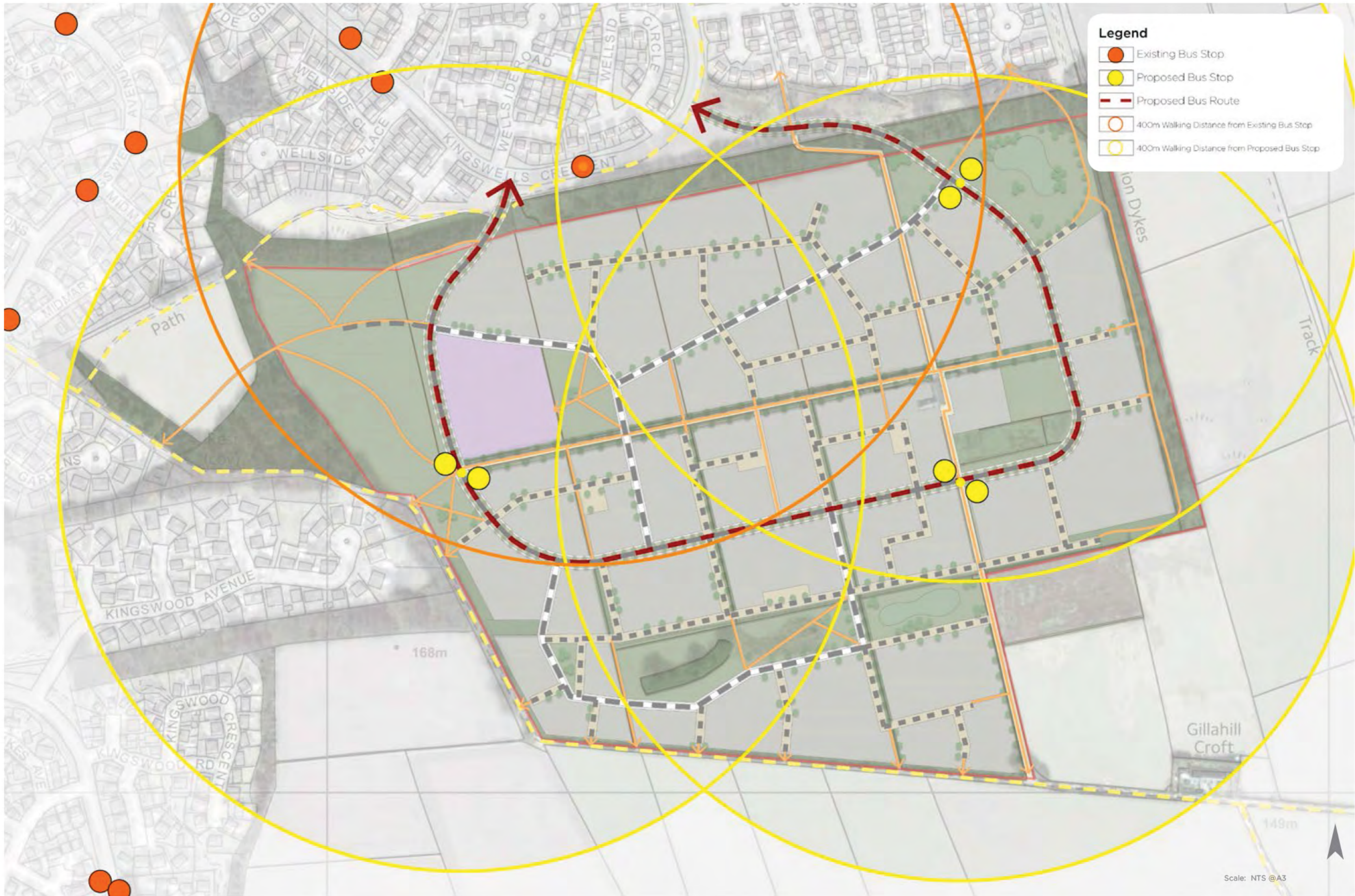
## 14 - Aberdeen - Kingswells

A bus service operated by Stagecoach North Scotland



Aberdeen Union Square Bus Station (Stance 8)	07:31		
Aberdeen Upperkirkgate (Stop R1)	08:30		21:30
Aberdeen Holburn Junction (Stop A4)	07:38	08:38	21:38
Westburn, at Harcourt Road	07:44	08:44	then hourly until 21:44
Summerhill, opp Shapinsay Square	07:48	08:48	21:48
Kingswells, opp Kingswood Gardens	07:54	08:54	21:54
Kingswells Crescent (opp)	07:57	08:57	21:57

Stagecoach Bus Timetable: Route 14 Aberdeen - Kingswells





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# 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](http://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](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	Claire Coutts
Organisation (if relevant)	Ryden LLP
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](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"/>
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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 refer to attached Paper Apart

**YOUR COMMENTS CONTINUED**

## **PAPER APART**

### **Representations to the Aberdeen City Local Development Plan 2019 Main Issues Report on behalf of Stewart Milne Homes in relation to Site No. B03/06 at Huxterstone, Kingswells, the Settlement Strategy and Question 1.**

#### **Settlement Strategy**

On behalf of Stewart Milne Homes objection is made to the settlement strategy within the Aberdeen City Main Issues Report.

