



Aberdeen Local Development Plan Review

Main Issues Report Response Form 2019

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

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

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

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

Responses to the published documents can be:

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

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



YOUR DETAILS

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



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	<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.

Housing Strategy and Housing Land allocations - see attached response.

YOUR COMMENTS CONTINUED

**ABERDEEN CITY LOCAL DEVELOPMENT PLAN
RESPONSE TO MAIN ISSUES REPORT**

HOUSING LAND AND STRATEGY

MAY 2019

On behalf of
DRUM Property Group



HALLIDAY FRASER MUNRO
CHARTERED ARCHITECTS & PLANNING CONSULTANTS



HALLIDAY FRASER MUNRO

CHARTERED ARCHITECTS & PLANNING CONSULTANTS

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1. Introduction

This report has been prepared by Halliday Fraser Munro, Chartered Architects and Town Planning Consultants, on behalf of DRUM Property Group in response to the Aberdeen City Local Development Plan Main Issues Report 2019 (MIR). This specific response covers policy issues in relation to the MIR proposed housing strategy. DRUM Property Group's concerns can be summarised as:

- An over-reliance on brownfield sites to make up the vast majority of new housing allocations;
- Unrealistic expectations on housing delivery from existing allocated sites;
- The need to allocate additional housing land to meet Proposed SDP requirements

And suggested changes to the Housing Land Allowances as follows:

- 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;
- Brownfield sites should be discounted from the overall calculation of available housing land unless they are proven to be "effective" and suitable for housing. An equivalent quantity of effective and deliverable sites should be allocated instead. The sites at Causewayend, Prime North and Airyhall Road/Craigton Road are considered to be immediately effective and should form part of the additional housing allocations. The site at Perwinnes is considered to be an area for future growth and should be identified as Strategic Reserve;
- Even if included the brownfield figures used are an extreme best-case scenario and should be discounted heavily to reflect actual opportunities and additional housing land (at least 682 homes) to account for the lack of generosity within the brownfield land figures.

2. Housing Land Strategy Response

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

The MIR housing strategy is essentially a continuation of the existing strategy that has now been in place for two LDPs. It will simply maintain the status quo. That existing strategy has not delivered the City's housing needs and in an economy where greater ambition is required to drive future success a do-minimum housing strategy is simply not the answer. The City deserves a far more ambitious strategy that can deliver housing numbers and quality new places that are appropriate to the City Council's vision to:

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

(MIR, p.5)



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

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

- identify a **generous supply of land for each housing market** area within the plan area to support the achievement of the housing land requirement across all tenures, maintaining **at least** a 5-year supply of effective housing land at all times;
- enable provision of a **range** of attractive, well-designed, energy efficient, good quality housing, contributing to the creation of successful and sustainable places; and
- have a **sharp focus on the delivery of allocated sites** embedded in action programmes, informed by strong engagement with stakeholders.

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

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

Paragraph 119 of SPP also requires that LDPs "... *in city regions should allocate **a range of sites** which are effective or expected to become effective in the plan period to meet the housing land requirement of the strategic development plan up to year 10 from the expected year of adoption. They should provide for a **minimum of 5 years effective land supply at all times**. In allocating sites, planning authorities should be **confident that land can be brought forward for development within the plan period** and that the range of sites allocated will enable the housing supply target to be met". That calculation is generally based on annual Housing Land Audits (HLA) and although these can provide an element of certainty up to year 5, they are inherently inaccurate and over-optimistic the further from the base year that the housing delivery is forecast. This can be demonstrated quite clearly from an analysis of HLAs over a number of years (see Table 2 over).*



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

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

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



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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.

In Aberdeen City there are a number of locations where existing or new infrastructure and existing settlement patterns could support additional housing. DRUM Property Group has suggested sites in these locations during the call for sites stage. These include:

- Causewayend, Bridge of Don (B0218) – immediately deliverable sustainable extension to the urban area and close to existing and new facilities with easy access to the AWPR and City employment areas;
- Perwinnes, Bridge of Don (B0219) – longer-term planned extension to Aberdeen close to existing and new facilities with easy access to the AWPR and City employment areas. That bid is large enough to provide a true mix of uses to support sustainable lifestyles;
- Craigton Road, Aberdeen – (B0912/0913) – smaller site on the edge of the built-up area that proposes sensitive development to reflect the local context;
- Land to the North of the Prime Four Business Park, Kingswells (B0311) - smaller site with easy (walkable) access to Kingswells and the modern, high amenity facilities and employment opportunities provided on the Prime Four Business Park.

Individual and more detailed responses in respect of these sites have also been provided to this MIR consultation. However, these areas are popular and marketable locations where additional sites would contribute to highly deliverable and sustainable housing development.



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2.1 Housing Land Supply

Halliday Fraser Munro has also made representation to the Proposed Strategic Development Plan (PSDP) on behalf of DRUM Property Group. The PSDP is particularly important to the LDP as it sets the housing requirements for LDPs. We're aware of significant representations to the PSDP strongly suggesting that the adopted strategy on housing growth is not ambitious enough. That issue will be a key topic in its imminent examination. If those arguments are accepted, then the LDP may be required to allocate additional housing sites.

In particular DRUM Property Group supported changes to the PSDP which:

- Amended the proposed Spatial Strategy to increase flexibility on future direction for growth and provide additional guidance on longer-term City expansion options;
- Take the AWPR and the opportunity it presents into consideration when planning for future growth;
- Adopt Strategic Reserve Sites in line with the proposed approach by Aberdeenshire Council and allow future draw-down of alternative housing sites where existing allocations are slow in delivering their original expected housing numbers;
- Specifically identify the area at Perwinnes (Bid site B0219) as an "area for future growth" as the only large and relatively constraint-free area in Aberdeen under single ownership that is capable of providing that future alternative housing (mixed-use) reserve;
- Took a more realistic view of how existing allocations have been performing and will perform on delivering the City's housing requirements;
- Adopts a more realistic high growth scenario to determine housing land supply; and
- Increase the generosity included within the Housing Land Allowances to increase flexibility to accommodate the slower than expected housing delivery from some of the currently allocated larger housing sites.

These will be considered during the current SDP review and may alter the housing allowances to be included in the LDP. Regardless of the outcome the themes of flexibility and realism remain key to a successful LDP and the above points are also relevant to the preparation of the Proposed LDP.

The PSDP Housing Strategy relied almost entirely on existing allocations in the early years of the plan, pushing some of the need identified in the HNDA to later years. It also relied on existing allocations to deliver more homes than they have been doing over the last few years. That over-reliance on an unrealistic delivery rate is also 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).**



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Comparison of Major Housing Proposals in 2012 LDPs with outturn									
City	site	ref	2007-2016	Cumulative 2015	shortfall	Cumulative 2016	shortfall 2016	Cumulative 2017	shortfall 2017
	Grandhome	OP 12	2600	0	2600	0	2600	0	2600
	Dubford	OP 25	550	190	360	309	241	397	153
	Stoneywood	OP 24	500	133	367	231	269	514	-14
	Craibstone South	OP 28	750	0	750	0	750	0	750
	Rowett South	OP 30	1000	0	1000	0	1000	0	1000
	Greenferns Landward	OP 31	750	0	750	0	750	0	750
	Maidencraig	OP 43 & O	750	5	745	24	726	60	690
	Greenferns	OP 45	600	0	600	0	600	0	600
	Countesswells	OP 58	2150	0	2150	4	2146	154	1996
	Oldfold	OP 62	400	0	400	25	375	50	350
	Loirston	OP 77	1100	0	1100	0	1100	0	1100
	TOTALS		11150	328	10822	593	10229	1175	9054
			percentage delivered	2.9%		5.3%		10.5%	
Shire	site	ref	2007-2016	Cumulative 2015	shortfall	Cumulative 2016	shortfall 2016	cumulative 2017	shortfall 2017
	Banff	M1	140	0	140	0	140	0	140
	Banff	H1	100	0	100	0	100	0	100
	Fraserburgh	M1	350	0	350	0	350	10	340
	Fraserburgh	H1 2004	350	44	306	95	255	122	228
	Fraserburgh	H1 2014	350	0	350	0	350	0	350
	Peterhead	M1	575	0	575	0	575	0	575
	Peterhead	H1	180	0	180	0	180	0	180
	Mintlaw	M1	250	0	250	0	250	0	250
	Mintlaw	H1	300	48	252	73	227	86	214
	Ellon	M1	745	0	745	0	745	0	745
	Inverurie	M2	150	76	74	76	74	76	74
	Inverurie	M3	250	0	250	0	250	0	250
	Inverurie	H1	300	0	300	0	300	0	300
	Inverurie	H4	150	0	150	0	150	0	150
	Newmachar	M1	140	0	140	0	140	0	140
	Elsick/Chapelton	M1	1845	62	1783	107	1738	126	1719
	Laurencekirk	M1	485	0	485	0	485	0	485
	Edzell Woods	M1	150	0	150	0	150	0	150
	Inverbervie	H2	100	0	100	0	100	0	100
	TOTALS		6910	230	6680	351	6559	420	6490
			percentage delivered	3.3%		5.3%		6.4%	

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

Table 3 above illustrates how the larger sites 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) 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
Rowatt 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 4: Delivery Rates for large sites – Aberdeen City (Source – Housing Land Audit Series and 2012 LDPs, Aberdeen City and Aberdeenshire Councils.)

Table 4 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.

Site Ref: A/PC/R/070															
Site Description: Countesswells															
	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026
2011 HLA					not included in 2011 HLA										
2012 HLA			100	200	200	250	250	250	900+						
2013 HLA			100	200	200	250	250	250	250	650+					
2014 HLA				150	200	250	250	250	250	250	1400+				
2015 HLA				20	150	200	250	250	250	250	250	1380+			
2016 HLA					15	150	200	250	250	250	250	1635+			
2017 HLA						4	150	200	250	250	250	250	1396+		
2018 HLA							150	200	250	250	250	250	250	1146+	
2019 HLA (Draft)								150	150	175	175	175	175	175	1496+

Table 5: Housing Land Audit Review for Countesswells (OP58 in 2012 LDP, now OP38)
(Source – Housing Land Audit Series and 2012 LDPs, Aberdeen City and Aberdeenshire Councils)

Taking Countesswells as an illustration only (and this is not the only example), table 5 above shows that expected housing completions have consistently been pushed back since it was first allocated in 2012. Based on the 2012 Housing Land Audit forecasts, the site has under-delivered by 696 units to 2018 (304 as per the 2019 Draft HLA rather than 1,000 homes as set out in the 2012 HLA). Every HLA since 2012 has moved the site start date into the future. The development has now begun and should remain an allocation, but it illustrates that a more realistic delivery rate should have been adopted from the start for all larger allocated sites that would allow additional allocations of a differing scale to fill the housing delivery gap.



2.2 Over-Reliance on Brownfield Sites

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

The 2018 BUCS:

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

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

2.2.1 Site Context and End Use

Not all brownfield sites are suitable for housing. By their nature they are difficult to develop, their suitability for housing is influenced by their existing and surrounding uses and quite often require difficult and time-consuming site assembly. Brownfield sites have the potential to be contaminated. Investigation and mitigation can also be a complicating factor in respect of both time and cost. A straight assumption that all of the sites in BUCS can be considered as housing sites is not realistic and a full and justified evaluation of appropriate uses on these sites should be considered prior to making that assumption.



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

Table 6 – Brownfield Sites Review (example sites where housing may not be suitable or available within appropriate timescales)

2.2.2 Site Effectiveness

The “effectiveness” of the list of brownfield sites is critical to their inclusion within the housing land supply figures. The BUCS has stated that site effectiveness has not been considered as the does not specify that brownfield sites have to be effective. The rationale behind that approach does not match the expectations set out in SPP or wider accepted methodologies for calculating a realistic and “effective” housing land supply. If brownfield sites are not effective, then they simply should not be considered as part of the City’s housing allowances. Why treat brownfield sites differently than greenfield sites? In the case of the latter 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.



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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 overall brownfield reliance up to 90% in the MIR additional housing allowances. On a purely proportional basis this is a clear over-reliance on brownfield sites.

Brownfield sites are more difficult to develop, have complex servicing needs, have significantly greater contextual issues to overcome, can include more convoluted ownership and are proportionately more costly to develop. Constraining factors are generally more difficult to overcome but, with the right site-specific support from flexible planning policies, they can supplement the housing supply over time. However, relying on these sites to make up a significant proportion of the new proposed housing land allowance (approximately 90%) will undermine the PLDPs ability to increase the delivery of housing and therefore runs contrary to national and strategic requirements to focus on allocating deliverable housing sites. Brownfield development requires specific policy-based support such as the current, but temporary, relaxation of affordable housing contributions from such sites in the City Centre. Even with that relaxation brownfield sites are proving difficult to develop in a viable manner. Relying on such sites as a key element of the City’s housing strategy not appropriate.

The scale of the site will also make a significant difference to its deliverability. Larger and national housebuilders have specific requirements when it comes to housing sites and many will simply not consider smaller brownfield sites. These smaller sites would, traditionally, have been picked up by local housebuilders but many of these are no longer operating, partially because of the downturn in the housing market over recent years and partially because allocating larger sites in past plans has catered only for more mainstream housebuilders leaving limited scope for more bespoke developers. Of the full list of sites in BUCS 2018 15 (approximately 1/3) are under 0.5Ha, another 10 are between 0.5ha and 1ha. At that scale mainstream developers are unlikely to be interested. That scale of site is also likely to be suitable only for flatted development which at present has a very limited market adding to potential constraints to development.

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.**



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2.2.3 Housing Density

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

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

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

2.2.4 Capacity Assumptions & Lack of Generosity Margin

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

Generally, when identifying housing allowances, development plans should first identify the housing requirement and then add to that a generosity margin of between 10% and 20% to allow flexibility should sites not come forward as planned. By simply assuming the best possible scenario for brownfield sites that inbuilt generosity margin in the SDP housing allowances is ignored. The MIR assumes 3,408 brownfield housing units can be delivered from the BUCS sites as a best-case scenario. If these were greenfield sites, to achieve a delivered housing figure of 3,408, a greater housing allocation would have to be adopted. If a generosity margin of 20% was adopted (as per the PSDP) then the MIR would have to allocate a further 682 units. Brownfield sites, however, are a finite resource so even if brownfield sites remain a part of the Period 1 Housing Allowances, they can't be relied on to deliver the full 3,408 units suggested but rather, at the most, 2,786 units (3,408 minus 20%).



HALLIDAY FRASER MUNRO

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3.0 Specific MIR Questions

Section 2 – Settlement Strategy

Question 1 – New Housing Sites

a) Do you agree with our preferred housing sites?

No, the MIR does not allocate enough housing land to meet the PSDP housing allowances and relies far too heavily on slow delivering large allocations and a difficult set of brownfield housing sites. The timescale for delivering the larger allocations should be recognised with their delivery spread out over a longer period.

Brownfield sites should be considered as additional flexibility and windfall rather than an integral part of the housing allowances.

Additional housing land allocations are therefore required to meet the Proposed Strategic Development Plan requirements (or amendments thereto as a result of the current review)

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

Yes, Causewayend, Bridge of Don (B0218), Prime North, Kingswells (B0311) and Airyhall Road/Craigton Road (B0912/0913) offer deliverable and sustainable extensions to the existing urban area.

Perwinnes, Bridge of Don (B0219) offers an opportunity for “area for future growth” (Strategic Reserve) as the only large and relatively constraint-free area in Aberdeen under single ownership that is capable of providing that future alternative housing (mixed-use) reserve.

Question 2 – Housing Allowances Beyond 2032

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

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

Question 6 – City Centre Masterplan Intervention Areas

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

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



HALLIDAY FRASER MUNRO

CHARTERED ARCHITECTS & PLANNING CONSULTANTS

4. Conclusion

In summary, DRUM Property Group requests 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.



Aberdeen Local Development Plan Review

Main Issues Report Response Form 2019

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

The MIR has been published alongside a Monitoring Statement and Environmental Report. Copies are available to view at Marischal College, Broad Street, Aberdeen. These, and other supporting documents, are available at: - www.aberdeencity.gov.uk/alDP2022

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

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

Responses to the published documents can be:

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

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



YOUR DETAILS

Name	STEVE CRAWFORD
Organisation (if relevant)	HALLIDAY FRASER MUNRO
On behalf of (if relevant)	DRUM PROPERTY GROUP
Address	
Postcode	
Telephone	
E-mail	

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



If yes, please provide an e-mail address

PRIVACY STATEMENT

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

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

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

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

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

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

YOUR DATA, YOUR RIGHTS

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

YOUR COMMENTS

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

Perwinnes - Please see separate response enclosed in respect of:

- Site B0218

Please also find enclosed the following in support of the response:

- 2018 LDP Bid Document (for reference only)

YOUR COMMENTS CONTINUED

B0218 Causewayend - MIR Response – May 2019

- *B0218 – Causewayend, 280 homes*

1. Introduction

Halliday Fraser Munro lodged an LDP bid for the above site on behalf of Drum Property Group – B0218 for the development of 280 homes to be allocated in the first 5 years of the Proposed Local Development Plan (PLDP). Aberdeen City Council officers when reviewing the bid have suggested that the site should not be preferred at this stage. Drum Property Group do not agree with that view. This response provides justification for including the Causewayend site in the Proposed LDP.

The Causewayend site offers a range of benefits as set out in the original bid document (resubmitted for information):

- Relatively flat site;
- Highly deliverable extension to the urban area;
- Limited sensitivity;
- On-site landscape features can assist in creating high-amenity housing areas;
- Good access to local services and facilities;
- Existing opportunities for links to Middleton Park to the south that would provide that area with a convenient secondary access (currently limited access only from the south).

These strongly suggest that the site can be considered a deliverable housing site that will be seen as an extension to the existing urban area.

The MIR reasoning for not preferring the site is based on the following:

- Encroachment into the Green Belt;
- Potentially loss of ancient woodland;
- Previous LDP view that the development would constitute a significant urban extension into open countryside;
- While the B997 and existing tree belts would provide a strong green belt boundary around parts of the proposed development, much of the southern boundary consists of a relatively weak field boundary.
- Distance from most local facilities.

These, we believe, are not valid reasons for discounting this site as a housing site and have responded accordingly in the following response.

B0218 offers an opportunity for the City's Local Development Plan to identify an additional deliverable housing site on the edge of the urban area and with good access to southward. The 2012 Development Plan allocated a number of large development sites. This was central to the housing strategy at that time. Since then, however it has become clear that, although such sites offer an opportunity to masterplan large future expansion areas for the City, they take time to plan and coordinate effectively. Allocating this site at Causewayend as a limited scale housing site will help bolster the City's housing supply and deliver a high-quality residential development.

This site is also significantly constraint-free area, in single ownership and highly capable of being developed early in the plan period.

On a more general note the housing strategy adopted in the MIR has significant limitations. In effect not enough housing land has been identified to meet the area's housing needs, it doesn't include enough choice of location for new homes and relies too heavily on brownfield sites. A separate response has been made in that respect on behalf of Drum Property Group which can be summarised as:

- An over-reliance on brownfield sites to make up the vast majority of new housing allocations;
- Unrealistic expectations on housing delivery from existing allocated sites; and
- The need to allocate additional housing land to meet Proposed SDP requirements

Site B0218 offers an immediately deliverable housing site with limited landscape impact. **It should be identified as a housing allocation for approximately 280 homes in Proposed Local Development Plan.**



Figure 1 – Site Location Plan (Extract – 2018 LDP bid document)

2. MIR Response – B0218 Causewayend

2.1 Location and Context

Bridge of Don has grown to be one of Aberdeen’s largest and popular suburbs. This site is located immediately to the north of the main residential area and close to employment, shops, schools and recreational areas. Extensive road infrastructure improvements have been completed or are under construction within the northern part of the city. These include the AWPR, the Third Don Crossing, Murcar Roundabout improvements and Haudagain Roundabout improvements. These change the context around this site considerably, improve its accessibility and have a major positive impact on the opportunity it represents.

The B997 forms the north eastern edge of the site and provides good opportunities for access. The site is recognised in the MIR review to be relatively flat. It comprises two large fields with partially wooded boundaries and covers approximately 34 acres of unused agricultural land. Its southern boundary is essentially the housing along Woodcroft Avenue to the north of Middleton Park. Historically the site has been affected by proposals for previous iterations of the AWPR that ran through these fields.

The neighbouring residential community was developed in the 1980s and includes two wayleave/access gaps along the northern boundary of the housing development (southern boundary of Causewayend). These wayleaves create clear linkages to the existing development and facilities to the south with service tails built in to enable convenient extension of services.



Figure 2 – Existing Wayleave/Access gaps

The site lies at the southern end of the strategic Energetica corridor, a City and Shire development initiative between Aberdeen and Peterhead to create a world-class business and residential location within a high-quality environmental setting. A key aspiration for Energetica is to become a place where work and home are brought closer together in a more balanced and rewarding way. Energetica has been adopted by Aberdeen City and Shire Councils and a means to stimulate investment in new employment opportunities, leisure and high-quality housing to create new communities “... amongst the best in the world”.

Energetica is therefore about more than just jobs and energy. It's about creating integrated, energy efficient communities that support innovation and employment. Developing this site for a residential use would complement the Energetica concept as well as provide new high-quality homes at its southernmost edge.

General design principles include:

- **Identity** – as an extension to the existing Middleton Park area;
- **Access** - The main feeder road, the B997, runs to the east of the site offering a clear opportunity for new access;
- **Green Space** – integrated green space and woodland to create high amenity neighbourhoods;
- **Woodland and landscape feature retention** – on-site to create amenity and character;
- **Phasing** – A phased approach to assist in the delivery of liveable new homes early in the plan period that will assist in making up identified housing shortfalls.

The proposal asks the Council to allocate this land for housing. Drum Property Group's commitment to high-quality sustainable development would be reflected in the development of this site, supporting the creation of a convenient, pleasant and inspiring place to live.

The bid document associated with site B0218 set out Drum Property Group's focus on respecting the site's assets and character to create the highest quality development. Drum Property Group has a strong track record of delivering award winning and celebrated developments. In Aberdeen the best example is Prime Four Business Park at Kingwells. Through working closely with the City Council and local community that site has been developed in a manner that creates character by re-using or incorporating natural features, respecting the field layout and the Scheduled Ancient Monument to the north and ancient woodland at its edges. That approach has proven very successful and the approach to this site would be similar – agreeing a development framework, identifying key features to be protected or incorporated, establishing appropriate development areas and producing adoptable overall or phased masterplans to deliver the proposed development. All of these processes would ensure a successful and deliverable expanded community and a worthy new community for Aberdeen.

A further benefit of developing this site, with vehicular access from the south, is that this will create a secondary local access/egress for the existing homes in the Middleton Park area. That additional new vehicular route would make accessing the Middleton Park area easier for residents and emergency or other services. At the moment the main access to this area is via a single main distributor road that emerges onto the wider road network between 1.8 and 2km to the south. A new access from via B0218 Causewayed will reduce journey length to the wider road network significantly, possibly down to less than 750m, improving the overall accessibility in this part of the Bridge of Don.

Despite the positives recognised in the MIR analysis (**Sustainability Checklist – see review in Appendix 1**) the MIR suggests the proposed development should not be allocated for the following reasons. We've responded to each of the MIR criticisms in turn.

2.2 Encroachment into the Green Belt

The site is within the existing green belt designation but the LDP review provides an opportunity to rezone land from the green belt where it is appropriate for development. Paragraph 50 of Scottish Planning Policy (SPP) states that in identifying the most sustainable locations for longer-term

development, planning authorities should review the boundaries of the greenbelt where necessary. Using zonings in the previous plan to rule out new opportunities in the next plan runs contrary to the LDP review process. Each bid should be fully considered against planning related criteria, including an up-to-date Greenbelt review, and rezoned if considered acceptable.

The extents of the site are defined in part by strong boundaries - the west, south and east include woodland areas that could be strengthened where required with additional woodland planting and layouts that take that context into account. The boundary to the north could also be strengthened to create more enclosure and shelter.

A similar criticism could have been made of Dubford before it was allocated for development. In fact, Dubford is more prominent, sits higher in the landscape and is more exposed. Nonetheless, the development at Dubford is considered to be high-quality and an acceptable extension to the City, despite those potential impacts. This site, too, could be developed in such a manner to create a quality urban extension.

The site is within the existing green belt designation but the LDP review provides an opportunity to rezone land from the green belt where it is appropriate for development. Paragraph 50 of Scottish Planning Policy (SPP) states that in identifying the most sustainable locations for longer-term development, planning authorities should review the boundaries of the greenbelt where necessary. Using zonings in the previous plan to rule out new opportunities in the next plan runs contrary to the LDP review process. Each bid should be fully considered against planning related criteria, including an up-to-date Greenbelt review, and rezoned if considered acceptable.

2.3 Potential Loss of Ancient Woodland

SNH's Ancient Woodland Inventory does not seem to identify the woodland in this area as "ancient". It identifies it as "long established (of plantation origin)". In any event the proposal is to work with the existing woodland as much as possible to allow retention on site and help maintain the site's character. There would therefore be little chance of loss of Ancient Woodland.

2.4 Urban Extension into the Countryside

Despite previous LDP review's not accepting this site we are still of the view that it is not a significant urban extension into the countryside. The site already has established linkages from the south, established tree belts that would help integrate it into the landscape and further opportunity for additional landscape and design treatment to make it feel part of the City. The site is not extensive and given the existing landscape features will be seen as an extension of the Middlefield area.

Bridge of Don is a large suburb of Aberdeen and is popular with its residents. It sits on its own to the north of the River Don and has an established character of mainly housing areas set along the road network. These, and its employment areas (e.g. Denmore Industrial Estate) tend to back onto the main distributor roads with a housing design and layout of their time. Services are few and far between and much of the criticism from local residents has been on the lack of planned services, shops and leisure uses to serve the community. The proposed development has considered these criticisms and will be far more integrated, take more account of its setting and aim to create a place where people can live a more sustainable and connected lifestyle.

Newer developments such as Dubford (OP10 as per the extract from the current LDP) and Grandhome (OP9) have been planned and designed in a similar manner. These new developments have taken a more modern "placemaking" approach and delivered to agreed masterplans. Design requirements

on developers are now greater than ever and sites such as this can be considered and developed across a broad spectrum of issues.

The development of this site then can adopt all of the Scottish Planning Policy place principles to ensure that it delivers homes, employment, access to leisure and open space, enhanced natural environments, access networks and sustainable infrastructure of the best quality. It would be seen in the context of Bridge of Don but the placemaking qualities adopted will ensure that it will be seen as a modern and high-quality extension to the City designed to have the least possible impact on the setting of the City.

SNH's Landscape Character Assessment indicates that this site is within the Undulating Wooded Farmland (UWF) character area. These areas are located across Aberdeen and Aberdeenshire by key characteristics of UWF include:

- A gently undulating landform with occasional shallow basins and low ridges;
- Long shelterbelts of beech line roads and screen residential areas on the edge of the city;
- Surviving influence of estate landscapes, including policy woodland and estate buildings;
- Well-used roads traverse this landscape; and
- Views tend to be short-medium range, curtailed by nearby woodland blocks.

The SNH analysis covers a wide-ranging area but for this particular site the key messages are that Undulating Wooded Farmland includes well-used roads, long shelter belts and has short-medium range views only. The impact on the landscape in this particular area is therefore not as serious as suggested in the MIR.

2.5 Distance from most Local Facilities

The site is close to facilities. There are employment opportunities, retail and community facilities significantly less than 1.6km at Middleton Park local centre with good pedestrian and cycle access. Major industrial areas of the Bridge of Don, the Core and Denmore Industrial parks are approx. 2km from the site and if the land to the North at Perwinnes is allocated then additional new employment opportunities will be well within 1.6km from the site. The site is therefore acceptably close to most local facilities and we note that the MIR scoring (Appendix 1) scores this site full marks for accessibility to local services. This reasoning to reject the bid is therefore not relevant.

2.6 Housing Land

The housing strategy adopted in the MIR has significant limitations. In effect not enough housing land has been identified to meet the area's housing needs, it doesn't include enough choice of location for new homes and relies too heavily on brownfield sites. A separate response has been made in that respect on behalf of Drum Property Group which can be summarised as:

- An over-reliance on brownfield sites to make up the vast majority of new housing allocations;
- Unrealistic expectations on housing delivery from existing allocated sites; and
- The need to allocate additional housing land to meet Proposed SDP requirements

2.9 Site Scoring/Development Options Assessment Review

The MIR gives this site a score of 46 out of a maximum of 63 in its sustainability scoring checklist. This is already a reasonable score for a greenfield site and many of the checklist questions score the site at its maximum. Those criteria which mark the site less than full marks have been reviewed and an analysis is included in **Appendix 1**. The reviewed scoring is now suggested to increase to 62 out of 63 making this site a very high scoring site in the MIR Sustainability Checklist Review. Comments on each point are included in Appendix 1 and reflected in the body of this MIR response.

3. Conclusion

Drum Property Group do not agree with the justification presented in the MIR to reject the bid B0218.

The reasons for rejecting the bid is not backed up by facts or context. This is a well-connected site that can use the existing site features to help create a quality and sustainable residential extension to the City. It will have a limited visual impact that can be mitigated by good design and layout. It's also highly deliverable and could easily be implemented within the first LDP time period to provide much needed new housing for the City.

Drum Property Group has a strong track record of delivering award winning and celebrated developments. They work closely with planning authorities and the local community to develop in a manner that retains or creates character by re-using or incorporating natural features, respecting the site context and making best use of resources. That approach has proven very successful. Their approach to this site would accommodate the existing woodland and landscape features to create the very best quality development.

On a more general note the housing strategy adopted in the MIR has significant limitations. In effect not enough housing land has been identified to meet the area's housing needs, it doesn't include enough choice of location for new homes and relies too heavily on brownfield sites. A separate response has been made in that respect on behalf of Drum Property Group.

Site B0218 offers a highly deliverable site in an area where people want to live and at a scale that could come forward in the first LDP period. It should be identified in the Proposed Local Development Plan as a housing site for approximately 280 homes.

Attachments:

- *Response Form; and*
- *2018 LDP Bid document (for reference purposes)*

APPENDIX 1: DEVELOPMENT OPTIONS ASSESSMENT REPORT

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

The site assessment process undertaken by Officers comprised an assessment of sites against a sustainability checklist and used the outcomes of the strategic environmental assessment to inform the decision on whether a site was suitable. Site B0218 has been assessed and identified as 'undesirable'. The tables below provide a review of the officer's assessment, and reconsider the site scoring of the proposed site. The table includes the score given by Officers, and a 'Proposed Score' reflecting the additional justification provided in the table.

Table 1: B0218 Causewayend Sustainability Checklist Review Assessment

Criteria	Officers Score (max. 3)	Proposed Score	Justification
Exposure	2	3	<p><i>The site has little shelter from northerly winds. To the west of the site there is a tree belt which decreases exposure however on the east there is not a tree belt which makes this part of the site more exposed.</i></p> <p>The site does have shelter from northerly winds. Tree belts to the west, north and through the centre of the site provide shelter. The site has a woodland edge on the north east boundary with the B997. That edge and other strategic site boundaries could be further enhanced/planted to ensure good shelter from the north.</p>
Aspect	2	3	<p><i>The aspect is very slightly northern and westerly.</i></p> <p>See below. Slope is considered flat on this site suggesting that aspect is not a constraint to development.</p>
Slope	3	3	<i>The site is generally flat.</i>
Flood Risk	3	3	<i>SEPA flood maps show only limited surface water flooding.</i>
Drainage	3	3	<i>No issues.</i>
Built/Cultural Elements	3	3	<i>No issues</i>
Natural Conservation	2	3	<p><i>There could be a potential loss and disruption to natural conservation. The tree belts are ancient woodland. Adjacent to the west of the site is a priority habitat and adjacent to the east of the site designated as both a Local Nature Conservation Site (Scotstown) and a Local Nature Reserve. The area is identified as an area of potential bat habitat; a bat survey may need to be carried out. Designated species on site may present an issue. Other designated species on site are: West European Hedgehog.</i></p> <p>The proposal is to retain as much woodland on site as possible. SNH's Ancient Woodland Inventory does not identify any Ancient Woodland on site.</p>

			Designated species surveys at the planning application stage would determine if there are any issues but the main natural woodland spaces are being retained. None of these issues would rule out development.
Landscape Features	1	3	<p><i>There could be significant loss or disruption of trees that are present in the site. The tree belts are prominent local features which help to screen the residential area at Bridge of Don. There may also be some loss of stone dykes that are present in the site.</i></p> <p>The proposal (see 2018 LDP Bid included with this response) is to retain as many of the trees on site as possible as these both provide shelter and character. Similarly, the stone dykes on site would either be retained or re-used to help create a distinct residential character suited to the site.</p>
Landscape Fit	1	3	<p><i>The development of this site will significantly intrude the landscape. There is a tree belt that surrounds some of the sites perimeter however there are areas of no tree coverage to the east which will make development on this site very obvious from Scotstown Road. There are also large lengths of the perimeter with no tree belt which will make development very intrusive from the north of the site. The current green belt boundary is considered more robust.</i></p> <p>See section 2.4 – development can be designed to sit within the landscape and be seen as a modern, high-quality urban extension.</p>
Relationship to existing settlement	2	3	<p><i>The development will not be well related to the existing residential development. The houses to the south have their back gardens running along the perimeter of the site. There is only limited opportunity to run any road access to the new housing development from the existing housing estate, through an area that is currently open space. There may be a need for accesses to be developed on the northern perimeter of the site making it a separate entity from the existing residential area. However, there is scope for strong footpath and cycle path links between both developments.</i></p> <p>The site is immediately adjacent to the existing residential area. That development was deliberately designed with two access points northwards clearly suggesting that expansion in that direction has been accounted for. The area that is currently open space mentioned was always intended as a link through to the north. We note the recognition strong footpath/cycle route connections in line with sustainable travel options.</p>

Land Use Mix / Balance / Service Thresholds	1	2	<p><i>This development would bring around no improved land use mix as it would be a residential development in a primarily residential area.</i></p> <p>The site is promoting residential development which could result in the additional critical mass to attract services to this area and support existing services.</p>
Accessibility	2	3	<p><i>The nearest bus stops for the No2 are approximately 450m from the edge of the site on Jesmond Drive.</i></p> <p>Bus services remain relatively close to the site and strong cycle and walking routes are noted by the Council already.</p> <p>The Council is already proposing new cross city public transport routes through this area so future access will be greatly improved.</p>
Proximity to facilities / shopping / health / recreation	3	3	<p><i>No issues</i></p>
Direct footpath / cycle connection to community and recreation facilities and resources	2	3	<p><i>There are limited paths that connect to community facilities. One path connects to the cycle network that goes to the district centre but there are no direct Core Path or cycle connections serving this site.</i></p> <p>New footpath and cycle links will be provided on site and improved off-site. MIR analysis above notes scope for strong footpath and cycle path links between this site and the residential area to the south which in turn link to recreation facilities and resources.</p>
Proximity of employment opportunities	1	3	<p><i>There are no significant employment areas within 1.6km of the site.</i></p> <p>There are employment opportunities significantly less than 1.6km at Middleton Park local centre with good pedestrian and cycle access. Major industrial areas of the Bridge of Don, the Core and Denmore Industrial parks are approx. 2km from the site and if the land to the North at Perwinnes is allocated then additional new employment opportunities will be well within 1.6km from the site. There is therefore a choice of employment opportunities in the area.</p>
Contamination	3	3	<p><i>No issues.</i></p>
Land Use Conflict	3	3	<p><i>No issues.</i></p>
Physical Infrastructural Capacity	3	3	<p><i>No issues</i></p>

Physical Infrastructure Future	3	3	<i>No issues</i>
Service Infrastructure Capacity	3	3	<i>No issues</i>
Other Constraints	2	3	<p><i>There are footpaths along the edge of the site which are used by local people.</i></p> <p>This isn't a constraint as footpath links can be incorporated and improved as a result of development.</p>
	48	62	

Section 2 – Settlement Strategy

Question 1 – New Housing Sites

a) Do you agree with our preferred housing sites?

See separate response on behalf of Drum Property Group.

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

Yes, Causewayend, Bridge of Don (B0218) offers a deliverable and sustainable extension to the existing urban area. It should be allocated for housing.



DRUM
PROPERTY GROUP
DEVELOPMENT & INVESTMENT

CAUSEWAYEND, BRIDGE OF DON

LOCAL DEVELOPMENT PLAN BID / MAY 2018

PREPARED BY HALLIDAY FRASER MUNRO

1. INTRODUCTION AND VISION

This site is considered as highly deliverable extension to the existing urban area to the north of Aberdeen. It has limited sensitivity and on site landscape features can assist in creating a high amenity housing development with good access to existing and future local services and open spaces.

The bid site is proposed by Drum Property Group, the developers of the award winning Prime Four Business Park and residential development elsewhere in Scotland. Drum Property Group's central ethos is to support deliverable and viable developments of the highest quality. They believe that this site has the potential to create an inspiring and successful place where people will wish to live.

Although previously a bid site we have reviewed all pertinent issues and this review suggests quite clearly that allocating this site would positively promote quality housing development in an established residential location.



View of the site looking south

2. THE SITE

Causewayend is located immediately adjacent to the northern section of Bridge of Don's urban area. It comprises two large fields with partially wooded boundaries and covers approximately 34 acres of unused agricultural land. Its southern boundary is essentially the housing along Woodcroft Avenue to the north of Middleton Park. An aerial photograph is included below for reference.

The neighbouring residential community was developed in the 1980s and includes two rights of access along the northern boundary of the housing development (southern boundary of Causewayend). These access points create clear linkages to the existing development and facilities to the south with service tails built in to enable convenient extension of services.

The site is presently zoned as Green Space Network (GSN) and Green Belt (GB) but many of the sites now zoned in the LDP for housing development, including Grandhome to the South were previously zoned in a similar fashion. Aberdeen has a tight Green Belt boundary and little brownfield opportunities. Any development around the City will require rezoning to fit the new proposed use.

The key question in areas such as Causewayend is whether the current zoning is appropriate and whether the qualities of the site are sensitive enough to merit retaining it in that zoning. We don't believe that this site is particularly sensitive.

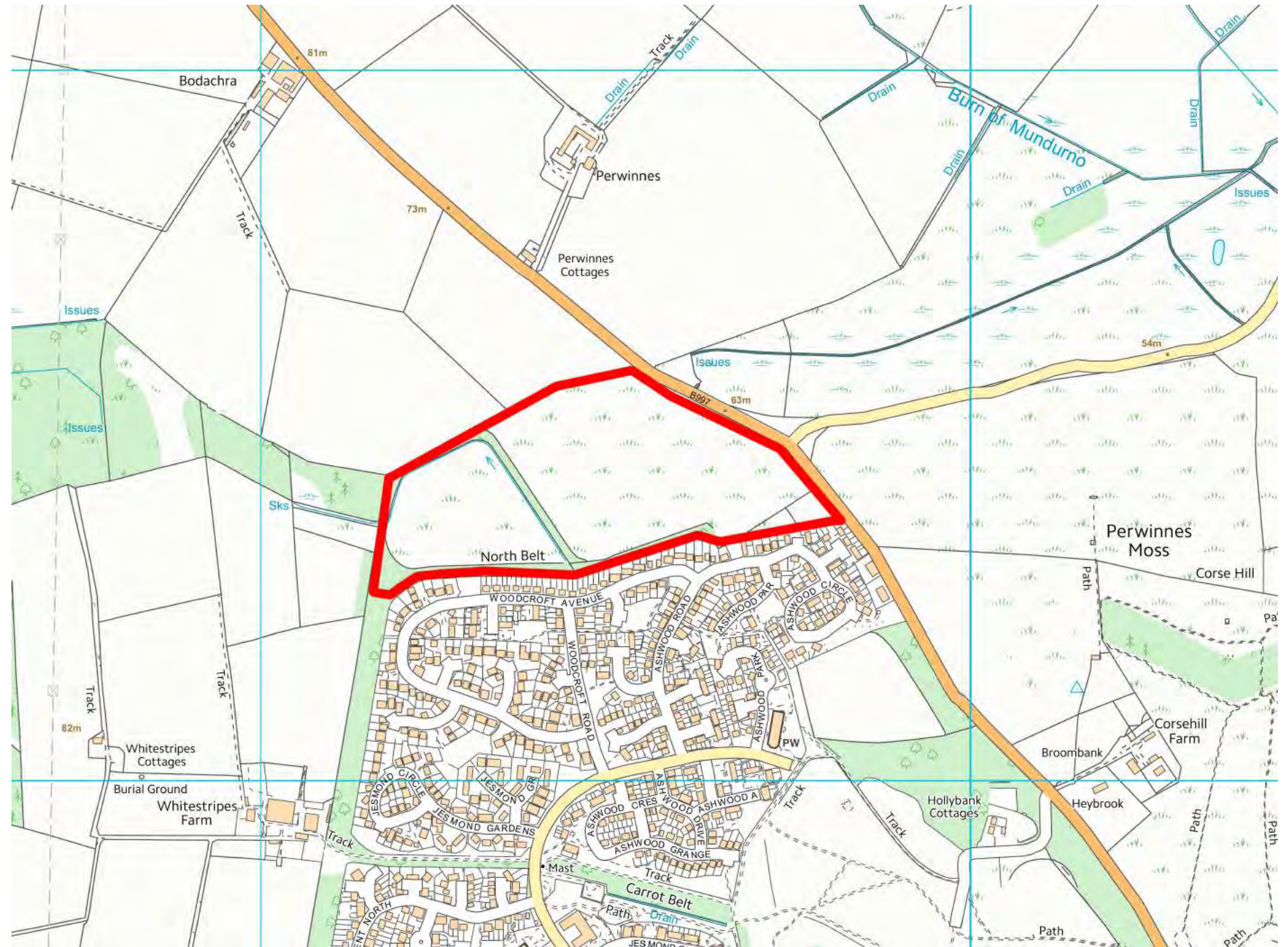


Figure 1 - Location Plan

It is more appropriately and helpfully zoned as a development site for new housing. Existing landscape elements (woodland and drystone dykes) will be retained as part of the development. Rather than being constraints they are exactly the type of elements that can add character and amenity to housing developments as they could easily be incorporated into the design of the new development. The Council's green belt review (as part of this LDP review) should not therefore rule out development on this site.



Figure 1 - Aerial Photo ((copyright) Getmapping plc 2015)

3. GRANDHOME, AWPR AND ENERGETICA

Three other major projects affect this proposed site, creating a stronger case for its development. Grandhome Village (7,000 new homes plus retail, community, commercial and leisure uses) has been allocated, and is now under construction, immediately adjacent to the Causewayend site. See the Grandhome Masterplan to the right. This means that the access to facilities, to employment and to opportunities will, over time, significantly improve in this part of the City.



Figure 4 – Grandhome Masterplan

The AWPR now runs north of this site but one of the key routes to the City will be via the Goval Junction and along the B997 Scotstown Road. This proposed development site could tie in with local road upgrades and will now sit on a major identified key route into the City from the AWPR.

Energetica – is a strategic policy to support energy related development and a higher quality of life in a corridor between the Bridge of Don and Peterhead. It's about providing homes as much as jobs and economic development, especially homes with access to the outdoors, to recreation and with good links. This site falls within the southern section of the Energetica Corridor and could help deliver much needed housing to support economic development.



Figure 5 – Energetica Plan (Bridge of Don extract)

4. PLANNING CONTEXT

Housing land

Current housing land allocations haven't been delivering at the scale originally anticipated. This has created a housing delivery backlog and new housing allocations are required to deliver the City's housing requirements.

The joint Strategic Development Plan Main Issues Report, currently out for consultation, states that the 2,769 fewer houses overall and 3,000 fewer affordable houses were delivered in the 5 years to 2016 than required by the SDP and the HNDA. That's around 600 houses less than required every year.

Analysis of housing land delivery in the City on key large sites identifies a significantly worse housing delivery record. The following table identifies that key development sites in the City, their original anticipated housing numbers and the actual delivery over a 10 year period, all based on the Council's Housing Land Audits. It shows that of the 11,150 houses originally proposed on these sites just over 2,000 (around 10%) have been delivered.

The evidence points to slower delivery rates on a site by site basis. The City Planning Authority needs to allocate additional housing land to help supplement that lack of delivery over many years and catch up with demand. These sites should be in a range of locations and at a range of scales to encourage a greater range of developers and offer choice to those looking to buy a new home. The City Council has suggested that sites up

Comparison of Major Housing Proposals in 2012 LDPs against actual delivery									
City	site	ref	2007-2016	Cumulative 2015	shortfall	Cumulative 2016	shortfall 2016	Cumulative 2017	shortfall 2017
	Grandhome	OP12	2600	0	2600	0	2600	0	2600
	Dubford	OP25	550	190	360	309	241	397	153
	Stoneywood	OP24	500	133	367	231	269	514	-14
	Craibstone South	OP28	750	0	750	0	750	0	750
	Rowett South	OP30	1000	0	1000	0	1000	0	1000
	Greenferns Landward	OP31	750	0	750	0	750	0	750
	Maidencraig	OP43 & OI	750	5	745	24	726	60	690
	Greenferns	OP45	600	0	600	0	600	0	600
	Countesswells	OP58	2150	0	2150	4	2146	154	1996
	Oldfold	OP62	400	0	400	25	375	50	350
	Loirston	OP77	1100	0	1100	0	1100	0	1100
	TOTALS		11150	328	10822	593	10229	1175	9054
			percentage delivered	2.9%		5.3%		10.5%	

Figure 1 - Location Plan

to 100 housing units are appropriate. This site meets that specified requirement.

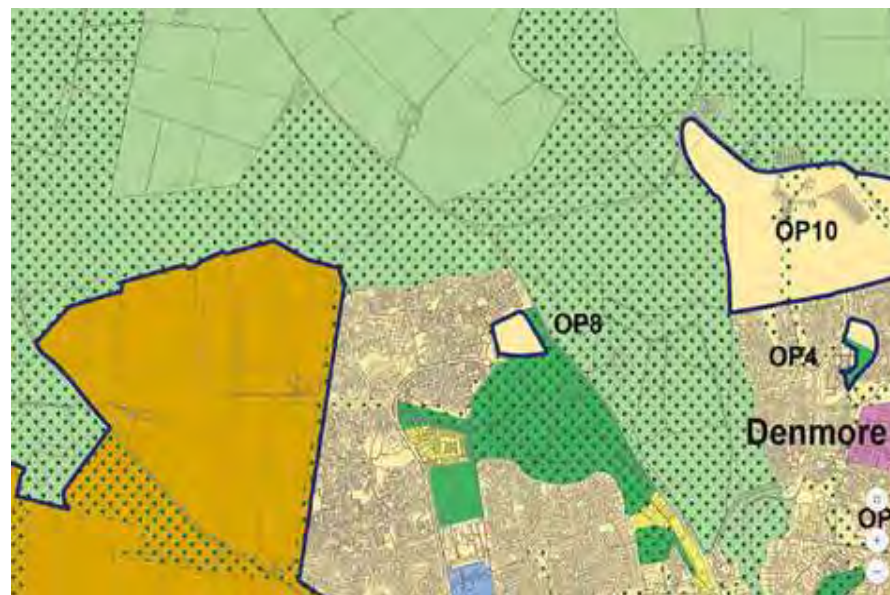
Housing Strategy and Allocations

Aberdeen is the strategic centre for housing development for the City region and the main focus for growth. The SDP MIR identifies future housing need and a requirement for additional release of housing land across the City and Shire and the vision remains to create an attractive, resilient, prosperous and sustainable European City Region and an excellent place to live.