Paragraph 2.1 deals with housing allowances and states that the MIR puts forward new housing and employment allowances in line with the Proposed Strategic Development Plan 2018, which sets out a total allowance of 13,598 houses over three plan periods. This comprises 4168 in the period 2020-2032; 4500 in the period 2033-2035 and 4930 in the period 2036-2040. Any sites not identified as being 'effective' in the 2016 Housing Land Audit could be counted towards the 4168 allowances for 2020-2032. This includes 2449 constrained greenfield sites identified in the 2016 HLA; 120 greenfield sites in the current ALDP but not in the 2016 HLA; and 3048 brownfield sites. Aberdeen City Council have discounted the 2449 constrained greenfield sites as most are part of larger sites and may not be all be delivered in that period. That leaves 3528 units towards the 4168 allowances, leaving a shortfall of 640 units to be met through new allocations.

However, the general consensus of house builders in the region, as argued by Homes for Scotland in their response to the Proposed Strategic Development Plan (Appendix 1) is that the Council should take a more ambitious approach to growth and the housing supply target, housing land requirement and housing allowances.

The MIR provides a more positive approach to the delivery of new homes in later periods, through the identification of larger housing allowances in the periods 2033-2035 and 2036-2040. However, it is argued that the plan should be more aspirational in the first plan period, rather than increasing housing to later periods where delivery is less certain. This will support the recovery of the city following the recent downturn in the oil industry and boost economic growth.

The Council fail to acknowledge the significant value the delivery of new homes makes to the City Region and it is therefore argued that additional allocations should be identified in the Proposed Local Development Plan, particularly in the period 2020-2032. This will support the delivery of new homes, including affordable housing and should be in locations that people want to live, close to employment opportunities and infrastructure.

Aberdeen City Council further state that any greenfield allocations should be small scale and should not be extensions to existing sites identified in the 2017 LDP. Objection is made to this strategy. Scottish Planning Policy (SPP) places a presumption in favour of development that contributes to sustainable development, making efficient use of land and locating the right development in the right

place. Extensions to existing allocations is a sustainable way of delivering development, with efficient use made of existing infrastructure. It is a logical location for siting new development and resisting this type of development goes against the fundamental aim of the Scottish Government. Consideration should therefore be given to the extension of existing allocations, where it is appropriate to do so.

**Q1. Do you agree with our preferred housing sites? Are there any other sites that would be suitable for housing?**

On behalf of Stewart Milne Homes, objection is made to the preferred housing sites identified by Aberdeen City Council in the MIR. These are mostly brownfield sites or small scale greenfield sites. It is argued that this does not provide an adequate range of sites as required by SPP, to enable a variety of scale and choice of location to promote sustainable mixed communities.

Objection is also made to Aberdeen City Council's recommendation to identify bid site B03/06 at Huxterstone as undesirable. This site is considered suitable for a housing development of approximately 90 houses. This representation should be read in conjunction with the original bids submitted on behalf of Stewart Milne Homes at the pre-MIR stage which together demonstrate that this area is suitable for development. Kingswells Community Council have also stated that site B03/06 along with one other "are the only suitable sites for consideration". Development of bid site B03/06 at Huxterstone would therefore fit with their aspirations for development in the settlement.

The officer's assessment of the site has raised some issues to which we wish to respond.

**Flood Risk**

The Council's assessment of the site states that the Den Burn runs along the south of the site, but has a low chance of flooding, with no flooding incidents recorded on the site. This is due to the topography of the site and any flood risk associated with the site would be investigated fully through the planning application process. Any development would be kept clear of any flood risk area as suggested by Aberdeen City Council.

**Natural Conservation**

It is noted by Aberdeen City Council that the site sits within an area of potential bat habitat (woodland) and a bat survey may be required. There are a line of trees to the south of the site along the Den Burn, however, the rest of the site is open fields. An ecological study was carried out on the site to the west which concluded that there were no statutory sites included within the site boundary and the site has low ecological value. This is expected to be the same for this bid site, however, surveys for protected species would be carried out at the application stage and appropriate mitigation provided if necessary. Therefore ecological enhancements along the burn would be provided through any development and it is not anticipated that there would be any impact on bats.

The assessment states that the Green Space Network runs just to the south of the site, as does the Rubislaw Local Nature Conservation Site. These lie outwith the site boundary and any development will take due cognisance of these designations. It would enhance that network through the provision of

open space and riverside walks along the burn, connecting to the land to the east and enhancing access in this area. This bid site was previously designated as Green Space Network, however, this has now been removed, demonstrating that this is not a valuable site in nature conservation terms.

Reference is made to the River Dee catchment area within the assessment, however, this is a huge area that covers all of Aberdeen City and much of Aberdeenshire. Given that extensive development has taken place within Aberdeen, all falling within the River Dee catchment area, this is not an impediment to any further development on bid site B03/06. It would be ensured that the development of this site would not result in any adverse effect on the River Dee.

### **Landscape Features**

The Council's assessment states that the site is zoned as green belt and that the function still stands, making the site inappropriate for residential development. The aim of the Green Belt is to maintain the distinct identity of Aberdeen and the communities within and around the city and to avoid coalescence of settlements and sprawling development on the edge of the city, maintaining Aberdeen's landscape setting and providing access to open space. It is argued that the identification of this site for development would not significantly affect this aim. Within the Finalised Aberdeen Local Plan 2004, Aberdeen City Council considered that this site was suitable for development by designating it as a 'Future New Community', suitable for 450 houses post 2010.

Stewart Milne Homes subsequently produced an Indicative Masterplan in 2009 showing a proposed expansion of Kingswells, considered beneficial to the Aberdeen City Strategic Growth Area. This was followed by the submission of a development bid, including the Masterplan later in 2009. However, only the western portion of the site was identified as a preferred option, even though bid site B03/06 to the east was previously considered suitable.

Issues related to coalescence and landscape setting will not be affected through the development of this site. The site is generally low lying and south facing development will not breach the skyline when viewed in the context of the village as demonstrated by development to the west. Development will be contained by the burn and existing development to the west and seen as a natural extension of that. Substantial landscaping is proposed to the east of the site to screen the proposed development, provide a defensible boundary to any built development and avoid any coalescence with Maidencraig. It will also ensure that a boundary to the green belt to the east is suitably imposed.

As such, it is argued that the landscape setting of the area will be protected and the site can be developed as per the vision in the Masterplan to deliver additional housing in Aberdeen to meet the housing land requirements.

Aberdeen City Council go on to state in their assessment that there would be potential loss of tree belt which lies the southern boundary of the site. This is not accepted. These trees would be retained and landscaping enhanced in this area to create an attractive residential setting.



The assessment makes reference to a boundary wall bisecting the site and these will be retained as far as practicable, or re-used in the layout of the site. This demonstrates that the developer has taken these features into account.

### **Landscape Fit**

Aberdeen City Council acknowledge that the site relates strongly to the existing residential areas and the OP30 site to the west is well screened from the A944. However, they also state that the site helps separate Kingswells from Aberdeen. Although it is accepted that the development of this site will extend built development in an eastward direction, it is a natural extension of the site to the west which was contained within the 2009 masterplan prepared by Stewart Milne Homes.

There is significant land remaining in the area between Kingswells and Aberdeen to avoid coalescence. This includes steep land which is unsuitable for development and will therefore unlikely ever be built upon, therefore maintaining the setting of both Aberdeen and Kingswells.

OPEN have prepared an Addendum to the Strategic Masterplan Document, dated April 2019 (Appendix 2). This contains supplementary information and addresses the points raised in the assessment by Aberdeen City Council, specifically in relation to the encroachment into the gap that separates Aberdeen from Kingswells and the lack of any strong boundary feature to the east to act as a 'full stop' to development towards Aberdeen.

It concludes that the effects of the proposed housing on the landscape character of the site and the surrounding area are relatively localised and as a result, the visibility of the site from the wider area is also relatively contained. In terms of the eastern boundary, OPEN have amended the Indicative Masterplan for the site, contained in the addendum (Appendix 2). This is strengthened through the provision of a 15m woodland boundary to contain development and create the desired 'full stop' to development towards Aberdeen.

### **Land Use Mix/Balance**

Aberdeen City Council state that the site is proposed as an extension to OP30 and proposes more residential, so unlikely to contribute to a better mix or balance of uses. This could be said of the adjacent site which is also purely residential and considered suitable by the Council. Not all sites are appropriate for a mix of uses. The site is well related to the settlement, forming a natural and logical location for additional housing. It would contribute to meeting the housing land requirements and provide a mix of house types, including affordable housing. There is adequate employment land at Prime Four, without the need to provide a mix of uses on this site.

### **Proximity to facilities**

The site scores low in this category, with the Council stating that shopping facilities and the Primary School located 1.4km from the site, with the medical practice 1.6km away. However, in terms of walk time, the furthest facilities are a 15 minute walk from the site, which is not considered to be significant and existing "safe routes to school" are marked along the footpaths. It is important to note that bus

stops are located approximately 400m from the site, providing access to public transport facilities within close proximity of the site.

### **Service Infrastructure Capacity**

In terms of education provision, the Council state that Kingswells Primary is forecast to be under capacity in 2025. Although pupils in Kingswells currently attend Bucksburn Academy, the site is included in the future Countesswells Academy catchment area. It is understood that the proposed Countesswells Academy will have 1100 pupil capacity, with housing at Countesswells accounting for approximately half of this. There would therefore be spare capacity for this development. It is also understood that Bucksburn Academy is due to have an extension built which could also provide spare capacity. If required, developer contributions would be agreed as part of any planning application process and this is not an impediment to development.

### **Conclusion**

To conclude, it is argued that the housing allowances identified for Aberdeen City should be increased, with additional sites identified for housing in the Proposed Local Development Plan. As such, bid site B03/06 should be identified for housing development within the Proposed Local Development Plan, given its location immediately adjacent to existing development in Kingswells.

The site does not contribute significantly to the aims of the Green Belt. Any development would be seen in the context of existing development and be well contained in the landscape. Significant landscaping proposed would screen any development and provide a defensible green belt boundary, preventing coalescence with Maidencraig to the east.

Aberdeen City Council previously identified this site as a Future New Community and therefore the principle of development has been accepted by them. Kingswells Community Council have stated that site B03/06 is suitable for consideration and therefore meets with their aspirations for development in Kingswells.