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

The proposed housing allowance is for 13,000 new homes in the City over the next 22 years. Alternative sites in locations that offer attractive and popular places where people would like to live should be allocated to complement the existing housing land supply.

In terms of housing land, therefore, this bid is entirely in line with the suggestions of site size and location from both the Strategic Development Plan MIR and the City Council's Call for Sites.



Extract – 2017 Aberdeen Local Development Plan



Extract – 2017 Aberdeen Local Development Plan

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

	2016 to 2030	2031 to 2035	2036 to 2040	Total
Aberdeen Housing Market Area	4,200	5,700	6,300	16,200
Rural Housing Market Area	1,300	1,700	2,500	5,500
Total	5,500	7,400	8,800	21,700
Split as follows:				
Aberdeen City Council	3,500	4,700	4,800	13,000
Aberdeenshire Council	2,000	2,700	4,000	8,700

Current Local Development Plan

The site is presently zoned as Green Belt and Green Space Network (GSN). Green Belt release is required to meet the Council's stated request for new greenfield sites of 100 houses or less or greater land release should the Strategic Development Plan strategy require it. The Local Plan Review process is the mechanism where such releases can be considered. Green Belt policy protects land for 4 main reasons.

These are:

- to maintain the distinct identity of Aberdeen and the communities within and around the City;
- to safeguard the Green Belt to help avoid coalescence and sprawling development on the edge of the city;
- to maintain Aberdeen's landscape setting and
- to provide access to open space.

Figure 1 - Aerial Photo ((copyright) Getmapping plc 2015)

Identity – This proposal would be seen as an extension to the existing Middleton Park area. Development of this site is therefore a sensible extension of an existing settlement. It would not detract from the distinct identity of Aberdeen.

Coalescence and Sprawling Development - The site does not create coalescence or sprawling development for the same reason as set out above. It's a well-contained sustainable urban extension.

Landscape Setting - The landscape setting of Aberdeen is not undermined by this proposal. The site is a few unused fields screened and broken up by woodland and other landscape features. Developing this site with appropriate landscape treatment, retaining the woodland and introducing a new landscape treatment has the potential to enhance the landscape setting in this part of Aberdeen.

Access to Open Space - The proposals themselves will not impact unduly on access to open space. Associated offsite road and junction improvements however do have the potential to significantly increase safe and convenient access for the wider community to neighbouring open spaces and Perwinnes Moss nature reserve.

This review has not identified any concerns in relation to the function of the Green Belt for this bid site. The loss of this specific bid sites from the Green Belt would not undermine its overall purpose.

Policy NE1 – Green Space Network does not rule out development. Where development would impact on GSN it

requests that such development “... *maintain and enhance the coherence of the network. In doing so, provision should be made for access across roads for wildlife and outdoor recreation.*” (page 67, 2017 LDP). That can be achieved here and would be a similar approach to that taken on the residential zoned land immediately south-west of this site at Grandhome.

Planning and Design

At a national level the Scottish Government are pursuing both a housing delivery and design quality agenda. They are promoting 6 essential qualities of place:

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

Drum has embraced this approach in all of their developments and will continue to embrace that in the delivery of housing on this site. An essential element of quality of life is location, quality of the landscape that development is set within and the convenience of access to facilities and jobs locally. This site will deliver on all of these.

Historic Planning Context

Previous bids for this site have raised a number of topics worthy of review. Quite often during extensive consultation processes the facts of the case for development are lost

amongst generalities. Those promoting development sites spend more time and effort in researching issues, considering the facts and looking far more closely at the proposed site than the Planning Authority do. This is not unusual or unexpected as the Planning Authority is considering a great many sites during these processes and time can be tight. However, this approach sometimes leads to a generic approach to sites rather than a detailed review.

In this instance there are elements of previous reviews of this site that merit further explanation to help confirm their acceptability:

Landscape Impact – this is subjective. Regardless of where a site is situated it will be seen within the landscape and the context within which it's seen, from where and the impact that has on the landscape setting as a whole are the important factors. In this instance the site sits immediately adjacent to the existing settlement. In fact, for approximately 1/3 of its southern boundary there are no significant landscape features between this site and the neighbouring houses. These houses are clearly visible from the B997 from both north and south of the site. In fact these houses also hide the majority of the site from view from the south as they are located immediately adjacent to the B997.

From the north these same houses can be seen against the backdrop of the wider housing development. Additional housing at this location would benefit from the same setting i.e. a backdrop of the existing housing development. This

does not pose a significant landscape setting issue and with the benefit of sensitive design will provide a more suitable transition to the countryside than at present. The northern boundary of the site is also delineated by an original dry stone dyke creating a clear differential between it and the larger agricultural fields beyond. Again, this is an established traditional landscape feature that defines the site. It could also be strengthened if required by appropriate landscape design and strategic landscape features. These types of traditional features on the site will be integrated into proposed designs and layouts.

As the B997 passes the site most of the boundary consists of mature trees and dry stone dyke. These, together with the B997 itself, create a strong eastern boundary to the site, stronger than any features on the current GB boundary. They also help integrate any proposed development into the landscape. Approximately 1/3 of the site is well screened by existing tree belts. These, however, are not extensive and can help to frame development and create amenity should the site be developed. In developing the site the majority of the trees would be retained.

The site sits in a bowl in the landscape. The B997 slopes down from the south towards the site and upwards to the north away from the site. This allows the site to sit within the landscape and reduce any potential impact to local impacts only, perceived while travelling south on the B997.

Overall, the landscape impact will be limited. It will be local and seen as a logical extension to the existing built up area. Established strong landscape features at the north, west and east will help to contain the development within the landscape. The clear visual and physical connectivity between the site and the housing to the south will provide a continuity of development. This site, therefore, has a plenty going for it in landscape terms.

Woodland – this would not be affected in any major way by the proposed development of this site. In this case (see aerial photo) only a small proportion of the site is wooded. In fact they are just tree belts. The woodland provides amenity for the site and can be incorporated into any future landscape strategy. It also provides local character and shelter. There's no reason why the site should be discounted because it includes tree belts. The neighbouring allocated Grandhome Urban Village wasn't discounted because it included far more woodland. A consistent approach suggests that this site should be treated in a similar manner with the woodland being considered a constituent part of any proposed development.

Nature Conservation – although neighbouring sites are designated for nature conservation this site has no nature conservation designations. There can therefore be no significant loss or disruption to natural conservation.

Access – access is achievable at a number of locations. The eastern boundary of the development can facilitate a new and improved access (and the adjacent junctions) for the whole

site. The housing area to the south already has an established road access to the south east of the site and there's also an area of open space that could facilitate footpath (or vehicular) access to the west of the site. These are consented and deliberate to facilitate future development. These are service tails. The development to the south has clearly been designed to provide access to Causewayend. The houses either side of the retained road link turn the corner and face onto that link providing the start of a new street connection.

Public Transport - The site is within 400m of a major bus link and the scope exists to create a strong cycle and footpath link between the existing housing and the proposed development site.

Proximity to Facilities – The primary school is within 800m. ASDA Middleton Park is a 3 minute drive via Ashwood Road/ Jesmond Drive or a 10 minute bus journey. Walking would take just under 20 minutes. Oldmachar Academy is even closer. Local facilities are therefore close and certainly no worse than any other part of the Bridge of Don. The proposal is to allocate the land to the north of Middleton Park as a new residential zoning of approximately 280 houses. This will include the retention of the tree belts on site, using the existing retained access points from the south and creating a new access to the east.

Pedestrian and cycle connections southwards could enhance accessibility and provide a choice of routes to and from the development. The retained woodland would provide a natural backdrop to the housing and screen it from south and west predominantly but also from the east.

4. DEVELOPMENT OPPORTUNITY

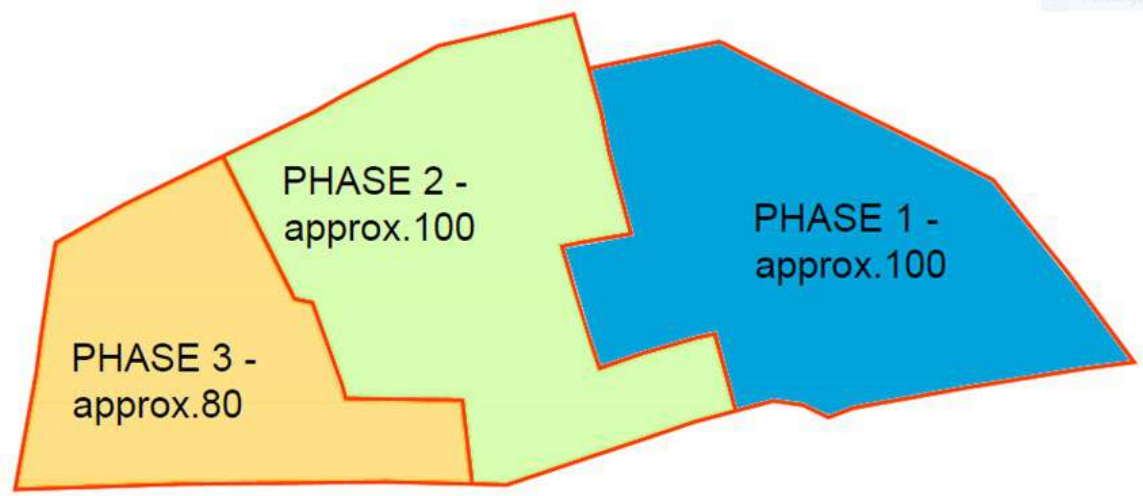
Drum Property Group's committed to high quality sustainable development would be reflected in the development of this site, supporting the creation of a convenient, pleasant and inspiring place to live.



Figure 3 – Potential existing access points (vehicular and pedestrian) ((c) Getmapping plc 2015)

Phasing

This site can be developed as a whole or phased in line with the above phasing plan. Phases are shown at roughly 100 units to align with the Council's suggested development scale for each bid site.



5. THE PROPOSAL



Bid Proposal



Aberdeen Local Development Plan Review

Main Issues Report Response Form 2019

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

The MIR has been published alongside a Monitoring Statement and Environmental Report. Copies are available to view at Marischal College, Broad Street, Aberdeen. These, and other supporting documents, are available at: - www.aberdeencity.gov.uk/alDP2022

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

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

Responses to the published documents can be:

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

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



YOUR DETAILS

Name	STEVE CRAWFORD
Organisation (if relevant)	HALLIDAY FRASER MUNRO
On behalf of (if relevant)	DRUM PROPERTY GROUP
Address	
Postcode	
Telephone	
E-mail	

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



If yes, please provide an e-mail address

PRIVACY STATEMENT

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

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

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

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

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

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

YOUR DATA, YOUR RIGHTS

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

YOUR COMMENTS

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

Perwinnes - Please see separate response enclosed in respect of:

- Site B0219

Please also find enclosed the following in support of the response:

- 2018 LDP Bid Document (for reference only)

YOUR COMMENTS CONTINUED

B0219 Perwinnes - MIR Response – May 2019

- *B0219 – Perwinnes, mixed-use (227Ha): Housing (3,000 to 4,000) homes, employment, retail, education, community etc.*

1. Introduction

Halliday Fraser Munro lodged an LDP bid for the above site on behalf of Drum Property Group – B0219 for a mixed-use development of 3,000 to 4,000 homes, employment, retail and a range of community uses (including retirement living). The bid was lodged promoting this land as Strategic Reserve or equivalent to be recognised as such in the Proposed Local Development Plan. Although Aberdeen City Council officers recognise positives that this site may offer, in reviewing the bid they have suggested that the site should not be preferred at this stage. Drum Property Group do not agree with that view. This response provides justification for including the Perwinnes site in the Proposed LDP.

The MIR review recognises the significant positive aspects of the bid:

- The site is relatively constraint-free;
- The proposal is large enough to support its own services and facilities including new schools and public transport; and
- The mixed-use nature of the site could encourage more sustainable lifestyles and reduce car dependency.

These align with national and local policy on creating sustainable new places.

The MIR reasoning for not preferring the site is based on the following:

- Visibility and impact on the setting of the Bridge of Don;
- The current Green Belt zoning and lack of a strong Green belt boundary to define the site;
- Existing limitations on accessibility;
- Potential for creating urban sprawl;
- Current connections to the existing settlement;
- Landscape impact; and
- A proposed, but yet to be determined, limited requirement to allocate new housing land through the Proposed Strategic Development Plan.

These, we believe, are not valid reasons for discounting this site as a strategic reserve site and have responded accordingly in the following pages. In particular the “existing” and “current” zonings and connections to the City are not considered to be determining factors as these can be overcome by development at the scale proposed.

B0219 offers an opportunity for the City’s Local Development Plan to identify the direction of growth for the City and plan for that well in advance. The 2012 Development Plan allocated a number of large development sites. This was central to the housing strategy at that time. Since then, however it has become clear that, although such sites offer an opportunity to masterplan large future expansion areas for the City, they take time to plan and coordinate effectively. Allocating this site at Perwinnes as a Strategic Reserve Housing Site will allow for that planning to start now, enabling strategic coordination across service and infrastructure providers and for appropriate funding mechanisms to

be agreed. It could then be made readily available as a reserve housing site should the extant housing allocations fall short on actual delivery.

This site is also the only relatively constraint-free area in Aberdeen under single ownership and capable of acting as a strategic reserve site over a 20 to 30-year period. It should be recognised as such now and protected for a housing-led mix of uses and a sustainable extension to the existing urban area. Should Aberdeen City's housing land allocations continue to under-deliver the homes the City requires then this site could be called upon, in phases if necessary, to deliver additional homes to meet those housing needs.

On a more general note the housing strategy adopted in the MIR has significant limitations. In effect not enough housing land has been identified to meet the area's housing needs, it doesn't include enough choice of location for new homes and relies too heavily on brownfield sites. A separate response has been made in that respect on behalf of Drum Property Group which can be summarised as:

- An over-reliance on brownfield sites to make up the vast majority of new housing allocations;
- Unrealistic expectations on housing delivery from existing allocated sites; and
- The need to allocate additional housing land to meet Proposed SDP requirements

Site B0219 offers a medium to long-term focus for the future growth of Aberdeen and, if allocated as strategic reserve, could be effectively planned and coordinated in advance. **It should be identified as Strategic Reserve/Future Housing Land in the in the Proposed Local Development Plan.**

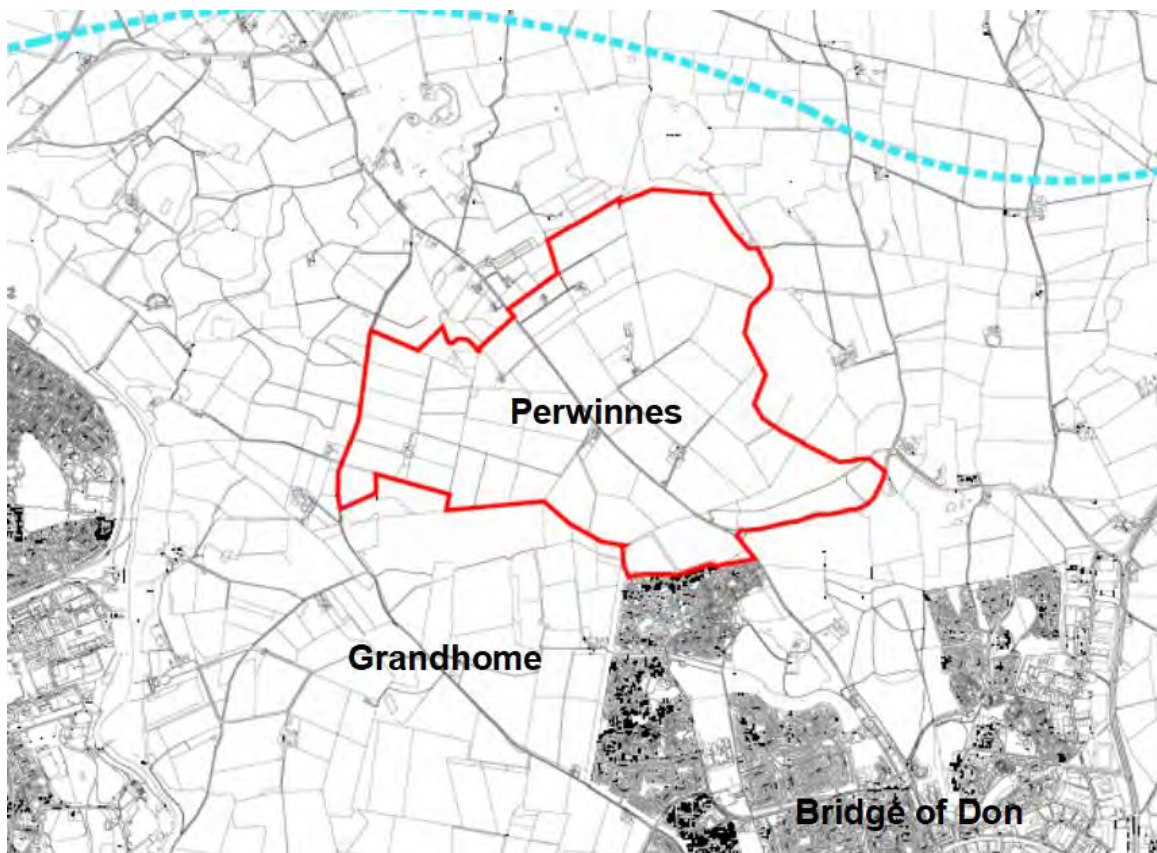


Figure 1 – Site Location Plan (Extract – 2018 LDP bid document)

2. MIR Response – B0219 Perwinnes

2.1 Location and Context

Bridge of Don has grown to be one of Aberdeen’s largest and popular suburbs. This site is located to the north of the main residential area, between it and the AWPR. It sits at the edge of the urban area close to residential, employment and the coastal recreational areas.

Extensive road infrastructure improvements have been completed or are under construction within the northern part of the city. These include the AWPR, the Third Don Crossing, Murcar Roundabout improvements and Haudagain Roundabout improvements. These change the context around this site considerably, improve its accessibility and have a major positive impact on the opportunity it represents.

The B997 forms a spine road linking the site southward to the City and northward to the AWPR.

The site extends approximately 1.3 miles north from the northern end of the Middleton Park area within a relatively flat and gentle rolling landscape at the urban edge. The south and west sides of the site are generally adjacent to mature woodland with Whitestripes Road running along the west side of the site. The very north east corner of the site sits just south of Corby Loch. The site also contains a radar station located at the highest point of the site in the north east quadrant. Previous discussions with the radar operator have confirmed that this is not a serious constraint will require stand-off and consideration in terms of the layout. More recent discussions suggest that technological advances may make this type of radar redundant during the lifespan of this proposed development. The site has a rolling topography which will provide some natural site screening from the existing developments to the south.

The site also forms part of the strategic Energetica corridor, a development initiative between Aberdeen and Peterhead to create a world-class business and residential location within a high-quality environmental setting. A key aspiration for Energetica is to become a place where work and home are brought closer together in a more balanced and rewarding way. Energetica has been adopted by Aberdeen City and Shire Councils and a means to stimulate investment in new employment opportunities, leisure and high-quality housing to create new communities “... amongst the best in the world”.

Energetica is therefore about more than just jobs and energy. It’s about creating integrated, energy efficient communities that support innovation and employment. Developing this site for a residential based mixed-use community in the form suggested in this bid would complement the Energetica concept as well as provide new employment, and leisure opportunities that support the high quality of life expected in this area.

The 2018 Bid document (resubmitted for information) set out the opportunities this site offers. These are repeated below:

- Limited development constraints;
- Natural northward extension to the existing residential area;
- Deliverable site under single entity control;
- Alterations to the B977 create interest and naturally calm traffic;
- Ability to provide a mixture of housing types to serve a wide range of needs;
- Rolling topography helps create a variety of design solutions;
- Integration of significant areas of green space to create high quality amenity;

- Opportunity to provide an additional medium to long term 3,000 to 4,000 houses within the boundaries of Aberdeen;
- Provides security of housing provision should other housing allocations continue to under-deliver;
- Opportunities for significant affordable housing delivery as part of the overall development area;
- Well connected to the wider road and footpath networks;
- Strong connections to the countryside and recreational opportunities;
- Scale of the site allows for a fully masterplanned approach to future development; and
- In single developer control with a strong delivery focus.

General design principles include:

- **Access** - The main feeder road, the B997, currently dissects the site running in a North Westerly direction through the approximate centre of the site. This is a main route to the AWPR and will become an important transport route.

The proposal would be to alter the layout of this road as it enters the site at the south eastern edge in order to reduce traffic speed and improve safety. After meandering through the development, the road would exit at the NW side in its current location. A secondary benefit of this realignment approach would be to redirect longer distance traffic from further afield to the AWPR via other main A-road routes.

- **Green Space** - As the site contains two areas of Green Space Network and part of a Local Nature Conservation Site it is proposed to maintain/protect the latter from major development and incorporate the former to create significant green space corridors within the scheme – linking with the woodlands to the south and in a similar fashion to the adjacent Grandhome Masterplan site to the south. These enhanced green networks will help create character, natural linkages between development areas, provide recreational space and links to the wider countryside and help create a sense of place.
- **Distinct Neighbourhoods** - The scheme would be designed such that the layout could create a number of distinct neighbourhoods each with its own individual identity.
- **Associated Uses** - The scale of the site/proposal will require local services/community facilities as well as the proposed housing.
- **Phasing** - The framework approach would also allow for development in a phased manner.

The proposal asks the Council to reserve this part of the city for large-scale, potentially incremental, sustainable, masterplanned extension to the existing urban area.

The bid document associated with site B0219 set out Drum Property Group's focus on respecting the site's assets and character to create the highest quality development. This was set out in a vision for the site:

“A sustainable, viable and deliverable urban extension to secure a fully planned expanded City community that offers an excellent quality of life.

To help guarantee Aberdeen’s ongoing supply of quality housing land and provide housing delivery options should the existing housing land allocations continue to under deliver.” (extract, LDP Bid document, 2018)

That vision remains the case. Drum Property Group has a strong track record of delivering award winning and celebrated developments. In Aberdeen the best example is Prime Four Business Park at Kingwells. Through working closely with the City Council and local community that site has been developed in a manner that creates character by re-using or incorporating natural features, respecting the field layout and the Scheduled Ancient Monument to the north and ancient woodland at its edges. That approach has proven very successful and the approach to this site would be similar – agreeing a development framework, identifying key features to be protected or incorporated, establishing appropriate development areas and producing adoptable overall or phased masterplans to deliver the proposed development. All of these processes would involve coordination and involvement of the Council, communities and other relevant bodies to ensure a successful and deliverable expanded community and a worthy new community for Aberdeen.

Despite the positives recognised in the MIR analysis (**Sustainability Checklist – see review in Appendix 1**) the MIR suggests the proposed development should not be allocated for the following reasons. We’ve responded to each of the MIR criticisms in turn.

2.2 The setting of the Bridge of Don

A proposed development of this scale is always going to be visible within the landscape. That is generally the nature of development within the whole of the Bridge of Don i.e. it can all be seen from somewhere. Bridge of Don is a large suburb of Aberdeen and is popular with its residents. It sits on its own to the north of the River Don and has an established character of mainly housing areas set along the road network. These, and its employment areas (e.g. Denmore Industrial Estate) tend to back onto the main distributor roads with a housing design and layout of their time. Services are few and far between and much of the criticism from local residents has been on the lack of planned services, shops and leisure uses to serve the community. The proposed development has considered these criticisms and will be far more integrated, include a mix of appropriate uses, take more account of its setting and aim to create a place where people can live a more sustainable and connected lifestyle.

Newer developments such as Dubford (OP10 as per the extract from the current LDP) and Grandhome (OP9) have been planned and designed in a similar manner. These new developments have taken a more modern “placemaking” approach and delivered to agreed masterplans. Design requirements on developers are now greater than ever and larger sites such as this can be considered and developed across a broad spectrum of issues.

Scottish Planning Policy (SPP, Scottish Government 2014), and associated planning policy documents are now promoting the creation of “place”, not just development. This proposal will embrace that concept using SPP’s 6 qualities of a successful place as central pillars of its design:

Planning should support development that is designed to a high-quality, which demonstrates the six qualities of successful place.

One - Distinctive – *“... development that complements local features, for example landscapes, topography, ecology, skylines, spaces and scales, street and building forms, and materials to create places with a sense of identity”.*

The fact that this is a large site, relative constraint free, undulating and with a number of landscape features allows it to be developed in a manner that does complement local features to create a sense of identity. **It could deliver a distinctive development led by an agreed masterplan approach.**

Two- Safe and Pleasant – *“... development that is attractive to use because it provides a sense of security through encouraging activity. It does this by considering crime rates and providing a clear distinction between private and public space, by having doors that face onto the street creating active frontages, and by having windows that overlook well-lit streets, paths and open spaces to create natural surveillance. A pleasant, positive sense of place can be achieved by promoting visual quality, encouraging social and economic interaction and activity, and by considering the place before vehicle movement”.*

Again, a masterplan approach could secure a place that fulfils SPP’s aim to create an attractive, safe and supportive development. It could adopt more inclusive and community focused design cues to create a positive sense of place, high visual amenity and social and economic interaction and activity. It benefits from having an almost blank canvas to ensure that pedestrians, cyclist and public transport are priority users and the private car secondary. **A safe and pleasant place is more deliverable on this site than others as it can be built-in to the whole development, particularly its infrastructure, from the beginning.**

Three - Welcoming - *“... development that helps people to find their way around. This can be by providing or accentuating landmarks to create or improve views, it can be locating a distinctive work of art to mark places such as gateways, and it can include appropriate signage and distinctive lighting to improve safety and show off attractive buildings”.*

The protected landscapes, natural features and hilltops can be used to create real focal points or views that will allow people to navigate the development effectively. Green spaces, design and signage can all be adopted at the masterplanning stage to create a welcoming environment for new residents and users.

Four - Adaptable – *“... development that can accommodate future changes of use because there is a mix of building densities, tenures and typologies where diverse but compatible uses can be integrated. It considers how people use places differently, for example depending on age, gender and degree of personal mobility and providing versatile greenspace”.*

The scale of this proposal assists in delivering this quality as it offers plenty **of scope to include a range of building types and a mix of densities and uses in an integrated and compatible manner**. Smaller developments, although useful to fill gaps on housing delivery, are less adaptable at the larger scale.

Five - Resource Efficient – *“... development that re-uses or shares existing resources, maximises efficiency of the use of resources through natural or technological means and prevents future resource depletion, for example by mitigating and adapting to climate change. This can mean denser development that shares infrastructure and amenity with adjacent sites. It could include siting development to take shelter from the prevailing wind; or orientating it to maximise solar gain. It could also include ensuring development can withstand more extreme weather, including prolonged wet or dry periods, by working with natural environmental processes such as using landscaping and natural shading to cool spaces in built areas during hotter periods and using sustainable drainage systems to conserve and enhance natural features whilst reducing the risk of flooding. It can include using durable materials for building and landscaping as well as low carbon technologies that manage heat and waste efficiently”*.

Resource efficiency is a key requirement of any development, but larger scale developments can help plan for that more effectively. The Perwinnes site can adopt techniques such as denser development, shared infrastructure, siting to provide greater solar gain and reduced impacts from prevailing winds, collocating uses to reduce the need to travel, quality durable materials, natural management of resources and low carbon technologies. **These can easily be built in to the proposed development from the beginning to ensure resources are used efficiently.**

Six - Easy to Move Around and Beyond – *“... development that considers place and the needs of people before the movement of motor vehicles. It could include using higher densities and a mix of uses that enhance accessibility by reducing reliance on private cars and prioritising sustainable and active travel choices, such as walking, cycling and public transport. It would include paths and routes which connect places directly and which are well-connected with the wider environment beyond the site boundary. This may include providing facilities that link different means of travel”*.

How people move around an area is influenced substantially by the roads and path networks as well as the location of uses close to each other. This can encourage local journeys using more active travel modes (by foot or bicycle) and support the use of public transport. Perwinnes offers that opportunity, particularly as it is also located in an area where access to the wider environment can be incorporated for the benefit of those living there and the existing communities. **Routes, roads and location of uses that encourage easy of movement can be incorporated as a key design criterion if this site is allocated.** Given its scale these routes could more readily achieve the aims of SPP.

The development of this site then can adopt all of the SPP place principles to ensure that it delivers homes, employment, access to leisure and open space, enhanced natural environments, access networks and sustainable infrastructure of the best quality. It can achieve this across the wider site area and therefore at a scale that makes many of the proposed placemaking and sustainability measures viable and more effective. It can, therefore, create a quality mixed-use community that protects or incorporates the best of the area whilst providing new homes, jobs and services in a

planned manner. It would be seen in the context of Bridge of Don but the placemaking qualities adopted will ensure that it will be seen as a modern and high-quality extension to the City designed to have the least possible impact on the setting of the City. **Impact on the setting of the Bridge of Don should not, therefore, rule out the allocation of this site.**

2.3 Green Belt Zoning & Lack of a Strong Green Belt Boundary

The site is within the existing green belt designation but the LDP review provides an opportunity to rezone land from the green belt where it is appropriate for development. Paragraph 50 of Scottish Planning Policy (SPP) states that in identifying the most sustainable locations for longer-term development, planning authorities should review the boundaries of the greenbelt where necessary. Using zonings in the previous plan to rule out new opportunities in the next plan runs contrary to the LDP review process. Each bid should be fully considered against planning related criteria, including an up-to-date Greenbelt review, and rezoned if considered acceptable.

The site is generally outside of the Green Space Network (GSN) indicating it is less sensitive than other parts of the City – See extract from current LDP below. This is one of the very few areas of the City where Green Belt is not overlaid with GSN. We also disagree that the cultivated fields to the south west and north east of the bid site can be considered Green Space Network. These are actively farmed.

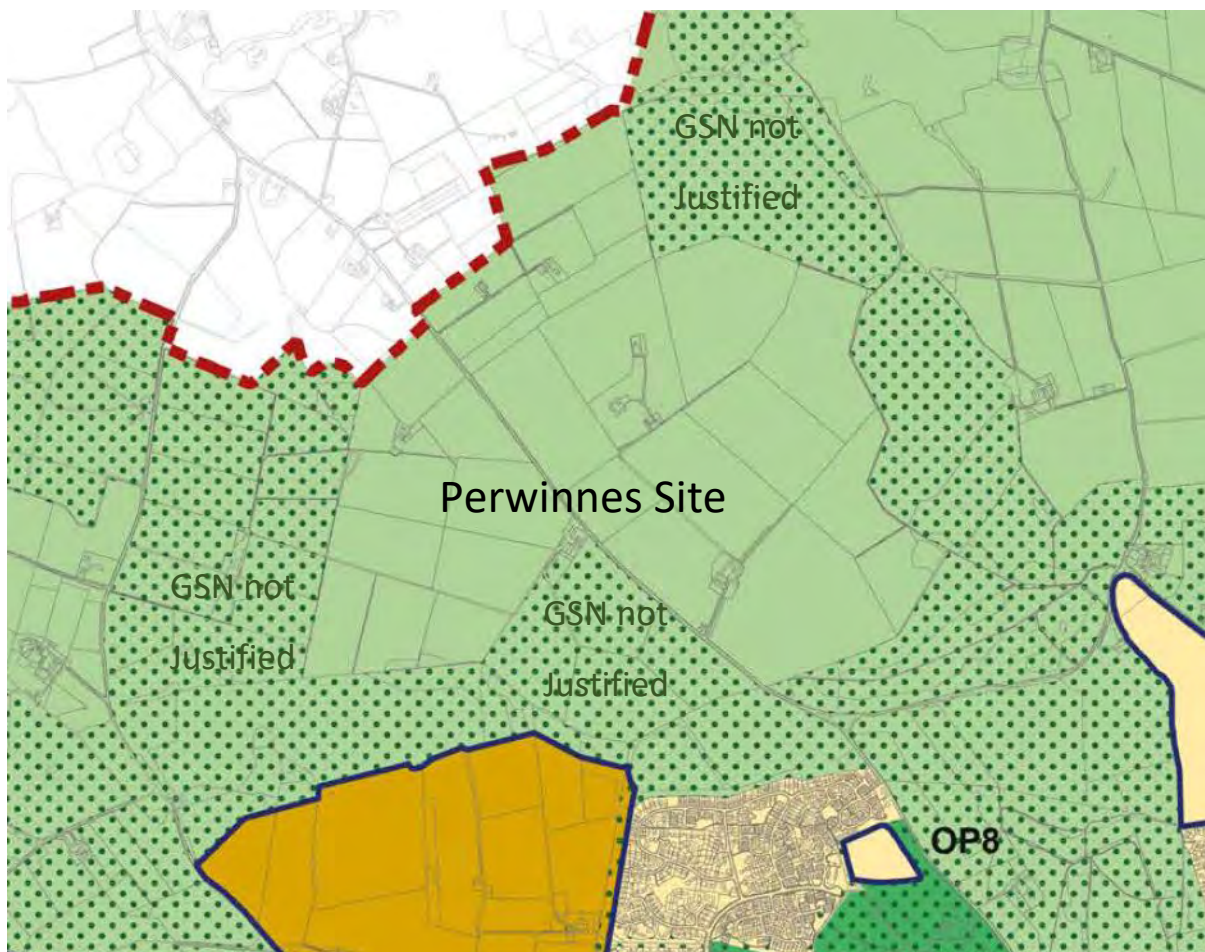


Figure 2 – Extract 2017 Local Development Plan Proposals Map

Green Space Network does not rule out development and the site could be designed to strengthen green links and significantly improve biodiversity. Green Space Network could be integrated into the design as GSN regularly covers existing areas that include development. In fact, enhanced green networks integrated into the proposed development could strengthen the City's GSN and provide significant opportunities for enhanced biodiversity compared to the current cultivated farmland.

The extents of the site are defined in part by strong boundaries - the west and south include woodland areas, to the north Corby Loch provides a boundary and to the east there are a number of landscape and landforms that can provide strong boundaries or be strengthened where required with additional woodland planting and layouts that take that context into account.

A similar criticism could have been made of Grandhome to the south of this site as it too has areas where its boundaries may not be defined as strong Green Belt boundaries. Nonetheless the site was allocated (from its previous Green Belt zoning) and masterplanned to provide what is now considered by the Council to be an appropriate high-quality development. The same principles could therefore apply at Perwinnes.

2.4 Existing Limitations on Accessibility

See also section 2.2 above. This is a large development with the opportunity to increase accessibility where required and improve access by other forms of sustainable transport. The existing access limitations are not a justifiable reason for discounting the site. New and improved access can be implemented on and off site where necessary to overcome this issue. With the site's access to the AWPR and the Balmedie Tipperty road improvements, the airport and the bus network this part of the City could be considered one of the better-connected areas in any event.

We're also aware of the current strategy to improve public transport accessibility around the City. This particular part of the City was subject to a number of improvement options in the Council/Nestrans Aberdeen Cross City Transport Connections Consultation (2018). Drum Property Group responded to that consultation in detail but summarised below:

- Support for the general principle of linking development areas by public transport and other forms of sustainable travel methods;
- Introducing public transport routes through areas of land has the potential to offer greater access to sustainable travel options but need to be integrated with development to make them viable;
- Causewayed, Perwinnes, Goval and Prime Four areas are subject to current Local Development Plan bids and consideration of new routes should only take place as an integral element of future development strategies;
- Regardless of timing the chosen option should consider how and where the City may develop in the future; and
- Drum Property Group welcomed the opportunity for better public transport and active connections and the opportunities that their landholding and development bids could offer. They saw potential positives from including such links.

The Aberdeen Cross City Transport Connections study aims to identify opportunities to connect the city in a more comprehensive manner. Development of this site could help achieve that and the outcomes of that study could help improve accessibility to the Perwinnes area. This can only support a more positive view of this particular bid site as the LDP review moves forward.

2.5 Potential for creating urban sprawl

Urban sprawl could be defined as the growth of towns and cities outside of their existing boundaries in an unplanned manner. The term is an emotive one and not appropriate to the LDP review where proper planning for required growth is being considered. If the City needs to expand it has no choice but to move into the Green Belt to the north, west or south. Unlike other major UK cities Aberdeen is restricted in expansion opportunities by the North Sea, the Rivers Dee and Don, now the AWPR and the tight City/Shire boundaries. The City will have to grow in the future, it needs to plan for that sensibly now.

2.6 Connections to the Existing Settlement

The scale of the proposed site offers scope for self-sufficiency and sustainable collocation of uses and services that can discourage the use of the private car. In that context wider connections back to the Bridge of Don are not always necessary. Nonetheless, connections back to the existing settlement can be improved, especially as the bidder also has control of the Causewayend site immediately to the south of Perwinnes where walking, cycling routes can be provided. See section 2.4 re public transport potential improvements.

2.7 Landscape Impact

Landscape impact is subjective and, as stated in section 2.1, any new development will be visible and impact in the landscape. In SNH's Landscape Character Assessment this site is split between two character areas. To the south and west it's identified as Undulating Wooded Farmland (UWF) and to the east as Undulating Open Farmland (UOF).

These areas are located across Aberdeen and Aberdeenshire by key characteristics of UWF include:

- A gently undulating landform with occasional shallow basins and low ridges;
- Long shelterbelts of beech line roads and screen residential areas on the edge of the city;
- Surviving influence of estate landscapes, including policy woodland and estate buildings;
- Well-used roads traverse this landscape; and
- Views tend to be short-medium range, curtailed by nearby woodland blocks.

For UOF areas key characteristics include:

- A gently undulating landform with some shallow basins contained by low-lying ridges.
- A sparsely settled landscape with a pattern of scattered farmsteads and houses accessed by a network of minor but often busy roads.
- A landscape with a prevailing rural character although eastern areas are influenced by the proximity of the urban area.

The SNH analysis covers a wide-ranging area but for this particular site the key messages are that half of the site is situated in Undulating Wooded Farmland that includes well-used roads and has short-medium range views and the other half is in Undulating Open Farmland where views may be longer but eastern areas, such as Perwinnes, are heavily influenced by the proximity of the urban area. The impact on the landscape in this particular area is therefore not as serious as suggested in the MIR.

2.8 Housing Land

The housing strategy adopted in the MIR has significant limitations. In effect not enough housing land has been identified to meet the area's housing needs, it doesn't include enough choice of location for new homes and relies too heavily on brownfield sites. A separate response has been made in that respect on behalf of Drum Property Group which can be summarised as:

- An over-reliance on brownfield sites to make up the vast majority of new housing allocations;
- Unrealistic expectations on housing delivery from existing allocated sites; and
- The need to allocate additional housing land to meet Proposed SDP requirements

In respect of this particular site the proposal is to identify it as a Strategic Reserve site, allowing it to progress towards delivery and supplement the existing allocations where these don't deliver as expected. An allocation of that type now will allow appropriate masterplanning.

2.9 Site Scoring/Development Options Assessment Review

The MIR gives this site a score of 46 out of a maximum of 63 in its sustainability scoring checklist. This is already a reasonable score for a greenfield site and many of the checklist questions score the site at its maximum. Those criteria which mark the site less than full marks have been reviewed and an analysis is included in **Appendix 1**. The reviewed scoring is now suggested to increase to 61 out of 63 making this site a very high scoring site in the MIR Sustainability Checklist Review. Comments on each point are included in Appendix 1 and reflected in the body of this MIR response.

3. Conclusion

Drum Property Group do not agree with the justification presented in the MIR to reject the bid B0219. They see this bid as offering a real opportunity to ensure that future current and future housing needs can be met securely should the current allocations not deliver as expected. By allocating this site now it can be properly masterplanned. The Council as Planning Authority would be involved in that process and could approve a masterplan that gives comfort and certainty on the type and quality of development to be delivered.

The scale of the development offers a self-sufficient and sustainable opportunity to create a new mixed-use neighbourhood. Drum Property Group has a strong track record of delivering award winning and celebrated developments. They work closely with planning authorities and the local community to develop in a manner that retains or creates character by re-using or incorporating natural features, respecting the site context and making best use of resources. That approach has proven very successful. Their approach to this site would accommodate the existing woodland and landscape features to create the very best quality development.

On a more general note the housing strategy adopted in the MIR has significant limitations. In effect not enough housing land has been identified to meet the area's housing needs, it doesn't include enough choice of location for new homes and relies too heavily on brownfield sites. A separate response has been made in that respect on behalf of Drum Property Group.

Site B0219 offers a highly deliverable site in an area where people want to live and at a scale that could come forward in a phased manner to meet potential future housing delivery issues. It should be identified in the Proposed Local Development Plan as strategic reserve/future housing land, including a mix of supporting uses.

MIR Specific Questions - Section 2 – Settlement Strategy

Question 1 – New Housing Sites

a) Do you agree with our preferred housing sites?

See separate response on behalf of Drum Property Group.

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

Yes, Perwinnes, Bridge of Don (B0291) offers a deliverable and sustainable extension to the existing urban area. It should be allocated as a Strategic Reserve site to allow for upfront masterplanning and a housing backup site should existing allocations under deliver in the proposed plan period.

Question 2 – Housing Allowances Beyond 2032

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

Yes, the PLDP should recognise the longer delivery period associated with large development sites and shift these proportionately into appropriate future allowance periods. The PLDP should also include Strategic Reserve Sites to bring these in line with Aberdeenshire’s MIR and Proposed Local Development Plan. Perwinnes (B0219) should be identified as a Strategic Reserve housing site.

Attachments:

- *Response Form; and*
- *2018 LDP Bid document (for reference purposes)*

APPENDIX 1: DEVELOPMENT OPTIONS ASSESSMENT REPORT

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

The site assessment process undertaken by Officers comprised an assessment of sites against a sustainability checklist and used the outcomes of the strategic environmental assessment to inform the decision on whether a site was suitable. Site B0219 has been assessed and identified as 'undesirable'. The tables below provide a review of the officer's assessment, and reconsider the site scoring of the proposed site. The table includes the score given by Officers, and a 'Proposed Score' reflecting the additional justification provided in the table.