It is therefore respectfully requested that the Green Belt designation is removed from the site and bid site B03/06 and the site identified as an Opportunity Site for residential development in the Proposed Aberdeen Local Development Plan.

## **Appendix 1**

### **Homes for Scotland response to Proposed SDP**

<b>What document are you commenting on?</b>	Proposed Strategic Development Plan <span style="float: right;">X</span>		
<b>HFS Issue 3</b>	DELIVERY OF NEW HOMES	<b>Paragraph(s)</b>	Paragraphs 4.9-4.10 and Table 1: Housing Supply Target

**What would you like to say about the issue?**

*(if you would like to write more than the box allows then please attach this form to any additional papers)*

Homes for Scotland (HFS) has significant concerns regarding the SDPA’s methodology and calculation of the housing supply target (HST), housing land requirement (HLR) and housing allowances. These issues are set out in separate issues for the purposes of the submission of representations, and all relate to one another so should be considered as a package.

Scottish Planning Policy (SPP) states that the HST is a “*policy view of the number of homes*” to be delivered (paragraph 115), and that “*wider economic, social and environmental factors*” should be taken into account. HFS considers that the HST must take an ambitious approach, recognising the significant economic and social value that the delivery of new homes will make to the City Region. To further promote economic recovery and growth in the City Region and meet the significant social challenge of delivering more affordable homes, an ambitious HST should be set by the SDP. To achieve the growth that the City Region aspires to, the SDP must be in line with this ambition and set bold targets to drive delivery of new homes.

HFS acknowledges that all HNDA scenarios have declining trends towards the later years of the assessment. We understand that the SDPA has sought to reverse this to provide a more positive rising growth trend to the later years of the plan. HFS would note that the downward trajectories of all of the HNDA scenarios do not align with the home building industry’s aspirations, nor the City Region’s aspirations for growth. However, instead of providing a more aspirational approach to the later stages of the plan alone, the SDP has sought to modify the Principal Scenario, adjusting it to be lower in aspirations in the first few years of the Plan and growing towards later years of the Plan. Rather than achieving the positive modification that the SDPA set out to accomplish, the result is, in fact, negative.

SPP requires that the HST “*should properly reflect the HNDA estimate of housing demand in the market sector*” (paragraph 115), however HFS does not consider the HST set by the Proposed Plan properly reflects the HNDA as it inverts the curve of the Principal Scenario. Comparing the Modified Principal Scenario with the original Principal Scenario (see Appendix 1), the HST total from 2016-2032 in the Principal Scenario is 37,484, and in the Modified Principal Scenario is a lower total of 36,400. It is therefore clear that the result of the modification is to remove over 1,000 homes from the 2016-2032 plan period. That is 1,000 homes that are needed but are not planned for due to the change in the HNDA scenario. Those homes are pushed out to later years of the plan where there is far less certainty over deliverability. The period to 2032 is the key period for which allowances are made, with the period beyond

this only requiring an “*indication of the possible scale and location of housing land...*” (SPP, paragraph 118). LDPs are not required to make allocations in this later period post 2032. HFS therefore does not support the HST set by the Proposed Plan based on the Modified Principal Scenario due to a lack of ambition in the target, and a target which does not properly reflect the HNDA estimate.

SPP further requires the HST to be “*supported by compelling evidence*” (paragraph 115). HFS does not consider that compelling evidence has been provided by the SDPA in demonstrating its divergence from the HNDA scenario. The Methodology Paper does not explain the significant implications of the modification of the Principal Scenario for the SDP plan period 2020 – 2032, which is the key period over which the forthcoming LDPs will have to allocate land.

For example, paragraph 3.5 of the Methodology Paper lists factors which have been taken into account in setting the HST. These appear merely as a list and have no explanation provided to demonstrate what assumptions have been used, what conclusions have been drawn, and importantly how these factors have influenced the HST.

Further, Paragraph 3.110 of the Methodology Paper states that HSTs are “*realistic yet ambitious level of delivery given the city region’s historic levels of home completions and the current economic recovery*”. HFS believes that looking back to past completions trends is not an appropriate way to guide the future ambition of the city region’s growth. With the significant impact of the drop in oil price in recent years, looking back to recent years of home delivery gives a falsely negative view of the potential for the region to deliver in the future. Projected completions from the 2016 Housing Land Audit show increased levels of completions programmed than the actual completions from the past few years. HFS believes that the SDP should be looking forward and setting ambitious targets that drive the increased delivery of new homes, rather than looking back to previous lower levels of delivery.

Paragraph 3.7 of the Housing Methodology Paper shows the annual average homes per annum from each of the three HNDA scenarios. Whilst we are aware that the new HNDA and Plan both ‘reset’ the aspirations, need and demand for growth in the city region, it is still relevant to consider that the aspiration of the last SDP was to move towards the delivery of 3,000 homes per annum by 2020. Looking at projected completions from the most recent 2018 Housing Land Audit, the City Region will meet this aspiration by 2019, therefore demonstrating the ability and desire to achieve far higher levels of completions in the future.