Table 1: B0219 Perwinnes Sustainability Checklist Review Assessment

Criteria	Officers Score (max. 3)	Proposed Score	Justification
Exposure	2	2	<p><i>Perwinnes Hill has a high point of 96m at the radar station and is exposed. The topography to the north provides little if any shelter and there is no significant tree planting on the site. The same can be said of the land between the site and the coast some 3.5km to the east – the land is lower here and with very few trees. The land between the B997 and Grandhome Moss is lower and is slightly more sheltered by woodland to the south and higher ground to the north.</i></p> <p>The site has elements where exposure may be greater than other parts, but the south west corner is well-screened similar to Grandhome, and the eastern section is very similar to (probably less exposed than) the site recently developed at Dubford. Design and masterplanning can introduce shelter, reduce any exposure issues and avoid areas where exposure is considered an issue.</p>
Aspect	2	3	<p><i>The aspect goes in all directions with the majority running east to south to south west.</i></p> <p>The majority of the site is south or south west facing.</p>
Slope	3	3	<p>The site is gently sloping.</p>
Flood Risk	2	3	<p><i>The Burn of Mundurno runs along the eastern border of the site and is shown in the SEPA flood map to have the potential to flood. This is only likely to affect the eastern margins of the site.</i></p> <p><i>There are some significant areas of surface water flooding shown on the SEPA flood map around Middle and Lower Bodachra and between Lower Bodachra and Grandhome Moss.</i></p> <p>The site is large enough to avoid any potential areas of flooding.</p>

Drainage	2	3	<p><i>Most of the site appears to be freely drained. However, the lower lying areas to the south of Lower Bodachra and to the north of the Shielhill Road appear to be boggy and poorly drained.</i></p> <p>The site is large enough to avoid any potential areas of boggy ground.</p>
Built/Cultural Elements	3	3	<p><i>No listed buildings or Scheduled Monuments in the vicinity. A few scattered Sites and Monuments records usually associated with existing farms (structures, piles of stones and troughs).</i></p>
Natural Conservation	3	3	<p><i>Most of the site is unaffected by designated sites or woodland areas - agreed</i></p>
Landscape Features	3	3	<p><i>Relatively few features in the area other than the radar station, tree belts at Causewayend and a very sparse settlement pattern. Bodachra Farm is a prominent landmark. Field boundaries tend to be either poorly maintained stone walls and/or post and wire fencing.</i></p>
Landscape Fit	1	3	<p><i>This is open farmland and Perwinnes is a highly visible exposed hill. It is a landmark that provides a backdrop to development at Bridge of Don and helps to contain it. There are wide views from the B997 to Brimmond, Kingswells, Kirkhill, Bucksburn and there are even glimpses of Bennachie at times which provides a sense of place. Other than the Mundurno Burn and former sand and gravel pit at Leuchlands which forms a distinctive mound to the east, there are no other significant features in the area which could be used to form a strong green belt boundary.</i></p> <p>See section 2.7 – development can be designed to sit within the landscape and be seen as a modern, high-quality mixed-use urban extension.</p>
Relationship to existing settlement	1	3	<p><i>When considering major growth around Bridge of Don, one subtle feature that should be considered is a line of lower ground running roughly from the Mill of Mundurno, along the burn to Shielhill then along Perwinnes Moss through Grandhome Moss and Stoneyhill Wood. This separates the developed plateaus at Denmore and Middleton Park from the higher ground to the north at Mundurno and Perwinnes and the woodland areas at Parkhill. Despite some physical connection to the existing urban area at Causewayend, development breaking out over this feature would add to a sense of urban sprawl unconnected to the existing urban area.</i></p> <p>Aberdeen is built on 7 hills and along 2 major river valleys. The topography of the City is far from subtle and development has historically used that topography to</p>

			help create character. The level differences and undulating nature of the Perwinnes site is considered a positive in placemaking terms. The terms urban sprawl in not appropriate in the LDP review process – see section 2.5 of this response for further detail.
Land Use Mix / Balance / Service Thresholds	3	3	<i>This development is of a scale that should attract a good range of services and facilities.</i>
Accessibility	1	3	<p><i>The nearest bus stop is 1.3km away from the site at Jesmond Drive, with the number 1 and 2 (First Service) providing links into town.</i></p> <p>New bus services can be facilitated on site. The Council is already proposing new cross city public transport routes through this area so future access will be greatly improved.</p>
Proximity to facilities / shopping / health / recreation	1	3	<p><i>There are no local shopping facilities within 800m from the centre of the development area, although new facilities are proposed to be provided as part of this development.</i></p> <p><i>Old Machar Academy is 1.8km away from the site. Greenbrae Primary School is 2.6km away from the site. Glashieburn Primary is 2.2km away from the site. Old Machar Medical Practice is 2.04km away from the site.</i></p> <p>The scale of the development will allow for appropriate new facilities to be provided on site.</p>
Direct footpath / cycle connection to community and recreation facilities and resources	1	2	<p><i>The are no Core Paths or Cycle Networks surrounding the site. The closest Core Path to the site is Core Path 13 (Brig O’Balgownie to Ashwood), located 1.4km south from the centre of the site at Jesmond Drive. This is also where the nearest Cycle Network is located (Unnamed Footpath: Carrot Belt/Home Farm).</i></p> <p>New footpath and cycle links will be provided on site and improved off-site.</p>
Proximity of employment opportunities	2	3	<p><i>There are limited employment opportunities within 1.6km of this site, but the development will create employment opportunities in this area. Murcar and Denmore Industrial Estates is 2.38km away from the site.</i></p> <p>New employment will be provided on site.</p>
Contamination	3	3	<i>Former sand and gravel pit at Leuchlands adjacent to the eastern boundary but no evidence of contamination within the site itself.</i>
Land Use Conflict	2	3	<i>Uses proposed are unlikely to cause conflict with surrounding land uses. Helicopters fly across this area and their noise can be intrusive. Aircraft noise from the airport is much less intrusive.</i>

			<p><i>Scotstown Road/B997 is a busy route and could cause issues of community severance.</i></p> <p>To be considered in the masterplan approach and particularly the re-routing of the B997 to avoid issues of severance.</p>
Physical Infrastructural Capacity	3	3	<i>Upgrades would be required but the scale of development should ensure this can take place.</i>
Physical Infrastructure Future	2	3	<p><i>MIR analysis seems to mark this aspect down as fibre internet is only available at present at slow speeds.</i></p> <p>As a site immediately adjacent to the existing built up area of Aberdeen it will be reasonably straightforward to provide adequate infrastructure, especially for a site of this scale.</p>
Service Infrastructure Capacity	3	3	<p><i>Oldmachar Academy can currently accommodate development, but this will be used up by the Grandhome development and is forecast to go over capacity in 2024. Glashieburn Primary – covers most of the site. It has a stable roll with capacity for around 180 pupils – approximately 500 houses. Greenbrae Primary – covers the eastern section of the site.</i></p> <p><i>This has much less capacity than Glashieburn – falling to 37 pupils in 2023. However, the site is large enough to accommodate its own primary school capacity.</i></p>
Other Constraints	3	3	<i>Very few paths and no recreational use apparent in the area. Development close to the electricity pylons should be avoided. Consultation would be required with NATS with regards to the operation of Perwinnes Radar.</i>
	46	60	



DRUM
PROPERTY GROUP
DEVELOPMENT & INVESTMENT

LAND AT PERWINNES, BRIDGE OF DON
LOCAL DEVELOPMENT PLAN BID
MAY 2018

FOR DRUM PROPERTY GROUP
BY HALLIDAY FRASER MUNRO



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- 2.0 Opportunities & Constraints
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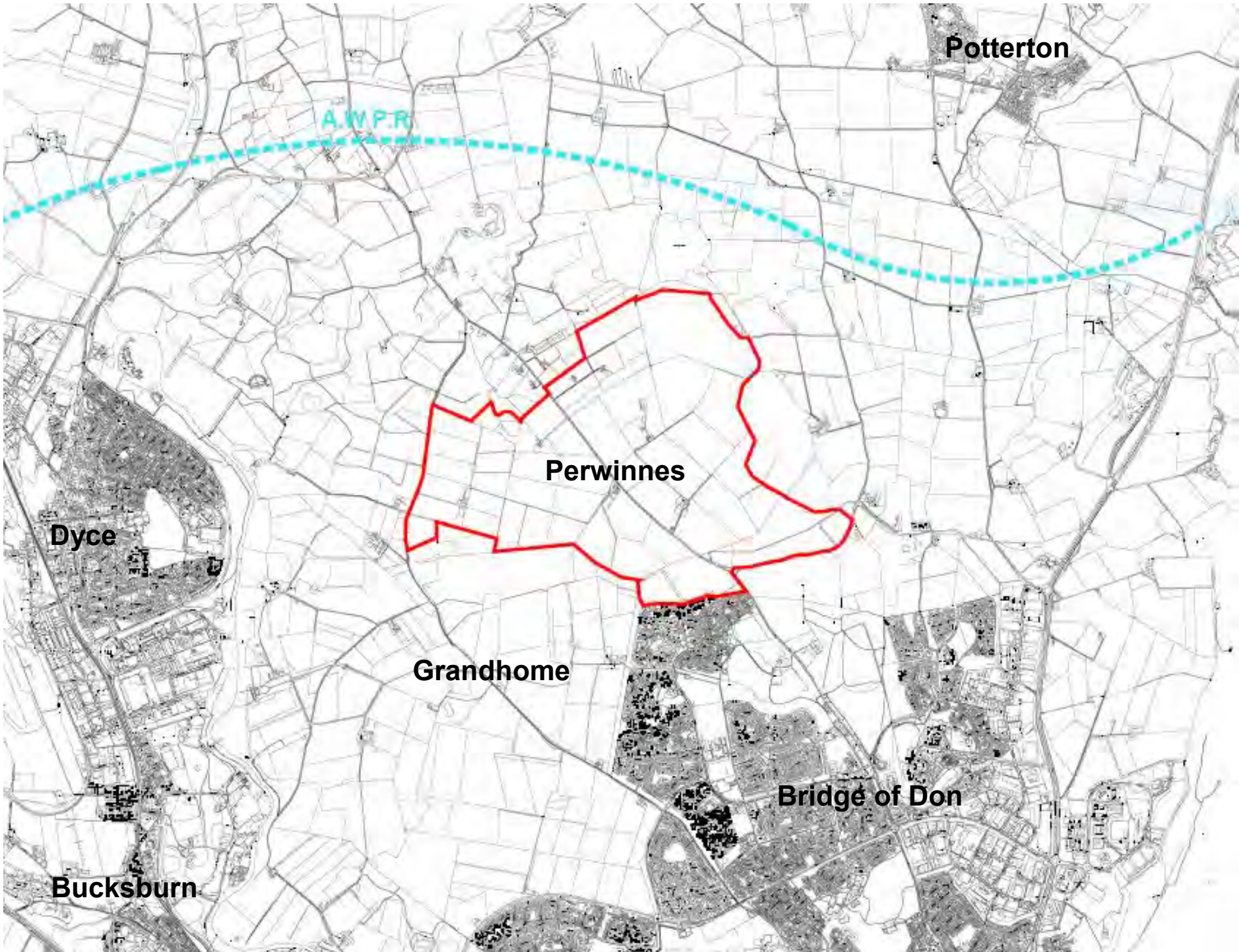


Figure 1—Location Plan

1.0 Introduction & Site

A sustainable, viable and deliverable urban extension to secure a fully planned expanded City community that offers an excellent quality of life

Introduction

The site “Perwinnes” is an area of land totalling approximately 277 Ha to the north of Aberdeen. The area is predominantly agricultural land and is currently located in the Green Belt and partly in the Green Space Network in the Current LDP.

This bid is proposed by Drum Property Group in order to promote the land as a “Strategic Reserve Site” or equivalent in the forthcoming LDP.

Site Description

The site is located either side of the B997 and extends approximately 1.3 miles north from the northern end of the Middleton Park area.

The site is currently used predominantly for agriculture or informal open land and forms a significant area for the City set within a relatively flat and gentle rolling landscape at the urban edge.



Figure 2—Indicative Framework Plan

2.0 Opportunities & Constraints

Perwinnes consists mainly of arable farm land. It is dissected diagonally through the approximate centre by the B997 running from south east to north west. The south east corner of the site contains the northern section of a Local Nature Conservation site. The south and west sides of the site are generally bounded by mature woodland with Whitestripes Road also bounding the west side of the site. The very north east corner of the site is bound by Corby Loch.

The site also contains a large Radar located at the highest point of the site in the north east quadrant. Previous discussions with the radar operator have confirmed that this is not an absolute constraint but its location will require stand-off and careful consideration in terms of the layout. More recent discussions suggest that technological advances may make this type of radar redundant during the lifespan of this proposed development. The site has a rolling topography which will provide some natural site screening from the existing developments to the south.

Opportunities

- A. Natural extension to the existing residential development
- B. Deliverable site under single entity control
- C. Alterations to the B977 create interest and naturally calm traffic
- D. Ability to provide a mixture of housing types
- E. Rolling topography helps create a variety of design solutions
- F. Integration of significant areas of green space

Constraints

- 1. Woodland to south east and north east boundaries
- 2. Local nature conservation site to the south east
- 3. Corby Loch to north most edge of site
- 4. Radar station within the site
- 5. B997 passes through the site
- 6. Two areas of Greenspace Network
- 7. Whitestripes Road bounds site to the west

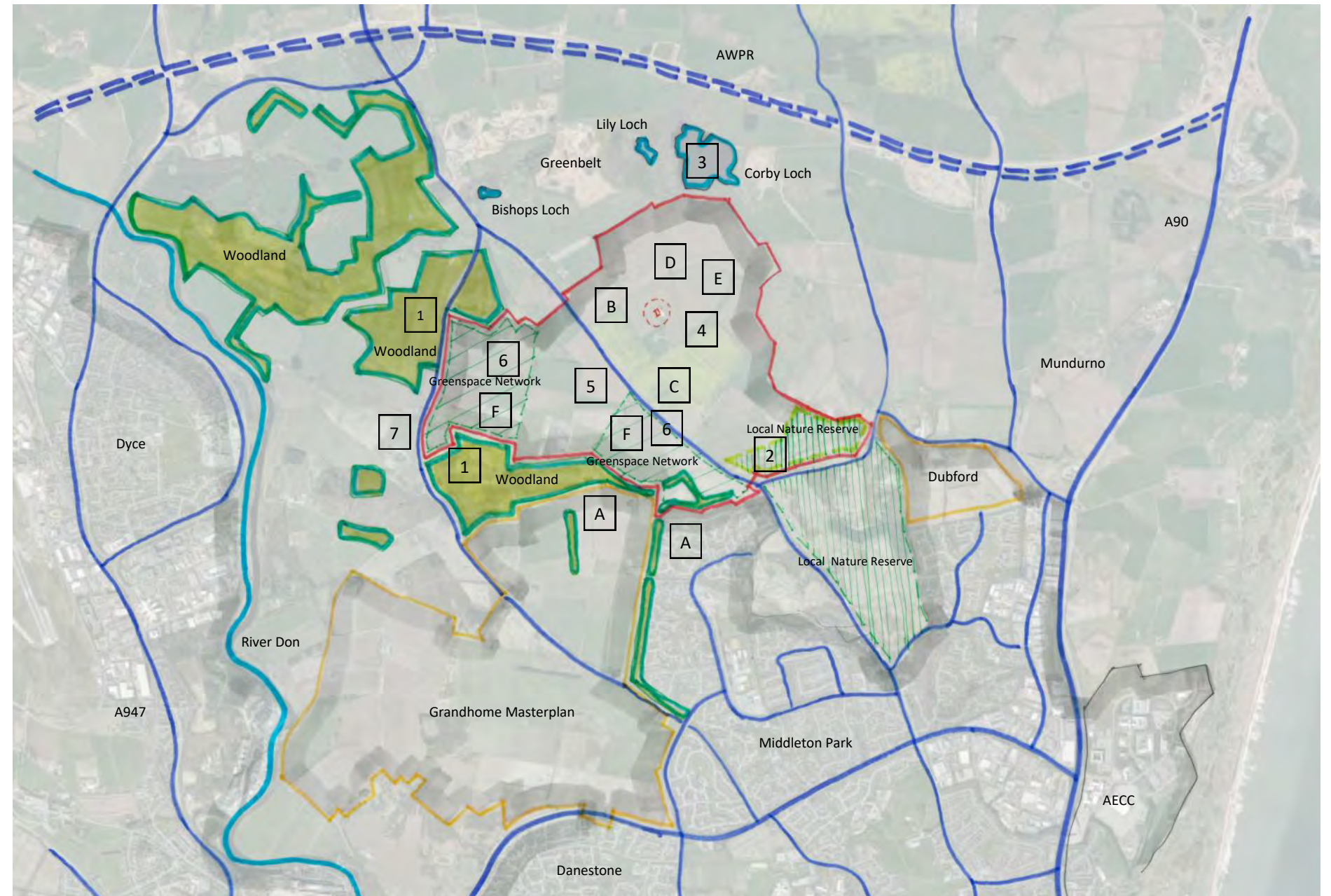


Figure 3—Opportunities & Constraints

3.0 Key Routes & Connections

- B997—the key route between the Goval Junction/AWPR and Bridge of Don
- East west links to Dyce, Aberdeen Airport and the A90
- Local links into the wider Green Space Network and open spaces along the north side of the City.

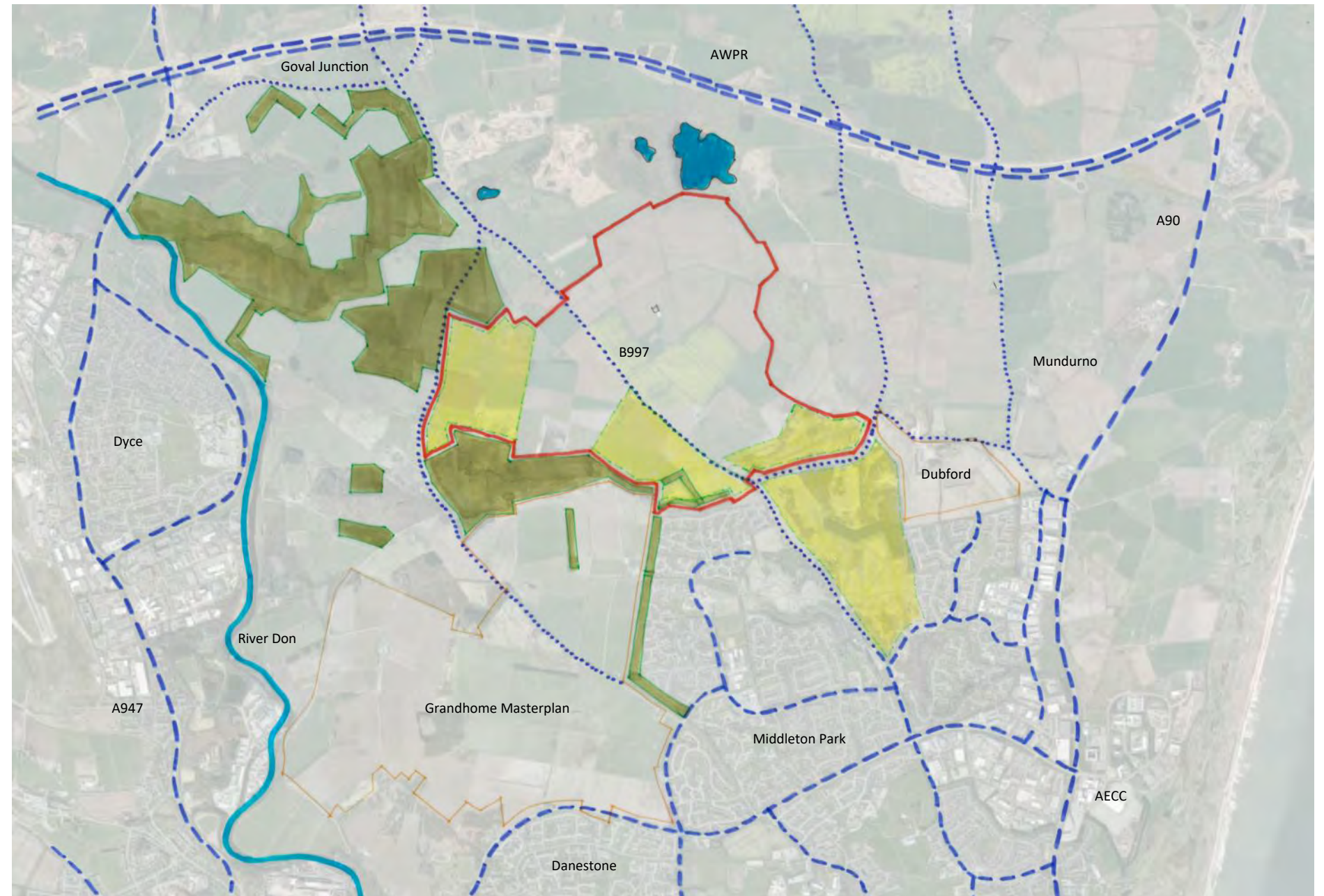


Figure 4—Key Routes and Connections

4.0 Concept Diagram

Access

The main feeder road, the B997, currently dissects the site running in a North Westerly direction through the approximate centre of the site. This is a main route to the AWPR and will become an important transport route.

The proposal would be to alter the layout of this road as it enters the site at the south eastern edge in order to reduce traffic speed and improve safety. After meandering through the scheme the road would exit at the NW side in its current location.

Green Space

As the site contains two areas of Green Space Network and part of a Local Nature Conservation Site it is proposed to maintain/protect the latter from major development and create significant green space corridors within the scheme – linking with the woodlands to the south and in a similar fashion to the adjacent Grandhome Masterplan site to the south.

Distinct Neighbourhoods

The scheme would be designed such that the layout could create a number of distinct neighbourhoods each with its own individual identity.

Associated Uses

The scale of the land area indicates a significant development that will require some local services/community facilities as well as the proposed housing.

Phasing

The framework approach would also allow for development in a phased manner.

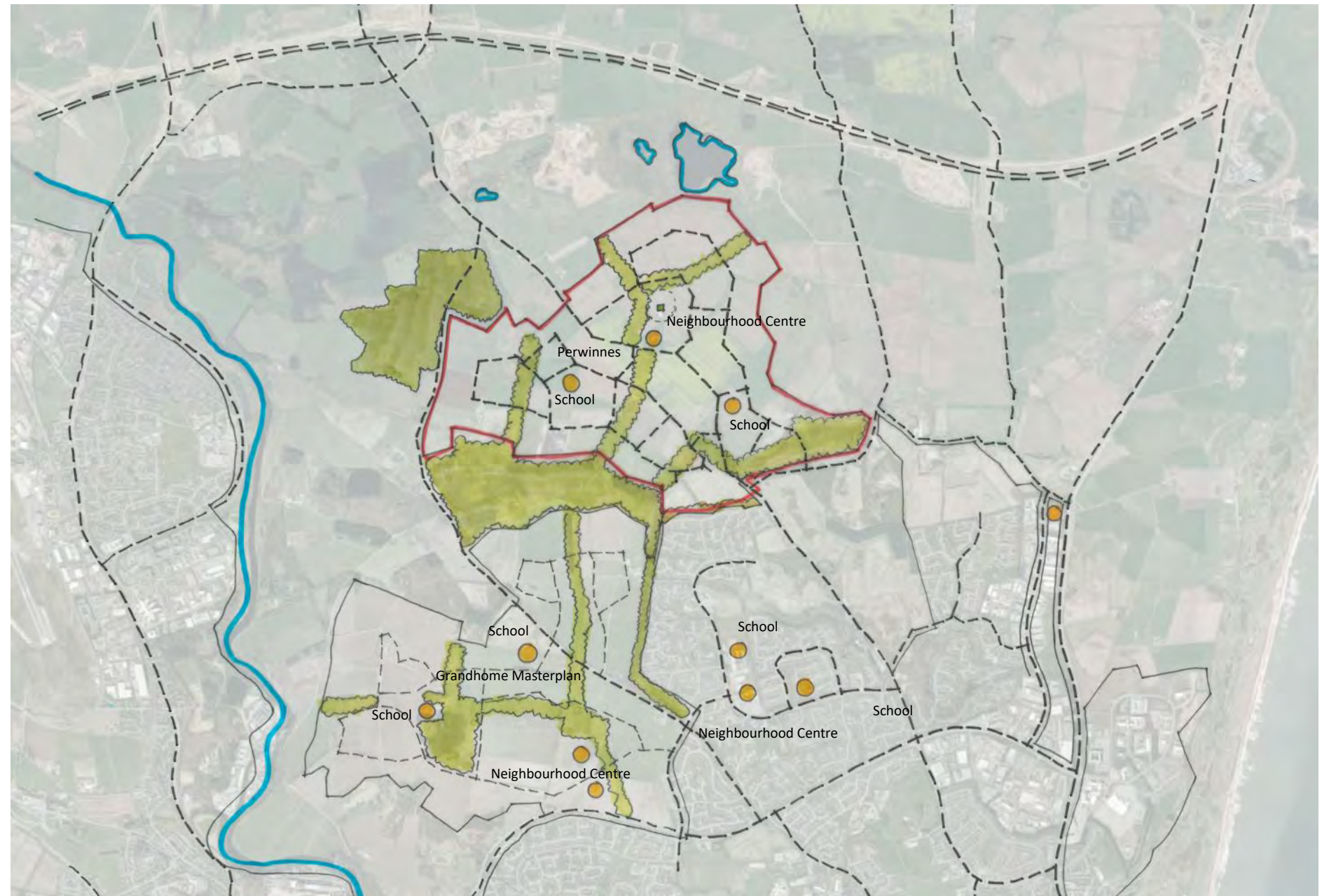


Figure 5— Indicative Concept Diagram

5.0 Indicative Framework

Vision

A sustainable, viable and deliverable urban extension to secure a fully planned expanded City community that offers an excellent quality of life.

To help guarantee Aberdeen's ongoing supply of quality housing land and provide housing delivery options should the existing housing land allocations continue to under deliver.

This area of the City should be identified as "area of future growth" (Strategic Reserve Site), supported strategically through the SDP to allow future LDPs to propose detailed policy on how and in what circumstances sites like this can be delivered.

Current major housing allocations still have to be built out but this is the only large, relatively constraint free area in Aberdeen under single ownership capable of acting as a strategic reserve site over a 20 – 30 year period. It should be protected for that use. Should Aberdeen City not be delivering the required number of homes it requires from current allocations then this site could be called upon in phases to deliver more homes over time.

Summary

The proposal is to protect this part of the city for large-scale, potentially incremental, sustainable urban growth. The key benefits in supporting this bid are that it is controlled by a single developer, it has limited constraint, can improve access and local road networks as a sustainable masterplanned extension to the existing urban area.

Benefits

Opportunity to provide an additional medium to long term 3,000 to 4,000 houses within the boundaries of Aberdeen

Provides security of housing provision should other housing allocations continue to under-deliver

Opportunities for significant affordable housing delivery as part of the overall development area

Well connected to the wider road and footpath networks

Strong connections to the countryside and recreational opportunities

Limited development constraints

Scale of the site allows for a fully masterplanned approach to future development

In single developer control

Developer with a strong delivery focus



AWPR

Lily Loch

Corby Loch

Greenbelt

Bishops' Loch

Woodland

Woodland

Mundumo

Radar

Neighbourhood Centre

Secondary School

Primary School

Local Nature Reserve

Dyce

A90

Woodland

Causewayend Site

Scotstown Moor Local Nature Reserve

Dubford Housing Scheme

Murcar Units

Middleton Park

River Don

Secondary School

Secondary School

Primary School

Neighbourhood Centre

A947

Primary School

Grandhome Masterplan site

Primary School

Neighbourhood Centre

Bridge of Don

AECC

Danestone

6.0 Housing Land

Housing Land

Consideration should be given in both the SDP and the LDP to how realistic expectations are for delivery of existing housing allocations, in particular when considering infrastructure constraints of large allocations. Assuming previous build rates will continue accepts that those existing allocations could not deliver at a greater pace. This may not be the case due to their complex and often financially challenging infrastructure issues.

The failure of some large allocated sites to deliver housing is evident in annual housing land audits. The tables below illustrate specific examples of the larger allocations in both City and Shire. In the City these selected sites have only delivered just over 10% of their original anticipated housing units and in the Shire only 6.4%. The SDP MIR also reports a shortfall in the delivery of housing.

These have failed to deliver for a number of reasons. This is often down to infrastructure delivery issues, ownership or procedural delays in the preparation and agreement of masterplans. This needn't be the case and especially so if potential sites are identified well in advance. The strategic reserve approach outlined below would allow such sites to be manoeuvred into a development ready state prior to their requirement and create opportunities for much more efficient delivery mechanisms.

Current housing land allocations haven't been delivering at the scale originally anticipated. This has created a housing delivery backlog and new housing allocations are required to deliver the City's housing requirements.

The joint Strategic Development Plan Main Issues Report, currently out for consultation, states that the 2,769 fewer houses overall and 3,000 fewer affordable houses were delivered in the 5 years to 2016

Comparison of Major Housing Proposals in 2012 LDPs against actual delivery									
City	site	ref	2007-2016	Cumulative 2015	shortfall	Cumulative 2016	shortfall 2016	Cumulative 2017	shortfall 2017
	Grandhome	OP12	2600	0	2600	0	2600	0	2600
	Dubford	OP25	550	190	360	309	241	397	153
	Stoneywood	OP24	500	133	367	231	269	514	-14
	Craibstone South	OP28	750	0	750	0	750	0	750
	Rowett South	OP30	1000	0	1000	0	1000	0	1000
	Greenferns Landward	OP31	750	0	750	0	750	0	750
	Maidencraig	OP43 & OP44	750	5	745	24	726	60	690
	Greenferns	OP45	600	0	600	0	600	0	600
	Countesswells	OP58	2150	0	2150	4	2146	154	1996
	Oldfold	OP62	400	0	400	25	375	50	350
	Loirston	OP77	1100	0	1100	0	1100	0	1100
	TOTALS		11150	328	10822	593	10229	1175	9054
			percentage delivered	2.9%		5.3%		10.5%	

than required by the SDP and the HNDA. That's around 600 houses less than required every year.

Analysis of housing land delivery in the City on key large sites identifies a significantly worse housing delivery record. The following table identifies that key development sites in the City, their original anticipated housing numbers and the actual delivery over a 10 year period, all based on the Council's Housing Land Audits. It shows that of the 11,150 houses originally proposed on these sites just over 2,000 (around 10%) have been delivered.

The evidence points to slower delivery rates on a site by site basis. The City Planning Authority needs to allocate additional housing land to help supplement that lack of delivery over many years and catch up with demand. These sites should be in a range of locations and at a range of scales to encourage a greater range of developers and offer choice to those looking to buy a new home. The City Council has suggested that sites up to 100 housing units are appropriate.

This site meets that requirement on the basis that is utilised as a reserve site on a phased basis following a masterplan.

Housing Land and "Strategic Reserve Sites

We have made a submission to the SDP indicating that the Spatial Strategy should be amended to increase more flexibility in terms of future directions of growth for the City of Aberdeen throughout the whole period of the SDP. Whilst there are a number of existing large scale housing allocations that need to be worked through it is important for the SDP to provide guidance for where also Aberdeen can expand long term.

A higher housing target incorporating strategic reserve sites should be adopted to push the industry to deliver whilst providing flexibility to adapt should existing sites not deliver at the pace required by the SDP. This is the best of both worlds i.e. allows existing allocations to be developed and shortfalls to be met by other identified sites.

Increasing housing delivery is a priority for the Scottish Government and an ambitious housing supply target would challenge the market to deliver more housing. Identifying future direction of growth areas and Strategic Reserve Sites provide the SDP and LDP's with a further mechanism of increasing completion rates. This is on the basis that should existing allocations not deliver the ambitious target then the reserve sites could be called upon to assist.

We have said the SDP should identify "potential future area of growth" and propose the creation of strategic reserve sites in in the LDP's in order to provide flexibility should it be realised the housing supply target is not being met. Existing large allocations in the LDP would still take priority however strategic reserve sites could be called upon in phases if need be.

Strategic reserve sites in the LDP can still be masterplanned appropriately to avoid unplanned urban expansion but on the understanding that before development can be accommodated on reserve sites it has to be demonstrated that there is a need in order to meet housing supply targets. Incremental growth into strategic reserve sites can happen over a 20 – 25 year period with appropriate masterplanning, which would provide long term flexibility in meeting the housing supply target whilst not prejudicing the existing effective housing land supply.

By establishing the direction of travel for future urban expansion through strategic reserve sites it would also allow the SDP and LDP strategy to accommodate a high growth scenario should that be encountered or if large existing allocations do not deliver as expected.







Aberdeen Local Development Plan Review

Main Issues Report Response Form 2019

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

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

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

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

Responses to the published documents can be:

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

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



YOUR DETAILS

Name	STEVE CRAWFORD
Organisation (if relevant)	HALLIDAY FRASER MUNRO
On behalf of (if relevant)	DRUM PROPERTY GROUP
Address	
Postcode	
Telephone	
E-mail	

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



If yes, please provide an e-mail address

PRIVACY STATEMENT

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

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

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

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

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

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

YOUR DATA, YOUR RIGHTS

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

YOUR COMMENTS

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

Prime West - Please see separate response enclosed in response to:

- Site B0310

Please also find enclosed the following in support of the response:

- 'Retail Update' Document
- LDP Bid Document

YOUR COMMENTS CONTINUED

B0310 – Prime West, May 2019

- *B0310 – Rezoning of land for 1400sqm of convenience retail, 13900 sqm comparison retail*
Note that the Council have split the site into three areas for the purposes of assessing the site, as follows;
 - Area 1 – Eastern third of the site*
 - Area 2 – Middle Section (including garage)*
 - Area 3 – Western third of the site (adjacent to AWPR)*

1.Introduction

Halliday Fraser Munro lodged an LDP bid for the above site on behalf of Drum Property Group. During the review process Aberdeen City Council officers have suggested that the site is ‘undesirable’ and presented an analysis. Their reasons are generally based on the following:

- Erosion of allocation for high quality business use
- Contrary to agreed development framework
- Additional traffic on A944
- Contrary to town first principle & may have an impact on commercial centres including Aberdeen City Centre
- Contrary to SDP in that employment land should be protected

These, we believe, are not valid reasons for discounting the site and we have responded accordingly in the following pages. Site B0310 is located in a sustainable location, with a core path adjacent to the site offering cycling and pedestrian route to the site from Aberdeen City and Westhill, a park and ride within 800m of the site, and the opportunity to provide a new bus stop and enhance public transport series along the A944. The site is adjacent to a world class business park and the new Aberdeen Western Peripheral Route (AWPR).

The key reasons against the allocation of site B0310 largely relate to conflict with existing policy positions. The LDP review is an opportunity to address strategic issues and should not be reviewed within the confines of the existing policy context. Development plans should be based on deliverable spatial strategies that take account of the scale and type of development pressure and the need for growth. The assessment of the site should therefore be based on the need for the development and the appropriateness of the site.

It is also of relevance that part of allocated site OP29 adjacent to the proposed development has recently been recommended for approval for three food and drink units (including 2 fast food restaurants). The planning application (reference 181336) was found to be compliant with Policy B2 as it would service Prime Four employees. The proposal was also said to have a positive economic impact on the city and surrounding areas, adding to the limiting local amenities for residents. These principles could also be applied to the development proposed on site B0310, which would also offer additional benefits given that it proposes a greater mix of uses.

Each of the issues raised in the site assessment are considered in the following response.

2. MIR Response

2.1 Loss of Business Land

Aberdeen City has plenty of employment land as demonstrated by the Employment Land Audit 2017/2018. There are almost 300 hectares (ha) of established employment land in the city, and an 222ha of marketable land (see figure 1 below). The Proposed Strategic Development Plan (PSDP) requires only 60 ha of marketable land is available at all times, and that 20 hectares of marketable land within the Strategic Growth Area is available to attract high quality business.

APPENDIX 2: Employment Land Supply in Aberdeen City (all figures in hectares)

Location	Developer	Constraints	Serviced	Established	Constrained	Marketable	(of which) immediately available	Under Construction
LOC108/Newlands (Balmoral Business Pk)	Balmoral Group	None	Yes	2.2	0	2.2	2.2	0
Aberdeen Gateway	Halladale Muir	None	Yes	2.4	0	2.4	2.4	0
Peterseat	Forbes Development Ltd	None	Yes	8.6	0	8.6	8.6	0
Altens East & Doonies	Aberdeen City Council / Essen Properties	None	Part	8.2	0	8.2	8.2	0
Aberdeen Science & Energy Park	Scottish Enterprise	Class 4 Only	Yes	1.5	0	1.5	0	0
Aberdeen Innovation Park	Scottish Enterprise	Class 4 Only	Yes	3	0	3	0	0
Findlay Farm	Aberdeen Science Parks LP	Class 4 Only	No	16.4	0	16.4	0	0
The Core Berrhill/Cloverhill	Private		No	88.4	0	88.4	0	0
Airport Dyce Drive	Miller, Abstract, ABZ Development Ltd	Ownership & Infrastructure	Part	77.35	30.1	47.25	21.5	0
Dyce Drive (Dyce Avenue)	Norley		Yes	1.1	0	1.1	1.1	0
Halls Dyce (Kirkton Drive)	Private		Yes	1.5	0	1.5	1.5	0
Wellheads West	Private	Noise & Height Restrictions	Yes	0.9	0	0.9	0.9	0
OP9 Grandhome	Grandhome Trust		No	5	5	0	0	0
OP18 Craibstone North & Walken Farm	Private		No	1.5	1.5	0	0	0
OP19 Rowett North	Private		No	34.5	0	34.5	0	12
Prime Four	Drum		Part	16.5	0	16.5	5.9	0
OP33 Greenferns	ACC		No	10	10	0	0	0
OP34 East Arnhall	Private		No	1	1	0	0	0
OP38 Countesswells	Countesswells Consortium		No	10	0	10	0	0
OH8 Oldford	CALA		No	5	5	0	0	0
OP59 Lorston	Private		No	11	11	0	0	0
				286.05	63.6	222.45	52.3	12

Figure 1 – Extract from Employment Land Audit 2018 (Aberdeen City and Aberdeenshire) – showing Employment Land Supply Note: Prime Four shown as highlighted in yellow

Whilst figure 1 above shows that the employment targets are being met, we would suggest that the established land supply is actually in excess of this.

The land available in the wider Prime Four site is suitable for high quality businesses and will remain so. This proposal, however, is promoting a greater mix of uses, including retail, to help support Prime Four as the prime location for new businesses in the City. That principle was agreed recently by Aberdeen City Council when approving the three food and drink uses on the adjacent site. We suggest that principle is applied to this section of the OP29 which most accessible from the A944. Even with the proposed retail site (8.5ha), and the proposed food and drink (1.5ha) the OP29 site could accommodate more than 20ha over current and future phases to help meet the PSDP employment land targets.

Re-allocating site B0310 for supporting retail use will have a minimal impact on the overall employment land supply but will help widen the attraction of Prime Four and support future business use on the remaining land.

2.2 Development Framework

The OP29 Development Framework was first adopted as Supplementary Guidance in 2011. The Framework was subsequently adopted as Supplementary Guidance to the 2017 Aberdeen Local Development Plan given that it remained a valid planning consideration.

The Framework sets out design parameters and a spatial framework for the development of the business park as a whole, with masterplans providing additional detail for each phase of development. The proposed development site (site B0310) was identified as phase 4 in the agreed framework. The Framework document has the key objectives to:

- *Create a landscape which reflects the rural character of Aberdeenshire;*
- *Relates to the surrounding area and takes its references from the natural heritage;*
- *Create settings for buildings which are sympathetic, balanced and mitigate their visual impact on the landscape;*
- *Create external environments which enhance the daily living experience (e.g. spaces for outdoor socialising and exercise);*
- *Create a high-quality environment by the considered design of external features such as footpaths, street furniture, woodland belts and boundary wall;*
- *Provide multiple connections and maximum choices for people to use sustainable travel modes to travel to work, e.g. walk, cycle, or bus; and*
- *Create opportunities for ecological enhancements, biodiversity and nature conservation.*

These objectives would be integrated into the retail development at Prime West should it progress, and the quality of finish would be in line with that at the adjacent Prime Four Business Park. The only element in which the proposal would not accord with in the framework is land use.

The high-quality environment at Prime Four would be maintained through a retail development on this site.

Drum Property Group has a strong track record of delivering award winning and celebrated developments. In Aberdeen the best example is Prime Four Business Park at Kingswells. Through working closely with the City Council and local community that site has been developed in a manner that creates character by re-using or incorporating natural features, respecting the field layout and the Scheduled Ancient Monument to the north and ancient woodland at its edges. That approach has proven very successful and the approach to this site would be similar – agreeing a development framework, identifying key features to be protected or incorporated, establishing appropriate development areas and producing adoptable overall or phased masterplans to deliver the proposed development. All of these processes would involve coordination and involvement of the Council, communities and other relevant bodies to ensure successful and deliverable, appropriate and worthy new retail facilities that are fit for purpose and increase Aberdeen’s competitiveness.

2.3 Traffic Impact

The site has access to a range of sustainable travel modes including; bus, cycling and walking. The site is located close to Kingswells and Westhill and is less than 6 miles from Aberdeen City Centre. In combination with the Prime Four Business Park, the development would create a sustainable mixed-use commercial and business centre for West Aberdeen.

In relation to vehicular traffic, the site is already allocated in the Aberdeen Local development Plan and hence the site will be included as a committed development for the purposes of traffic modelling. The transport impact of a retail development will be different to business uses, primarily in relation to the timing of vehicle trips. The proposed retail use is unlikely to have the same peak impact as the proposed business uses. There is also potential for linked trips with the business park, and the new football stadium currently under construction to the west of the site.

Drum Property Group has undertaken significant transport improvements on the A944 to enable Prime Four to progress. Additional road and junction improvements would be required to enable this retail proposal to progress. However, given the operation of the AWPR is in its early stages, there is not currently the traffic data available to assess the impact of the development in detail. This is as noted in a recent report to Aberdeen City Council's 'City Growth and Resources Committee' on the "Performance of Junctions Associated with the AWPR/B-T". That report stated "the AWPR technical advisors are conducting daily surveys to monitor the performance of the junction at South Kingswells", and so there is not the level of traffic information available at present to fully assess the traffic impact. Aberdeen City Council's Roads Development Management Department recently commented on a proposed development adjacent to the site noting that post AWPR traffic data was not yet available. It is therefore impossible to rule out proposals on the basis of that unknown data, especially for allocated sites where development is already expected.

In summary, any impact on the A944 would be mitigated, taking into account the AWPR at the time of the respective applications. The LDP review should not be ruling out development as a result of an unknown impact.

It should also be noted that Transport Scotland, in respect of impacts on the AWPR, did not object to the previous and larger retail planning application lodged for this bid site. Their consultation response included two proposed conditions: 1) that the food retail element of the proposed development shall not exceed a total of 3,716 sqm and the total development GFA shall not exceed 30,000 sqm and 2) that no part of the development shall be occupied until a comprehensive Travel Plan that sets out proposals for reducing dependency on the private car has been submitted and approved in writing by the planning authority. The scale of the current bid is significantly below that previously accepted by Transport Scotland.

The proposal would result in an additional bus stop on the A944 and given the potential increase in footfall to the area, could result in an improved public transport connection along the A944 to the benefit of the residents of Westhill and Kingswells. The site is already allocated and therefore has associated traffic flows which have been taken account of, meaning the impact of an alternative development on the site is minimal.

The proposal and associated road improvements would help manage traffic along the A944 and at the new AWPR junction.

2.4 Retail Impact

This bid for development proposes:

- 1,400sqm of local convenience floorspace
- 13,900sqm of comparison floorspace (to exclude department store and fashion/clothing)
- full mobility access
- associated parking
- on-site bus stop
- dedicated management suite and a click & collect facility
- baby changing and toilet facilities.

It is of note that this bid is substantially smaller (about 50% less) than the previous proposal which was the subject of application reference 161429/PPP and hence comparisons should not be drawn between the two.

A retail statement was submitted in support of the bid and has been updated to support this response (enclosed). This statement by Zander Planning summarises that the proposed development would have an impact on the city centre of around 5.5% but that this is not considered significant, particularly given that the city centre is considered to be 'healthy'.

The proposal seeks to complement the city centre by offering a new retail destination. There is an identified deficiency in retail floorspace, and this proposal provides the opportunity for new large format stores for which there is no opportunity within the city centre. Aberdeen City urgently requires a modern retail park which will satisfy demand, provide updated customer facilities required by shoppers and make the City more competitive.

In addition to consideration of the impact on the city centre, the need for a commercial centre to the west of Aberdeen is also a key consideration. The proposed retail use offers an opportunity to claw back a substantial amount of the identified and accepted retail expenditure leakage from the city region. Aberdeen needs to be able to compete with other retail locations in Scotland. The site is considered the optimal location for retail given:

- its co-location with major existing and future employment uses at Prime Four Business Park;
- its location adjacent to recently approved restaurant development (planning reference: 181336)
- its location adjacent to one of the few junctions on the AWPR; and
- its location at the centre of Aberdeen's major strategic westward expansion.

In addition, there are no alternative sequentially preferable sites available. A full review of alternative sites was undertaken for the previous larger scheme. However, despite the reduction in floor space, the site area is not significantly less, and hence there is no change to the previous assessment. No site closer to the city centre is available or suitable to deliver the proposed development.

The proposed retail development would create a high-quality commercial centre to the west of Aberdeen, serving a growing population to the west of the city. The need for additional facilities in this location was acknowledged in the recently approved food and drink/Drive-thru application to the east of the site. This site would help meet that identified need.

2.5 Proposed Strategic Development Plan

The PSDP supports the Town Centre First Principle and seeks to ensure that vitality and viability of town centres is guaranteed and notes the transformation of Aberdeen City Centre needs to be supported. This proposed retail development would not have any significant adverse impact on Aberdeen City Centre, as outlined above and in the supporting information. The supporting retail statement provides justification in relation to this, but in summary, the scale and type of retail proposed will not be in direct competition with Aberdeen City Centre.

2.6 Other Issues

2.6.1 Landscape

The site is framed between the Prime Four Business Park to north and east (as well as the Ardene Veterinary practice), the A944 to the south and the AWPR to the west. Beyond the AWPR is the proposed football stadium. The site therefore sits in a context of developed land.

A landscape and visual assessment supported a previous, larger application (reference 161429) on the site and noted the context of the site in that it was allocated, and adjacent to the Prime Four Business Park which has changed the character of this part of the city. The assessment also noted that the AWPR establishes a new outer limit to the perceived extent of the city. The assessment concluded that any impacts would be localised.

“The natural landform of the valley combined with the presence of intervening tree cover and built form, contains the extent to which the proposed development would be visible across the wider landscape... Prime 4 Business Park has already altered the character of this edge of city landscape and in which the newly constructed AWPR is establishing a new outer limit to the perceived extent of city development.”

Extract from LVIA (OPEN 11.07.16)

In any case, the site is already allocated for development and the agreed development framework outlines that the site could accommodate buildings of up to 3 storeys. A retail proposal on the site is likely to be of lower density and lower building heights with less landscape impact.

2.6.2 Loss of Trees

The group of conifer trees along adjacent to the A944 would be proposed for removal for the proposed development to progress. There would be no impact on other trees within the site.

A tree survey was carried out for the site which identified that the group of conifers are a relatively young group of trees, of a commercial nature which have not been maintained. The life of these trees is likely to be short-lived and require removal within 30 years in any case. Any trees to be removed would be replaced.

Trees are not therefore an issue for the proposed development site and would have to be removed should the site be developed for business use in any case.

2.6.3 Green Space Network

Part of the site is identified as green space network, and whilst the proposed development would change the nature of the network, the connectivity of green spaces within the site would be retained. That would be the case regardless of the end use.

3. Conclusion

Drum Property Group do not agree with the justification presented in the MIR to reject bid B0310 (Prime West). The assessment dismisses the site on unjustified grounds. In summary;

- The site is an allocated site. Even if reallocated for retail use the wider OP29 site would still maintain a supply of high-quality business land equivalent of around 20hectares.
- The site could comply with the design parameters set out in the agreed Development Framework and would therefore not be significantly contrary to this document.
- The site is in a sustainable location which is accessible by a range of means. The traffic impact will need to be fully assessed once the post-AWPR traffic data is available, but any impact could be mitigated. Transport Scotland had no traffic issues with a previous planning application for a larger development in 2017.
- This reduced scale retail proposal would not have an adverse impact on the city centre, and there is a need for a high quality out of town retail part to service bulky and household goods.
- Sequentially, there are no preferable sites closer to the city centre.
- There is a deficiency in retail provision to the west of the city which is compounded by the growth of the city in that general westerly direction
- The site is not contrary to the Proposed Strategic Development Plan as it would not have a major adverse impact on the city centre and would create an opportunity to grow the economy and reduce retail spending leakage.

The site has minimal impact in relation to natural heritage, built heritage, landscape, and infrastructure. The site assessments prove that the site is well placed for development, across the three site areas the site scores an average of 58 (out of a possible 63).

The site would ultimately result in a new sustainable mixed-use commercial and business centre for West Aberdeen. The development would have minimal impact on the city centre and would offer significant benefits in terms of meeting current retail deficiencies and reducing retail spending leakage. The site would also be compatible with the recently approved football stadium to the west with the opportunity for linked trips. A development of three restaurants (including two drive-thru) was recently approved on the adjacent Ardene Veterinary site which is also within the allocated site OP29.

Drum Property Group have a record of delivering high quality developments, as demonstrated by Prime Four Business Park. This development would follow that trend, and a high-quality retail development with exemplary landscaping is proposed. Drum Property Group are fully committed to mitigating against any adverse impacts in relation to roads, as they have done for Prime Four.