HFS therefore supports the most ambitious HNDA scenario, the High Migration Scenario to strive towards significantly increasing the delivery of homes in the city region over time in line with need and demand, and positively supporting the recovery and economic growth of the region and delivery of affordable homes. For the avoidance of doubt, HFS would note that the High Migration Scenario is Scenario 3 from the HNDA, with the Principal Scenario being Scenario 1.

The Methodology Paper states that “*completions have only exceeded 2,000 homes per annum once in the period 2009-2016*” (paragraph 3.17, bullet 2), looking backwards at historic trends of completions. However, this is misleading as looking more recently, we know that completions last year in 2017 were over 2,000 homes and indeed the average number of completions over the past 5 years has been 2,003 homes per annum. Looking forward, projected completions are far higher than 2,000 homes per annum.

The Methodology Paper (paragraph 3.17, bullet 3) states that “*the development industry may encounter difficulties in delivering such numbers given its current construction capacity*”, however to the contrary, it should be noted that during the most difficult period for home building in recent times, the industry managed to deliver an average of 2,000 homes per annum, therefore the future potential for delivery by the home building industry looks positive. In addition to the difficult economic climate, the industry

managed to deliver this consistent level of homebuilding through a period where the last Local Development Plans in the region largely provided significant strategic allocations. These take time to work through the planning and other consenting processes to delivery, and we are now seeing the delivery of some of these sites coming forward now and in the next few years, at varying rates.

While the SDPA states that “*an annual target of 2,768 new homes [...] is not considered achievable or realistic*” (Background Paper, paragraph 3.17, bullet 2), looking at the programmed completions in the joint Aberdeen City and Shire Housing Land Audit prepared by the Councils themselves, the programmed completions in the recent 2018 Audit and the 2016 Audit used as an evidence base for this plan show several years above the level of 2,768 homes, and other years far closer to this annual target than any other HNDA scenario.

Appendices 1 and 2 provide updated versions of Proposed Plan Table 1. These include the HST for the Principal and High Migration Scenarios, as well as an updated Modified Principal Scenario table to correct an error in calculation from the Proposed Plan table for use as a comparator. Despite the Housing Methodology Paper confirming that “*the Proposed Plan amends this percentage adjustment to 80% / 20% in favour of the Aberdeen Housing Market Area*”, on reviewing the table, the split between AHMA and RHMA for the first period from 2016-2019 is actually a 75% / 25% split. This is not explained anywhere in the Methodology Paper or the Plan. Appendix 1 updates the HST for the three scenarios to be 80% / 20% and Appendix 2 updates the HST for the three scenarios to an 85% / 15% split for comparison.

In conclusion, HFS does not believe that the approach of the SDPA in modifying the Principal Scenario is in accordance with SPP as it is not closely aligned with the HNDA, nor does the Methodology Paper provide compelling evidence to support the divergence from the HNDA. The result of pushing need and demand (amounting to over 1,000 homes) which is identified in the HNDA scenario out of the key plan period to 2032 will result in LDPs not being required to allocate land to meet this need. Furthermore, the approach lacks ambition and is not adequately planning for growth in the City Region.

## **What change would you like to see made?**

*(if you would like to write more than the box allows then please attach this form to any additional papers)*

HFS supports the High Migration Scenario. We request that this alternative HNDA scenario is used as the basis for the HST. We also request that Table 1 of the Proposed Plan is updated in line with a more ambitious evidence base, and Paragraph 4.10 of the Proposed Plan also updated accordingly.

HFS supports an 85% / 15% split between the Aberdeen Housing Market Area and Rural Housing Market area. Justification for this is explained fully under HFS Issue 5 – Housing Allowances. We request that Tables 1, 2 and 3 of the Proposed Plan are updated to take into account an alternative split and that paragraph 4.16 of the Proposed Plan is amended to include reference to an 85% / 15% split between the AHMA and RHMA.

HFS requests that Tables 1, 2 and 3 of the Proposed Plan are updated to ensure that a consistent split between AHMA / RHMA is used instead of the current 75%/25% split for 2016-2019 and then 80%/20% thereafter.

As stated above and throughout this representation, HFS supports the High Migration Scenario and an 85% / 15% split between the AHMA / RHMA, but would clarify that a secondary position to this would be

the Principal Scenario in lieu of the Modified Principal Scenario. The Modified Principal Scenario is not supported at all for the reasons set out within this issue and in other HFS representations that it is not closely aligned enough to the HNDA, it is not supported by compelling enough evidence, and despite positive intentions, does not provide a positive outcome for the delivery of homes in the City Region for the plan period to 2032.

## **Appendix 2**

### **OPEN Addendum to Strategic Masterplan**



# Huxterstone, Kingswells

## Addendum to Strategic Masterplan Document (dated May 2018)

April 2019



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# 1. Introduction

## 1.1 Purpose of the document

This document has been prepared in response to the Aberdeen City Main Issues Report (MIR) by Optimised Environments Limited, 'OPEN' on behalf of Stewart Milne Homes' (SMH).

It has been arranged as an addendum to accompany SMH's Strategic Masterplan response to Aberdeen City Council (ACC) Call for Sites submitted May 2018 and contains supplementary information to address the points raised in the MIR and further assist in demonstrating the effectiveness of land at Huxterstone (MIR REF B0306) to accommodate around 90 units as part of a new residential allocation.

This information should be read in conjunction with the MIR Response Form.

### Updated Development Strategy

The MIR lists the main constraint to development of the site as green belt, stating that 'its development would clearly and visibly encroach into the existing gap that separates Kingwells from Aberdeen due to its high level of visibility from the A944 and the lack of any strong boundary feature to the east to act as a 'full stop' to development towards Aberdeen.

The information presented in this document addresses these issues through provision of a landscape and visual appraisal of the site and preparation of a revised development framework which includes a robust woodland boundary to the east of the site to contain the development.



# 2. Landscape Appraisal

The landscape and visual analysis presented in this section of the report, whilst representing a cross section of receptor types and sensitivities in the area, is intended as a preliminary appraisal and does not constitute an LVIA.

## 1.1.1 Landscape Context

The site is within an area of agricultural and rural character, split into two clearly defined field compartments separated by drystone walling. These field compartments appear rougher in texture than surrounding fields, with areas of gorse along the Lang Stracht and patches of rougher rush vegetation throughout the sites rough grassland ground cover. The proposal site would add an area of development to the east of the land currently being developed at Huxterstone (4.54ha).

The topography of the site is dominated by the south facing sloping ground which is part of the lower slopes of the Newpark Hill rising to the north. The Lang Stracht runs along the northern boundary which at approximately 160m AOD is the highest elevated part of the site and the Den burn marks the southern boundary and lowest elevated part of the site at approximately 130m AOD.

There are substantial woodland edges to the south along the Den burn, although this dissipates beyond the south east corner of the site, where the burn corridor is more open in appearance. There are properties to the south of the site whose rear gardens are bounded by the Den burn. These properties are accessed from either side of Fourmile House.

There are no scenic landscape designations on or close to the site. The site is in an area of Greenbelt land that covers the vast majority of the landscape that surrounds Aberdeen.

The site area is within Landscape Character Area (LCA) Undulating Open Farmland (6) as defined and described in Scotland's digital map-based national character assessment (published in 2019). Key Characteristics of Undulating Open Farmland (6) are listed as follows:

- A gently undulating landform with some shallow basins contained by low-lying ridges.
- Predominantly improved pasture and arable farming with a weak enclosure pattern.
- Semi-natural habitats are limited to pockets of rough grass and scrub with

occasional areas of moss and wetland.

- Sparse woodland with only occasional small clumps and lines of trees and some coniferous plantations in the south-west.
- A sparsely settled landscape with a pattern of scattered farmsteads and houses accessed by a network of minor but often busy roads.
- The openness of this landscape allows extensive views particularly on the western edges of the city.
- A landscape with a prevailing rural character although eastern areas are influenced by the proximity of the urban area.

The character of this part of the Undulating Open Farmland LCA would not be substantially altered when considered within the context of a further addition to the emerging residential development to the west.

## 1.1.2 Visual Context

South facing topography offers views across the Den Burn / A944 corridor. The more distant view along the sloping terrain to the east provides a more focussed view towards Aberdeen and the coast.



Figure 1: View across site area from minor road Lang Stracht

The properties to the south of the site whose rear gardens are bounded by the Den burn would have views into the site area. Visual effects for residents in these properties would depend on the level of intervening riparian vegetation and the degree of density provided by it from the property or the garden. Visual effects would be greater during winter months when the deciduous trees along the rear of these properties are not in leaf.

Visibility of the proposal site area is limited to close views from the Lang Stracht, views from a short section of the A944 when westbound and views from North Counteswells Road when northbound. Overall therefore, the site area is considered to be visually quite contained and where there are views they tend to be framed by existing trees and vegetation of the various shelterbelts and roadside planting strips that are a common feature in the landscape surrounding Kingswells.

### 1.1.3 Summary / conclusion

It is considered that the effects of the proposed housing development on the landscape character of the site and the surrounding area are relatively localised with the main changes in character occurring on the site itself. Visibility of the

site from the wider area is relatively contained and of a localised extent with clear views of the site limited to a short section of the A944 road corridor to the south and the minor road to the north (Lang Stracht).