Attachments:

- *Response Form;*
- *LDP Bid document (for reference purposes)*
- *Updated Retail Statement*

APPENDIX 1 – Site Assessment Review

'Sustainability Checklist' Area 1 (Eastern Section of Site B0311)

Criteria	Officers Score	Updated Score	Drum Response
Exposure	3	3	Site has woodland to the north.
Aspect	3	3	The site is south facing.
Slope	2	2	The majority of the site is generally flat, but the land slopes to the north of the site.
Flood Risk	2	2	SEPA flood maps indicate a small area of surface water flood risk. The Denburn runs along the southern boundary but is culverted. There haven't been any recording flooding incidents, and the development provides the opportunity to improve drainage on the site.
Drainage	1	2	There is an area to the south of the site which is boggy due to the Denburn, however the development offers the opportunity to enhance this feature and improve drainage. This could be done in a similar manner to Prime Four where the treatment of that issue is now considered part of the high-quality site landscaping.
Built/Cultural Elements	3	3	No loss or disturbance to archaeological sites or vernacular buildings.
Natural Conservation	1	2	<i>The assessment notes that the area is classed as a priory habitat, bat habitat and Red Squirrel and Tern species have been recorded on the site. The southern half of the site is green space network.</i> An ecological impact assessment supported a previous application on the site, and found the site is overall of low ecological interest and there were no issues identified by the Councils Environment team at that time. Landscaping is proposed to the south of the site.
Landscape Features	2	3	<i>Development would lead to loss of woodland.</i> The conifer woodland belt is not of significant landscape value and improved landscaping would be part of any development.
Landscape Fit	2	3	<i>Suggestion that the site does not fit well with veterinary hospital to the east.</i>

			The site is essentially framed by existing development and fits well in the landscape. The existing Prime Four business park provides a backdrop to the development, and the site is bound by main roads to the south and west. To the east an application for three restaurants has been approved which will change the nature of this part of the site. The veterinary surgery is within the OP29 designation in any case.
Relationship to existing settlement	2	3	The site is part of allocation OP29/OP63. It is well related to the Prime Four Business Park.
Land Use Mix / Balance / Service Thresholds	2	3	Proposed development improves the land use mix.
Accessibility	3	3	The site is highly accessibly by public transport and by walking/cycling.
Proximity to facilities / shopping / health / recreation	1	2	The site is within 800m of the Prime Four hub which includes a hotel, nursery and recreation facilities. As a proposed retail development, proximity to facilities and health requirements is not essential.
Direct footpath / cycle connection to community and recreation facilities and resources	3	3	Core path 91 runs along the southern boundary of the site. Improvements to this path would form part of the proposed development.
Proximity of employment opportunities	3	3	Prime Four Business Park is a world class business park adjacent to the site.
Contamination	1	2	The site possibly has some contamination which would be remediated through the development of the site.
Land Use Conflict	3	3	No conflicts.
Physical Infrastructural Capacity	3	3	No known constraints
Physical Infrastructure Future	1	3	The site does have access to high speed broadband which is currently available at Prime Four (this would be a requirement for the proposed development).
Service Infrastructure Capacity	3	3	School capacity is not a requirement for the proposed development.

Other Constraints	1	3	There is an electricity line across the site which would be relocated for the development to take place and discussions have taken place with the operator.
Score	45	57	

Table 1 – Sustainability Checklist for Area 1 of site B0310 – extract from Appendix 3 of the MIR

'Sustainability Checklist' Area 2 (Middle Section of Site B0311)

Criteria	Officers Score	Updated Score	Drum Response
Exposure	2	3	Site is relatively sheltered.
Aspect	3	3	The site is south facing.
Slope	2	2	The majority of the site is generally flat, but the land slopes to the north of the site.
Flood Risk	2	2	SEPA flood maps indicate a small area of surface water flood risk. The Denburn runs along the southern boundary but is culverted. There haven't been any recording flooding incidents, and the development provides the opportunity to improve drainage on the site, as per Phase 1 of Prime Four Business Park.
Drainage	3	3	Site is freely draining.
Built/Cultural Elements	3	3	No loss or disturbance to archaeological sites or vernacular buildings.
Natural Conservation	2	2	<i>The assessment notes that the area is within potential bat habitat and the conifer tree belt is classed as a priory habitat.</i> An ecological impact assessment supported a previous application on the site, and found the site is overall of low ecological interest and there were no issues identified by the Councils Environment team at that time.
Landscape Features	2	2	Loss of the existing garage and caravan park but the proposed development would improve the landscape.
Landscape Fit	2	3	<i>Development could be seen not to fit with the landscape given open farmland opposite.</i> There is existing development on the site, and the site sits within a developed context. The existing Prime

			Four business park provides a backdrop to the development, and the site is bound by main roads to the south and west. To the east an application for three restaurants has been approved which will change the nature of this part of the site.
Relationship to existing settlement	2	3	The site is part of allocation OP29/OP63. It is well related to the Prime Four Business Park.
Land Use Mix / Balance / Service Thresholds	2	3	Proposed development improves the land use mix.
Accessibility	2	3	The site is highly accessible by public transport and by walking/cycling. The development would provide the opportunity to enhance public transport provision along the A944 and would include provision for bus stops.
Proximity to facilities / shopping / health / recreation	1	2/3	The site is within 800m of the Prime Four hub which includes a hotel, nursery and recreation facilities. As a proposed retail development, proximity to facilities and health requirements is not essential.
Direct footpath / cycle connection to community and recreation facilities and resources	3	3	Core path 91 runs along the southern boundary of the site. Improvements to this path would form part of the proposed development.
Proximity of employment opportunities	3	3	Prime Four Business Park is a world class business park adjacent to the site.
Contamination	1	2	The existing garage could have contamination, but this would be remediated through the development of the site.
Land Use Conflict	3	3	No conflicts.
Physical Infrastructural Capacity	3	3	No known constraints
Physical Infrastructure Future	1	3	The site does have access to high speed broadband which is currently available at Prime Four (this would be a requirement for the proposed development).
Service Infrastructure Capacity	3	3	School capacity is not a requirement for the proposed development.

Other Constraints	1	3	There is an electricity line across the site which would be relocated for the development to take place and discussions have taken place with the operator. Removal of this line could result in a landscape improvement.
Score	46	57	

Table 2 – Sustainability Checklist for Area 2 of site B0310 – extract from Appendix 3 of the MIR

'Sustainability Checklist' Area 3 (Western Section of Site B0311)

Criteria	Officers Score	Updated Score	Drum Response
Exposure	1	2	Site has some shelter from topography (land slopes to the north).
Aspect	3	3	The site is south facing.
Slope	3	3	The land slopes gently to the north.
Flood Risk	3	3	No known flood risk on this part of the site.
Drainage	3	3	Site is freely draining.
Built/Cultural Elements	3	3	No loss or disturbance to archaeological sites or vernacular buildings.
Natural Conservation	3	3	No significant natural conservation features in this part of the site.
Landscape Features	3	3	Open farmland with minimal features.
Landscape Fit	2	3	<i>Development very visible from the A944 & AWPR junction.</i> The site is allocated and so would be developed in any case. The visibility of the site from the existing road network is not considered to be an issue, given that a high-quality development that fits in the landscape would be proposed.
Relationship to existing settlement	2	3	The site is part of allocation OP29/OP63. It is well related to the Prime Four Business Park.
Land Use Mix / Balance / Service Thresholds	2	3	The proposed development improves the land use mix.
Accessibility	2	3	The site is highly accessibly by public transport and by walking/cycling. The development would provide the

			opportunity to enhance public transport provision along the A944 and would include provision for bus stops.
Proximity to facilities / shopping / health / recreation	1	2/3	The site is within 800m of the Prime Four hub which includes a hotel, nursery and recreation facilities. As a proposed retail development, proximity to facilities and health requirements is not essential.
Direct footpath / cycle connection to community and recreation facilities and resources	3	3	Core path 91 runs along the southern boundary of the site. Improvements to this path would form part of the proposed development.
Proximity of employment opportunities	3	3	Prime Four Business Park is a world class business park adjacent to the site.
Contamination	3	3	No known contamination on this section of the site.
Land Use Conflict	3	3	No conflicts.
Physical Infrastructural Capacity	3	3	No known constraints
Physical Infrastructure Future	1	3	The site does have access to high speed broadband which is currently available at Prime Four (this would be a requirement for the proposed development).
Service Infrastructure Capacity	3	3	School capacity is not a requirement for the proposed development.
Other Constraints	1	3	There is an electricity line across the site which would be relocated for the development to take place and discussions have taken place with the operator.
Score	51	60	

Table 3 – Sustainability Checklist for Area 3 of site B0310 – extract from Appendix 3 of the MIR

Strategic Environmental Assessment Site B0309

SEA Topic	Objective	B0311 'Site score'	Drum Response (including suggested score post mitigation)
WATER	Status of water body	0	Agree that the scoring is neutral (0)
	Direct impact on water environment	0	Agree that the scoring is neutral (0)
	Public Foul Sewer	0	Agree that the effect would be neutral (0)
BIODIVERSITY FLORA AND FAUNA	Biodiversity, flora and fauna	0	Agree that the effect would be neutral (0)
CLIMATE CHANGE	Carbon Emissions Impact	0	Agree that the scoring is neutral (0)
AIR QUALITY	Air Quality Managed Area (AQMA)	0	Sustainable transport methods will be promoted within the site. Agree site scoring would be neutral (0)
SERVICE INFRASTRUCTURE	Green Network	+	Landscaping proposed Agree site scoring would be positive (+)
SOILS	Greenfield / brownfield	-	Greenfield site but short-term impact during construction. Contamination will be remediated & quality of the soil would not be affected. This is a site which is already allocated for employment uses. The effect is therefore temporary, and score should be neutral (0)
	Contaminated land	0	Agree that the scoring is neutral (0)
DELIVERABILITY / SUSTAINABILITY	Delivered within LDP, Servicing Constraints	+	Site is deliverable within LDP timescales. Agree site scoring would be positive (+)

	Site Aspect	0	<p>Site is south facing and has some shelter. The majority of the site is flat. No development is proposed on the northern part of the site which is steeper.</p> <p>Suggest the site scoring should be positive (+)</p>
	Vehicular Access	-	<p>A new access road into the site would be required, but the majority of the road infrastructure is in place. The AWPR is not a constraint to development.</p> <p>There is ongoing monitoring on the South Kingswells AWPR junction, and it may be that improvements are required to this junction to facilitate development.</p> <p>Suggest the site scoring should be positive (+)</p>
	Facilities	+	<p>Site in close proximity to bus stop (park and ride) and would provide the opportunity for additional bus stops on the A944.</p> <p>Agree the site scoring would be positive (+)</p>
LANDSCAPE	Landscape capacity	-	<p>This is an allocated site, so the principle of development is already established. The A944 corridor between Aberdeen and Westhill is largely developed. The suggestion that the development wouldn't fit with the surrounding agricultural land is therefore questioned.</p> <p>The development would include additional landscaping and tree planting.</p> <p>The AWPR has further changed the nature of the site, and the site is now enclosed between a major dual carriageway road and an existing business park.</p> <p>The site would not have an adverse impact on the landscape, and the development would include high quality landscaping as demonstrated on the adjacent Prime Four Business Park.</p> <p>Suggest that the site scoring should be neutral (0/+)</p>
MATERIAL ASSETS	Impact on waste management site?	++	<p>Agree the site scoring would positive (++)</p>
	Compliance with waste locational criteria	0	<p>The development would provide adequate provision for recycling.</p> <p>Suggest the site scoring would be positive (+)</p>
CULTURAL HERITAGE	Effect on cultural heritage	0	<p>There are no features within the site, but the C listed friends' burial ground is to the north of the site. The impact on this would be considered in the detailed development of the site.</p> <p>Suggest the site scoring would be positive (+)</p>

POPULATION	Promote economic growth, social inclusion...	+	<p>The proposed development would offer employment opportunities and would promote economic growth.</p> <p>Agree the site score would be positive (+)</p>
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Table 5 – Strategic Environmental Assessment: Site B0310

Prime West Aberdeen Retail Proposal

Context

Planning permission was sought for a retail development at Prime West in October 2016 for a mixed use development to include up to 30,000sq.m of retail floorspace together with food & drink uses (reference P161429/PPP).

The application was withdrawn before consideration at Full Council however the Committee Report was made public on 21 June 2017, which recommended refusal of the application.

The recommended reasons for refusal relates to conflict with the existing Specialist Employment allocation in the LDP and that the proposal would have a significant impact on Aberdeen City Centre contrary to Policy NC5. It was also considered that the proposal would have a significant impact on the delivery of mixed use centres at Countesswells and Newhills.

The purpose of this report is to review the retail aspects of the proposal and comment on options for this revised proposal.

Retail Baseline

The Council engaged an external adviser to assist in their consideration and assessment of the previous proposal on the site.

The external advice was provided by Hargest Planning and concluded that the proposed development given its scale (of regional scale), nature and type of use would have a significant adverse impact on the vitality and viability of Aberdeen City Centre. They also advised that the proposal could threaten proposals for new investment at Union Square and Bon Accord.

The Hargest Planning review estimated that a -9% impact on the City Centre was significant. This impact was derived mainly from a -12% impact on comparison goods and -1% on convenience goods.

Prime West Aberdeen Retail Proposal

The Hargest Planning Review put considerable weight on the downturn that Aberdeen had recently experienced at the time and in particular reference was made to Brexit and the price of Crude Oil going to \$44 a barrel. Hargest Planning argued that these recent events are likely to have an impact on the trading performance of the City Centre and therefore recommended that a more cautious approach be taken to population and expenditure growth.

Since then the price of Crude Oil has increased to \$60 which is a reasonable indication that matters may be improving in the oil sector, which could also mean that matters in Aberdeen either have improved or did not materialise as feared over the last year. Generally predictions are that this could increase to \$90 to \$100 next year.

For the purposes of this review, a full Retail Assessment has not been undertaken as it is considered that the Hargest Planning review provides sufficient information in which to base these general findings and recommendations.

The Hargest Planning review identified that the proposed convenience element would have a turnover of approximately £23m per annum. This was based on the fact that the scale of the proposal was suited to a medium sized foodstore operated by one of the big 4 (ASDA, Morrisons, TESCO, Sainsburys).

Reconsideration of the convenience floorspace would result in a significant reduction in the turnover of this aspect. Occupation of the floorspace by a discount retailer such as Aldi or Lidl would result in lower turnover as per below.

Convenience Floorspace	GFA	Net	Turnover ratio	Turnover £m	Difference
As previously proposed	2787	1672	£11500	£19.22	
Revised M&S proposal	1488	840	£11000	£9.2	£10m
Revised Aldi proposal	1580	990	£8500	£8.4	£11m
Revised Lidl proposal	1988	1126	£7000	£7.88	£12m

Prime West Aberdeen Retail Proposal

As noted in the above table, an alternative proposal that does not involve a medium sized foodstore attractive to the Big 4, results in a significant reduction in turnover of the proposed convenience element of the proposal.

Whilst the convenience element of the proposal did not play a significant part in the impact on Aberdeen City Centre, it did raise the objections to the scheme on the basis of impacting on the new retail centres to be created at Newhills and Counteswells. Both these urban expansion areas have provision for new supermarkets of around 4000sq.m gross. The previously proposal was seen to been in direct competition with those new stores. Reducing the convenience aspect of the proposal makes the convenience floorspace more localised and therefore not a threat to the establishment of new convenience stores at these new urban locations.

In terms of comparison retailing, the key aspects of the proposal was scale, the type of goods to be sold and the inclusion of a 80,000 sq.ft unit, assumed to be a department store.

In terms of the type of goods to be sold, the previous proposal indicated this would be predominately clothing and footwear. From a retail planning perspective, clothing and footwear occupiers are generally the key traders in town centres. As a consequence a reduction or limit on clothing and footwear goods will see a significant reduction in turnover and trade diversion from the City Centre. On top of that, the previous proposal included a department store. This is also viewed as a key component of a centre and not for out of centre locations. Removal of the department store proposal would assist to further remove concerns over impact on the City Centre.

This in terms of comparison turnover can be demonstrated in the table below.

Comparison Floorspace	GFA	net	Turnover ratio	Turnover £m	Difference
As previously proposed	27000	20500	£5800	£119	
Revised floorspace	13000	10000	£6000	£60	£59m
Revised no department store	13000	10000	£5800	£58	£61m
Revised limited clothing	13000	10000	£4500	£45	£74m
Revised no clothing	13935	11000	£2500	£27.5	£91.5m

Prime West Aberdeen Retail Proposal

As noted above, a reduction in the floorspace by 50% in simple terms cuts the turnover by a half. Whilst there is very little difference between the reduced floorspace with and without a department store, the former will have a higher impact on the City Centre due to the nature of the floorspace proposed. Restricting or completely removing clothing and footwear goods has the largest impact on reducing the turnover of the proposed development and ultimately the impact on the City Centre.

In retail impact terms, all the above options will reduce the impact of the proposal on the City Centre but it is the significance of any impact that is critical.

Comparison	City Centre Turnover	Trade Diversion	Residual Turnover	Impact	Difference
As previously proposed	£996.59m	£88.93m	£907.66m	-10%	
Revised Floorspace	£996.59m	£45m	£951.59	-4.5%	5.5%
Revised no department store	£996.59m	£37m	£959.59	-3.7%	6.3%
Revised limited clothing	£996.59m	£32m	£964.59	-3.2%	6.8%
Revised no clothing	£996.59m	£15m	£981.59	-1.5%	8.5%

The above table simply illustrates the differences of the retail impact on the City Centre when applying the different options. Clearly the reduced option with no clothing has the least impact on the City Centre.

From the above removing the department store from the proposals will reduce the impacts on the City Centre. This coupled with a reduction in any clothing and footwear retailing would bring the impacts down to an acceptable level.

In general a centre with an average vitality and viability would expect to be able to cope with impacts of around 10-12%. Hargest Planning advised that -9% would be significant but that was influenced by the nature of the proposal (ie the scale and department store/clothing biased). It also was influenced by potential cumulative impacts not estimated and the 'risk' to the centre as a result of the downturn in the oil industry.

Prime West Aberdeen Retail Proposal

That said, the City Centre could not be viewed as a poor centre but a centre of below average vitality and viability should be able to cope with impacts of around -7%. We would suggest the City Centre has a better vitality and viability than this.

Conclusion

For this reason, we consider a retail proposal that involves around 1394sq.m (15,000sq.ft) of convenience floorspace and 13935sq.m (150,000sq.ft) of comparison retail floorspace that excludes a department store and fashion/clothing, would not have an unacceptable impact on the City Centre and could be accommodated having regard to the availability of expenditure.

A.W.P.R.

PHASE 4

RETAIL



DRUM
PROPERTY GROUP
DEVELOPMENT & INVESTMENT

PRIME WEST, KINGSWELLS

PARK & RIDE

LOCAL DEVELOPMENT PLAN BID / MAY 2018

PREPARED BY HALLIDAY FRASER MUNRO



1. INTRODUCTION AND VISION

Summary

This bid covers an area of land already allocated for development in the Local Development Plan (LDP) and requests the rezoning of that land from a singular employment zoning to allow new retail uses that both complement the existing uses at Prime Four and provide modern retail provision for the City. The proposal has been promoted previously through the last LDP review and a subsequent planning application. That application was subsequently withdrawn but it provides a recent and comprehensive backdrop to this now revised and reduced LDP bid. It has proven that there are no technical constraints to development and identified policy issues that are further considered in this bid.



Bid location in context of Prime Four

The site is promoted on the following basis:

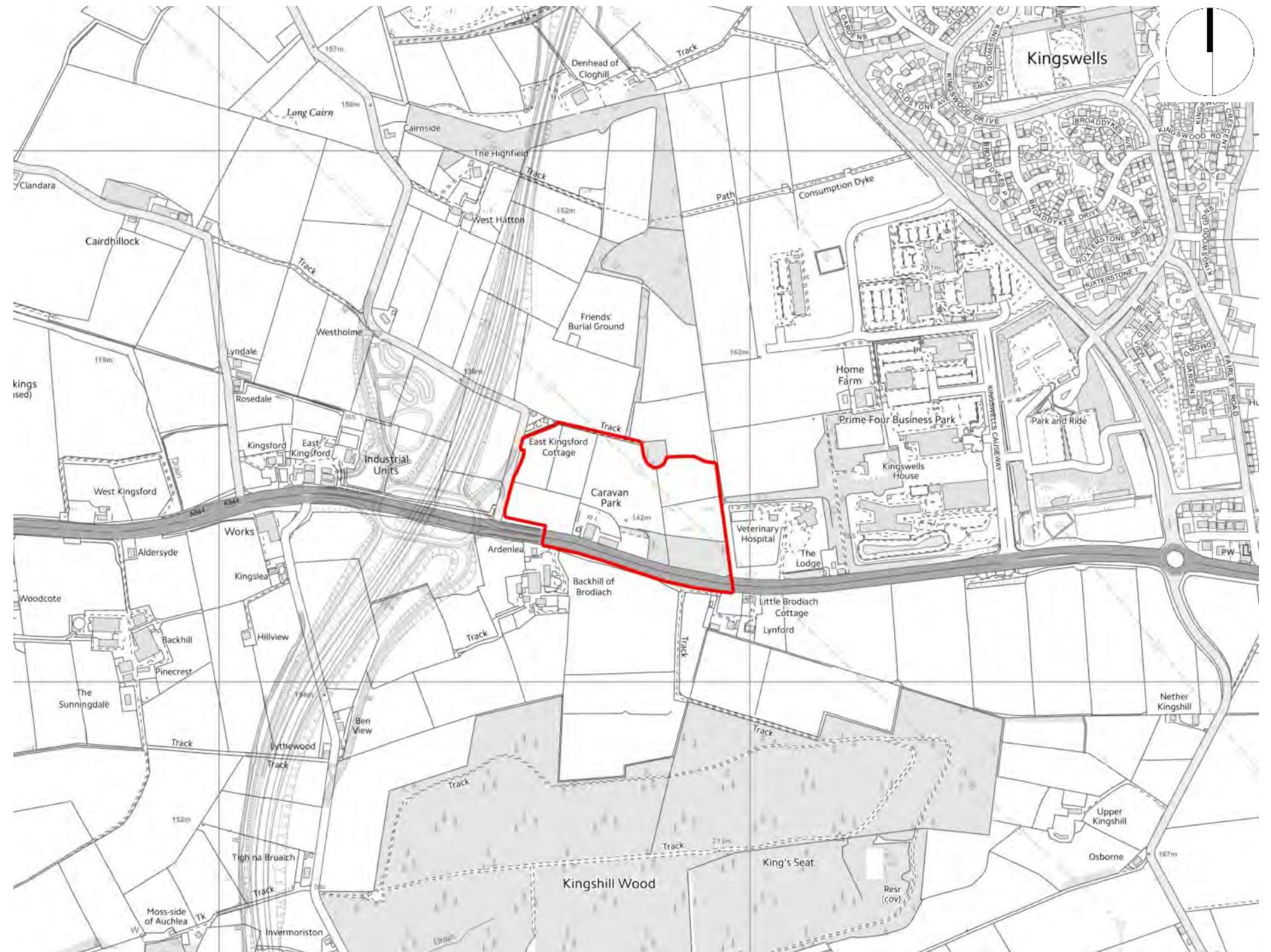
- As part of a new sustainable mixed-use commercial centre for West Aberdeen that includes Prime Four;
- As a retail proposal of approximately 1,400sqm (15,000sqft) of local convenience floorspace and 13,900sqm (150,000sqft) of comparison floorspace. Retail uses will exclude department store and fashion/clothing to avoid direct competition with the City Centre;
- Other uses will include: dedicated click & collect facility; baby changing and toilet facilities; management suite; associated parking; on-site bus stop; full mobility access;
- Impact on the City Centre will be minimal as a result;
- City and Shire Retail Study identified the West of the City as being deficient in retail provision, especially as the City expands westwards;
- Large commercial areas need to have an appropriate mix of uses rather than having a singular use profile;
- Opportunity for significant linked trips with Prime Four and the new Aberdeen Football Club stadium;
- Location and proximity to AWPR, key cycle routes and Park & Ride, makes this site easily accessible and reduces the need to travel for much of the City and Shire population. Could also assist in the connection between P&R and new AFC football stadium;
- City has substantial employment land reserves so loss of the site would not impact on employment land supply;
- Significant positive economic impact for the West of the City.

2. THE SITE AND HISTORY

The Site

The site forms part of a large area of land allocated for employment use. Prime Four Business Park is being developed to the north and east but this particular area of land is more related to the frontage along the A944. To the south the site is generally flat but rises to the north. The 5-Mile Garage and Ardene House Veterinary Hospital (with consent for office use) sit to the south with existing accesses onto the A944.

Within the wider context, the site is located four miles to the west of Aberdeen City Centre, adjacent to the settlement of Kingswells. Its western boundary abuts the Aberdeen Western Peripheral Route (AWPR) route, due for completion in 2019, its southern boundary sits adjacent to the A944. The settlement of Kingswells is adjacent, to the east of Prime Four, however visual links to the site from the settlement are limited due to ground levels and extensive shelter belt tree planting to the east of the site. The Prime Four Business Park also restricts views from Kingswells and the C89 Kingswells bypass. Westhill is just under 2km to the west.



Location Plan

2. THE SITE AND HISTORY

The site already covered under Prime Four Framework (including Phase Four). It is approximately a fifteen minute journey north to Aberdeen Airport and ten minutes to Cults and the Deeside Valley to the south during off-peak times. These times are expected to be reduced post AWPR opening. Walking time from Kingswells to the site is approximately 5 – 25 minutes, depending on the location within Kingswells. Cycle time from Westhill and Hazlehead (Aberdeen City) is approximately 10- 15 minutes. This site extends to approx. 8.4Ha and is allocated within the Proposed Local Development Plan as opportunity site OP29 with OP63 forming part of the Prime Four allocation to the north.

The existing land use is predominantly agricultural. Currently three varied sized fields used primarily for pasture. A copse of trees contained within a drystone dyke boundary sits to the north of the central field. Woodland runs along the southern boundary of the site from the mid-point eastwards. A belt of mature trees runs along the northeast edge of the site.



Photograph of the site looking west to AWPR

3. PLANNING HISTORY

Planning History

The site has been promoted for a larger commercial scheme through a previous LDP bid and a planning application. Ultimately the application was withdrawn. In considering that application the Council identified three main concerns. These were:

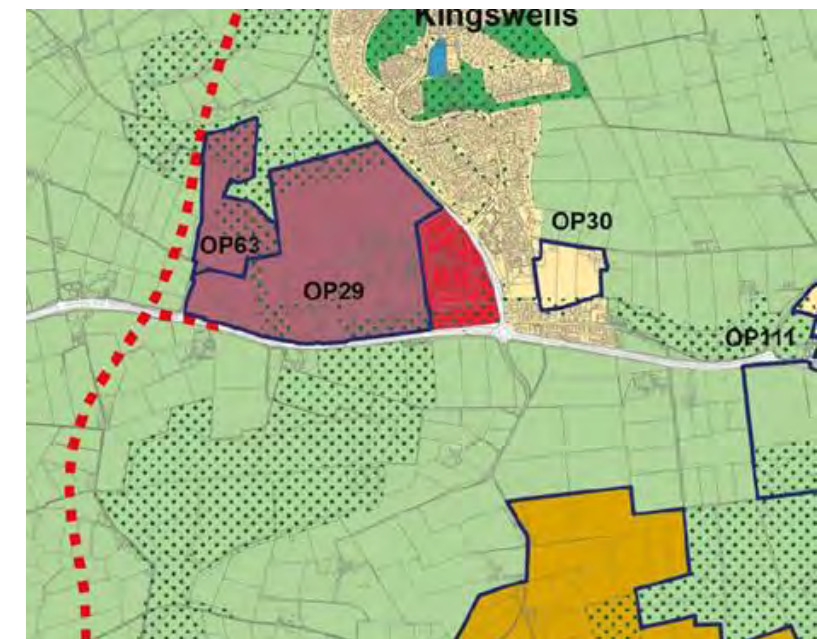
- Impact in the town centre;
- Loss of Business Space; and
- Roads issues

Items 1 and 2 above are specifically dealt with in this bid document. In summary the impact in the City Centre is considered to be minimal and the loss of employment land not an issue.

Significantly reducing the scale of the proposed development by approximately half and restricting the uses to those less commonly found on the high street is anticipated to reduce the impact on the City Centre to approximately 1.5% which is considered minimal and will not impact on its vitality or viability - see separate paper prepared by Zander Planning.

The site has also historically been protected for high amenity commercial uses. Presently the City has over three times their required employment land supply. 12.7Ha of additional high amenity commercial land is allocated at OP63 to the north of this site. More analysis of this issue is covered later in this bid but the site is not considered essential to maintain the Council's employment land supply. The office market has also changed considerably since these sites were last protected for that use.

Item 3 (roads) however was a surprise given pre-application discussions between the applicant's traffic consultants and the Council's roads officers had concluded that an access solution was acceptable in principle and that any mitigation works could be agreed as a condition on any consent. This smaller scale development would have significantly less impact on the road network and it remains that an access solution is entirely possible. This is especially so bearing in mind that the site is already allocated for business use with its associated traffic generation.



LDP 2017 Zoning



LDP 2017 Constraints Map

4. PLANNING POLICY

Local Development Plan 2017

The OP29 sites is already allocated for development and includes non-office related commercial uses (hotel, leisure, childcare and retail) albeit at a smaller scale than now proposed. Using existing allocated land for the type of development proposed is preferable to allocating additional greenfield land for development of the nature proposed.

Employment Land

The 2016/17 Employment Land Audit (ELA - prepared by Aberdeen City and Shire SDA) has identified that the supply of office space around Aberdeen is outstripping requirements by at least 300%. It states:

“This continued situation where the supply of office space in and around Aberdeen significantly exceeds demand contrasts with the situation before the fall in oil prices in 2014, when there was soaring demand from occupiers and a lack of stock. The oversupply of Grade A office space in particular can also be attributed to new developments committed to prior to the downturn in the oil and gas industry being delivered into a much weaker occupier market...”

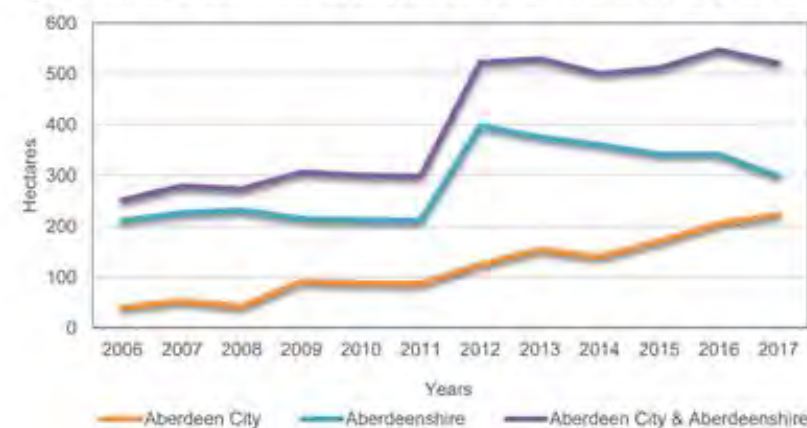
Figure 9 below shows both the increase in supply of office space and the fall in take up over the past three years as a result of the downturn in the oil industry. With such significant levels of good quality new and second hand office stock available in prime locations, there is likely to be an impact on the building of new office developments over the next few years and a slowdown in the take up of employment land for office use in and around Aberdeen.”

Figure 9: Aberdeen Office Supply and Take Up



Source: Ryden, 80th Property Review, pp9, April 2017

Figure 11: Trends in Marketable Employment Land in Aberdeen City and Shire 2006-2017



Employment Land (cont.)

Figure 11 of the ELA identifies an upward trend in the delivery of marketable employment land across the region. Prime Four is specifically mentioned the ELA as being the focus for new high quality business use in City for the last few years. However, it also recognises that circumstances are changing and the Council's policy of directing high quality office space to the City Centre is coming to fruition in the delivery of Liberty House, The Silver Fin, The Capital and Marischal Square. The absolute need for the level of land retention for high quality business use is therefore being affected by an oversupply and a reduced requirement.

4. PLANNING POLICY

APPENDIX 2: Employment Land Supply in Aberdeen City (all figures in hectares)

Location	Developer	Constraints	Serviced	Established	Constrained	Marketable	(of which) immediately available	Under Construction
Lochside/Newlands (Balmoral Business Pk)	Balmoral Group	None	Yes	2.2	0	2.2	2.2	0
Aberdeen Gateway	Halladale Muir	None	Yes	2.4	0	2.4	2.4	0
Peterseat	Forbes Development Ltd	None	Yes	8.6	0	8.6	8.6	0
Altens East & Doonies	Aberdeen City Council / Esson Properties	None	Part	8.2	0	8.2	8.2	0
Aberdeen Science & Energy Park	Scottish Enterprise	Class 4 Only	Yes	1.5	0	1.5	0	0
Aberdeen Innovation Park	Scottish Enterprise	Class 4 Only	Yes	3	0	3	0	0
Findlay Farm	Aberdeen Science Parks LP	Class 4 Only	No	16.4	0	16.4	0	0
The Core Berryhill/Cloverhill	Private		No	68.4	0	68.4	0	0
Airport Dyce Drive	Miller, Abstract, ABZ Development Ltd	Ownership & Infrastructure	Part	77.35	30.1	47.25	21.5	0
Dyce Drive 9 Dyce Avenue	Morley		Yes	1.1	0	1.1	1.1	0
Raiths, Dyce (Kirkton Drive)	Private		Yes	1.5	0	1.5	1.5	0
Wellheads West	Private	Noise & Height Restrictions	Yes	0.9	0	0.9	0.9	0
OP9 Grandhome	Grandhome Trust		No	5	5	0	0	0
OP18 Craibstone North & Walton Farm	Private		No	1.5	1.5	0	0	0
OP19 Rowett North	Private		No	34.5	0	34.5	0	12
Prime Four	Drum		Part	16.5	0	16.5	5.9	0
OP33 Greenfems	ACC		No	10	10	0	0	0
OP34 East Arnhall	Private		No	1	1	0	0	0
OP38 Countesswells	Countesswells Consortium		No	10	0	10	0	0
O48 Oldfold	CALA		No	5	5	0	0	0
OP59 Loirston	Private		No	11	11	0	0	0
Report Total				286.05	63.6	222.45	52.3	12

Employment Land (cont.)

The 2016/2017 Employment Land Audit (ELA) identifies land at Prime Four (16.5ha) as part of the “established” and “marketable” land supply. Given that the OP63 is in itself 12.7Ha we don’t believe that figure is correct. OP29 includes the following undeveloped sites, all presently allocated for high amenity employment use:

- Ardene House vet site (consent for HQ offices) - 3Ha
- This bid site – 8.5Ha
- Undeveloped plots in Phases 2 and 3 - approximately 6.5ha

OP63 and OP29, therefore, currently include a zoning for high amenity employment land in excess of 30Ha. This is some 14Ha greater than that identified in the 2016/17 ELA and greater than the overall requirement for the City and Shire. Removing the proposed site from that zoning would not therefore impact on the stated and accepted overall supply and would retain a healthy supply of high amenity employment land.

This particular section of the OP29 allocation, although it benefits from a development zoning and approved Framework document, does not yet have a specific planning consent for employment use.

4. PLANNING POLICY

“The targets for the supply of marketable employment land in both Aberdeen City and Aberdeenshire continue to be significantly exceeded and the overall employment land supply provision is generous.

Over 20ha of the total marketable land available is considered suitable for high quality business use and/or company headquarters.”

(Source: 2016/2-17 Employment Land Audit)

This site then represents less than 4% of the overall marketable supply and removing it from that supply would still retain well over 200 hectares of marketable employment land. That is equivalent of over 300% of the Strategic Development Plan requirement.

The site at Prime Four (OP29 and OP63) retains over 16Ha of land suitable for high amenity office space. Taken together with the oversupply of Grade A office space, other land suitable for such use in the City and Aberdeenshire’s supply (11.5ha of marketable land at Chapelton alone) suggests quite clearly that the City and Shire will maintain the minimum 20ha marketable land required for this high amenity use.

Retail Policy

The City Council retail policy promotes town and city centre first but planning policies do not rule out other locations where retail development may be appropriate. This proposal specifically targets retailers less likely to be attracted to or have an impact on the town centre. It also includes a smaller convenience store than previously suggested in order to meet local market requirements, service Kingswells and the 8,000 people expected to work at Prime Four once fully developed.

As a result the potential retail impact is considered to be limited, in the region of 1.5% (see attached retail overview by Zander Planning).

All retail planning policy recognises that there are circumstances where non-town centre retail proposals can be supported. The previous planning application had considered the sequential approach to retail provision and had come to the conclusion that there are no other sites in the City that that could accommodate the

proposed development. That was accepted through the application process by the Planning Authority. Indeed, without this type of development the City would be vulnerable to competition from retail sites outwith the City. The retail development at Blackdog is a good example of this type of development.

The proposed retail use also offers an opportunity to claw back a substantial amount of the identified and accepted retail expenditure leakage from the city region. Aberdeen needs to be able to compete with other retail locations in Scotland. The site is considered the optimal location for retail given:

- its co-location with major existing and future employment uses at Prime Four Business Park;
- its location adjacent to one of the few junctions on the AWPR; and
- its location at the centre of Aberdeen’s major strategic westward expansion.

From a sustainable travel perspective the site is on key bus routes, cycle routes and footpath networks and is close to existing and proposed housing as well as significant employment uses, the latter facilitating on-the-way-home shopping.

4. PLANNING POLICY

National Policy

When considering the proposal against National Policy, Scottish Planning Policy (SPP) requires that the economic benefit of proposals is given due weight, and also promotes sustainable economic development. A retail development in this location would support sustainable regional economic growth.

SPP, sitting strategically above development plans, seeks to encourage better places, successful and sustainable places, low carbon places, natural resilient places, more connected places and a presumption in favour of development that contributes to sustainable development. At the macro level, the proposed retail development could achieve all of these to a greater or lesser extent. This could be developed through the key land-use planning approach supported through SPP - 'Placemaking'. Placemaking requires a design-led approach with the right development in the right place and adopting the six qualities of a successful place:

- Distinctive;
- Safe and pleasant;
- Welcoming;
- Adaptable;
- Resource efficient; and
- Easy to move around and beyond.

The development in question here is being promoted by the same developers behind the neighbouring award-winning Prime Four Business Park. Its success is based on a design-led process and collaborative approach between the developer, Aberdeen City Council and others that has adopted the six principles set out above to create an outstanding business location. The same design-led collaborative approach could be adopted for the design of the proposed retail development, ensuring the quality of development expected for a development of this nature.

SPP also sets out how Development Plans should tackle retail issues and, specifically, locational aspects of retail development. It does not rule out new retail development in locations such as that proposed here but it does set out the ground rules should such a development be considered. It requires Development Plans **to identify a network of town centres, commercial centres** and adopt a sequential town centre first approach.



Changing Retail Landscape

This application seeks to complement the City Centre by offering a new retail destination. Modern shopping requires large format stores, which the recent planning application had proven there are no alternative suitable locations in the City Centre. There is clearly a need and demand for more retail floorspace, and we would suggest this is the optimal and obvious location for such a proposal. The need for additional retail floorspace has been outlined in the Council's shopping study.

The two aspects which gave objectors to the previous application most concern was the proposal to sell clothing/fashion and the overall scale of the development. The scale made the proposal regional in nature and whilst Drum continue to believe this is necessary for Aberdeen City to maintain its dominance in the North of Scotland and prevent further migration South, they have taken the decision to reduce the proposed scale. Furthermore, they are proposing to withdraw any reference to selling fashion and clothing.

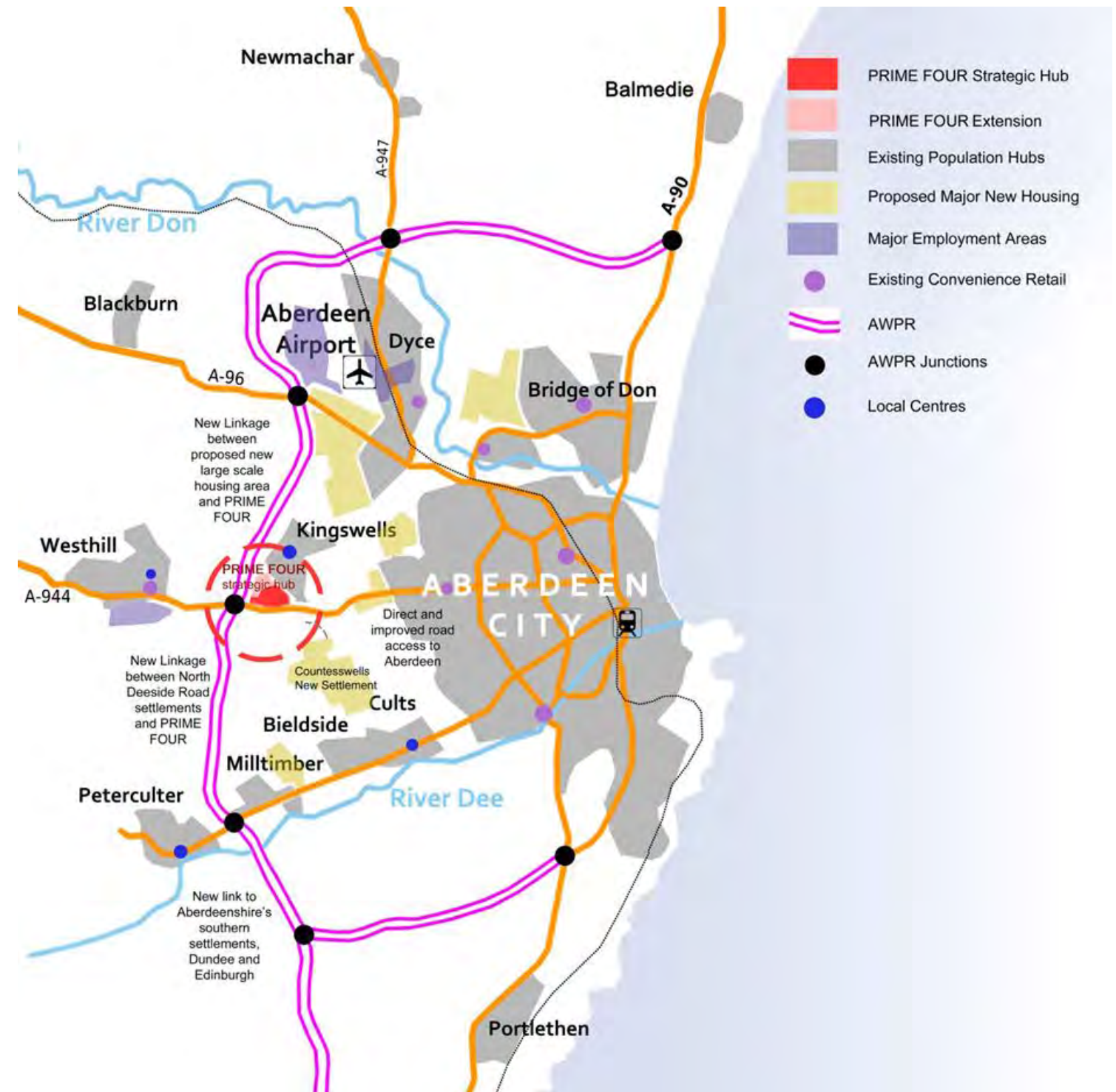
In their previous sequential test report they highlighted the limitations of the current stock of retail parks in Aberdeen. These limitations were also highlighted by ACC's own consultants Hargest Wallace in the 2013 Retail Capacity Study. This showed widespread limitations in the ability of the town's retail parks (Kittybrewster, Berryden, Beach Boulevard and Garthdee) to cater for demand through expansion. Aberdeen City urgently requires a modern retail park which will satisfy demand and provide updated customer facilities required by shoppers.

4. PLANNING POLICY

Retail patterns are changing dramatically and are multi-channel in nature. Some commentators state that Online shopping now accounts for 18% of all retail trade although most believe the figure to be around 15% with an anticipated annual growth of 10-12% over the next 5 years. Today's shopper requires the retail experience to be frictionless and to adapt to a faster pace of life. This move towards On Line retailing dictates that increasingly bricks and mortar, should provide showroom and click and collect facilities, as well as traditional retail formats.

In tandem with these traditional 'choose and pay' in store formats, new facilities must be lively and attractive places for the shopper to visit and for the community to enjoy. As reported by the Hargest Wallace's 2013 audit, the current stock of retail parks in the region fall short of these ambitions.

To cater for current trends in retailing and to provide space for current demand in the home ware sector Drum propose to create a Homeware Shopping Park at Prime West.



Strategic Location Plan

5. ACCESS AND CONNECTIONS

Locational Benefits

Being located at one of the few AWPR junctions provides clear benefits for the development in terms of accessibility. It also offers an opportunity for other communities to access retail more readily e.g. Cults, Bieldside, Milltimber, Peterculter and Countesswells reducing the need to travel as far.

Kingswells as a community is lacking in facilities. Prime Four Business Park has provided some of these (hotel, restaurant, leisure etc.) and this proposed retail use will provide others not readily available to the existing village.

Fairhurst, in their Transport Assessment carried out in respect of the larger retail application, concluded:

"... the Prime Four Phase 5 Retail proposal accords with transport planning policy and will integrate well with the settlements of Kingswells and Westhill and the existing and on-going phases of the Prime Four Business Park.

9.4.2 The TA demonstrates that the Phase 5 development site is well served by all travel modes. Access by sustainable travel modes will be delivered through infrastructure proposals both within and outwith the site facilitating links to the external network." ... and

" ... that a proposed new A944 signal controlled junction providing access to Prime Four Phase 5 (Prime West) and permitting all movements can accommodate traffic from the proposed mixed-use retail park development on a standalone basis. In conjunction with the site development a package of improvement measures can also be undertaken on the surrounding road network which would enhance capacity and road safety for all road users."