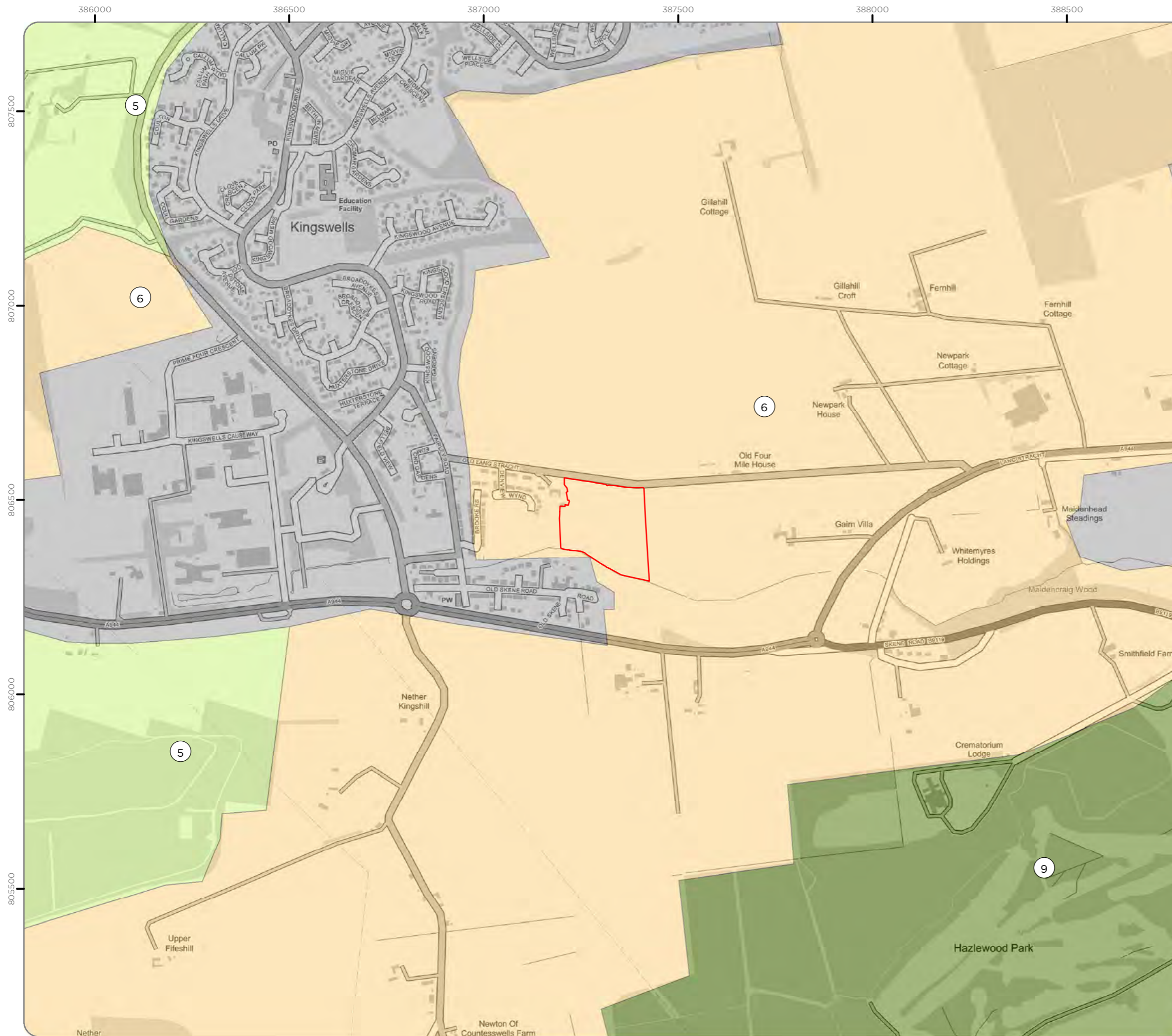
The easternmost boundary of the proposal site sits on a south facing shoulder of the Newpark Hill with the slope of the site area orientated SSW and the area to the east of the site orientated SSE. Whilst the topography (in terms of differences in visual experience) is considered to be subtle, there are clear benefits in keeping development to the west of this shoulder to avoid development from spilling around this topographical feature and so reducing its potential visual influence from the east. Whilst this is considered to be a subtle topographical transition it would form part of a strong landscape feature when combined with the proposed woodland strip along the eastern edge of the development and contribute to a sense of visual containment of the settled edge within the existing setting of south Kingswells.

The changes therefore would be relatively localised in extent. The following considerations and potential landscape mitigation, are also applicable in relation to settlement expansion in this area:

- An ecological / landscape buffer between the Den burn and built development would help to conserve the smaller scale intimate character of the burn and associated riparian vegetation;
- The proposed planting along the eastern edge of the site ties into the riparian character of the Den burn and picks up the pattern of shelterbelt woods along the Den burn, radiating out from the A944 and along Skene Road;
- The majority of the Kingswells settlement edges are bounded by woodland / shelterbelt or roadside tree planting and the proposed mitigation planting is in keeping with this established pattern of wooded settlement edge;

The visual effect of housing development on the proposal site would be restricted to close views within and immediately surrounding the site. It is therefore considered that proposals as described in the SMG 'Strategic Masterplan' for the site provide the potential to introduce a discreet addition to the development currently being developed at Huxterstone to the west of the site within the context of relatively localised landscape and visual effects.





Legend

- Site Boundary
- SNH Landscape Character (2019)
- Source: SNH GIS Data Download (2019)
- 5, Low Hills Aberdeen
- 6, Undulating Open Farmland
- 9, Wooded Estates Aberdeen
- Urban

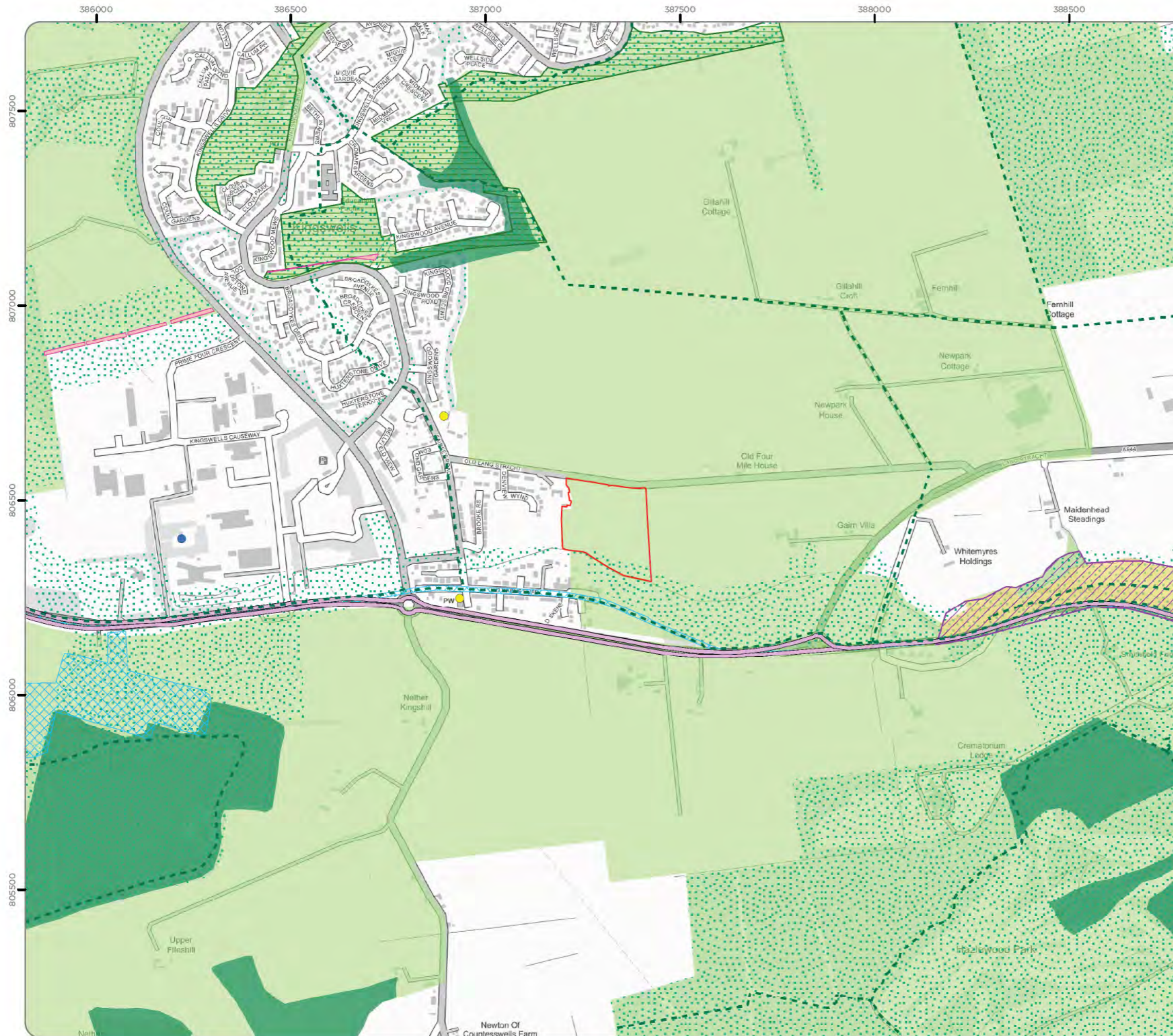


HUXTERSTONE

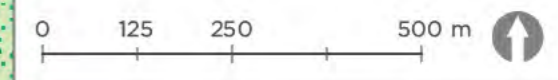
Figure. 2: Landscape Character

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Scale: 1:10,000	Drawing Size: A3	Date: 10/04/2019
Coordinate System: BNG OS GB 1936 Datum		





- Legend**
- Site Boundary
  - B Listed Building
  - C Listed Building
  - Core Path
  - National Scenic Route
  - Scheduled Ancient Monument
  - Canmore Historic Site
  - Local Nature Conservation Site
  - Geenspace Network
  - Urban Greenspace
  - Ancient Woodland
  - Greenbelt
  - Local Nature Reserve



**HUXTERSTONE**

**Figure. 3: Landscape Designations**

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Scale: 1:10,000	Drawing Size: A3	Date: 10/04/2019
Coordinate System: BNG OS GB 1936 Datum		



# 3. Revised Strategic Masterplan

## 3.1 Updated Strategic Masterplan

The vision site layout has been revised in response to the MIR through provision of a 15m woodland boundary to the eastern boundary of the site to contain the development and create the desired 'full stop' to development towards Aberdeen.

The sketch site layout plan on the opposite page demonstrates that accommodating the woodland belt can be readily achieved without materially affecting the site layout principles proposed within the original submission documents. This is shown adjacent for comparison.



- 01 Pedestrian & vehicular access from Lang Stracht
- 02 Pedestrian & vehicular site access through existing Den View development
- 03 Continuation of Burn Side Activity walk
- 04 House Types which respond to site topography
- 05 Pedestrian pathway
- 06 SUDS maintenance track – 3m
- 07 Breaks in landscaped settlement edge to expose feature gable which act as a full stop to development
- 08 20m planted/ landscaped edge to settlement
- 09 SUDS

Figure. 4: Strategic masterplan submitted with response to Aberdeen City Council (ACC) Call for Sites submitted May 2018





Figure. 5: Revised masterplan

**optimised environments ltd.**

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