Aerial of Prime West and Surrounding Area

6. PROPOSED USES

Proposed Uses

The site is promoted on the following basis:

- As part of a new sustainable mixed-use commercial centre for West Aberdeen that includes Prime Four;
- As a retail proposal of approximately 1,400sqm (15,000sqft) of local convenience floorspace and 13,900sqm (150,000sqft) of comparison floorspace. Retail uses will exclude department store and fashion/clothing to avoid direct competition with the City Centre;
- Other uses will include: dedicated click & collect facility; baby changing and toilet facilities; management suite; associated parking; on-site bus stop; full mobility access;

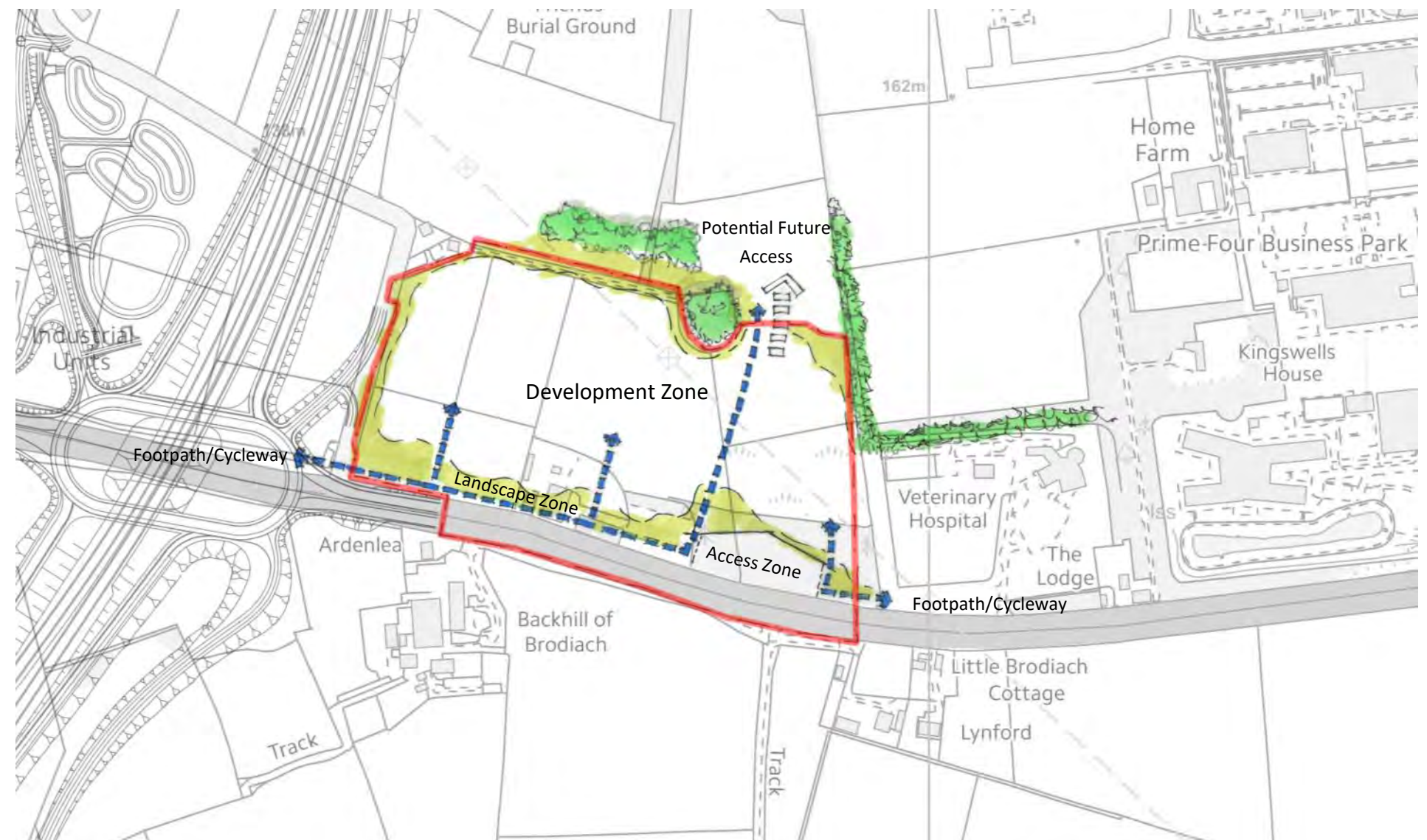
7. DESIGN CONCEPT

Proposed Uses

A design-led approach has been central to the success of Prime Four. For Prime West that same approach will be adopted. The Design Statement prepared to support the previous (larger) application explains how the development of this site can respect the requirements of the approved Framework whilst delivering a viable retail development.

A modern sustainable retail development reflecting rural buildings and roofscapes, high quality design and outside spaces with extensive landscaping to help with landscape fit and pedestrian/cycle connectivity east to west.

This site is covered by the OP40 development Framework. In 2011, Drum Property Group Ltd working with Aberdeen City Council produced the Development Framework to guide the development of Prime Four Business Park. Following the adoption of the Aberdeen Local Development Plan 2012, this Framework was adopted as supplementary guidance in January 2013.



Indicative Framework Plan



Prime Four
OP63

Bid Site

9. CONCLUSION

Prime Four Business Park has proven to be an unrivalled success in Aberdeen, providing a popular business location for energy related headquarter and training facilities. The quality of the environment, the approved 4-star hotel and spa, the versatile and lively focal point of the Fourcourt public square and the major new parkland sitting alongside it all create an atmosphere of quality and drive demand for others to be located there. Discussions with future occupiers are continuing and it is clear that the demand is not just from energy related businesses but from services and uses that help support the business use and make the whole business park successful as a place to work, visit and spend leisure time during, pre or post the working day.

Prime Four continues to encourage other uses to service the users of the business park and allow the park to operate on a wider timeframe than simply 9-5 on weekdays. The aim of this mix of uses is to establish a business location that provides a wide range of services and facilities locally, increases the sustainability of Prime Four and reduces the need to travel for its users. Of course this has a double benefit as it will also help serve Kingswells community and provide them with a much wider range of services that are unlikely to be provided locally except by Prime Four Business Park.

Single use developments, particularly at the scale of the OP29/OP63 allocations (50 plus hectares), don't provide the mix of uses that will make them truly sustainable. The consents and the Frameworks and Masterplans produced for Prime Four have allowed some movement away from business use in the existing consented phases but we believe that a change of zoning is required to allow the wider area to develop a more useful mix of uses.

Prime West, however, offers an opportunity to increase the mix of uses across the whole site. It already includes the petrol filling station, shop and storage uses and is now close to the AWPR A944 junction.

As a result it has excellent accessibility and with a new access onto the A944 can assist in creating better public transport accessibility across the wider area. New footpath and cycle path connections will link into those existing and provide a wide choice of transport modes to access the whole development.

Aberdeen is a polycentric city with clear urban districts and distinct communities. The growth that it is experiencing through the current Local Development Plan allocations require pragmatic and well thought through planning and masterplanning solutions. Each of the existing LDP growth locations is likely to include district centres where local facilities, shops and community facilities will be provided in easily accessible locations. The City Centre is the main retail centre for Aberdeen and the only Regional Centre. But it is not necessarily easily accessible for those living in the peripheral settlements around Aberdeen. With over 8,500 new homes allocated in a short corridor between Countesswells and Craibstone and only local centres serving existing communities, the west of Aberdeen is in need of a new district or sub-regional centre to service the City's growing population. Prime West is a clear opportunity to provide such a centre.

This location is a sustainable solution to providing new retail uses in the City and is located in an area already established for this use. Infrastructure is already being improved and a major new transport route (the AWPR) provides an easily accessible grade separated junction to facilitate ease of movement and accessibility.

This development brings a number of key benefits for the city:

- Allocated for development
- Key strategic location
- Excellent access by all modes of transport
- In an area of future growth, population and employment
- Retail uses help the city compete with other Scottish cities
- Provides Aberdeen with an enhanced and diversified retail offering
- Helps to retain shopping spend in the city
- Serves the local and wider area

The excellent accessibility and proximity to significant new housing allocations strongly suggests that the Prime Four site could act as more than simply a business park. It could be established as a commercial centre for the west of Aberdeen and even serve parts of Aberdeenshire.

To create that opportunity the zoning of the western section of OP29 allocation should be revisited to allow for a mix of uses including leisure, retail, service uses and food and drink as well as business use.



Aberdeen Local Development Plan Review

Main Issues Report Response Form 2019

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

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

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

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

Responses to the published documents can be:

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

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



YOUR DETAILS

Name	STEVE CRAWFORD
Organisation (if relevant)	HALLIDAY FRASER MUNRO
On behalf of (if relevant)	DRUM PROPERTY GROUP
Address	
Postcode	
Telephone	
E-mail	

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



If yes, please provide an e-mail address

PRIVACY STATEMENT

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

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

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

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

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

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

YOUR DATA, YOUR RIGHTS

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

YOUR COMMENTS

Which document(s) are you commenting on?	<ul style="list-style-type: none">• Main Issues Report• Strategic Environmental Assessment Environmental Report• Monitoring Statement	<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 see separate response enclosed in response to:

- Question 1 - New Housing Sites
- Site B0311

Please also find enclosed the following in support of the response:

- 'Safe Routes to School Review' Document
- 2018 LDP Bid Document (for reference only)

YOUR COMMENTS CONTINUED

B0311 – Prime Four North, May 2019

- *B0311 – Residential Development (90 dwellings), landscaping, parkland and paths*

1.Introduction

Halliday Fraser Munro lodged an LDP bid for the above site on behalf of Drum Property Group. During the review process Aberdeen City Council officers have suggested that the site is ‘undesirable’ and presented an analysis. Their reasons are generally based on the following:

- Intrusion on the surrounding landscape
- Development is proposed to the north of the consumption dyke which provides a robust green belt boundary
- Setting of the consumption dyke would need to be protected
- The development would alter views from the AWPR to the west
- The development would encroach upon open space between Kingswells and AWPR

These, we believe, are not valid reasons for discounting the site and we have responded accordingly in the following pages. Site B0311 is a logical location to allocate for housing, in a sustainable location, adjacent to a world class business park and the existing services of Kingswells. The site helps to integrate Kingswells and Prime Four, and the nature of the C89C road is changing with the construction of the AWPR. The site is a small-scale allocation in line with the Proposed Strategic Development Plan requirements.

On a more general note the housing strategy adopted in the MIR has significant limitations. In effect not enough housing land has been identified to meet the area’s housing needs, it doesn’t include enough choice of location for new homes and relies too heavily on brownfield sites. A separate response has been made in that respect on behalf of Drum Property Group which can be summarised as:

- An over-reliance on brownfield sites to make up the vast majority of new housing allocations;
- Unrealistic expectations on housing delivery from existing allocated sites; and
- The need to allocate additional housing land to meet Proposed SDP requirements

Site B0311 offers a highly deliverable site in an area where people want to live and at a scale that could come forward quickly to meet the identified shortfall in housing delivery. It should be allocated for a residential use in the Proposed Local Development Plan.

Each of the issues are considered in the following response. A full review of the site assessment is enclosed as Appendix 1 of this response.

2. MIR Response

2.1 Landscape

The landscape impact of the site is not significant. The site is framed between the Prime Four Business Park to the south, the C89C and Kingswells to the east, and woodland to the west. Beyond the woodland to the west of the site is the allocation OP63 which is allocated as an extension to the business park. The proposed site does not extend development any further north than OP63. There is a substantial landscape buffer proposed to the north of the site. The site is flat, with land sloping gently up to the south of the site, meaning the site is not highly visible.

The site assessment suggests that the landscape impact is particularly noticeable from the C89C (or Kingswells bypass). Protecting views from the C89C is not considered a priority. The C89C is a local road, which is not renowned for its expansive views, as it is largely enclosed by woodland along the western boundary of Kingswells. Given the proximity of Prime Four, this is the dominant view from the road, and the AWPR in the distance (see figure 1 below).



Figure 1 – Photograph of site looking North west from the C89C – Prime Four Northern Park is visible to the west, with the AWPR overbridge the prominent feature in the distance.

2.2 Green Belt

The site is within the existing green belt designation but the LDP review provides an opportunity to rezone land from the green belt where it is appropriate for development. Paragraph 50 of Scottish Planning Policy (SPP) states that in identifying the most sustainable locations for longer-term development, planning authorities should review the boundaries of the greenbelt where necessary. Using zonings in the previous plan to rule out new opportunities in the next plan runs contrary to the

LDP review process. Each bid should be fully considered against planning related criteria, including an up-to-date Greenbelt review, and rezoned if considered acceptable.

In any case, this site is not meeting the functions of the green belt (according to paragraph 49 of SPP) in that it is not protecting and enhancing the landscape character and setting of the settlement, it is not providing access to open space, and is not directing development to appropriate locations.

The site is located just to the north of the Prime Four business park and is adjacent to Kingswells. The identity of the area has been altered by the development of Prime Four and the construction of the AWPR to the west. The Reporter acknowledged this fact in the 2017 Examination Report noting that: *“the success of the Prime Four business park strengthens the case for further housing development in Kingswells”* (page 94). The impact of the AWPR is a fundamental change to the setting of the city, and consequently, the green belt.

The role of the C89C (or Kingswells bypass as it is referred to in the council’s site assessment) has changed significantly with the opening of the AWPR, as it is no longer serving the purpose of a distributor road. This in addition to the development of the business park on the west of the C89C makes the site part of an extended Kingswells and would form part of the urban area. The principle of development to the west of C89C has been set with the development of Prime Four.

The site contributes very little to the landscape setting of Aberdeen City. It’s a field with a large pylon crossing it and woodland to the west (see figure 2). Developing this site with appropriate landscape treatment, retaining the woodland and introducing a new park adjacent to the Consumption Dyke has the potential to enhance the landscape setting and secure future protection of the Consumption Dyke within that setting. The new park would also enhance access to open space and Prime Four to the south for its employment and leisure uses.



Figure 2 - Photograph of site - taken from the south of the site looking north

2.3 Setting of Consumption Dyke / Impact on Scheduled Monument

The supporting bid document (May 2018) includes an indicative site layout which shows a parkland area as an extension of the Northern Park at Prime Four (see figure 4). This parkland is proposed to maintain the setting of the dyke and follows the Green Space Network which is an indicative 90m from the consumption dyke (see figure 3 below).

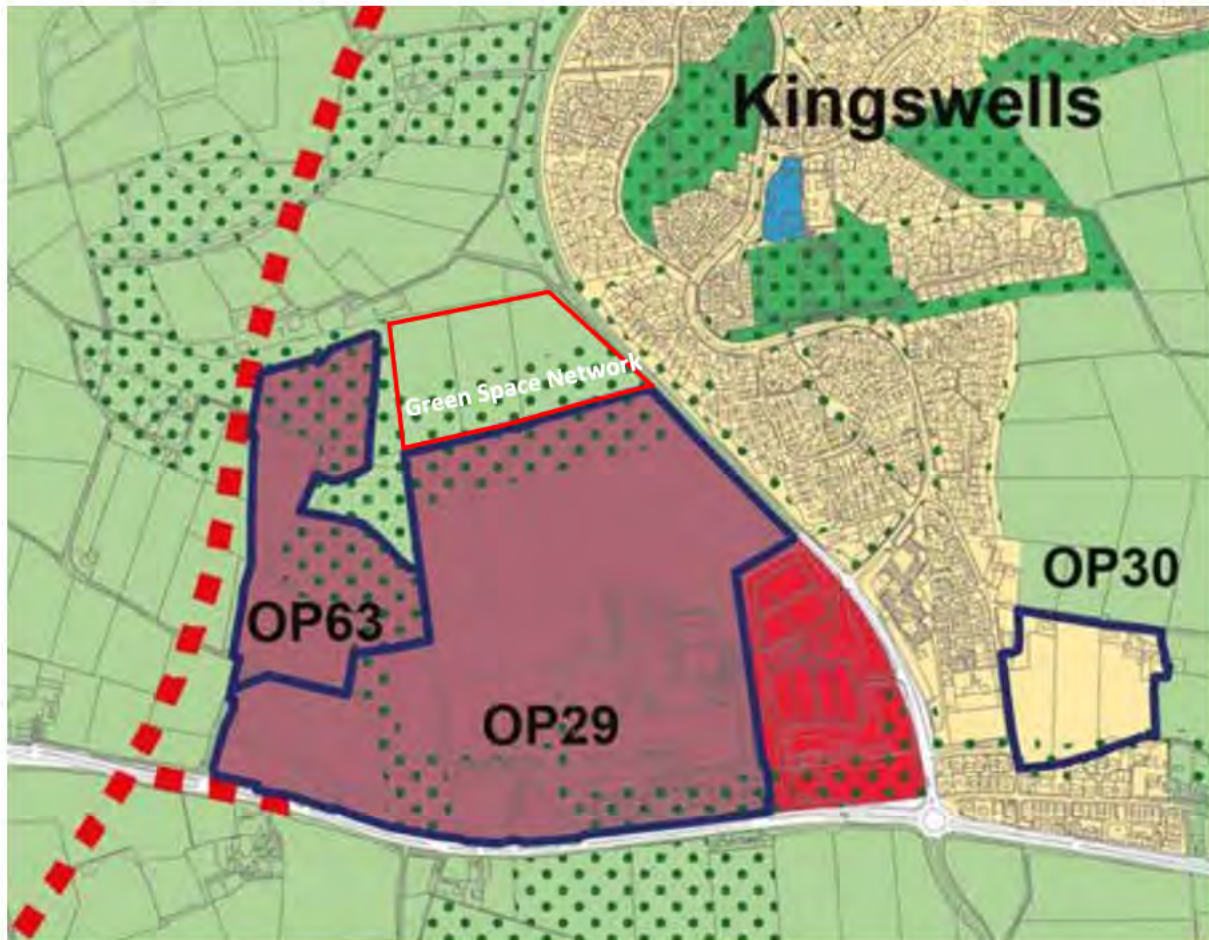


Figure 3 – Proposals Map – extract from ALDP Proposals Map 2017 *Note the indicative site boundary is shown by the red line.*

It should be noted that there was considerable discussion with Aberdeen City Council and Historic Environment Scotland in relation to retaining the setting of the consumption dyke during the design development of Phases 2 and 3 of Prime Four which has resulted in the Northern Park. The Northern Park provides a high-quality agricultural setting for the dyke, which increases in formality closer to the business park.

The proposed site to the north of the dyke sits at a lower level with the land sloping away from the dyke to the north. This means that there is likely to be less impact on the dyke. The residential development proposed will also have significantly less impact than the office buildings at Prime Four which are of a larger scale.

The parkland area proposed is equivalent to the Prime Four Northern Park, enhancing the setting of the consumption dyke given it will be set in a large maintained parkland. This parkland which balances the Northern Park will ensure the proposed development has no impact on the scheduled monument.



Figure 4 – Indicative Site Plan – extract from Bid Document (May 2018)

2.4 Views

There are absolutely minimal views of the site from the AWPR which is in a cutting at this point, and in any case the landform rises between the site and the AWPR. West Hatton wood is located between the site and the AWPR meaning there are no direct views of the site from the west. We would argue that even if the site was visible, site OP63 will be developed which would alter the views in any case. The proposed site extends development no further north than the allocated site OP63 (see figure 5). It's arguable whether views of the proposed development by those using the AWPR is particularly important. In any event the development would be seen within the same visual envelope as Kingswells, Prime Four and the new Aberdeen football stadium. In that context this proposed development will not have a significant visual impact.



Figure 5 – Site in relation to existing Prime Four Business Park *Note – Other points of interest are also shown in white text*

2.5 Open Space (Encroachment of Open Space between Kingswells and AWPR)

The site assessment notes that the development of the site would encroach upon the open space between Kingswells and the AWPR. The proposal includes over 3ha of new managed high-quality open space in the form of parkland to the north of the consumption dyke. This, in combination with the Northern Park to the south of the dyke, would give the consumption dyke an extensive parkland setting, and ensure a substantial area of open space between Kingswells and the AWPR is maintained and significantly more usable than the current open space, which is essentially an unused series of fields.

In any case, we are unclear of the justification or need for open space between Kingswells and AWPR. The AWPR is a logical defensible green belt boundary to the west of the city. This small development not impact on the overall greenbelt in any event.

2.6 Other Issues

2.6.1 Core Paths

The site is not directly adjacent to a core path, however, the site is well connected to core path 31 which routes through the settlement of Kingswells and onto core path 91 which is a segregated



Figure 7: Proposed safe route to school – extract from Safe Routes to School Review undertaken by Fairhurst (included with this MIR response)

2.6.2 Nature Conservation (Local Nature Conservation Site)

The site is not within the adjacent West Hatton Local Nature Conservation Site (see figure 8). That site, which is also designated as Ancient Woodland would not be impacted by the development. A future phase of the Prime Four Business Park is allocated (site OP63) to the west of LNCS site. A Development Framework for site OP63 has been agreed by Aberdeen City Council, and this document notes that a standoff distance from the boundary of the woodland will be required based on further investigations. There is no reason why a similar woodland stand off strategy could not be put in place for this site.



Figure 8 – Local Nature Conservation Site – extract from Aberdeen City Council’s Natural Heritage Mapping Database (*Note: the site is identified by the red line*)

2.6.3 School Capacity

The site is within the catchment for Kingswells Primary School which is currently operating over capacity but is forecast to have a declining roll from 2021. This is a small-scale site which, if built out on a phased basis, would have a minimal impact on the primary school roll.

The site is currently zoned to Bucksburn Academy but is within the new Countesswells Academy zone. Once built, the Countesswells Academy will relieve the pressure on secondary school provision.

2.6.4 Historical Context

The site was partially identified as ‘Future New Communities’ (FNC) in the 2004 Finalised Local Plan (see figure 9). At this point the expected line of the AWPR was estimated, hence the smaller area. The principle of development within the line of the AWPR at this location has therefore previously been accepted by Aberdeen City Council with an expectation of future housing development in this area.

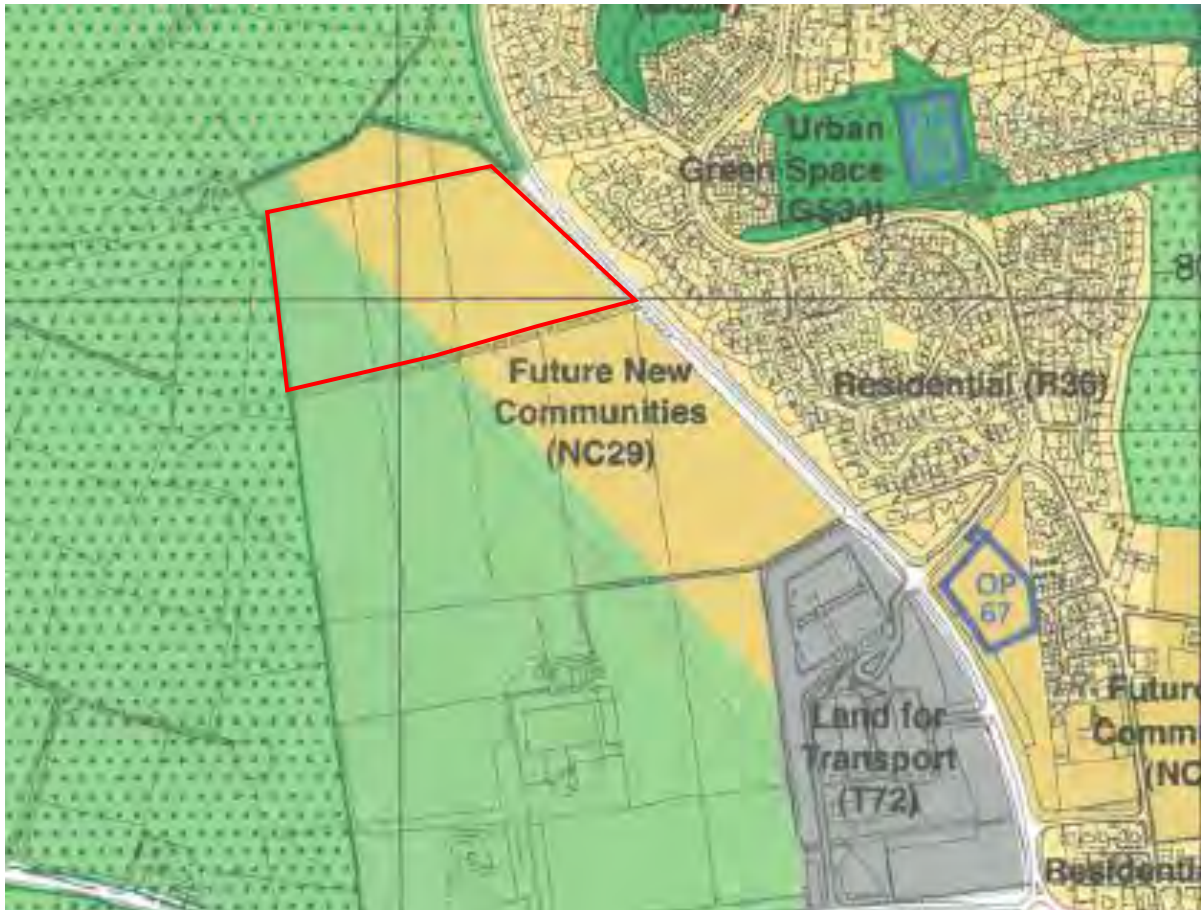


Figure 9 – Extract from 2004 Finalised Local Plan *Note: the site location is shown by the red line*

2.7 Housing Land Summary

Drum has submitted a separate response to the Main Issues Report on housing strategy which addresses this issue in full. In summary, Drum believe that the housing strategy contained within the Aberdeen City Council Main Issues Report (MIR) is flawed and will not address the shortfall in housing delivery across the City, nor meet with regional housing delivery requirements.

The strategy is too reliant on existing allocated sites and additional brownfield sites coming forward over the lifetime of the plan, and a very limited set of additional allocations. Drum suggest that; an additional 3000 homes should be allocated to account for cumulative lack of delivery inherent in Aberdeen’s housing land audit predictions and brownfield sites should be discounted from the overall calculation of available housing land unless they are proven to be “effective” and suitable for housing. It is also suggested that even if brownfield sites are included, they should be discounted by at least 682 homes to allow for lack of generosity within the figures.

3. Conclusion

Drum Property Group do not agree with the justification presented in the MIR to reject bid B0311. Site B0311 is the logical location to provide housing to meet the needs of Kingswells and utilises the changing nature of the C89C. Drum Property Group believe there is a need to identify additional housing sites, as demonstrated through a separate response but summarised as;

- An additional 3,000 houses (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.
- 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.

This site at Prime Four (B0311) has no constraints and is of a scale that requires limited infrastructure upgrades meaning it could come forward quickly. The Proposed Strategic Development Plan promotes smaller scale sites to meet housing requirements. Drum Property Group have a record of delivering high quality developments, as demonstrated by Prime Four Business Park.

The site has minimal landscape impact as it is sited at the bottom of an embankment, with woodland setting to the west, and existing development to the south and east. The site is highly accessible and has the opportunity to improve pedestrian links over the C89C into Kingswells and to Prime Four. The site is in an excellent location for access to employment and leisure at Prime Four Business Park and has historically been identified as a future housing development area.

This site at Kingswells is immediately deliverable with no infrastructure constraints and should be identified in the Proposed Local Development Plan as a housing allocation.

Attachments:

- *MIR Response Form*
- *LDP Bid document (for reference purposes)*
- *Safe Routes to School - Fairhurst*

APPENDIX 1 – Site Assessment Review

'Sustainability Checklist' Site B0311

Criteria	Officers Score	Updated Score	Drum Response
Exposure	2	3	New landscaping is proposed to the north of the site providing additional shelter.
Aspect	3	3	The site is south facing.
Slope	3	3	Site is generally flat.
Flood Risk	3	3	SEPA maps indicate small area of risk, but no incidents recorded, and no watercourses on the site.
Drainage	3	3	The site is well drained.
Built/Cultural Elements	2	3	The Kingswells Consumption Dyke (scheduled monument) is to the south of the site, but extensive parkland is proposed in the southern half of the site and there will be no loss or disturbance to archaeological sites or vernacular buildings. This has proven not to be an issue for Prime Four Business Park.
Natural Conservation	2	3	<p><i>There are records of bats on the site, and ancient woodland straddles the western boundary, part of the West Hatton Local Nature Conservation Site. The Southern part of the site is designated green space network.</i></p> <p>The site is not within the LNCS, and any potential impact on the LNCS would be fully mitigated. A full protected species survey would be carried out at planning stage. Habitat enhancement and mitigation would be identified.</p> <p>Parkland is proposed on the southern half of the site which corresponds with the green space network so there would be no loss.</p> <p>There would be no loss or disturbance of wildlife habitat or species.</p>
Landscape Features	1	3	<p><i>Development would lead to loss or disturbance of consumption dyke. Tree belt to the west of the site is designated as prime landscape.</i></p> <p>The supporting bid document provides an indicative layout (page 10) showing that the southern half of the site would be open space to protect the setting of the</p>

			<p>consumption dyke. The setting of the dyke would not be affected (as proven by the development of Prime Four to the south). The tree belt would not be affected, and an agreed stand-off distance could be agreed as per the adopted Prime Four Framework.</p> <p>We are unclear what the designation 'prime landscape' refers to? This is not referenced in Aberdeen City Council's current LDP and its associated SG. There is therefore no policy basis for ruling out sites on that basis.</p>
Landscape Fit	2	2/3	<p><i>Suggestion that development would intrude on the landscape from the Kingswells bypass.</i></p> <p>The development would be relatively unobtrusive in the landscape given the Prime Four business park to the north, and the backdrop of woodland when viewed from the C89C. The site sits at a low point and is not highly visible from wider viewpoints.</p>
Relationship to existing settlement	2	3	<p><i>Suggestion that connection to Kingswells is severed by the Kingswells bypass.</i></p> <p>Whilst the C89C road has in the past served the purpose of a distributor road, the AWPR will relieve this road of a significant level of traffic and this road will serve only local traffic. It is suggested that links between Kingswells and Prime Four should be improved, which this site could enable.</p> <p>The site is related to Kingswells as the land slopes to the east towards the settlement.</p>
Land Use Mix / Balance / Service Thresholds	2	3	The development would improve the land use mix on the western side of the C89C.
Accessibility	3	3	The site is within 400m of a bus stop, and within 800m of the park and ride which offers a greater range of bus services.
Proximity to facilities / shopping / health / recreation	3	3	The site is within 800m of Kingswells Village Centre and the health centre.
Direct footpath / cycle connection to community and recreation facilities and resources	1	2	<p>The site has good existing connections through Prime Four Business Park. Additional links into Kingswells are proposed as part of the development. This would link the development with Core path 33 in Kingswells.</p> <p>Core path 91 is just over 800m to the south of the site, from the site</p>

Proximity of employment opportunities	3	3	Prime Four Business Park is a world class business park adjacent to the site.
Contamination	3	3	No known contamination.
Land Use Conflict	2	3	The forties pipeline is well outwith the proposed site boundary and is not a conflict.
Physical Infrastructural Capacity	3	3	No known constraints
Physical Infrastructure Future	3	3	No known constraints
Service Infrastructure Capacity	2	2	Phasing of the development and its limited scale will create a very limited impact on school capacities.
Other Constraints	3	3	None known
Score	51	60/61	

Table 1 – Sustainability Checklist for site B0311 – extract from Appendix 3 of the MIR

Strategic Environmental Assessment Site B0309

SEA Topic	Objective	B0311 'Site score'	Drum Response (including suggested score post mitigation)
WATER	Direct impact on water environment	0	Agree that the scoring is neutral (0)
	Public foul sewer	0	Agree that the scoring is neutral (0)
	Public/Private water supplies affected	0	Agree that the effect would be neutral (0)
BIODIVERSITY FLORA AND FAUNA	Biodiversity, flora and fauna	-	<p>A protected species survey would be carried out at detailed planning stage. There is an allocated site to the west side of the West Hatton woodland where an offset distance has been recommended.</p> <p>The green space network will be retained and is not proposed for development.</p> <p>Suggest site scoring should be neutral (0)</p>

CLIMATE CHANGE	Carbon Emissions Impact	0	Agree that the scoring is neutral (0)
AIR QUALITY	Air Quality Managed Area (AQMA)	0	Sustainable transport methods will be promoted within the site. Agree site scoring would be neutral (0)
SERVICE INFRASTRUCTURE	Education	0	Mitigation for education provision in the form of contributions towards a new primary school and towards Countesswells Academy. Agree site scoring would be neutral (0)
	Open Space	-	<i>Suggests loss and interruption of green space network.</i> Green space network is being maintained and enhanced (see below) Suggest site scoring should be positive (+)
	Green Network	+	States that green space network will be maintained/enhanced. Agree site scoring would be positive (+)
SOILS	Greenfield / brownfield	-	Greenfield site but short-term impact during construction. The effect is therefore temporary, and score should be neutral (0)
DELIVERABILITY / SUSTAINABILITY	Delivered within LDP, Servicing Constraints	+	Agree site scoring would be positive (+)
	Site Aspect	+	Agree the site scoring would be positive (+)
	Vehicular Access	0	New access would need to be delivered. Agree the site scoring would be neutral (0)
	Facilities	++	Site in close proximity to facilities and bus stop. Agree the site scoring would be positive (++)

LANDSCAPE	Landscape capacity	-	<p>Suggests loss of, or disturbance to consumption dyke. Suggests intrusion on surrounding landscape, particularly from Kingswells bypass. It is noted that some mitigation is possible through screening/careful design.</p> <p>The site does not have an intrusive landscape impact. It is a low lying site, adjacent to existing development. A large park is proposed to the south of the site to maintain the setting of the consumption dyke, and which would integrate with the Northern Park at Prime Four Business Park. The consumption dyke would not be effected.</p> <p>Suggest that the site scoring should be neutral (0)</p>
	Impact on waste management site?	++	Agree the site scoring would positive (++)
MATERIAL ASSETS	Compliance with waste locational criteria	0	<p>The development would provide good provision for recycling.</p> <p>Suggest the site scoring would be positive (+)</p>
	Effect on cultural heritage	-	<p>Suggests the consumption dyke is likely to be interrupted or lost as part of the development.</p> <p>A large park is proposed to the south of the site which would integrate with the Northern Park at Prime Four, and provide the consumption dyke with a large parkland setting, which would be maintained. This is considered to be an enhancement and the consumption dyke would not be interrupted or lost.</p> <p>Suggest the site scoring would be positive (+)</p>
POPULATION	Promote economic growth, social inclusion...	+	Agree the site score would be positive (+)

Table 2 – Strategic Environmental Assessment: Site B0311

The overall SEA scoring should therefore be positive.

126235: TN01 Prime North Residential Development, Kingswells, Aberdeen

Safe Routes to School Review – October 2018

Overview

1. Fairhurst have been commissioned by Drum Property Group to prepare a Safe Routes to School Technical Note for the Prime North Residential Development at Kingswells, Aberdeen.
2. This Technical Note will provide a review of
 - Walking and Cycling Routes to Kingswells Primary School; and
 - Constraints on the identified routes to school and the possible mitigation required to ensure that the routes identified are safe

The Site

3. The Prime North site has been submitted as a bid for the 2018 Aberdeen Local Development Plan for approximately 90 houses and will complement the high amenity uses that the Drum Property Group have already established at the award winning Prime Four Business Park.
4. Improved connections between the Prime North site and Prime Four, the Park and Ride site and Kingswells village centre can help create high amenity and a sustainable location for new residential use that can also help reduce the need for its residents to travel to access jobs, leisure and services.
5. Prime North is located immediately to the north of the Prime Four Business Park and is currently used as farm land. The C89C Chapel of Stoneywood - Fairley Road runs to the east of the site and will see significant reductions in traffic volumes once the AWPR opens. The AWPR itself lies to the west of the site but is not immediately adjacent and won't impact on the amenity of the site. An area of Ancient Woodland bounds the site to the west but the site would not impact on this.
6. The sites location and an aerial photograph of the site are shown by Figures 1 and 2 overleaf.

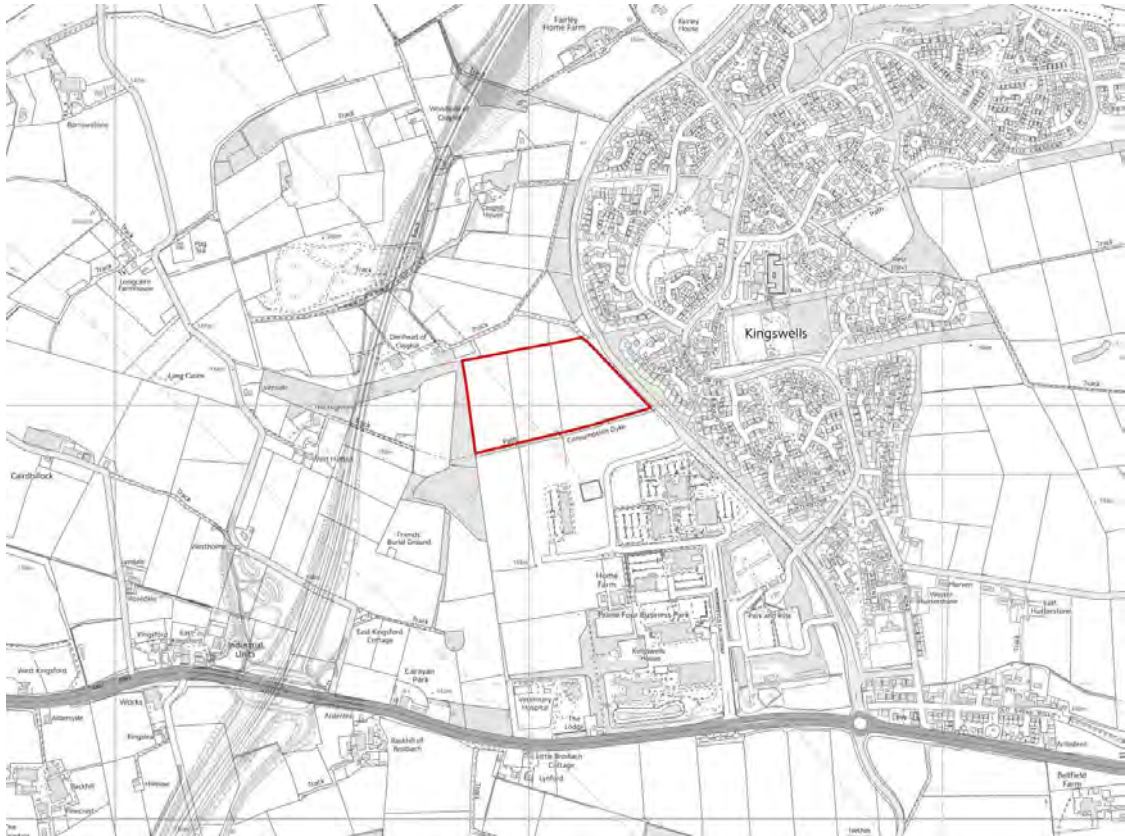


Figure 1: Location Plan



Figure 2: Aerial Photo of the Site

Safe Routes to School

7. Figure 3 shows an indicative site layout which identifies the general road arrangement within the site and its connections to the existing road network.



Figure 3: Indicative Site Layout

8. Aberdeen City Council Guidance dictates that for new developments between 50 and 100 units, one point of vehicle access and an emergency access is required. The Prime North site could accommodate around 100 houses and although not shown, an additional emergency access could be provided onto the C89C Chapel of Stoneywood - Fairley Road.
9. The indicative site layout illustrates that a vehicular access would be located to the north of the site forming a junction onto the C89C Chapel of Stoneywood - Fairley Road. A network of footpaths would be provided to the south of the site through an extensive parkland area which separates the housing from the Consumption Dyke (Scheduled Ancient Monument). Pedestrian and cycle connections would be provided to the Prime Four Business Park to enhance accessibility.
10. The Prime North site does not currently have a safe route to Kingswells Primary School which is potentially located within a 600 - 800m walk / cycle from the site. There are currently no footways provided alongside the C89C Chapel of Stoneywood - Fairley Road, which itself has a speed limit of 50mph as it passes the site. There are no current pedestrian desire lines to / from the site and as such there is no crossing infrastructure provided adjacent to the site.

11. In order to establish a safe route to school from the site, foot / cycleways and a Toucan Crossing should be provided. The speed limit should be reduced from 50mph to ideally 30mph where the C89C Chapel of Stoneywood - Fairley Road passes the site frontage. However depending on how far set back development is, 40mph may only be achievable.
12. To complete the link to the existing network of footways within Kingswells, a foot / cycleway would be required along the edge of an existing tree belt to the south of the houses served by Coull Gardens. This foot / cycleway should be 3m wide and lit.
13. With the provision of this foot / cycleway, pedestrians and cyclists can access the existing footways and road network within Kingswells via Kingswells Drive. It is considered that the existing provision within Kingswells currently facilitates safe routes to school. A Zebra crossing is provided on Kingswells Drive adjacent to the Kingswells shopping centre, where onward links to the primary school are provided.
14. Figure 4 illustrates the safe route to school and the mitigation discussed above.



Figure 4: Safe Route to School

15. Without the provision of the link through to Kingswells Drive, the alternative route is to walk / cycle alongside the C89C Chapel of Stoneywood - Fairley Road to the Kingswells Drive junction to the north (800m) or south (700m). This would require a shared foot / cycle way to be provided alongside the C89C Chapel of Stoneywood - Fairley Road.
16. The route to the north may also require to be segregated as it is currently 50mph and would require the provision of a Toucan Crossing in order to access the existing footway provision on Kingswells Drive. The total walking distance to Kingswells Primary School via the Kingswells Drive north junction would be 1400m.
17. When compared with the north route, there could be some advantages with the route to the south as the foot / cycleway provision could link with the existing provision provided on Prime Four Crescent which forms a signalised junction with the C89C Chapel of Stoneywood - Fairley Road. Continuing south, the foot / cycleway provision would also connect with the existing provision which links with an emergency access to the Prime Four Business Park which is designated as a shared use route. An existing footpath continues south alongside the C89C Chapel of Stoneywood - Fairley Road to its signalised junction with Kingswells Drive which includes a pedestrian crossing phase. The total walking distance to Kingswells Primary School via the Kingswells Drive south junction would be 1500m and would require the provision of approximately 600m of a shared use foot / cycle way alongside the C89C Chapel of Stoneywood - Fairley Road.
18. Providing links from the Prime North site to the existing Prime Four Business Park and onto Prime Four Crescent would provide a route via the existing footpath networks through Prime Four and linking to Kingswells Drive via the signalised junction at the C89C Chapel of Stoneywood - Fairley Road. This route would however be longer at approximately 1800m and route through the Prime Four Business Park and require the crossing of many junctions and accesses.
19. There is no secondary school located in Kingswells, with the catchment secondary school being Bucksburn Academy which is located approximately 3 miles to the north. Pupils who currently reside in Kingswells are entitled to free school transport and are picked up from designated locations within Kingswells.
20. It is envisaged that secondary school pupils from the Prime North site could route to the designated pick up points in Kingswells via the proposed Toucan Crossing and foot / cycleway discussed above. Alternatively, Academy pupils from the Prime North site could be picked up from a new designated pick up point created adjacent to the C89C Chapel of Stoneywood - Fairley Road. This would likely require the formation

of a bus layby and shelter, which may be required for the development regardless, as part of its public transport accessibility.

21. When considering the options available, the route identified via the new foot / cycle way adjacent to the tree belt, and as shown in Figure 4, would be considered the safest and is the shortest route. The route would also provide the most direct route to other facilities in Kingswells, including accessing bus services.

Mark Peters
Principal Engineer
15/10/2018



DRUM
PROPERTY GROUP
DEVELOPMENT & INVESTMENT

PRIME NORTH RESIDENTIAL, KINGSWELLS

LOCAL DEVELOPMENT PLAN BID / MAY 2018

PREPARED BY HALLIDAY FRASER MUNRO

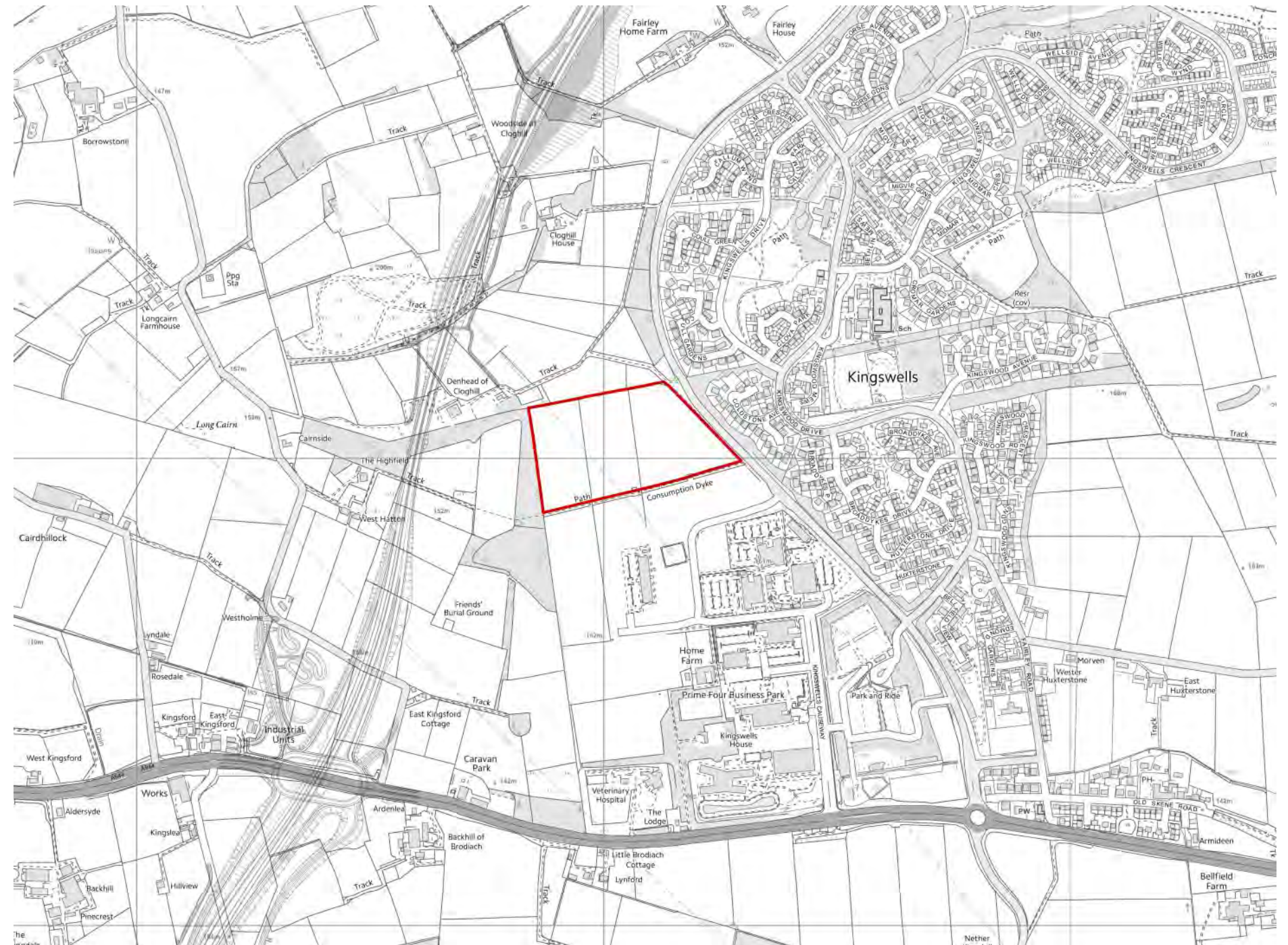
1. INTRODUCTION AND VISION

This site to the north of the Prime Four Business Park is located adjacent to Prime Four - the City's most successful major employment hub, the established recreational and leisure facilities at Prime Four and Kingswells village.

Improved connections between the proposed allocation and Prime Four, the Park and Ride site and Kingswells village centre can help create high amenity and sustainable location for new residential use that can also help reduce the need for its residents to travel to access jobs, leisure and services.

This bid is proposed by Drum Property Group and will complement the high amenity uses they have already established at the award winning Prime Four Business Park.

The site is generally south facing, offering the opportunity to take advantage of solar gain. The C89 Kingswells bypass runs to the east of the site. This road will benefit from significantly less traffic once the AWPR opens. The AWPR itself lies to the west of the site but is not immediately adjacent and won't impact on the amenity of this site.



Site Location

2. THE SITE

Site Description

The site is currently used as farm land but the wider landholding has been intersected and reduced in scale as a result of the development of the AWPR. The viability of this land for farming purposes is now therefore significantly lower.

The main landscape feature of this land is the Consumption Dyke (Scheduled Ancient Monument) which sits at the very southern boundary. This is respected by the proposed development with an area of parkland, similar to that to the south of the Consumption Dyke, being retained to protect its setting. An area of Ancient Woodland lies to the west but the allocation of this site would not impact on this. A major pylon line runs diagonally in a north westerly direction. Again development would respect this constraint which is limited to the west of the site.



Photograph looking south to Prime Four Business Park

3. AWPR AND CHANGING THE LANDSCAPE

The AWPR is a national scale infrastructure project and has significant implications for the landscape around Aberdeen. Not only does it introduce large-scale roads infrastructure into the physical landscape, it also alters how people will move around the city and creates a new and distinct physical boundary to the city.

The AWPR, however, is not the only element of the landscape that has altered in this location. Prime Four is now well-established with Phases 1-3 now almost complete and the new Northern Park and an additional access from the C89 is in place. The land to the south of the proposed allocation at Prime Four is now established as a world-class business park supporting thousands of jobs and offering high amenity leisure and recreational facilities. The land to the west is zoned as an extension to the Prime Four Business Park and will be developed in due course. New housing on this site with the same high amenity ethos adopted at Prime Four Business Park would complement the development to the south and create a new high quality housing location with an exceptional quality of life.

Prime Four is already part of Kingswells. This proposed allocation should be considered as an extension to that expanded village.



Aerial Photograph (Source: Google Maps)

4. PLANNING CONTEXT

Housing land

Current housing land allocations haven't been delivering at the scale originally anticipated. This has created housing a delivery backlog and new housing allocations are required to deliver the City's housing requirements.

The joint Strategic Development Plan Main Issues Report, currently out for consultation, states that the 2,769 fewer houses overall and 3,000 fewer affordable houses were delivered in the 5 years to 2016 than required by the SDP and the HNDA. That's around 600 houses less than required every year.

Analysis of housing land delivery in the City on key large sites identifies a significantly worse housing delivery record. The following table identifies that key development sites in the City, their original anticipated housing numbers and the actual delivery over a 10 year period, all based on the Council's Housing Land Audits. It shows that of the 11,150 houses originally proposed on these sites just over 2,000 (around 10%) have been delivered.

The evidence points to slower delivery rates on a site by site basis. The City Planning Authority needs to allocate additional housing land to help supplement that lack of delivery over many years and catch up with demand. These sites should be in a range of locations and at a range of scales to encourage a greater range of developers and offer choice to those looking to buy a new home. The City Council has suggested that sites up to 100 housing units are appropriate. This site meets that specified requirement.

Housing Strategy and Allocations

Aberdeen is the strategic centre for housing development for the City region and the main focus for growth. The SDP MIR identifies future housing need and a requirement for additional release of housing land across the City and Shire and the vision remains to create an attractive, resilient, prosperous and sustainable European City Region and an excellent place to live.

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

Table 6 of the SDP MIR is included below.

Comparison of Major Housing Proposals in 2012 LDPs against actual delivery									
City	site	ref	2007-2016	Cumulative 2015	shortfall	Cumulative 2016	shortfall 2016	Cumulative 2017	shortfall 2017
	Grandhome	OP12	2600	0	2600	0	2600	0	2600
	Dubford	OP25	550	190	360	309	241	397	153
	Stoneywood	OP24	500	133	367	231	269	514	-14
	Craibstone South	OP28	750	0	750	0	750	0	750
	Rowett South	OP30	1000	0	1000	0	1000	0	1000
	Greenferns Landward	OP31	750	0	750	0	750	0	750
	Maidencraig	OP43 & O	750	5	745	24	726	60	690
	Greenferns	OP45	600	0	600	0	600	0	600
	Countesswells	OP58	2150	0	2150	4	2146	154	1996
	Oldfold	OP62	400	0	400	25	375	50	350
	Loirston	OP77	1100	0	1100	0	1100	0	1100
	TOTALS		11150	328	10822	593	10229	1175	9054
			percentage delivered	2.9%		5.3%		10.5%	

4. PLANNING CONTEXT

Housing Strategy and Allocations

Aberdeen is the strategic centre for housing development for the City region and the main focus for growth. The SDP MIR identifies future housing need and a requirement for additional release of housing land across the City and Shire and the vision remains to create an attractive, resilient, prosperous and sustainable European City Region and an excellent place to live.

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

Table 6: Proposed Allowances

(land to be identified beyond the 2016 effective supply)

	2016 to 2030	2031 to 2035	2036 to 2040	Total
Aberdeen Housing Market Area	4,200	5,700	6,300	16,200
Rural Housing Market Area	1,300	1,700	2,500	5,500
Total	5,500	7,400	8,800	21,700
Split as follows:				
Aberdeen City Council	3,500	4,700	4,800	13,000
Aberdeenshire Council	2,000	2,700	4,000	8,700

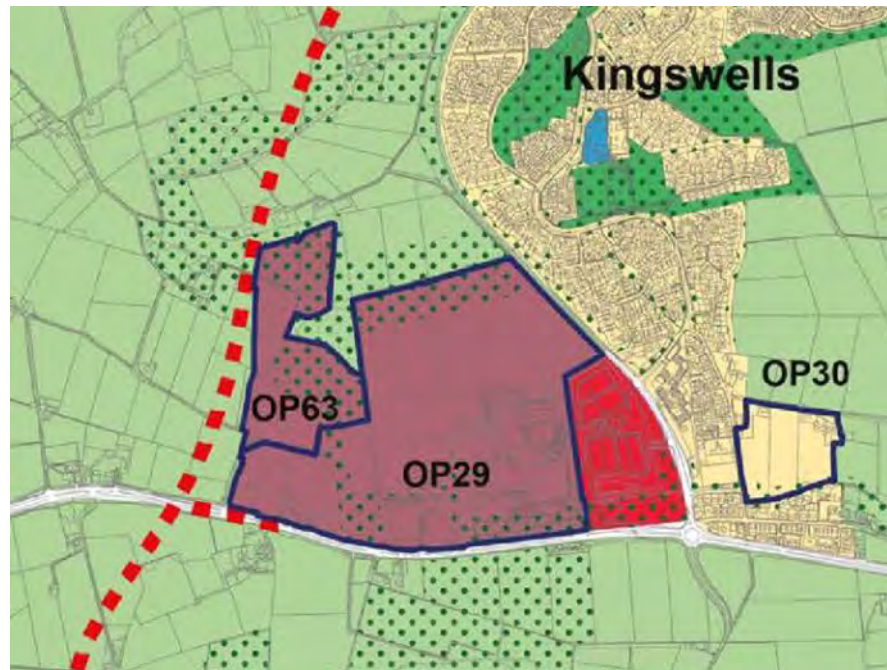
The proposed housing allowance is for 13,000 new homes in the City over the next 22 years. Alternative sites in locations that offer attractive and popular places where people would like to live should be allocated to complement the existing housing land supply.

In terms of housing land, therefore, this bid is entirely in line with the suggestions of site size and location from both the Strategic Development Plan MIR and the City Council's Call for Sites.

4. PLANNING CONTEXT

Current Local Development Plan

The site is presently zoned as Green Belt with an area of Green Space Network (GSN) adjacent to the Consumption Dyke. The GSN has been retained as open space to reflect the parkland approach to the south at Prime Four Northern Park. As a combined open space with the Consumption Dyke at its centre this will form the main landscape feature of this part of Aberdeen, respecting and protecting the setting of the Consumption Dyke.



Extract – 2017 Aberdeen Local Development Plan

Green Belt release is required to meet the Council's stated request for new greenfield sites of 100 houses or less. The Local Plan Review process is the mechanism where such releases can be considered. Green Belt policy protects land for 4 main reasons.

These are:

- to maintain the distinct around the City;
- to safeguard the Green Belt to help avoid coalescence and sprawling development on the edge of the city;
- to maintain Aberdeen's landscape setting and
- to provide access to open space.

Identity - This area of Aberdeen has changed considerably over recent years and will continue to change as Prime Four is built out. The land to the south is now a major world-class business park, the AWPR has been constructed to the west and the C89, as a result of the AWPR will become a far quieter local distributor road rather than a key north-south route. This site now sits in an extended Kingswells and would form part of that urban area. Development of this site is therefore a sensible extension of an existing settlement. It would not detract from the distinct identity of Aberdeen.

Officers and the Planning Authority have also agreed that the site was acceptable as a development site (Future New Communities) in the 2004 Finalised Local Plan when most of the site was identified for development.

Coalescence and Sprawling Development - The site does not create coalescence or sprawling development for the very same reasons as set out above. Kingswells has already expanded westwards.

Landscape Setting - The landscape setting of Aberdeen is not undermined by this proposal. The site is a field with a large pylon crossing it and woodland to the west. Developing this site with appropriate landscape treatment, retaining the woodland and introducing a new park adjacent to the Consumption Dyke has the potential to enhance the landscape setting.

Access to Open Space - The proposals will improve access to the existing open space locally, access to the more formal leisure facilities at Prime Four and, with improved linkages back to Kingswells Village, will enhance access from Kingswells westwards.

This review has not identified any concerns in relation to the function of the Green Belt for this bid site. The loss of this specific bid sites from the Green Belt would not undermine its overall purpose.

Planning and Design

At a national level the Scottish Government are pursuing both a housing delivery and design quality agenda. They are promoting 6 essential qualities of place:

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

Drum has embraced this approach in the development at Prime Four and will continue to embrace that in the delivery of housing on this site. An essential element of quality of life is location, quality of the landscape that development is set within and the convenience of access to facilities and jobs locally. This site will deliver on all of these.

4. PLANNING CONTEXT

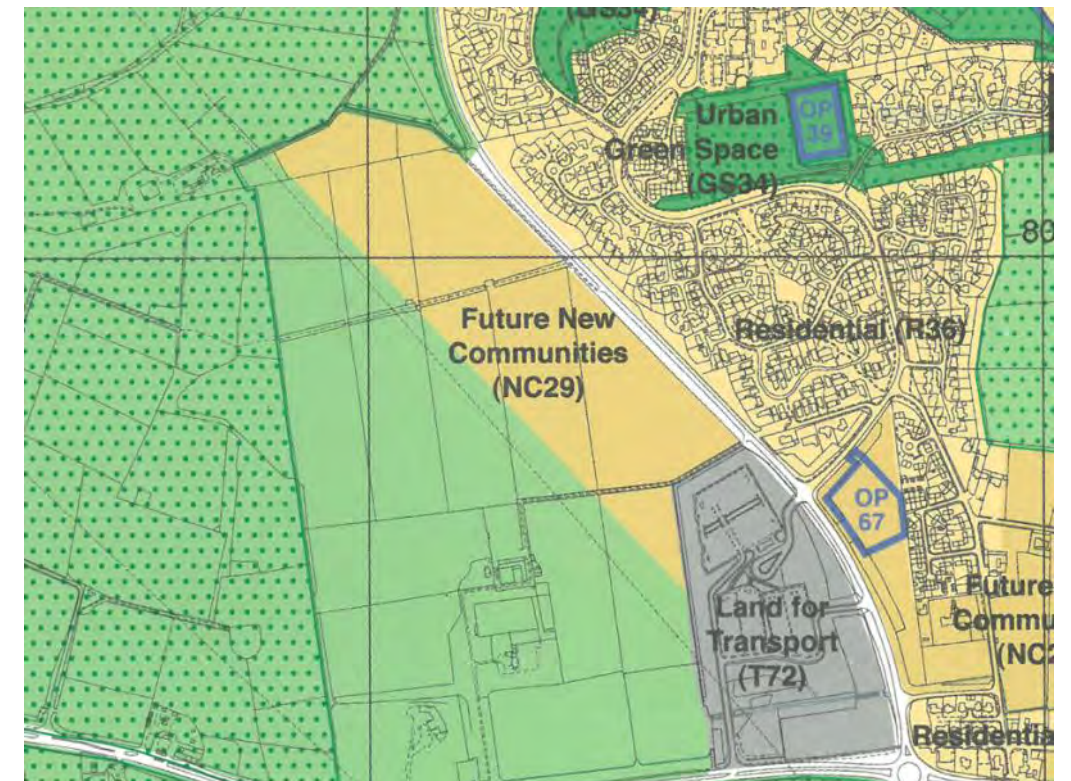
Historic Planning Context

The 2004 Finalised Local Plan (Green Spaces, New Places) identified this area as Future New Communities (FNC) – see extract on this page. Although never adopted the 2004 Finalised Local Development Plan, prepared by officers and agreed by Councillors, was the key material consideration in planning decisions prior to the 2008 Plan. The area of FNC zoning reflected the expected line of the AWPR at that time. The image to the right shows how the expected AWPR route sat immediately to the west of the FNC area. The AWPR has of course since been relocated much further west and the area to the south developed. The FNC zoning was not taken forward from 2004 to 2008 Plans as a result of uncertainty over the exact AWPR alignment and a change in strategy that saw Future New Communities for over 9,000 households become Strategic Reserve land for just under 1,000 homes.

This site, therefore, has a clear historic recognition of its potential for development even before Prime Four was developed and the AWPR agreed and implemented. The extent of that area was clearly restricted to the west by the optional AWPR route which was subsequently re-located westwards for cost reasons and to avoid impacting on the Consumption Dyke. The westwards AWPR restriction should therefore no longer apply and the development of Prime Four has proven that development in this area need not impact on the Consumption Dyke.



Extract 2004 Finalised Plan Technical Appendices – showing anticipated line of AWPR and relationship with West Kingswells FNC



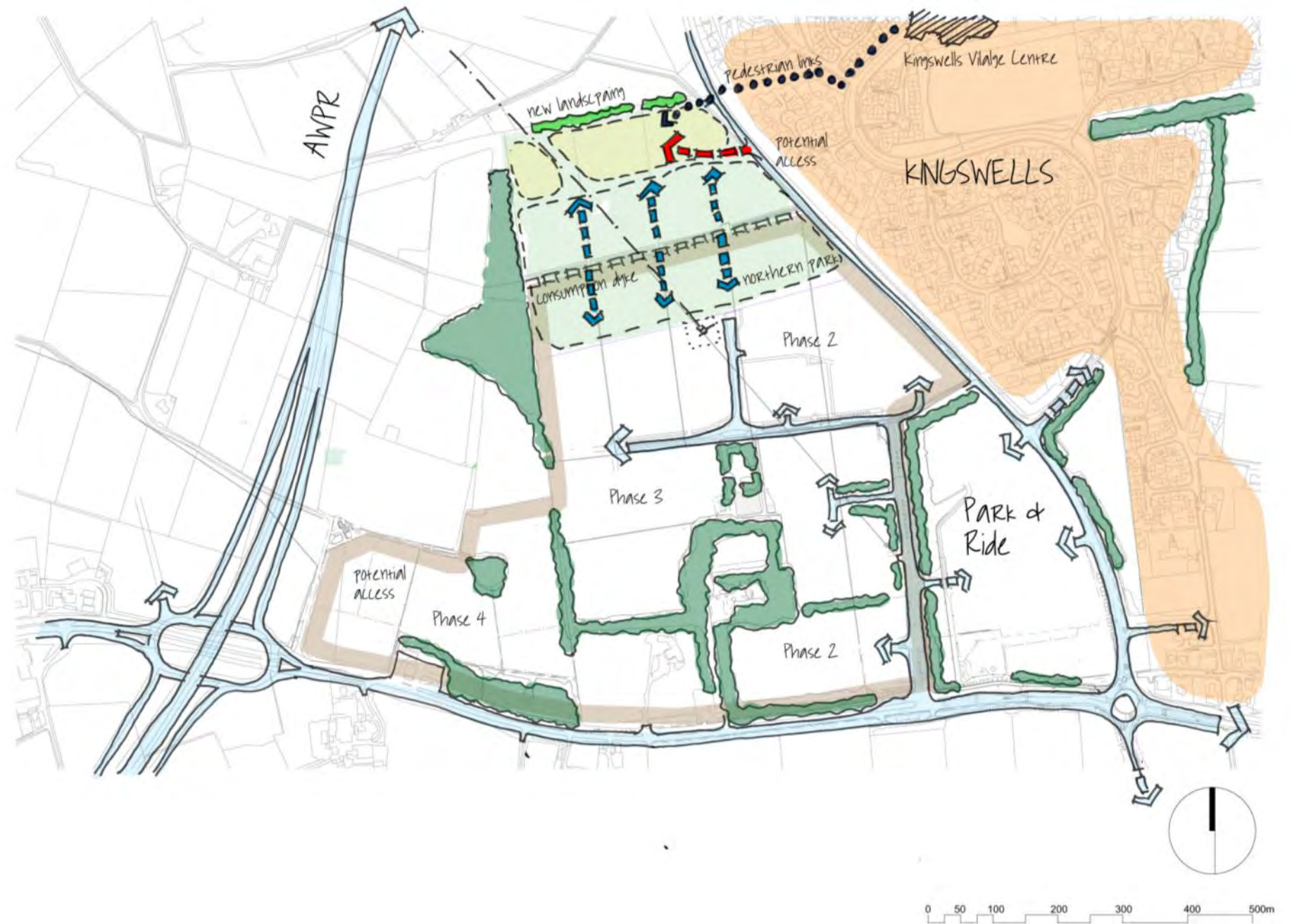
Extract—2004 Finalised Local Development Plan

5. CONCEPT

The proposal is to allocate the land to the north of Prime Four as a new residential zoning of approximately 90 houses. This will include an extensive parkland area to the south to separate the housing from the Consumption Dyke and protect its setting. The park would allow access directly to Prime Four by locating new footpath links through the existing gaps in the Consumption Dyke. The Consumption Dyke would then be at the centre of a single park, protecting its setting in perpetuity.

Further pedestrian and cycle connections southwards and to Kingswells could enhance accessibility and provide a choice of routes to and from the development.

The woodland to the west would provide a natural backdrop to the housing and screen it from the extended Business Park. Vehicular access from the east is possible from the C89.



Site analysis

6. PROPOSED BID

Drum Property Group is committed to retaining the quality and amenity of Prime Four Business Park. The commitment would be reflected in this proposal, supporting the creation of a convenient, pleasant and inspiring place to live.

The evidence in this bid suggests that this site should therefore be allocated for residential uses in the 2021 Local Development Plan.



Indicative Framework Plan





Aberdeen Local Development Plan Review

Main Issues Report Response Form 2019

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

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

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

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

Responses to the published documents can be:

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

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



YOUR DETAILS

Name	STEVE CRAWFORD
Organisation (if relevant)	HALLIDAY FRASER MUNRO
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

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YOUR COMMENTS

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

East Kingsford - Please see separate response enclosed in respect of:

- Site B0312

Please also find enclosed the following in support of the response:

- 2018 LDP Bid Document (for reference only)

YOUR COMMENTS CONTINUED

B0312 East Kingsford - MIR Response – May 2019

- *B0312 – East Kingsford, new limited-scale roadside fuel and food/drink development serving the AWPR and A944*

1.Introduction

Halliday Fraser Munro lodged an LDP bid for the above site on behalf of Drum Property Group – B0312 for the development of a new limited-scale roadside fuel and drive-thru food/drink development serving the AWPR and A944. Aberdeen City Council officers when reviewing the bid have suggested that the site should not be preferred at this stage. Drum Property Group do not agree with that view. This response provides justification for including the East Kingsford site in the Proposed LDP.

The East Kingsford site offers a range of benefits as set out in the original bid document (resubmitted for information):

- Re-use of a brownfield site;
- Existing use rights;
- Makes best use of land close to the AWPR to service passing traffic;
- Provides convenient services to AWPR and A944;
- Positive use of industrial land for new modern commercial food & drink uses and associated employment;
- Small scale food & drink and fuel related uses; and
- Sustainable travel options along the A944 (cycle, walking, public transport) for employees and those without access to the car

These remain the case and suggest that the site can be considered a deliverable small-scale commercial site close to the A944 and the AWPR.

The Council's MIR review recognises that:

- The site is low-lying and relatively sheltered; and
- Is part of the Kingsford Industrial area.

The MIR reasoning for not preferring the site seems to be based on the following:

- Traffic impact; and
- An existing fuel station 400m east on the A944.

These, we believe, are not valid reasons for discounting this site and have responded accordingly in the following pages.

B0312 offers an opportunity for a small-scale, brownfield, commercial development serving passing traffic on the A944 and AWPR. Similar facilities have been approved recently on the A944 at the Ardene Veterinary Practice although that development was three times the size. The impact of that development was not considered to be significant by ACC. B0312 also allows for the relocation of the petrol filling station facilities from the site OP29 (allocated as part of the Prime Four development) to this site.

B0312 should be identified as an allocation for small-scale commercial use of that type proposed and removed from the Green Belt.

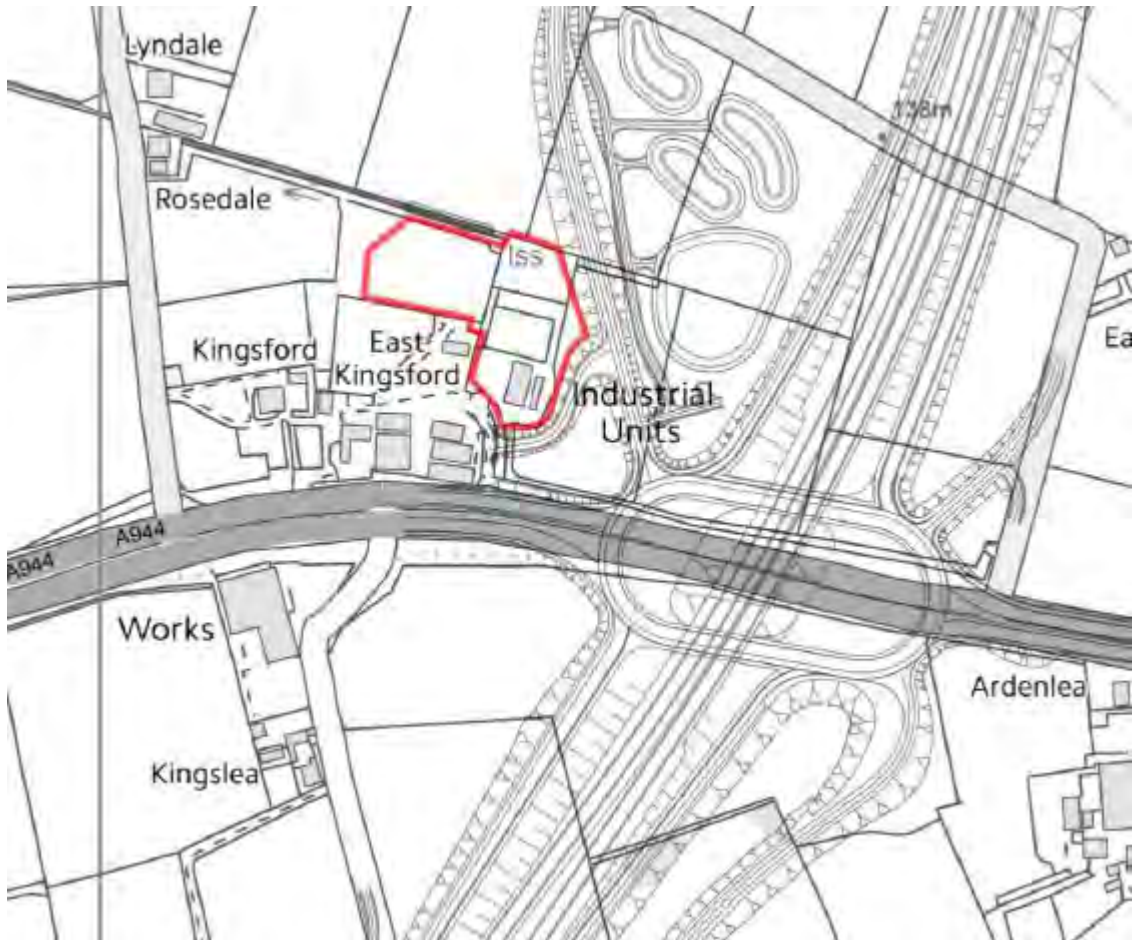


Figure 1 – Site Location Plan (Extract – 2018 LDP bid document)

2. MIR Response – B0312 East Kingsford

2.1 Traffic

The MIR suggests that traffic generation is a key issue in respect of the proposed development. That is unlikely to be the case and can be demonstrated using the information agreed by officers during the determination and approval of the three food and drink uses (including 2 drive-thru facilities) at the Arden Veterinary Practice land on the A944 and just along the road from this site. That development is essentially three times the scale of the drive-thru/food and drink uses proposed at B0312.

During analysis Traffic Analysis officers noted that in the run-up to the opening of the AWPR, surveys were not able to be undertaken (which would have provided concise and up-to-date information), thus an amalgamation of work undertaken on several other projects had to be relied on to produce a best estimate of traffic impact. Notwithstanding those circumstances, the applicant in that case was considered by ACC to have provided a robust traffic assessment. That assessment assumed:

- A 20% discount for pass-by traffic (i.e. vehicles which are on the road in any case) which resulted in very robust assessment, as for drive-thrus typically up to 75% of trips are attributed to pass-by traffic; and
- It is unusual for people to make a journey with the sole intention of visiting a drive-thru, especially at peak times.

It found that:

Four junctions were affected (expected impact shown in % in brackets).

- Junction 1 – A944 / AWPR Roundabout, A944 East Arm (3% increase – ACC Roads officers considered that in reality, the developments impact on this junction would be negligible as it is not anticipated that the development would result in any significant number of new trips on the road during peak times);
- Junction 2 – A944 / Kingswells Causeway Signals, A944 West (overall functionality would remain well within capacity);
- Junction 3 – A944 / Kingswells Causeway Signals, A944 East (functionality is still within capacity); and
- Junction 4 – A944 / C89C Roundabout, A944 West (2% increase – but still under the overall design capacity and not expected to be unacceptably problematic).

In summary the applicant's TA found that the impact on Junction 1 would be negligible and below a level at which it would be reasonable to expect any junction improvements to be carried out. The impacts on Junctions 2 and 3 are within desirable capacities, and the impact on Junction 4 would remain within design capacity. The report to Committee (ref 181336) summarised the traffic issues there as:

"... although that development would have an impact on several junctions along the A944, the individual impacts are minimal and therefore no mitigatory works to any junctions are required by roads officers. In relation to the AWPR, which is the responsibility of Transport Scotland, they have offered no objection to the proposal (Issue 10, 13 and 43)."

Bearing in mind that TA was considering a development three times the scale of that at B0312 the likely impacts associated with this bid site would be significantly less and have even less impact on the road network. The MIR view that traffic impact is a concern in respect of this bid site runs contrary to the findings of the application 181336 and the conclusions of roads and planning officers in that instance.

Traffic impact is not a reason for discounting this site. It will supply a service to passing traffic and robust traffic evidence for a similar scheme nearby has proven that impact for this much smaller development will be absolutely minimal.

2.2 Existing Refuelling Services

Secondly the fact that a fuel station exists close by is not a reason for discounting the site. Fuel stations have no need test in planning. In any event two key points help overcome that concern. The first is the significant increase in traffic as a result of the AWPR junction in this location. That makes the proposed site more accessible, more easily, and to a more passing traffic that will require refuelling options. The access to this site compared to the 5-Mile Garage (the existing fuel station referred to in the MIR) is significantly easier, more convenient and requires traffic to travel less to reach it. The AWPR, as a long-distance route, requires strategic refuelling and rest areas. These make most sense at the junctions. This site is perfect to serve that purpose.

The second is that the 5-Mile Garage is currently under the control of Drum Property Group and it is intended that in due course it may form part of a future phase of Prime Four.

2.3 Green Belt Zoning

The site sits within the current Green Belt but should be removed as it forms part of a small industrial area close to a major AWPR junction – see below:



Figure 2 – Aerial Image of site in the context of the AWPR (source: Google Maps)

The LDP review provides an opportunity to rezone land from the green belt where it is appropriate for development. Paragraph 50 of Scottish Planning Policy (SPP) states that in identifying the most sustainable locations for longer-term development, planning authorities should review the boundaries of the greenbelt where necessary. Using zonings in the previous plan to rule out new opportunities in the next plan runs contrary to the LDP review process. Each bid should be fully considered against planning related criteria, including an up-to-date Greenbelt review, and rezoned if considered acceptable.

2.4 Site Scoring/Development Options Assessment Review

The MIR gives this site a score of 46 out of a maximum of 63 in its sustainability scoring checklist. This is already a reasonable score for a greenfield site and many of the checklist questions score the site at its maximum. Those criteria which mark the site less than full marks have been reviewed and an analysis is included in **Appendix 1**. The reviewed scoring is now suggested to increase to 61 out of 63 making this site a very high scoring site in the MIR Sustainability Checklist Review. Comments on each point are included in Appendix 1 and reflected in the body of this MIR response.

3. Conclusion

Drum Property Group do not agree with the justification presented in the MIR to reject the bid B0312. They see this bid as offering a real opportunity to deliver a small-scale commercial development to serve passing traffic, in particular the refuelling needs of the AWPR, on an existing brownfield site. Recent approvals for similar developments nearby offer substantive evidence that traffic issues should not be a concern. Existing refuelling services locally are not a justification to reject this bid. In any event those facilities are likely to be relocated as a result of the future development at Prime Four.

The site's location close to the A944 and the AWPR offers a clear opportunity for modern refuelling services without the need for drivers to deviate significantly from their journeys, thus reducing the need to travel simply to refuel or find something to eat.

Attachments:

- *Response Form; and*
- *2018 LDP Bid document (for reference purposes)*

APPENDIX 1: DEVELOPMENT OPTIONS ASSESSMENT REPORT

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

The site assessment process undertaken by Officers comprised an assessment of sites against a sustainability checklist and used the outcomes of the strategic environmental assessment to inform the decision on whether a site was suitable. Site B0312 has been assessed and identified as 'undesirable'. The tables below provide a review of the officer's assessment, and reconsider the site scoring of the proposed site. The table includes the score given by Officers, and a 'Proposed Score' reflecting the additional justification provided in the table.

Table 1: B0312 East Kingsford Sustainability Checklist Review Assessment

Criteria	Officers Score (max. 3)	Proposed Score	Justification
Exposure	2	2	<i>Some vegetation on boundary. Quite sheltered.</i>
Aspect	1	3	<i>East facing.</i> Contours suggest that the site is generally flat, potentially south west facing. No reason not to award full score.
Slope	2	3	<i>Very low-lying part of a valley. Some fairly steep slopes but the gradients are less than 1:12.</i> <i>The site is level</i>
Flood Risk	2	2	<i>According to SEPA's Indicative Flood Map there is little risk of flooding on the site, apart from on the northern boundary where the Drain to Brodiach Burn is located; this might be susceptible to flooding and hard development would need to be avoided around this area.</i>
Drainage	2	3	<i>There may be drainage issues around the existing watercourse on site.</i> Easily dealt with.
Built/Cultural Elements	3	3	<i>No issues</i>
Natural Conservation	3	3	<i>No issues.</i>
Landscape Features	2	3	<i>The site currently has industrial units and agricultural buildings used as AWPR construction depot.</i> <i>The site sits next to the AWPR roundabout junction.</i> This is a brownfield site being proposed for commercial use. Landscaping will be provided.
Landscape Fit	2	3	<i>The site is currently surrounded by open farmland. The existing uses surrounding the site are largely</i>

			<p><i>industrial. The site has the potential to produce an increase in traffic on a junction of the AWPR, as fuel station, food and drink use are proposed.</i></p> <p>The site is brownfield in a small-scale industrial setting. It will not impact on the landscape to any great extent.</p>
Relationship to existing settlement	1	3	<p><i>The development is not related to any existing development and sits within the Greenbelt in between the settlement of Westhill and Kingswells. It is approximately 1.5km away from any residential settlement, and the likelihood of people walking this distance along the busy A944 to get to the food/drink use is not very high. Therefore, this development is likely to encourage the use of car, especially with the drive through facilities which it proposes. This will in turn increase the amount of traffic on the AWPR junction.</i></p> <p>The site is in an existing small-scale industrial development and is being promoted to serve passing traffic. It is not targeted at existing settlements, so this issue is not relevant. ACC has already accepted three similar facilities on the A944 earlier this year.</p>
Land Use Mix / Balance / Service Thresholds	3	3	<i>No issues.</i>
Accessibility	2	3	<p><i>The nearest bus stop is located 816m from the centre of the site. Stagecoach Services 777 and First Bus Service N17 stop here.</i></p> <p>New bus stops are proposed for future phases of Prime Four. These are likely to be approximately 400m from this site and would improve accessibility. The site is also easily accessible by bike for employees.</p>
Proximity to facilities / shopping / health / recreation	2	3	<p><i>The nearest shopping facility is located 1.9km away at Tesco Superstore in Westhill. The nearest health facility is located 1.7km from the site at Skene Medical Group. The site sits within the catchment area for Kingswells Primary School (1.62km from site) and Interim Provision provided at Bucksburn Academy (4.9km). The site proposes to develop food/drink facilities as well as a fuelling station.</i></p> <p>Given the type of proposal proximity to facilities is not considered a key concern.</p>
Direct footpath / cycle connection to community and recreation facilities and resources	3	3	<i>Good access</i>

Proximity of employment opportunities	3	3	<i>No issues</i>
Contamination	3	3	<i>No issues.</i>
Land Use Conflict	1	3	<p><i>The site is located near an AWPR junction and this location could be deemed undesirable as a fuel station and food/drink development are likely to cause increased traffic.</i></p> <p>See section 2.1 of this response. Traffic has been proven not to be an issue for similar nearby developments.</p>
Physical Infrastructural Capacity	3	3	<i>No issues</i>
Physical Infrastructure Future	1	3	<p><i>According to Think Broadband, there is no Broadband or Fibre available in the area.</i></p> <p>Broadband can be upgraded to provide modern connection speeds.</p>
Service Infrastructure Capacity	3	3	<i>No issues</i>
Other Constraints	2	3	<p><i>Site sits within the inner and middle BP Forties Oil and Gas Pipeline Zone.</i></p> <p><i>The site is located within the Greenbelt as designated in the Aberdeen Local Development Plan 2017.</i></p> <p>The pipeline issue has been considered in the draft layout. HSE guidelines allow for the scale of development proposed in this location. Green Belt is a current zoning and should not be used as a justification for rejecting a bid in this LDP review – see section 2.3 of this response.</p>
	46	61	



DRUM
PROPERTY GROUP
DEVELOPMENT & INVESTMENT

EAST KINGSFORD
LOCAL DEVELOPMENT PLAN BID
MAY 2018

FOR DRUM PROPERTY GROUP
BY HALLIDAY FRASER MUNRO



1.0 Introduction & Site

This bid covers an area of brownfield land immediately to the west of the AWPR/A944 Roundabout. The proposal is for small scale commercial use for food & drink related restaurant with a drive through option and fuel station.

The site has been used as one of the AWPR compounds and has a good quality access road to serve that use and any use that it reverts to post completion of the AWPR. It has a large shed (approximately 24m by 10m) on site. Prior to the AWPR the site was used for livery purposes as part of a larger land holding that has been CPO'd to deliver the AWPR. That use is no longer viable.

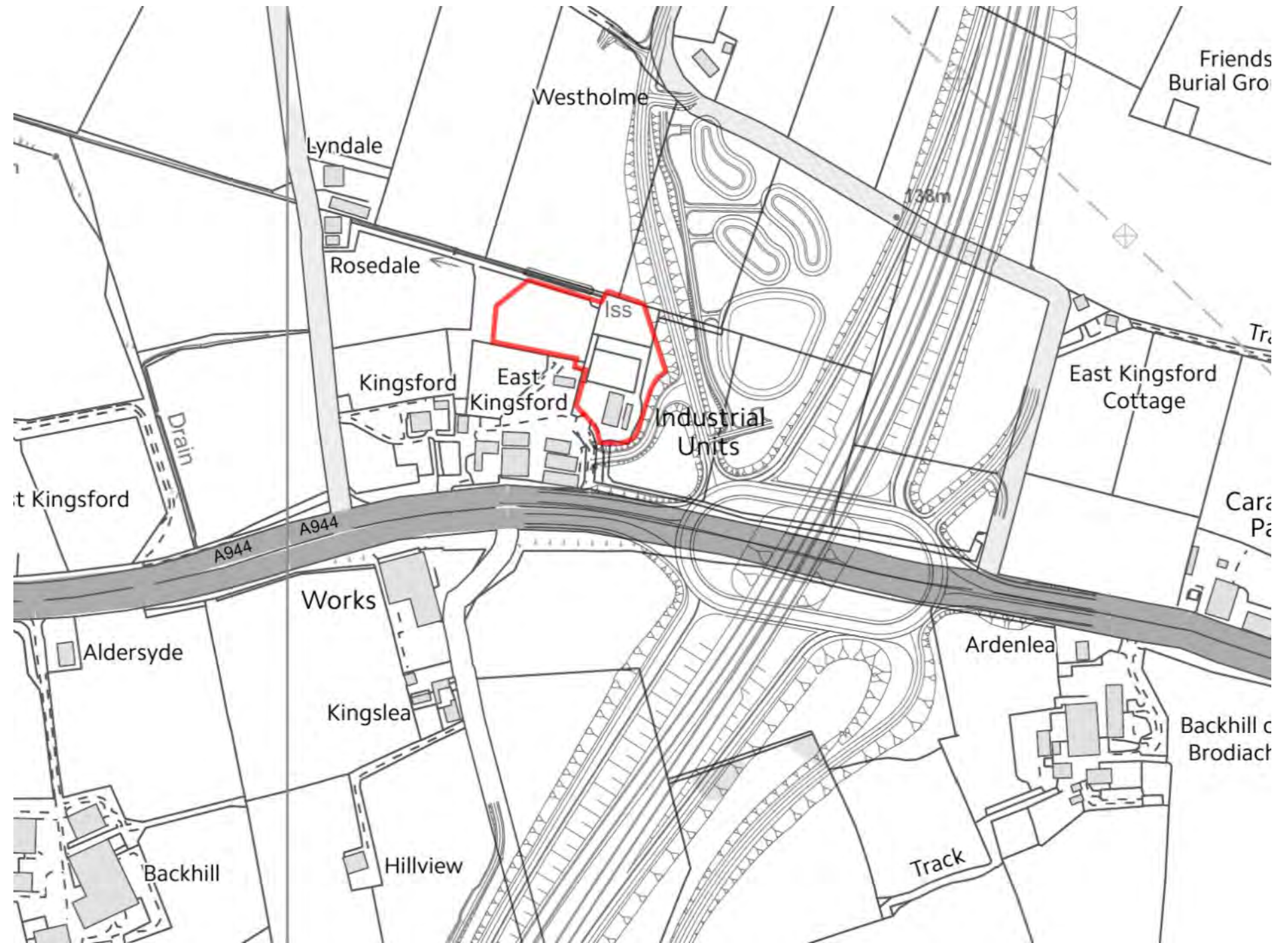


Figure 2—Indicative Framework Plan

The site is promoted on the following basis:

- Re-use of a brownfield site;
- Existing use rights;
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Long distance view of the site (Google Maps)

Within the wider context, the site is located approximately 1.5kms to the west of Kingswells and a similar distance to the east of Westhill. It has existing industrial uses to the south, the AWPR to the east and is screened from longer distance views from the west by existing woodland and buildings. The site for the new AFC Kingsford Stadium sits to the west.



The site from the west (Google Maps)

2.0 Planning Policy

Local Development Plan 2017

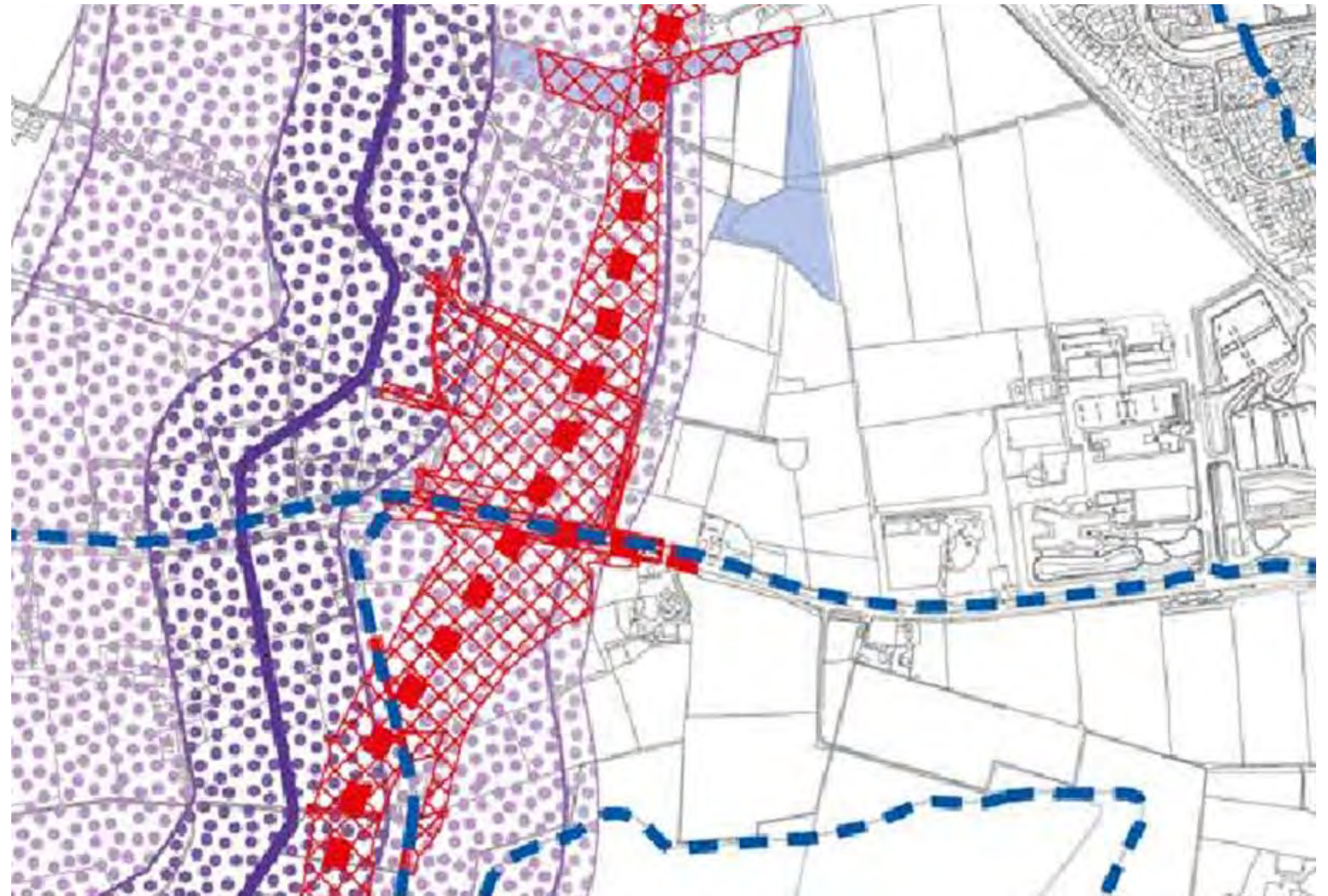
The site is located in the Middle Zone of a pipeline consultation area (see constraints plan on this page). In these circumstances the HSE provide guidance (PADHI) on the acceptability of use and the scale of those. In this case the use is likely to be a level 2 use (Food & Drink - *Developments for use by the general public where total floor space (of all floors) is from 250 m² up to 5000 m² – Level 2*) and would not be affected by the consultation zone (DAA = Do Not Advise Against in the table below)

Level of Sensitivity	Development in Inner Zone	Development in Middle Zone	Development in Outer Zone
1	DAA	DAA	DAA
2	AA	DAA	DAA
3	AA	AA	DAA
4	AA	AA	AA

DAA = Don't Advise Against development

AA = Advise Against development

HSE Advisory table – Location versus Sensitivity



LDP 2017 Constraints Map

The site is zoned as Green Belt but is brownfield and has existing use rights as part of the East Kingsford Industrial complex and previous uses. The setting of the site and viability of previous uses have been significantly impacted upon by the AWPR.

Locational Benefits

Being located at one of the few AWPR junctions provides clear benefits for the development in terms of accessibility. It also offers an opportunity for local communities to access fuel and convenient roadside food and drink uses retail more readily.



LDP 2017 Zoning

3.0 Bid Proposals

The site is promoted on the following basis:

- A new limited-scale roadside fuel and food/drink development serving the AWPR and A944; and
- As the redevelopment of an existing brownfield site, the previous use having been rendered unviable by the AWPR;



Indicative Site Plan

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Name	STEVE CRAWFORD
Organisation (if relevant)	HALLIDAY FRASER MUNRO
On behalf of (if relevant)	DRUM PROPERTY GROUP
Address	
Postcode	
Telephone	
E-mail	

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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	<input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
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Airyhall/Craigton Road - Please see separate response enclosed in respect of:

- Site B0912

Please also find enclosed the following in support of the response:

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YOUR COMMENTS CONTINUED

B0912 Craighton Road South 1 - MIR Response – May 2019

- *B0912 – residential use, 70-75 units*

1. Introduction

Halliday Fraser Munro lodged an LDP bid for the above site on behalf of Drum Property Group – B0912 for 70-75 new homes as an extension to the City’s urban area. During the review process Aberdeen City Council officers have suggested that the site should not be preferred and presented an analysis. Their reasons are generally based on the following:

- Its separation role between Aberdeen and Cults;
- The current Green Belt zoning;
- The current Green Space Network zoning;
- The site’s location in Pitfodels Conservation Area and the character of that area;
- The site’s location in the Dee Valley Landscape Character Area; and
- An assumed limited requirement to allocated new housing land.

These, we believe, are not valid reasons for discounting this site as a housing site and have responded accordingly in the following pages. B0912 offers an opportunity for a small-scale extension to the urban area without impinging significantly on landscape separation. It offers an opportunity for new healthy and sustainable lifestyles in the City, close its existing facilities and amenities, but with excellent access to green spaces and wider path networks.

On a more general note the housing strategy adopted in the MIR has significant limitations. In effect not enough housing land has been identified to meet the area’s housing needs, it doesn’t include enough choice of location for new homes and relies too heavily on brownfield sites. A separate response has been made in that respect on behalf of Drum Property Group which can be summarised as:

- An over-reliance on brownfield sites to make up the vast majority of new housing allocations;
- Unrealistic expectations on housing delivery from existing allocated sites; and
- The need to allocate additional housing land to meet Proposed SDP requirements

Site B0912 offers a highly deliverable site in an area where people want to live and at a scale that could come forward quickly to meet the identified shortfall in housing delivery. **It should be allocated for a residential use in the Proposed Local Development Plan.**

2. MIR Response – B0912 Craigton Road

2.1 Location and Context

This site is located on the south side of Craigton Road and offers an opportunity for a small-scale housing development immediately adjacent to the settlement boundary. It represents an obvious small-scale extension westward from Aberdeen and from the recently completed care home and housing development to the east. These neighbouring developments are also located within the Pitfodels Conservation Area with a very similar locational context. The bid document associated with site B0912 set out Drum Property Group’s focus on working with development sites and respecting their existing assets and character to create the highest quality development.

“The vision for the land at Craigton Road, Pitfodels is to create a new exceptional residential neighbourhood as a limited expansion westward from Aberdeen’s urban edge, respecting the setting and landscape character of the Pitfodels Conservation Area.” (extract, LDP Bid document, 2018)

That vision remains the case. Drum Property Group has a strong track record of delivering award winning and celebrated developments. In Aberdeen the best example is Prime Four Business Park at Kingwells. Through working closely with the City Council and local community that site has been developed in a manner that creates character by re-using or incorporating natural features, respecting the field layout and the Scheduled Ancient Monument to the north and ancient woodland at its edges. That approach has proven very successful. Their approach to this site would accommodate the existing woodland and landscape features to create the very best quality development.

The MIR analysis (Sustainability Checklist – see review in Appendix 1) suggests that this location in the Pitfodels Conservation Area should reflect historic development pattern of large country houses set within large plots. The MIR analysis also mentions the derelict cottage and walled garden on site and Pitfodels House and Viewbank House to the south.

The site does include a derelict cottage and walled garden, but these elements just make the site a partial brownfield site and support its development rather than detract from it. Historic buildings off-site are not relevant to the allocation of this site.



Figure 1 – Site Photos 2019 – showing brownfield nature of parts of the site, onsite pylons and the neighbouring development to the east

The Pitfodels Conservation Area was originally designated in October 1977 and reduced in scale in 1993. It covers 191 hectares and its significance has been summarised as *“the sub-division of the Pitfodels Estate ... from 1845 ... led to a number of small feus. Large detached villas were erected in these plots set in spacious landscaped gardens with generous tree planting. These properties reflected the growing wealth of Aberdeen’s bourgeoisie who colonised this semi-rural suburb.”* (Source: Pitfodels Conservation Area Character Appraisal and Management Plan, ACC January 2015)

We are, however, in changed times. The large pylon line that now crosses the site came about well after 1845 and now dominates this part of the Conservation Area, particularly this site. The land to the east of this site is within the Conservation Area but has recently been developed for uses that don’t particularly reflect the character set out in the MIR review and the development of sites such as Woodlands Hospital and the International School have fundamentally changed the character of this area. It is no longer dominated by north/south plots with single very large houses but has a character that reflects a mix of modern mainstream homes, large modern buildings and far more efficient use of development sites that are effectively part of the City. Aberdeen does not need very large detached villas set in large feus to serve the wants of the wealthy bourgeoisie. Although that is the history of this part of Aberdeen it doesn’t reflect today’s housing needs and any future redevelopment of this site can be managed positively to maintain the general landscape characteristics that are historically important. The City desperately needs more homes, a wider range of homes in a range of locations that are suitable for a wider variety of the population and in pleasant places where existing services exist or are easy to access.

An essential element of quality of life is location, the quality of the landscape that development is set within and the convenience of access to jobs and facilities. This site delivers on all of these. The Craigton Road site could easily accommodate development whilst retaining much of the important characteristics of the Conservation Area. The bid document included the retention of trees on site and retention or re-use of dry-stone dikes. It respected the findings of Reporters during previous LDP reviews with the land immediately adjacent to Craigton Road and Airyhall Road retained as green space buffers.



Figure 2 – Site Analysis and Design Options - retaining significant green space, woodland and site features (extracts from original Call for Sites bid document)

Conservation and development are not mutually exclusive. By controlling the use and reuse of on-site features the proposed development can respect the Conservation Area context and deliver much needed housing in a location where people want to live.

The MIR analysis suggests that although there is development to the east and south, the proposed development comprises a different pattern to that. Figure 2 above shows the development at Woodlands Hospital to the west of the site and housing areas to the east. These are mainstream housing developments similar in density and layout to that proposed and clearly demonstrate that housing development of the nature proposed does already exist in the area. The proposed pattern of development is not therefore unusual. The area to the south is a different character but has a clear separation from the proposal site by mature woodland and Airyhall Road. The specific character of that roads will not alter as a result of this development as access is proposed to be taken from Craigton Road. The area to the south is also very much developed and allocated through the current LDP for further residential compatible use.

The MIR review also suggests that the development would not contribute to a better mix of land use. This just isn't the case. The area around this site already has a mixture of uses (care home, school, hotel, residential, social club) and the introduction of limited additional housing reflects that mix. The Sustainability Checklist Criteria asks whether the development would contribute to a better mix of land uses or provide the impetus for attracting facilities and whether land use impacts can be mitigated without other harmful effects. The scoring of a site against this criterion is not therefore only about the proposed use but also about its context. In this case the context is a mix of uses surrounding the site with the green network retained to the west and north.

The MIR scores this particular criterion with the lowest possible score i.e. unlikely to contribute to a better mix or balance of land uses. We suggest that the development is more in line with the median scoring criterion i.e. that it would contribute a little towards a better mix or balance of uses and provide some basis for attracting new services and facilities. The site is promoting residential development which could result in the additional critical mass to attract or retain services to/in this area. Appendix 1 includes a full review of the MIR scoring matrix and identifies a new proposed scoring for some elements. That review suggests that the site generally scores much more favourably than the MIR suggests, further supporting its allocation for residential purposes.

2.2 Nature Conservation and Landscape

MIR analysis suggests an ancient woodland designation off site to the south west and no TPOs, but trees protected as a result of location in the Conservation Area with mature trees on-site. It also suggests that the site is identified as Green Belt and Green Space Network and potentially has designated protected species on site. These are considered below.

2.2.1 Woodland

The ancient woodland offsite will not be affected so is not relevant.

On-site mature woodland is generally to be retained with any overall impact on woodland limited with replacement planting where required – See indicative layout below. The resulting impact on woodland will therefore be positive rather than negative and allow for ongoing management of the tree resource to keep it healthy and improve its longevity. An analysis of the existing woodland stock suggests that woodland management, selective felling and replanting in appropriate locations across the site would be beneficial.



Figure 3 – Indicative Layout (extract from original Call for Sites bid document 2018)

Contrary to the suggestion in the MIR analysis linear tree belt features, the central “clump” of trees and existing stone dykes will not be significantly affected. The existing woodland is unmanaged and highly self-seeded. Over time that will lead to a requirement for more intensive intervention and potentially a greater impact on the trees.

Development of the site will also increase formal options for public access to these areas of woodland. We note that the site is already used by members of the public, primarily for walking and a network of informal paths similar to those shown below already exist. Development of the site will maintain access to the site, specifically to the retained central green spaces and walled garden areas, from neighbouring areas residential areas.



Figure 4 – Informal Paths – to be retained, consolidated or improved

Some woodland replacement planting and stone dyke relocation may be required but that will enable improvements to these elements in a planned manner.

2.2.2 Green Belt and Green Space Network

MIR analysis suggests that the site forms part of the Green Belt buffer between Braeside and Cults, and that areas of open space are typical of the Pitfodels Conservation Area and Lower Deeside Landscape Character Type and Dee Valley Landscape Character.

This is not typical open space. It includes brownfield elements and large pylons (see Figure 1) with woodland visually shielding much of the proposed development area. Development here would not therefore have the major impact suggested.

We note the comments on the location within the Greenbelt and suggest that Aberdeen City Council should be carrying out a full Greenbelt review if this is going to be used as justification for not allocating a site. Supporting any form of development in and around the City will require a rezoning of land from Greenbelt to other uses. The obvious process to carry out this rezoning and evaluation of Greenbelt is the LDP review. Fundamentally, using zonings in the previous plan to rule out new opportunities in the next plan runs contrary to the LDP review process. Each bid should be fully considered against planning related criteria, including an up-to-date Greenbelt review, and rezoned if considered acceptable.

Green Space Network does not rule out development and the site could be designed to strengthen north-south green links. Green Space Network could be integrated into the design as GSN regularly covers existing areas that include development. It's also worthwhile noting that the now developed sites immediately adjacent to the east were previously GSN.

2.2.3 Protected Species

Any greenfield site that includes woodland in or adjacent to it has the potential to house protected species. There is, however, a tried and tested methodology for surveying, analysing and dealing with protected species. This issue is therefore not solely related to this site but to any greenfield site considered for development and is usually easily dealt with at the planning application stage.

Secondly, the most sensitive areas of the site i.e. the more natural woodland area around the derelict walled garden are proposed to be retained as green spaces with most of the woodland retained and new woodland planting proposed. The option to improve the ecological diversity of the site is therefore significant.

The possibility of protected species is therefore not an issue at this stage of the planning process.

2.3 Infrastructure

This is an extension to the existing City extents, making best and sustainable use of the current infrastructure without the need to introduce major new infrastructure. Upgrades to the existing infrastructure will be made as required.

2.4 Site Scoring/Development Options Assessment Review

The MIR gives this site a score of 47 out of a maximum of 63 in its sustainability scoring checklist. This is already a reasonable score for a greenfield site and many of the checklist questions score the site at its maximum. Those criteria which mark the site less than full marks have been reviewed and an analysis is included in **Appendix 1**. The suggested reviewed scoring is now suggested to increase to 56 out of 63 making this site a very high scoring site in the MIR Sustainability Checklist Review. Comments on each point are included in Appendix 1 and reflected in the body of this MIR response.

5. Conclusion

Drum Property Group do not agree with the justification presented in the MIR to reject the bid B0912. They see this bid as offering a real opportunity to meet housing need with a deliverable development in a location where people would like to live. As a limited extension to the western edge of the City it benefits from existing infrastructure or services, including local schools, with good access to the wider landscape. The site, then offers a healthy and sustainable lifestyle for prospective residents.

We note its location in the Pitfodels Conservation Area. However, this part of the conservation area is of a mixed character and has seen recent development immediately adjacent to the proposed bid site as well as some very large-scale educational facilities to the south. The site includes large pylons, brownfield elements and woodland that would help screen development on site. It is not an unspoilt green field and development here could be integrated successfully into the landscape.

Drum Property Group has a strong track record of delivering award winning and celebrated developments. They work closely with planning authorities and the local community to develop in a manner that retains or creates character by re-using or incorporating natural features, respecting the site context and making best use of resources. That approach has proven very successful. Their approach to this site would accommodate the existing woodland and landscape features to create the very best quality development.

On a more general note the housing strategy adopted in the MIR has significant limitations. In effect not enough housing land has been identified to meet the area's housing needs, it doesn't include enough choice of location for new homes and relies too heavily on brownfield sites. A separate response has been made in that respect on behalf of Drum Property Group which can be summarised as:

- An over-reliance on brownfield sites to make up the vast majority of new housing allocations;
- Unrealistic expectations on housing delivery from existing allocated sites; and
- The need to allocate additional housing land to meet Proposed SDP requirements

Site B0912 offers a highly deliverable site in an area where people want to live and at a scale that could come forward quickly to meet the identified shortfall in housing delivery.

Attachments:

- *Response Form; and*
- *2018 LDP Bid document (for reference purposes)*

APPENDIX 1: DEVELOPMENT OPTIONS ASSESSMENT REPORT

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

The site assessment process undertaken by Officers comprised an assessment of sites against a sustainability checklist and used the outcomes of the strategic environmental assessment to inform the decision on whether a site was suitable. Site B0912 has been assessed and identified as 'undesirable'. The tables below provide a review of the officer's assessment, and reconsider the site scoring of the proposed site. The table includes the score given by Officers, and a 'Proposed Score' reflecting the additional justification provided in the table.

Table 1: B0912 Craigton Road South Sustainability Checklist Review Assessment

Criteria	Officers Score (max. 3)	Proposed Score	Justification
Exposure	3	3	The site is well protected by established tree belts.
Aspect	3	3	The site is south facing.
Slope	3	3	The site is gently sloping.
Flood Risk	3	3	SEPA maps indicate no flooding on the site.
Drainage	3	3	The site is well drained.
Built/Cultural Elements	1	2 or 3	<p><i>MIR analysis suggests that location in the Pitfodels Conservation Area should reflect historic development pattern of large country houses set within large plots. It also mentions the derelict cottage and walled garden on site and Pitfodels House and Viewbank House to the south.</i></p> <p>See section 2 of the main response. This site is an extension of the City, includes brownfield elements and retains the majority of woodland on site. Areas to the east, also within the Conservation Area, have recently been developed and the form of development in the immediate area is mixed. The scoring should reflect this.</p>
Natural Conservation	1	2 or 3	<p><i>MIR analysis suggests an ancient woodland designation off site to the south west, no TPOs but trees protected as a result of location in the Conservation Area, mature trees on site, Green Belt and Green Space Network and potentially designated species on site.</i></p> <p>See Section 2 of the main response. Woodland off-site is not relevant, existing woodland needs managed to improve its lifespan. A green Belt review is probably required but any greenfield site proposed to be allocated will require the removal of Green Belt land from that zoning. Green Space Network does not rule out development and the site could be designed to strengthen north-south green links. Green Space Network could be integrated into the design as GSN regularly covers existing areas that include development.</p>

			It's also worthwhile noting that the now developed sites immediately adjacent to the east were previously GSN. Designated species surveys at the planning application stage would determine if there are any issues but the main natural woodland spaces are being retained. None of these issues would rule out development.
Landscape Features	2	3	<p><i>MIR analysis suggests that linear tree belt features and central clump of trees and existing stone dykes will be affected.</i></p> <p>The majority of woodland will be retained, and new planting proposed. Stone dykes will either be retained or relocated to maintain site characteristics.</p>
Landscape Fit	1	2	<p><i>MIR analysis suggests that the site forms part of the Green Belt buffer between Braeside and Cults, and that areas of open space are typical of the Pitfodels Conservation Area and Lower Deeside Landscape Character Type and Dee Valley Landscape Character.</i></p> <p>This is not a typical area of open space for the Conservation Area. It includes large electricity pylons and areas of previously developed land in parts. Much of it is screened by woodland that is intended to be retained.</p>
Relationship to existing settlement	2	3	<p><i>MIR analysis suggests that although there is development to the east and south, the proposed development comprises a different pattern to that.</i></p> <p>See section 2 of the main response. More contemporary development to the west and east and commercial and educational development to the south create a mixed development pattern. The proposed development is therefore not unusual within its wider context.</p>
Land Use Mix / Balance / Service Thresholds	1	2	<p><i>Suggestion that the development would not contribute to a better mix of land use.</i></p> <p>The site is promoting residential development which could result in the additional critical mass to attract services to this area and support existing services.</p>
Accessibility	3	3	A bus stop is located within 400m of the site.
Proximity to facilities / shopping / health / recreation	2	2	<p><i>MIR analysis suggests that some facilities are available locally.</i></p> <p>Agreed</p>
Direct footpath / cycle connection to community and recreation	3	3	The site has good access including core path access.

facilities and resources			
Proximity of employment opportunities	1	2	<p><i>Suggestion that there are no significant employment opportunities within 1.6km of the site.</i></p> <p>There are limited employment opportunities within Cults, but no business parks or large employers. Cults, however, is well located being only 3 miles from the city centre, and 3 miles from Prime Four Business Park. There are 10ha of business land proposed at Countesswells which is only just over 1.6km from the site. Therefore, the MIR scoring is not justified.</p>
Contamination	3	3	No known contamination.
Land Use Conflict	3	3	No known land use conflict.
Physical Infrastructural Capacity	3	3	Infrastructure available.
Physical Infrastructure Future	2	3	<p><i>MIR analysis seems to mark this aspect down as it not currently available but could be available.</i></p> <p>As a site immediately adjacent to the existing built up area of Aberdeen it will be reasonably straightforward to provide adequate infrastructure, especially for a site of this scale.</p>
Service Infrastructure Capacity	2	2	Site is allocated to Airyhall Primary School and Hazlehead Academy.
Other Constraints	2	2	<p><i>MIR analysis suggests that there are pylons running east to west across the site.</i></p> <p>There are pylons but these are not an absolute constraint on development. That pylon line already runs across the City's built up area to the north east, essentially through existing housing areas.</p>
	47	54/56	



DRUM
PROPERTY GROUP
DEVELOPMENT & INVESTMENT

LAND AT CRAIGTON ROAD/AIRYHALL ROAD, PITFODELS

LOCAL DEVELOPMENT PLAN BID
MAY 2018

PREPARED BY HALLIDAY FRASER MUNRO FOR DRUM PROPERTY GROUP



EXECUTIVE SUMMARY

The purpose of this document is to support the Local Development Plan bid submission, which has been prepared on behalf of Drum Property, the developer by Halliday Fraser Munro Architects and Planning Consultants

The site on the south side of Craigton Road, Pitfodels offers an excellent opportunity for a new high quality residential neighbourhood. An obvious extension to Aberdeen westwards of the recently completed care home and Bancon Development it respects the site and its context.

The proposals presented in this document have developed following a review of the site, planning context, an analysis of the opportunities and constraints of the site and the integration of new development as an appropriate extension to the Craigton Road, allowing new residential development whilst respecting the character of neighbouring green belt.

Drum Property Group pride themselves on quality of their developments and will continue to embrace that in the delivery of housing on this site.

An essential element of quality of life is location, quality of the landscape that development is set within and the convenience of access to facilities and jobs locally. This site will deliver on all of these.

“The vision for the Land at Craigton Road, Pitfodels is to create a new exceptional residential neighbourhood as a limited expansion westwards from Aberdeen’s urban edge, respecting the setting and landscape character of the Pitfodels Conservation Area”

1.0 SITE DESCRIPTION

The bid site is located between Craighton Road and Airyhall Road, within the Pitfodells Conservation Area .

The site sits south of Craighton road, Robert Gordon College's playing fields, areas of stone wall and a covered raised reservoir; It sits to the north of Woodbank (Shell social and sports club), the Marcliffe Hotel and the International School campus all of which front onto North Deeside Road; and immediately to the west of the adjacent Airyhall House and Northcote Lodge care home development.

To the west of the site are open fields, limited housing and beyond that the residential development at Woodland Gardens.

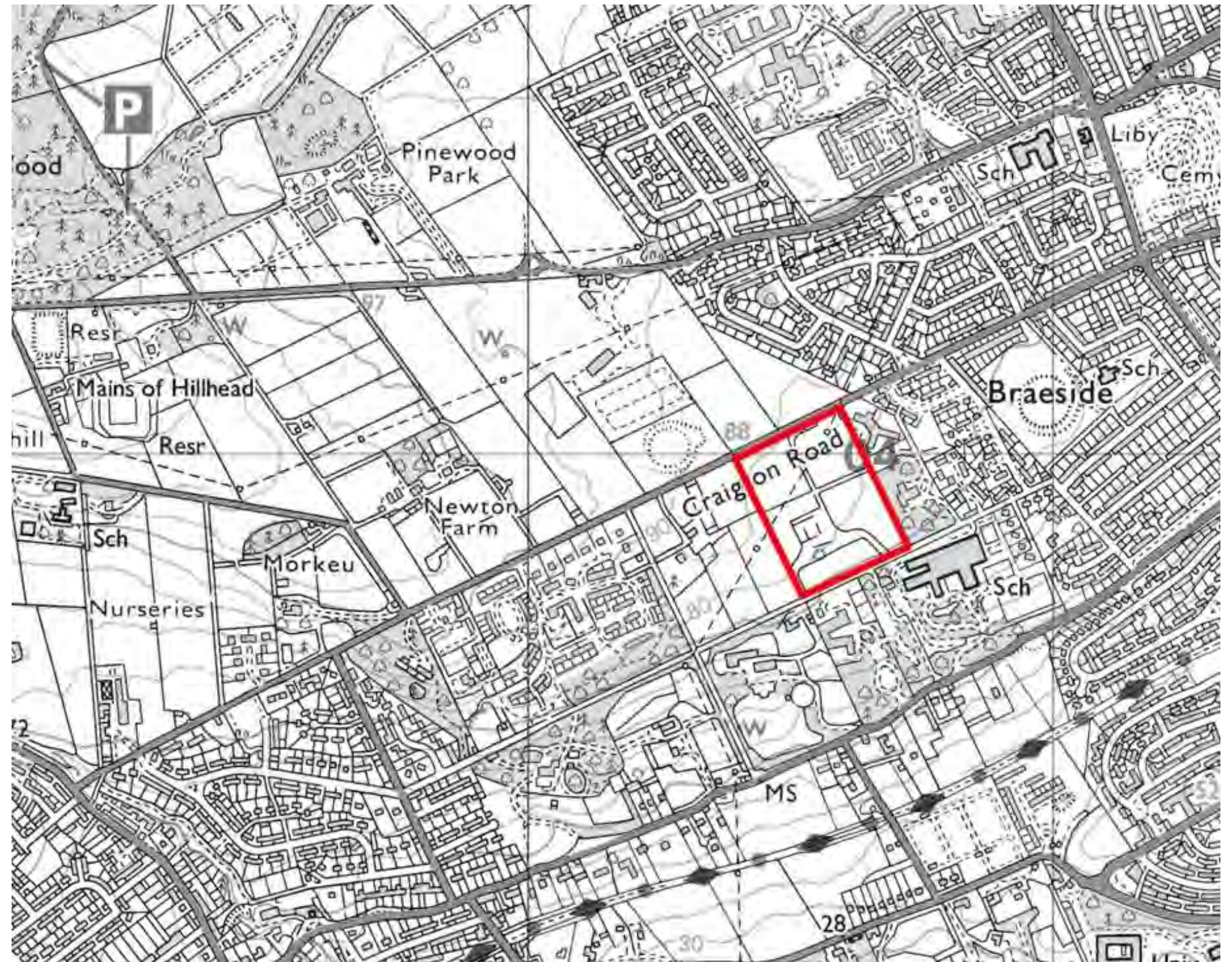
The existing unused agricultural land extends to 6.62 ha and comprises a redundant steading building to the north, the remains of a walled garden towards its centre and a paddock to the south of the site.

The proposed site includes avenues of mature trees and woodland. These provide a wooded character to Airyhall Road and screen the majority of views south from the site. Woodland is generally to be retained but will be subject to full detailed review if allocated to allow proper management and protection of the woodland resource.

The site is diagonally traversed by a 33kV overhead power line running from the north east to south west. The site is generally flat, falling gently to the south towards Airyhall Road. Main access to the site would be taken from Craighton road.

The two large residential areas of Cults and Aberdeen are a complex mix of urban and urban fringe land-uses creating the general area character of the proposed development.

The site offers opportunities for development in clear pockets that would retain much of the site character and respect its location with the Pitfodells Conservation Area.





The redundant steading building to the North of the site - (Source: Google Maps)



View to the site from Craigton Road- (Source: Google Maps)



Robert Gordon Play ground opposite the site - (Source: Google Maps)



The southern boundary of the site (Airyhall Road)- (Source: Google Maps)

2.0 PLANNING CONTEXT

Planning History

This partial brownfield site has been the subject of previous LDP bids but as part of a much larger land parcel. This bid, however, is now on a much reduced site and excludes land to the west. Elements of the justification from ACC (see below) for not including the site previously have been considered in preparing this bid.

Issues previously considered:

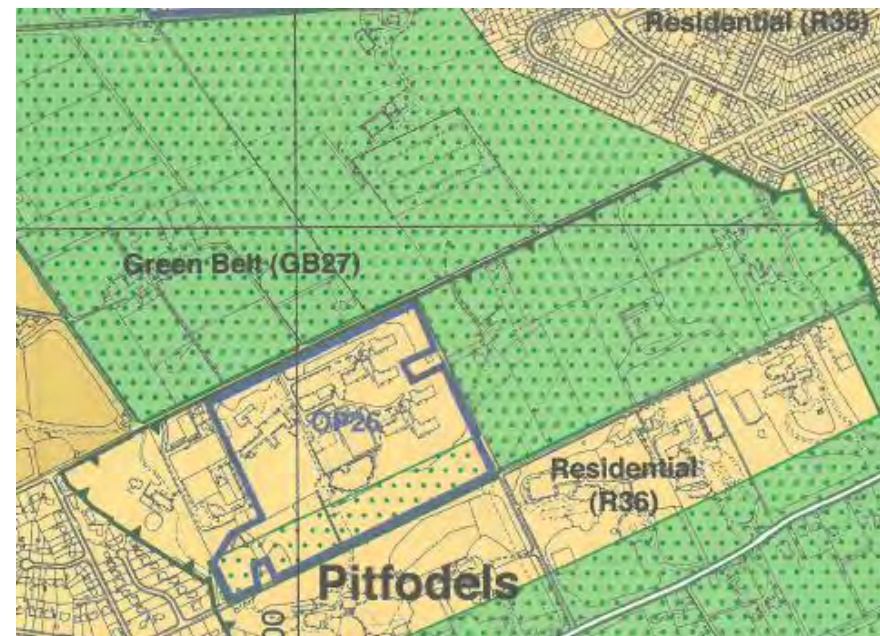
- Separation and coalescence
- Trees
- Architectural features
- Established wildlife and recreational functions
- Housing numbers

These have all been reconsidered in this bid.

Land use zoning and Function

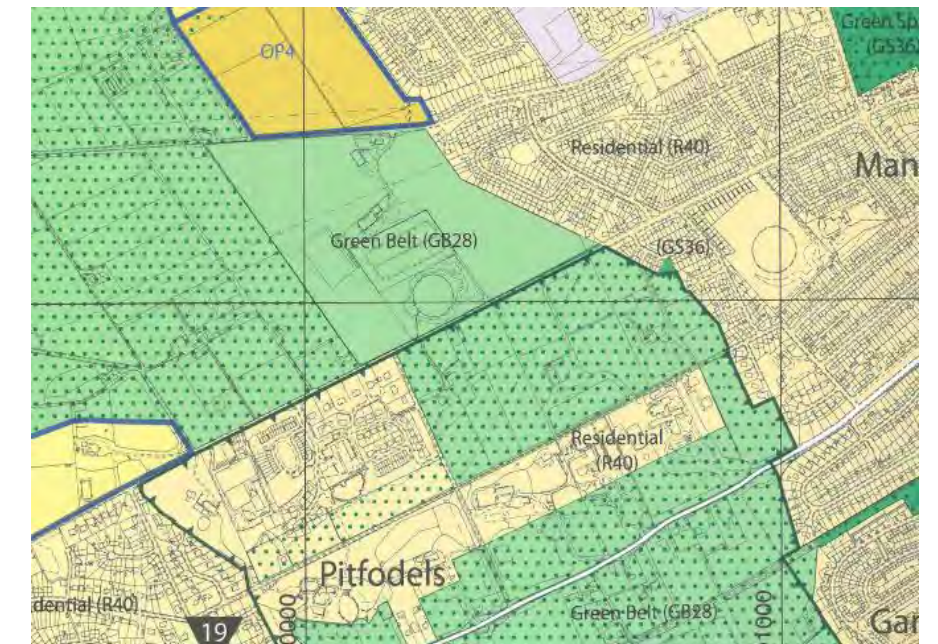
It's quite clear that the function of this part of Aberdeen has altered over the years and the zoning in relation to that function has also altered. The series of extracts below show that this area has altered over the last few LDP reviews.

2004 Finalised Local Plan



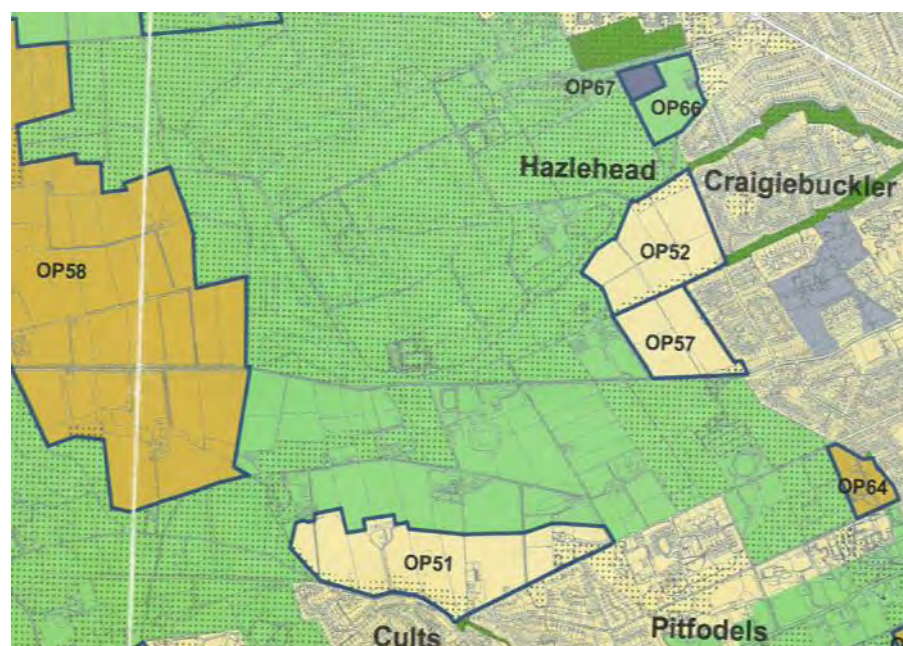
Whole site identified as green belt and green space network. Land to the south allocated for low density housing protecting landscape and tree belts.

2008 Finalised Plan



site remains unallocated but land to the north is removed from the green space network. Residential zoning to the south extended slightly to the south.

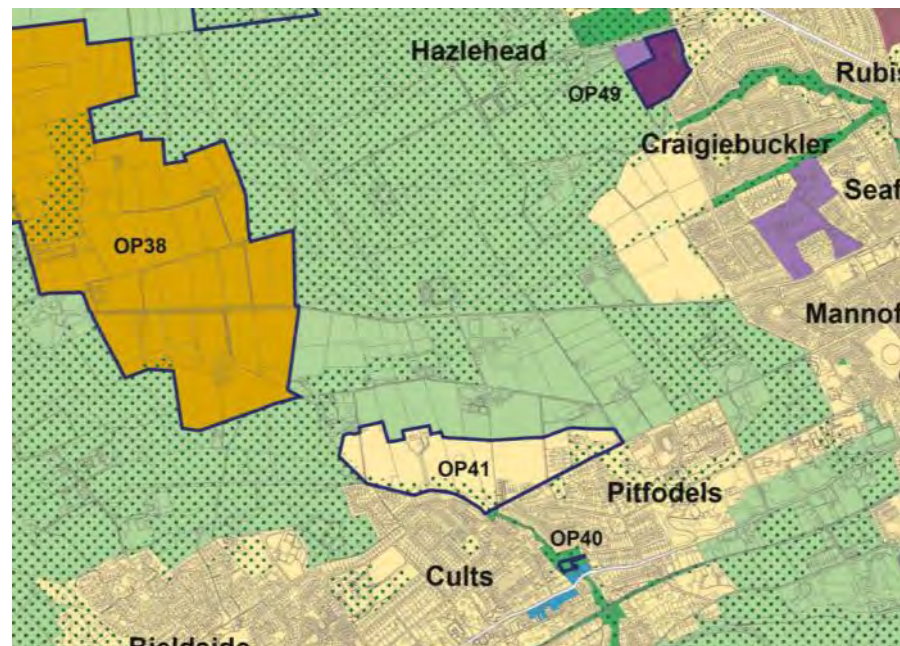
2012 Local Development Plan



The land immediately to the east (previously allocated as green belt and green space network) with a similar character to the proposed site is zoned as OP64, an opportunity for development of 20 homes on a Council owned site.

The inclusion of OP64 in 2012 ALDP has extended the edge of the city further to the west and now immediately adjacent to this site.

2017 City Local Development Plan



The current LDP identifies this area as Green Belt and Green Space Network, within the Pitfodels Conservation Area and closely related to Core Paths.

Allocating this site for development would require a rezoning away from Green Belt but this would not be unusual in a local development plan review, especially one where greenfield housing states of 100 units as less are being encouraged. Developing the site, however, would retain the key important landscape elements.

The 2017 LDP allocates Friarsfield as a development site (OP41—29.2 hectares for 280 homes). This established the Friarsfield area as a housing development zone in the current land use strategy for the City.

GSN does not rule out development but requires that it considers the character and function of the GSN in that area. In this case it is the woodland avenues that define the character. These will be protected if this site is allocated.

Planning Review Summary

The proposal for the Craighton Road bid site will have very little impact on the landscape and the character of the wider area.

It would retain on site woodland and landscape buffers to the north and south to help retain the woodland character to the to the south of the site.

2.0 PLANNING CONTEXT

Housing Land

Current housing land allocations haven't been delivering at the scale originally anticipated. This has created a housing delivery backlog and new housing allocations are required to deliver the City's housing requirements.

The joint Strategic Development Plan Main Issues Report, currently out for consultation, states that the 2,769 fewer houses overall and 3,000 fewer affordable houses were delivered in the 5 years to 2016 than required by the SDP and the HNDA. That's around 600 houses less than required every year.

Analysis of housing land delivery in the City on key large sites identifies a significantly worse housing delivery record. The following table identifies that key development sites in the City, their original anticipated housing numbers and the actual delivery over a 10 year period, all based on the Council's Housing Land audits. It shows that of the 11,150 houses originally proposed on these sites just over 2,000 (around 10%) have been delivered.

The evidence points to slower delivery rates on a site by site basis. The City Planning Authority needs to allocate additional housing land to help supplement that lack of delivery over many years and catch up with demand. These sites should be in a range of locations and at a range of scales to encourage a greater range of developers and offer choice to those looking to buy a new home.

The City Council has suggested that sites up to 100 housing units are appropriate. This site meets that specified requirement.

City	site	ref	2007-2016	Cumulative 2015	shortfall	Cumulative 2016	shortfall 2016	Cumulative 2017	shortfall 2017
	Grandhome	OP12	2600	0	2600	0	2600	0	2600
	Dubford	OP25	550	190	360	309	241	397	153
	Stoneywood	OP24	500	133	367	231	269	514	-14
	Craibstone South	OP28	750	0	750	0	750	0	750
	Rowett South	OP30	1000	0	1000	0	1000	0	1000
	Greenferns Landward	OP31	750	0	750	0	750	0	750
	Maidencraig	OP43 & O	750	5	745	24	726	60	690
	Greenferns	OP45	600	0	600	0	600	0	600
	Countesswells	OP58	2150	0	2150	4	2146	154	1996
	Oldfold	OP62	400	0	400	25	375	50	350
	Lairston	OP77	1100	0	1100	0	1100	0	1100
	TOTALS		11150	328	10822	593	10229	1175	9054
			percentage delivered	2.9%		5.3%		10.5%	

Housing Strategy and Allocations

Aberdeen is the strategic centre for housing development for the City region and the main focus for growth. The SDP MIR identifies future housing need and a requirement for additional release of housing land across the City and Shire and the vision remains to create an attractive, resilient, prosperous and sustainable European City Region and an excellent place to live.

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

The proposed housing allowance is for 13,000 new homes in the City over the next 22 years. Alternative sites in locations that offer attractive and popular places where people would like to live should be allocated to complement the existing housing land supply.

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

	2016 to 2030	2031 to 2035	2036 to 2040	Total
Aberdeen Housing Market Area	4,200	5,700	6,300	16,200
Rural Housing Market Area	1,300	1,700	2,500	5,500
Total	5,500	7,400	8,800	21,700
Split as follows:				
Aberdeen City Council	3,500	4,700	4,800	13,000
Aberdeenshire Council	2,000	2,700	4,000	8,700

In terms of housing land, therefore, this bid is entirely in line with the suggestions of site size and location from both the Strategic Development Plan MIR and the City Council's Call for Sites.

Land Use Zoning

The site is presently zoned as Green Belt and Green Space Network (GSN). Green Belt release is required to meet the Council's stated request for new greenfield sites of 100 houses or less. The Local Plan Review process is the mechanism where such releases can be considered. Green Belt policy protects land for 4 main reasons. These are:

- to maintain the distinct identity of Aberdeen and the communities within and around the City;
- to safeguard the Green Belt to help avoid coalescence and sprawling development on the edge of the city;
- to maintain Aberdeen's landscape setting and
- to provide access to open space.

Identity - This area of Aberdeen has changed considerably over recent years. The land immediately to the east is now built out and land to the south now includes the relocated International School. Retaining landscape buffers to the north and south would help retain the identity of this part of Aberdeen that can be characterised as development set within the landscape.

Coalescence and Sprawling Development - The site does not create coalescence or sprawling development for the same reasons as set out above. Aberdeen has already expanded westwards in this vicinity and the restricted scale of this development together with the proposed landscape treatment would not create coalescence or sprawling development.

Landscape Setting - The landscape setting of Aberdeen is not undermined by this proposal. The site is a field with a large pylon crossing it and woodland avenues set within it. Developing this site with appropriate landscape treatment, retaining and managing the woodland and introducing development-free zones to the north and south will maintain, and in terms of the woodland will improve, the contribution to the local landscape from this site.

Access to Open Space - The site is presently used informally by local residents, in the main for walking their dogs. Development of

the site will include a more formalised path network that can improve access to the managed and improved on-site open spaces (e.g. the walled garden) and safer access through the site to local core and other path networks. The proposal will alter the type of open space available on site but provide easier, safer and more formalised footpath networks to that open space.

This review has not identified any concerns in relation to the function of the Green Belt for this bid site. The loss of this specific bid sites from the Green Belt would not undermine its overall purpose.

Policy NE1 – Green Space Network does not rule out development either. Where development would impact on GSN it requests that such development "... maintain and enhance the coherence of the network. In doing so, provision should be made for access across roads for wildlife and outdoor recreation." (page 67, 2017 LDP). That can be achieved here and would be a similar approach to that taken on the residential zoned land immediately south of this site.

Planning and Design

At a national level the Scottish Government are pursuing both a housing delivery and design quality agenda. They are promoting 6 essential qualities of place:

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

Drum Property Group pride themselves on quality of their developments and will continue to embrace that in the delivery of housing on this site.

An essential element of quality of life is location, quality of the landscape that development is set within and the convenience of access to facilities and jobs locally. This site will deliver on all of these.

3.0 SITE CONTEXT

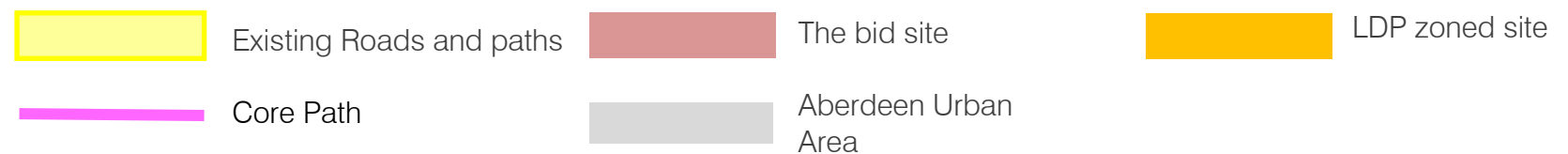
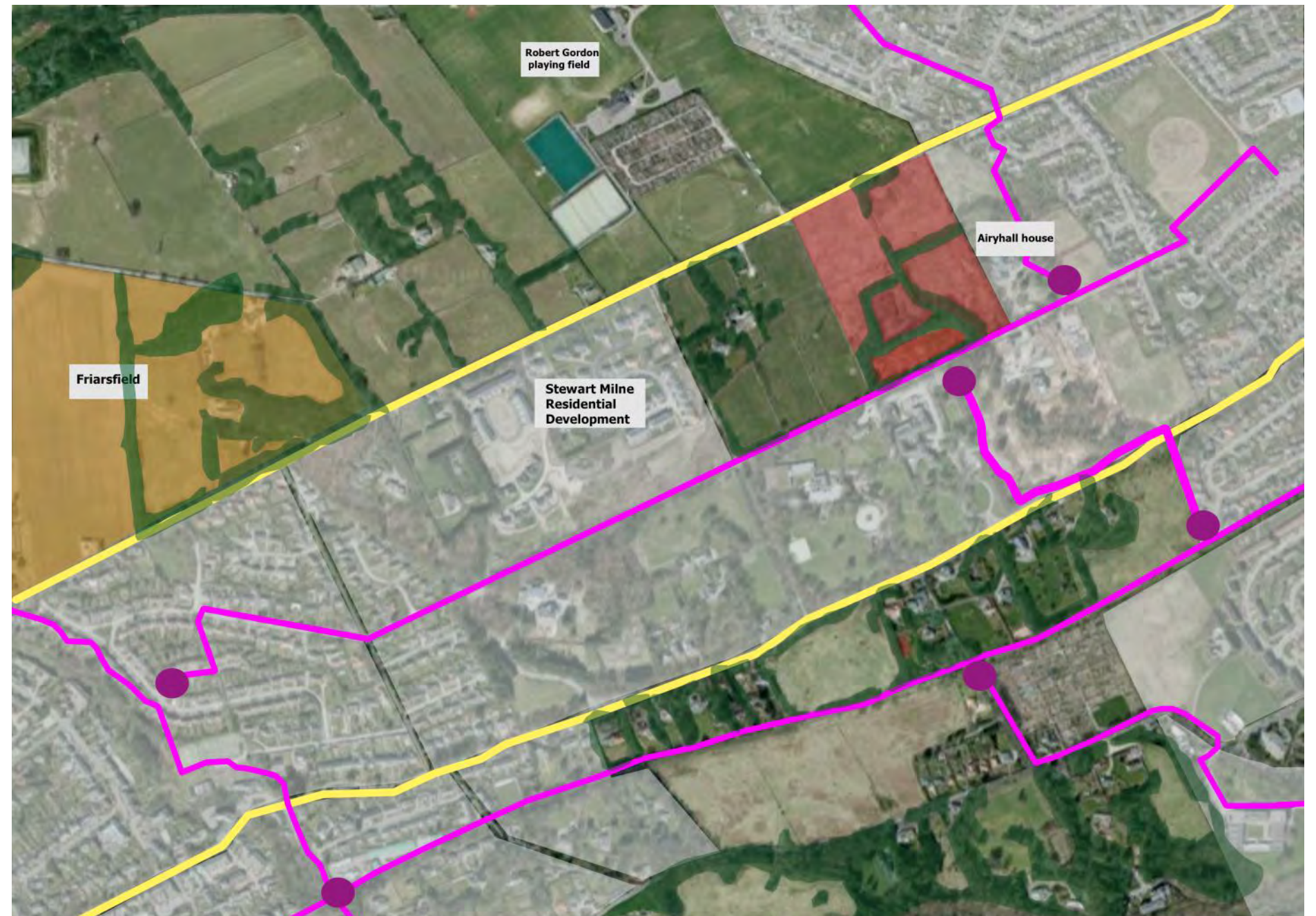
The Urban Area Character Area mainly comprises the areas of Craigiebuckler Braeside, Mannofield, Kaimhill and Garthdee in Aberdeen to the south and east of the site and the eastern component of Cults to the west of the site. Land around the site is primarily residential and educational land-use with a mix of building types and styles in a range of materials .

Plot sizes tend to be large to the south of Airyhall road although development is denser in the areas immediately to the east.

The proposed development site lies within an area that has been designated as Green Belt in the Aberdeen local plan although this full review of the Local Development plan is the opportunity to review that zoning.

Allocation of this site will lead to the rezoning of a partially brownfield site for much needed residential use.







It is not considered that urban coalescence will result from development of the Craigton Road site or that developing the site will materially affect the overall role of the Green Belt in this part of Aberdeen.

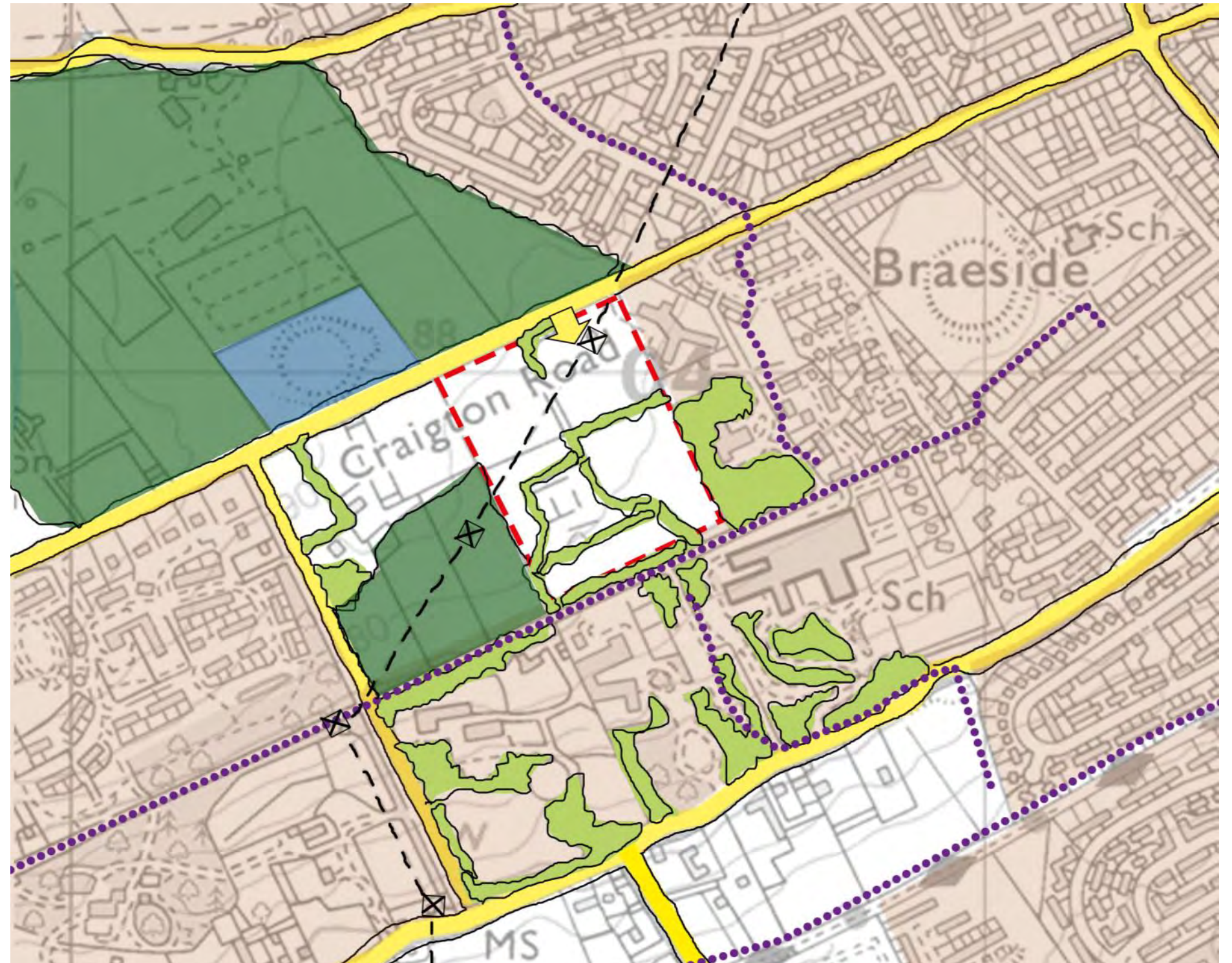


4.0 SITE ANALYSIS: OPPORTUNITIES AND CONSTRAINTS

Opportunities and Constraints Key

1. **Existing Road and Path Network** The site sits between Craighton Road to the north and Airyhall Road to the south with good access to roads and path networks
2. **Site connectivity** The site has excellent connections to the Core Path network
3. **Green Belt and Green Space Network** The site is identified within green belt but should be reconsidered through the current LDP review.
4. **Mature Trees and Woodlands** There are mature trees and woodland within the site. These can provide distinct character to the proposed development and will be protected. They are not a significant constraint.
5. **South Facing** - making the most of opportunities for solar gain
6. **Conservation Area** The site lies within the Pitfodells Conservation Area. This does not preclude development but will require a greater design focus.
7. **Overhead lines** Large pylons cross the site in a north easterly direction have been considered in this bid

-  Site
-  Existing Roads and paths
-  Core Path
-  Reservoir
-  Green Space Network
-  Access potential

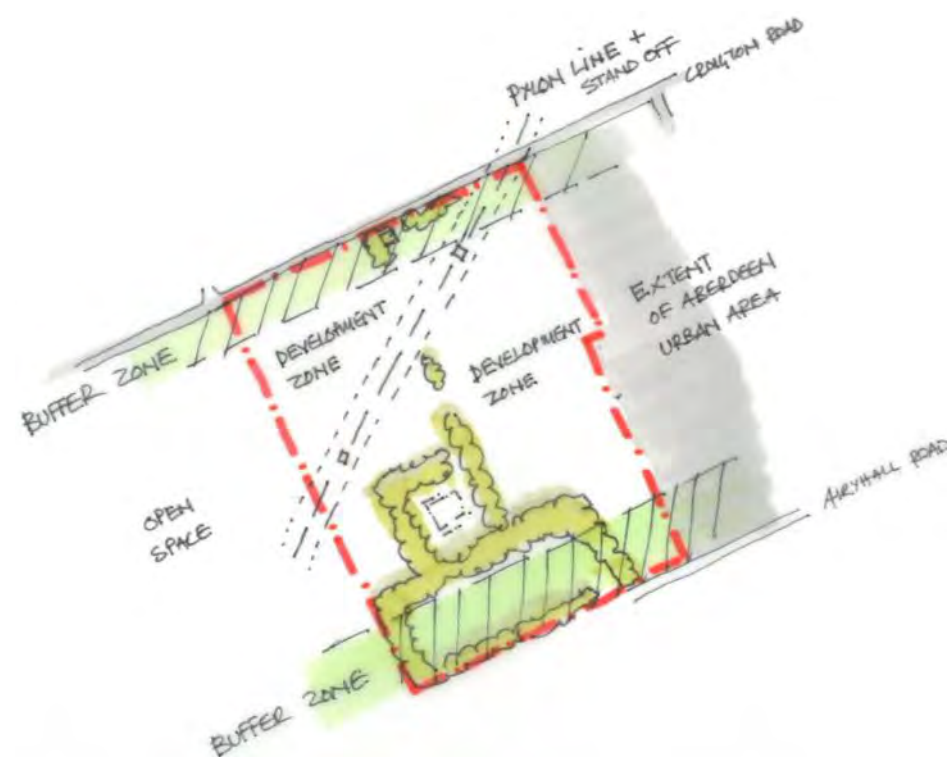


5.0 DESIGN CONCEPT

The land at Craighton Road, Pitfodells represents a deliverable, considered extension to the existing urban edge. The bid site is under the control of Drum Property Group and is immediately available for development with no constraints. The site can be accessed via Craighton Road to the north (main access point) and to the south by Airyhall Road (emergency access point).

The proposed design concept includes a landscape buffer to north and south to reflect the findings of previous LDP reviews and maintain the open visual nature of the edges of the site as seen from Craighton Road and Airyhall Road. The bid includes approximately 70-75 units indicatively.

Woodland will generally be retained with the main access taken from Craighton Road.



- Limiting housing to development pockets
- Retaining woodland on site
- Landscape buffers north + south
- Access from the north/Emergency access to the south
- Extensive on-site open space + path networks
- Appropriate stand off from existing trees

6.0 CONCLUSION

The site is an obvious extension to the existing residential land to the east and through careful design can create a new limited extension to the City where its residents have an exceptional quality of life close to the City. The site is accessible by a range of transport modes.

The proposed would respect the setting and landscape character of the wider area and particularly Pitfodells Conservation Area”

We therefore request that the site is included as an allocation in the forthcoming Aberdeen City Local Development Plan 2021:

**‘Land at Airyhall Road/Craigton Road, Pitfodells
– suitable for residential development of
around 70 houses’ that ...**

- Has good connections to the urban edge
- Will respect the landscape and conservation setting
- Retains and manages woodland
- Adopts the 6 qualities of a successful place promoted by The Scottish Government
- Takes access from Craigton road rather than Airyhall (emergency/secondary access only)
- Has clear defensible boundaries;
- Has good access to local footpath networks and urban area of Aberdeen; and
- Will respect the local context and setting



Aberdeen Local Development Plan Review

Main Issues Report Response Form 2019

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

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

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

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

Responses to the published documents can be:

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

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



YOUR DETAILS

Name	STEVE CRAWFORD
Organisation (if relevant)	HALLIDAY FRASER MUNRO
On behalf of (if relevant)	DRUM PROPERTY GROUP
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	<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.

Airyhall/Craigton Road - Please see separate response enclosed in respect of:

- Site B0913

Please also find enclosed the following in support of the response:

- 2018 LDP Bid Document (for reference only)

YOUR COMMENTS CONTINUED

B0913 Craighton Road South 2 - MIR Response – May 2019

- *B0913 – residential use, 30 units*

1. Introduction

Halliday Fraser Munro lodged an LDP bid for the above site on behalf of Drum Property Group – B0913 for 30 new homes as an extension to the City’s urban area. During the review process Aberdeen City Council officers have suggested that the site should not be preferred and presented an analysis. Their reasons are generally based on the following:

- Its separation role between Aberdeen and Cults;
- The current Green Belt zoning;
- The current Green Space Network zoning;
- The site’s location in Pitfodels Conservation Area and the character of that area;
- The site’s location in the Dee Valley Landscape Character Area; and
- An assumed limited requirement to allocated new housing land.

These, we believe, are not valid reasons for discounting this site as a housing site and have responded accordingly in the following pages. B0913 offers an opportunity for a small-scale extension to the urban area without impinging significantly on landscape separation. It offers an opportunity for new healthy and sustainable lifestyles in the City, close its existing facilities and amenities, but with excellent access to green spaces and wider path networks.

On a more general note the housing strategy adopted in the MIR has significant limitations. In effect not enough housing land has been identified to meet the area’s housing needs, it doesn’t include enough choice of location for new homes and relies too heavily on brownfield sites. A separate response has been made in that respect on behalf of Drum Property Group which can be summarised as:

- An over-reliance on brownfield sites to make up the vast majority of new housing allocations;
- Unrealistic expectations on housing delivery from existing allocated sites; and
- The need to allocate additional housing land to meet Proposed SDP requirements

Site B0913 offers a highly deliverable site in an area where people want to live and at a scale that could come forward quickly to meet the identified shortfall in housing delivery. **It should be allocated for a residential use in the Proposed Local Development Plan.**

2. MIR Response – B0913 Craigton Road

2.1 Location and Context

This site is located on the south side of Craigton Road and offers an opportunity for a small-scale housing development immediately adjacent to the settlement boundary. It represents an obvious small-scale extension westward from Aberdeen and from the recently completed care home and housing development to the east. These neighbouring developments are also located within the Pitfodels Conservation Area with a very similar locational context. The bid document associated with site B0913 set out Drum Property Group’s focus on working with development sites and respecting their existing assets and character to create the highest quality development.

“The vision for the land at Craigton Road, Pitfodels is to create a new exceptional residential neighbourhood as a limited expansion westward from Aberdeen’s urban edge, respecting the setting and landscape character of the Pitfodels Conservation Area.” (extract, LDP Bid document, 2018)

That vision remains the case. Drum Property Group has a strong track record of delivering award winning and celebrated developments. In Aberdeen the best example is Prime Four Business Park at Kingwells. Through working closely with the City Council and local community that site has been developed in a manner that creates character by re-using or incorporating natural features, respecting the field layout and the Scheduled Ancient Monument to the north and ancient woodland at its edges. That approach has proven very successful. Their approach to this site would accommodate the existing woodland and landscape features to create the very best quality development.

The MIR analysis (Sustainability Checklist – see review in Appendix 1) suggests that this location in the Pitfodels Conservation Area should reflect historic development pattern of large country houses set within large plots. The MIR analysis also mentions the derelict cottage and walled garden on site and Pitfodels House and Viewbank House to the south.

The site does include a derelict cottage and walled garden, but these elements just make the site a partial brownfield site and support its development rather than detract from it. Historic buildings off-site are not relevant to the allocation of this site.



Figure 1 – Site Photos 2019 – showing brownfield nature of parts of the site, onsite pylons and the neighbouring development to the east

The Pitfodels Conservation Area was originally designated in October 1977 and reduced in scale in 1993. It covers 191 hectares and its significance has been summarised as *“the sub-division of the Pitfodels Estate ... from 1845 ... led to a number of small feus. Large detached villas were erected in these plots set in spacious landscaped gardens with generous tree planting. These properties reflected the growing wealth of Aberdeen’s bourgeoisie who colonised this semi-rural suburb.”* (Source: Pitfodels Conservation Area Character Appraisal and Management Plan, ACC January 2015)

We are, however, in changed times. The large pylon line that now crosses the site came about well after 1845 and now dominates this part of the Conservation Area, particularly this site. The land to the east of this site is within the Conservation Area but has recently been developed for uses that don’t particularly reflect the character set out in the MIR review and the development of sites such as Woodlands Hospital and the International School have fundamentally changed the character of this area. It is no longer dominated by north/south plots with single very large houses but has a character that reflects a mix of modern mainstream homes, large modern buildings and far more efficient use of development sites that are effectively part of the City. Aberdeen does not need very large detached villas set in large feus to serve the wants of the wealthy bourgeoisie. Although that is the history of this part of Aberdeen it doesn’t reflect today’s housing needs and any future redevelopment of this site can be managed positively to maintain the general landscape characteristics that are historically important. The City desperately needs more homes, a wider range of homes in a range of locations that are suitable for a wider variety of the population and in pleasant places where existing services exist or are easy to access.

An essential element of quality of life is location, the quality of the landscape that development is set within and the convenience of access to jobs and facilities. This site delivers on all of these. This small site off Craigton Road site could easily accommodate development whilst retaining much of the important characteristics of the Conservation Area. The bid document included the retention of trees on site and retention or re-use of dry-stone dikes. It respected the Reporters' findings during previous LDP reviews with the land immediately adjacent to Craigton Road and Airyhall Road retained as green space buffers (see figures 2 and 3).

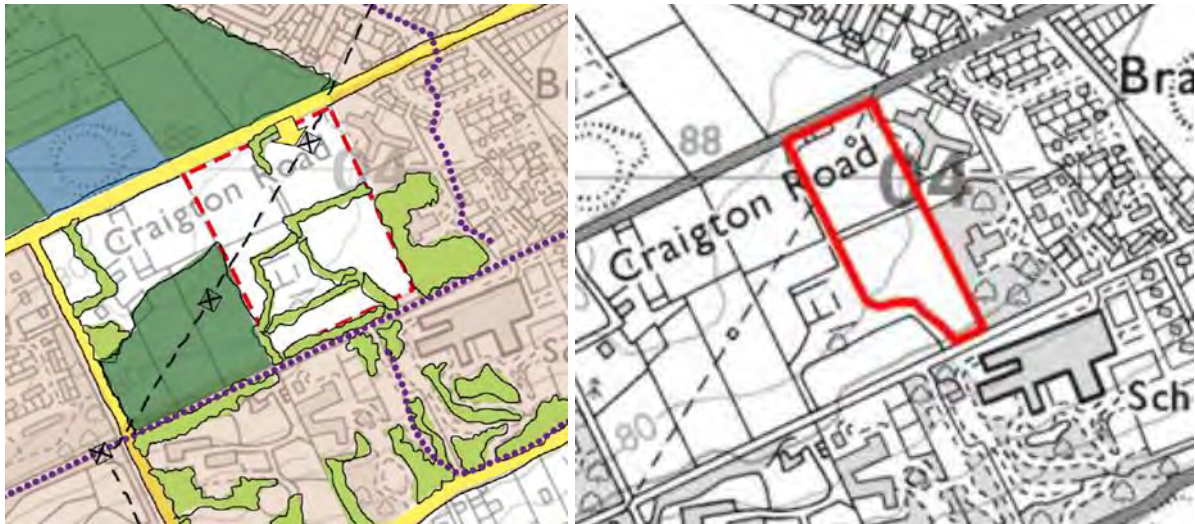


Figure 2 – Site Analysis and Boundary Plan - retaining significant green space, woodland and site features (extracts from original Call for Sites bid document)

Conservation and development are not mutually exclusive. By controlling the use and reuse of on-site features the proposed development can respect the Conservation Area context and deliver much needed housing in a location where people want to live.

The MIR analysis suggests that although there is development to the east and south, the proposed development comprises a different pattern to that. Figure 2 above shows the development at Woodlands Hospital to the west of the site and housing areas to the east. These are mainstream housing developments similar in density and layout to that proposed and clearly demonstrate that housing development of the nature proposed does already exist in the area. The proposed pattern of development is not therefore unusual. The area to the south is a different character but has a clear separation from the proposal site by mature woodland and Airyhall Road. The specific character of that roads will not alter as a result of this development as access is proposed to be taken from Craigton Road. The area to the south is also very much developed and allocated through the current LDP for further residential compatible use.

The MIR review also suggests that the development would not contribute to a better mix of land use. This just isn't the case. The area around this site already has a mixture of uses (care home, school, hotel, residential, social club) and the introduction of limited additional housing reflects that mix. The Sustainability Checklist Criteria asks whether the development would contribute to a better mix of land uses or provide the impetus for attracting facilities and whether land use impacts can be mitigated without other harmful effects. The scoring of a site against this criterion is not therefore only about the proposed use but also about its context. In this case the context is a mix of uses surrounding the site with the green network retained to the west and north.

The MIR scores this particular criterion with the lowest possible score i.e. unlikely to contribute to a better mix or balance of land uses. We suggest that the development is more in line with the median scoring criterion i.e. that it would contribute a little towards a better mix or balance of uses and provide some basis for attracting new services and facilities. The site is promoting residential development which could result in the additional critical mass to attract or retain services to/in this area. Appendix 1 includes a full review of the MIR scoring matrix and identifies a new proposed scoring for some elements. That review suggests that the site generally scores much more favourably than the MIR suggests, further supporting its allocation for residential purposes.

2.2 Nature Conservation and Landscape

MIR analysis suggests an ancient woodland designation off site to the south west and no TPOs, but trees protected as a result of location in the Conservation Area with mature trees on-site. It also suggests that the site is identified as Green Belt and Green Space Network and potentially has designated protected species on site. These are considered below.

2.2.1 Woodland

The ancient woodland offsite will not be affected so is not relevant.

On-site mature woodland is generally to be retained with any overall impact on woodland limited with replacement planting where required – See indicative layout below. The resulting impact on woodland will therefore be positive rather than negative and allow for ongoing management of the tree resource to keep it healthy and improve its longevity. An analysis of the existing woodland stock suggests that woodland management, selective felling and replanting in appropriate locations across the site would be beneficial.



Figure 3 – Indicative Layout (extract from original Call for Sites bid document 2018)

The wider site is also the control of the bidder. This allows for a more comprehensive consideration of onsite features to accommodate these within the overall site. Linear tree belt features, the central “clump” of trees and existing stone dykes can therefore be incorporated into the design to help tie it in with the wider landscape and Conservation Area features and help retain and create a sense of place for the proposed housing. Existing woodland is generally outside of the site boundary and will be retained and managed.

Development of the site will also increase formal options for public access to these areas of woodland. We note that the site is already used by members of the public, primarily for walking and a network of informal paths similar to those shown below already exist. Development of the site will maintain access to the site, specifically to the retained central green spaces and walled garden areas, from neighbouring areas residential areas.



Figure 4 – Informal Paths – to be retained, consolidated or improved

Some limited woodland replacement planting and stone dyke relocation may be required but that will enable improvements to these elements in a planned manner.

2.2.2 Green Belt and Green Space Network

MIR analysis suggests that the site forms part of the Green Belt buffer between Braeside and Cults, and that areas of open space are typical of the Pitfodels Conservation Area and Lower Deeside Landscape Character Type and Dee Valley Landscape Character.

This is not typical open space. It includes brownfield elements and large pylons (see Figure 1) with woodland visually shielding much of the proposed development area. Development here would not therefore have the major impact suggested.

We note the comments on the location within the Greenbelt and suggest that Aberdeen City Council should be carrying out a full Greenbelt review if this is going to be used as justification for not allocating a site. Supporting any form of development in and around the City will require a rezoning of land from Greenbelt to other uses. The obvious process to carry out this rezoning and evaluation of Greenbelt is the LDP review. Fundamentally, using zonings in the previous plan to rule out new opportunities in the next plan runs contrary to the LDP review process. Each bid should be fully considered against planning related criteria, including an up-to-date Greenbelt review, and rezoned if considered acceptable.

Green Space Network does not rule out development and the site could be designed to strengthen north-south green links. Green Space Network could be integrated into the design as GSN regularly covers existing areas that include development. The area to the west will be retained as a GSN link. It's also worthwhile noting that the now developed sites immediately adjacent to the east were previously GSN.

2.2.3 Protected Species

Any greenfield site that includes woodland in or adjacent to it has the potential to house protected species. There is, however, a tried and tested methodology for surveying, analysing and dealing with protected species. This issue is therefore not solely related to this site but to any greenfield site considered for development and is usually easily dealt with at the planning application stage.

Secondly, the most sensitive areas of the site i.e. the more natural woodland area around the derelict walled garden is not within this site so will be unaffected. As that area is also in the control of the proposer the opportunity to improve the ecological diversity of the wider site is significant.

The possibility of protected species is therefore not an issue at this stage of the planning process.

2.3 Infrastructure

This is an extension to the existing City extents, making best and sustainable use of the current infrastructure without the need to introduce major new infrastructure. Upgrades to the existing infrastructure will be made as required.

2.4 Site Scoring/Development Options Assessment Review

The MIR gives this site a score of 47 out of a maximum of 63 in its sustainability scoring checklist. This is already a reasonable score for a greenfield site and many of the checklist questions score the site at its maximum. Those criteria which mark the site less than full marks have been reviewed and an analysis is included in **Appendix 1**. The suggested reviewed scoring is now suggested to increase to 58 out of 63 making this site a very high scoring site in the MIR Sustainability Checklist Review. Comments on each point are included in Appendix 1 and reflected in the body of this MIR response.

5. Conclusion

Drum Property Group do not agree with the justification presented in the MIR to reject the bid B0913. They see this bid as offering a real opportunity to meet housing need with a deliverable development in a location where people would like to live. As a very limited extension to the western edge of the City it benefits from existing infrastructure or services, including local schools, with good access to the wider landscape. The site, then offers a healthy and sustainable lifestyle for prospective residents.

We note its location in the Pitfodels Conservation Area. However, this part of the conservation area is of a mixed character and has seen recent development immediately adjacent to the proposed bid site as well as some very large-scale educational facilities to the south. The site includes large pylons, brownfield elements and woodland that would help screen development on site. It is not an unspoilt green field and development here could be integrated successfully into the landscape.

Drum Property Group has a strong track record of delivering award winning and celebrated developments. They work closely with planning authorities and the local community to develop in a manner that retains or creates character by re-using or incorporating natural features, respecting the site context and making best use of resources. That approach has proven very successful. Their approach to this site would accommodate the existing woodland and landscape features to create the very best quality development.

On a more general note the housing strategy adopted in the MIR has significant limitations. In effect not enough housing land has been identified to meet the area's housing needs, it doesn't include enough choice of location for new homes and relies too heavily on brownfield sites. A separate response has been made in that respect on behalf of Drum Property Group which can be summarised as:

- An over-reliance on brownfield sites to make up the vast majority of new housing allocations;
- Unrealistic expectations on housing delivery from existing allocated sites; and
- The need to allocate additional housing land to meet Proposed SDP requirements

Site B0913 offers a highly deliverable site in an area where people want to live and at a scale that could come forward quickly to meet the identified shortfall in housing delivery.

Attachments:

- *Response Form; and*
- *2018 LDP Bid document (for reference purposes)*

APPENDIX 1: DEVELOPMENT OPTIONS ASSESSMENT REPORT

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

The site assessment process undertaken by Officers comprised an assessment of sites against a sustainability checklist and used the outcomes of the strategic environmental assessment to inform the decision on whether a site was suitable. Site B0913 has been assessed and identified as 'undesirable'. The tables below provide a review of the officer's assessment, and reconsider the site scoring of the proposed site. The table includes the score given by Officers, and a 'Proposed Score' reflecting the additional justification provided in the table.

Table 1: B0913 Craigton Road South Sustainability Checklist Review Assessment

Criteria	Officers Score (max. 3)	Proposed Score	Justification
Exposure	3	3	The site is well protected by established tree belts.
Aspect	3	3	The site is south facing.
Slope	3	3	The site is gently sloping.
Flood Risk	3	3	SEPA maps indicate no flooding on the site.
Drainage	3	3	The site is well drained.
Built/Cultural Elements	1	2 or 3	<p><i>MIR analysis suggests that location in the Pitfodels Conservation Area should reflect historic development pattern of large country houses set within large plots. It also mentions the derelict cottage and walled garden on site and Pitfodels House and Viewbank House to the south.</i></p> <p>See section 2 of the main response. This site is an extension of the City, includes brownfield elements and retains the majority of woodland on and off-site. Areas to the east, also within the Conservation Area, have recently been developed and the form of development in the immediate area is mixed. The scoring should reflect this.</p>
Natural Conservation	1	3	<p><i>MIR analysis suggests an ancient woodland designation off site to the south west, no TPOs but trees protected as a result of location in the Conservation Area, mature trees on site, Green Belt and Green Space Network and potentially designated species on site.</i></p> <p>See Section 2 of the main response. Woodland off-site is not relevant, existing woodland needs managed to improve its lifespan and the majority of that woodland is not within the site in any event.</p> <p>A green Belt review is probably required but any greenfield site proposed to be allocated will require the removal of Green Belt land from that zoning.</p> <p>Green Space Network does not rule out development and the site could be designed to strengthen north-south</p>

			<p>green links. Green Space Network could be integrated into the design as GSN regularly covers existing areas that include development but as the proposer also owns land to the west a more integrated approach to GSN could be adopted alongside limited housing development. It's also worthwhile noting that the now developed sites immediately adjacent to the east were previously GSN. Designated species surveys at the planning application stage would determine if there are any issues but the main natural woodland spaces are being retained. None of these issues would rule out development.</p>
Landscape Features	2	3	<p><i>MIR analysis suggests that linear tree belt features and central clump of trees and existing stone dykes will be affected.</i></p> <p>The majority of woodland is off-site and will be retained. More limited impacts on on-site woodland are possible but the site can accommodate new compensatory woodland planting where required. Stone dykes will either be retained or relocated to maintain site characteristics.</p>
Landscape Fit	1	3	<p><i>MIR analysis suggests that the site forms part of the Green Belt buffer between Braeside and Cults, and that areas of open space are typical of the Pitfodels Conservation Area and Lower Deeside Landscape Character Type and Dee Valley Landscape Character.</i></p> <p>This is not a typical area of open space for the Conservation Area. It includes large electricity pylons and areas of previously developed land in parts. Much of it is screened by woodland that is intended to be retained.</p>
Relationship to existing settlement	2	3	<p><i>MIR analysis suggests that although there is development to the east and south, the proposed development comprises a different pattern to that.</i></p> <p>See section 2 of the main response. More contemporary development to the west and east and commercial and educational development to the south create a mixed development pattern. The proposed development is therefore not unusual within its wider context.</p>
Land Use Mix / Balance / Service Thresholds	1	2	<p><i>Suggestion that the development would not contribute to a better mix of land use.</i></p> <p>The site is promoting residential development which could result in the additional critical mass to attract services to this area and support existing services.</p>
Accessibility	3	3	<p>A bus stop is located within 400m of the site.</p>

Proximity to facilities / shopping / health / recreation	2	2	<i>MIR analysis suggests that some facilities are available locally.</i> Agreed
Direct footpath / cycle connection to community and recreation facilities and resources	3	3	The site has good access including core path access.
Proximity of employment opportunities	1	2	<i>Suggestion that there are no significant employment opportunities within 1.6km of the site.</i> There are some employment opportunities within Cults, but no business parks or large employers. Cults, however, is well located being only 3 miles from the city centre, and 3 miles from Prime Four Business Park. There are 10ha of business land proposed at Countesswells which is only just over 1.6km from the site. Therefore, the MIR scoring is not justified.
Contamination	3	3	No known contamination.
Land Use Conflict	3	3	No known land use conflict.
Physical Infrastructural Capacity	3	3	Infrastructure available.
Physical Infrastructure Future	2	3	<i>MIR analysis seems to mark this aspect down as it not currently available but could be available.</i> As a site immediately adjacent to the existing built up area of Aberdeen it will be reasonably straightforward to provide adequate infrastructure, especially for a site of this scale.
Service Infrastructure Capacity	2	2	Site is allocated to Airyhall Primary School and Hazlehead Academy.
Other Constraints	2	2	<i>MIR analysis suggests that there are pylons running east to west across the site.</i> There are pylons but these are not an absolute constraint on development. That pylon line already runs across the City's built up area to the north east, essentially through existing housing areas.
	47	57/58	



DRUM
PROPERTY GROUP
DEVELOPMENT & INVESTMENT

LAND AT CRAIGTON ROAD/AIRYHALL ROAD, PITFODELS

LOCAL DEVELOPMENT PLAN BID
MAY 2018

PREPARED BY HALLIDAY FRASER MUNRO FOR DRUM PROPERTY
GROUP



EXECUTIVE SUMMARY

The purpose of this document is to support the Local Development Plan bid submission, which has been prepared on behalf of Drum Property, the developer by Halliday Fraser Munro Architects and Planning Consultants

The small site on the west side of Airyhall house on Craigton Road, Pitfodels offers an excellent opportunity for a small high quality residential development. An obvious extension to Aberdeen westwards of the recently completed care home and Bancon Development it respects the site and its context.

The proposals presented in this document have been developed following a review of the site, planning context, an analysis of the opportunities and constraints of the site with the integration of new development as an appropriate extension to Craigton Road, allowing new residential development whilst respecting the character of neighbouring green belt.

Drum Property Group pride themselves on quality of their developments and will continue to embrace that in the delivery of housing on this site.

An essential element of quality of life is location, quality of the landscape that development is set within and the convenience of access to facilities and jobs locally. This site will deliver on all of these.

“The vision for the Land at Craigton Road, Pitfodels is to create a new small exceptional residential neighbourhood as a limited expansion westwards from Aberdeen’s urban edge, respecting the setting and landscape character of the Pitfodels Conservation Area”

1.0 SITE DESCRIPTION

The bid site is located between Craighton Road and Airyhall Road, within the Pitfodells Conservation Area .

The site is bounded to the north by Craighton road, ; to the south by Woodbank (Shell Headquarters), the Marcliffe Hotel and the International School campus, immediately to the east by adjacent Airyhall House and Northcote Lodge care home development and to the west of the site are open fields and the Stewart Milne residential development.

To the north of Craighton Road lies sports fields which are separated from the road by a prominent stop fence, areas of stone wall and a grass covered raised reservoir.

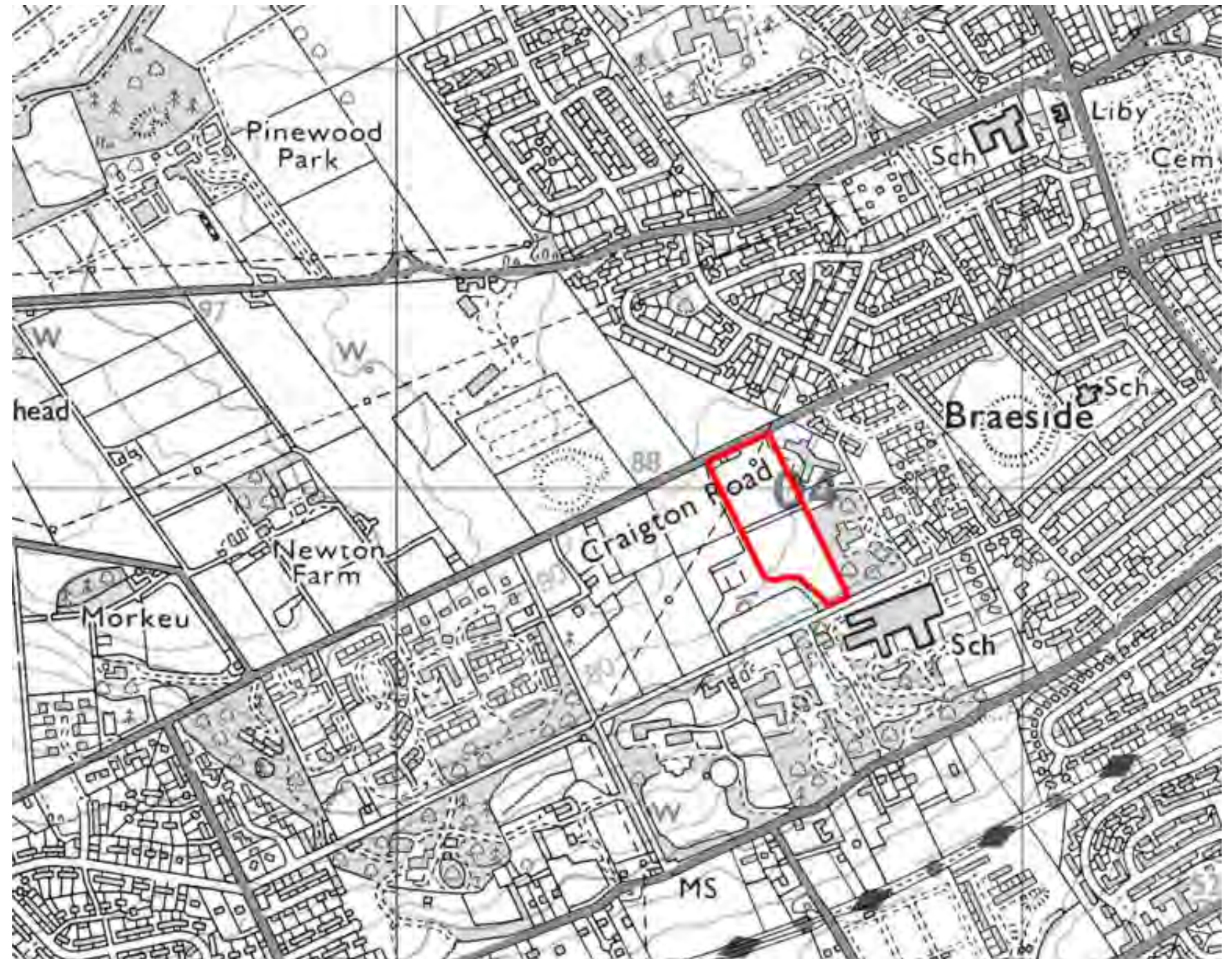
Craighton Road links the existing residential areas of Cults and Braeside and forms the northern boundary of the site.

The existing unused land extends to 2.7 ha and comprises a redundant steading building and open unused fields to the north and areas of mature trees and woodland just outside the site boundaries to the south. Woodland is generally to be retained but will be subject to full detailed review if allocated to allow proper management and protection of the woodland resource.

The site includes large pylons that cross the site in a north easterly direction. The site is generally flat, falling gently to the south towards Airyhall Road. Main access to the site would be taken from Craighton road.

The proposed development consists of around 30 houses. Road and footpath access will be taken from north to south across the site.

The site therefore offers opportunities for development in clear pockets that would retain much of the site character and respect its location with the Pitfodells Conservation Area.





The redundant steading building to the North of the site - (Source: Google Maps)



The Airyhall House to the east (View from Airyhall Road)- (Source: Google Maps)



Pylons to the north of the site- (Source: Google Maps)



The southern boundary of the site (Airyhall Road)- (Source: Google Maps)

2.0 PLANNING CONTEXT

Planning History

This partial brownfield site has been the subject of previous LDP bids but as part of a much larger land parcel. This bid, however, is now on a much reduced site and excludes land to the west. Elements of the justification from ACC (see below) for not including the site previously have been considered in preparing this bid.

Issues previously considered:

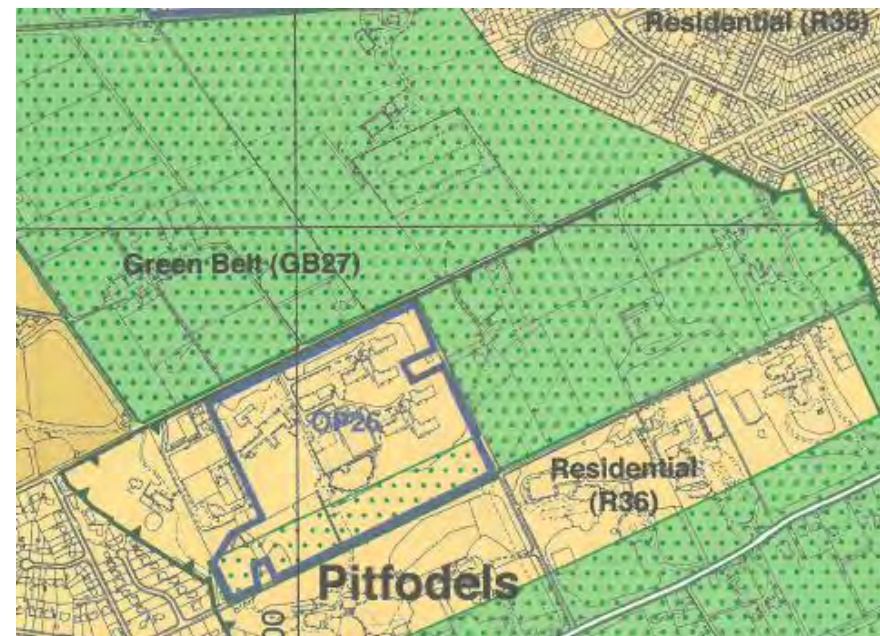
- Separation and coalescence
- Trees
- Architectural features
- Established wildlife and recreational functions
- Housing numbers

These have all been reconsidered in this bid.

Land use zoning and Function

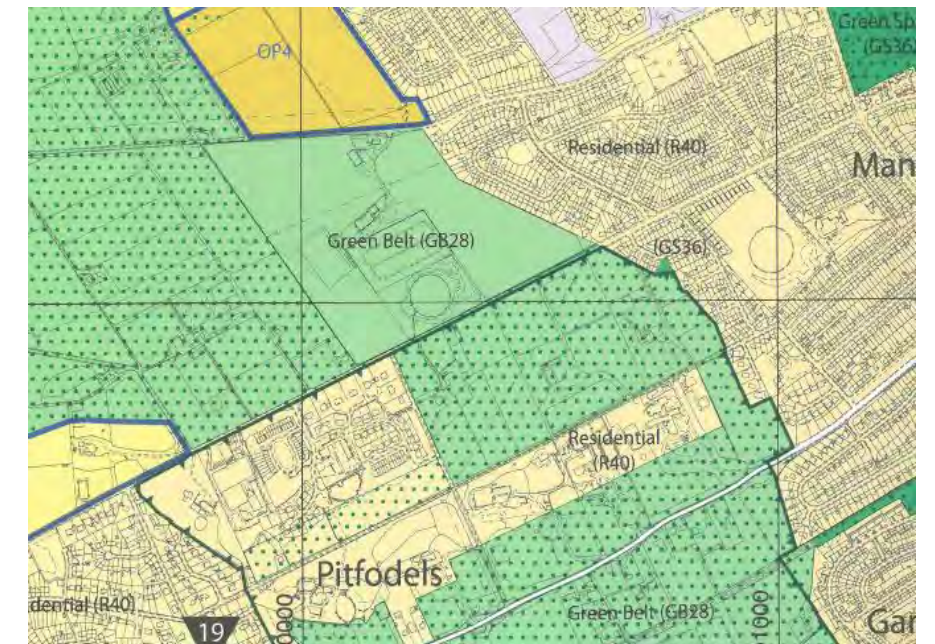
It's quite clear that the function of this part of Aberdeen has altered over the years and the zoning in relation to that function has also altered. The series of extracts below show that this area has altered over the last few LDP reviews.

2004 Finalised Local Plan



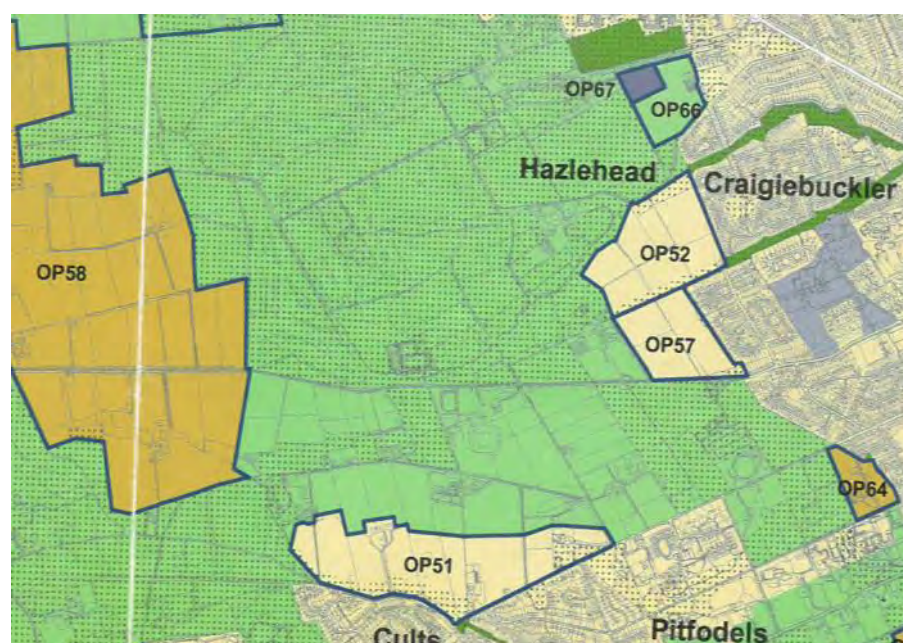
Whole site identified as green belt and green space network. Land to the south allocated for low density housing protecting landscape and tree belts.

2008 Finalised Plan



site remains unallocated but land to the north is removed from the green space network. Residential zoning to the south extended slightly to the south.

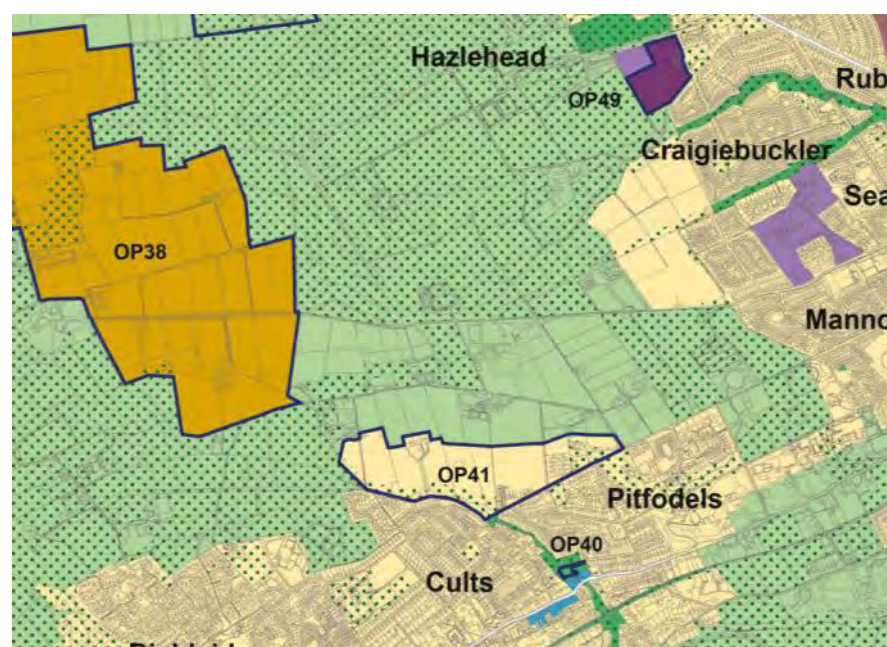
2012 Local Development Plan



The land immediately to the east (previously allocated as green belt and green space network) with a similar character to the proposed site is zoned as OP64, an opportunity for development of 20 homes on a Council owned site.

The inclusion of OP64 in 2012 ALDP has extended the edge of the city further to the west and now immediately adjacent to this site.

2017 City Local Development Plan



The current LDP identifies this area as Green Belt and Green Space Network, within the Pitfodels Conservation Area and closely related to Core Paths.

Allocating this site for development would require a rezoning away from Green Belt but this would not be unusual in a local development plan review, especially one where greenfield housing states of 100 units as less are being encouraged. Developing the site, however, would retain the key important landscape elements.

The 2017 LDP allocates Friarsfield as a development site (OP41—29.2 hectares for 280 homes). This established the Friarsfield area as a housing development zone in the current land use strategy for the City.

GSN does not rule out development but requires that it considers the character and function of the GSN in that area. In this case it is the woodland avenues that define the character. These will be protected if this site is allocated.

Planning Review Summary

The proposal for the Craigton Road bid site will have very little impact on the landscape and the character of the wider area.

It would retain on site woodland and landscape buffers to the north and south to help retain the woodland character to the to the south of the site.

2.0 PLANNING CONTEXT

Housing Land

Current housing land allocations haven't been delivering at the scale originally anticipated. This has created a housing delivery backlog and new housing allocations are required to deliver the City's housing requirements.

The joint Strategic Development Plan Main Issues Report, currently out for consultation, states that the 2,769 fewer houses overall and 3,000 fewer affordable houses were delivered in the 5 years to 2016 than required by the SDP and the HNDA. That's around 600 houses less than required every year.

Analysis of housing land delivery in the City on key large sites identifies a significantly worse housing delivery record. The following table identifies that key development sites in the City, their original anticipated housing numbers and the actual delivery over a 10 year period, all based on the Council's Housing Land audits. It shows that of the 11,150 houses originally proposed on these sites just over 2,000 (around 10%) have been delivered.

The evidence points to slower delivery rates on a site by site basis. The City Planning Authority needs to allocate additional housing land to help supplement that lack of delivery over many years and catch up with demand. These sites should be in a range of locations and at a range of scales to encourage a greater range of developers and offer choice to those looking to buy a new home.

The City Council has suggested that sites up to 100 housing units are appropriate. This site meets that specified requirement.

City	site	ref	2007-2016	Cumulative 2015	shortfall	Cumulative 2016	shortfall 2016	Cumulative 2017	shortfall 2017
	Grandhome	OP12	2600	0	2600	0	2600	0	2600
	Dubford	OP25	550	190	360	309	241	397	153
	Stoneywood	OP24	500	133	367	231	269	514	-14
	Craibstone South	OP28	750	0	750	0	750	0	750
	Rowett South	OP30	1000	0	1000	0	1000	0	1000
	Greenferns Landward	OP31	750	0	750	0	750	0	750
	Maidencraig	OP43 & O	750	5	745	24	726	60	690
	Greenferns	OP45	600	0	600	0	600	0	600
	Countesswells	OP58	2150	0	2150	4	2146	154	1996
	Oldfold	OP62	400	0	400	25	375	50	350
	Lairston	OP77	1100	0	1100	0	1100	0	1100
	TOTALS		11150	328	10822	593	10229	1175	9054
			percentage delivered	2.9%		5.3%		10.5%	

Housing Strategy and Allocations

Aberdeen is the strategic centre for housing development for the City region and the main focus for growth. The SDP MIR identifies future housing need and a requirement for additional release of housing land across the City and Shire and the vision remains to create an attractive, resilient, prosperous and sustainable European City Region and an excellent place to live.

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

The proposed housing allowance is for 13,000 new homes in the City over the next 22 years. Alternative sites in locations that offer attractive and popular places where people would like to live should be allocated to complement the existing housing land supply.

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

	2016 to 2030	2031 to 2035	2036 to 2040	Total
Aberdeen Hous-	4,200	5,700	6,300	16,200
Rural Housing	1,300	1,700	2,500	5,500
Total	5,500	7,400	8,800	21,700
Split as follows:				
Aberdeen City	3,500	4,700	4,800	13,000
Aberdeenshire	2,000	2,700	4,000	8,700

In terms of housing land, therefore, this bid is entirely in line with the suggestions of site size and location from both the Strategic Development Plan MIR and the City Council's Call for Sites.

Land Use Zoning

The site is presently zoned as Green Belt and Green Space Network (GSN). Green Belt release is required to meet the Council's stated request for new greenfield sites of 100 houses or less. The Local Plan Review process is the mechanism where such releases can be considered. Green Belt policy protects land for 4 main reasons. These are:

- to maintain the distinct identity of Aberdeen and the communities within and around the City;
- to safeguard the Green Belt to help avoid coalescence and sprawling development on the edge of the city;
- to maintain Aberdeen's landscape setting and
- to provide access to open space.

Identity - This area of Aberdeen has changed considerably over recent years. The land immediately to the east is now built out and land to the south now includes the relocated International School. Retaining landscape buffers to the north and south would help retain the identity of this part of Aberdeen that can be characterised as development set within the landscape.

Coalescence and Sprawling Development - The site does not create coalescence or sprawling development for the same reasons as set out above. Aberdeen has already expanded westwards in this vicinity and the restricted scale of this development together with the proposed landscape treatment would not create coalescence or sprawling development.

Landscape Setting - The landscape setting of Aberdeen is not undermined by this proposal. The site is a field with a large pylon crossing it and woodland avenues to the south and west. Developing this site with appropriate landscape treatment, retaining and managing the woodland and introducing development-free zones to the north and south will maintain, and in terms of the woodland will improve, the contribution to the local landscape from this site.

Access to Open Space - The site is presently used informally by local residents, in the main for walking their dogs. Development of the site will include a more formalised path network that can improve access to the managed and improved on-site open spaces (e.g. the walled garden) and safer access through the site to local core and other path networks. The proposal will alter the type of open space available on site but provide easier, safer and more formalised footpath networks to that open space.

This review has not identified any concerns in relation to the function of the Green Belt for this bid site. The loss of this specific bid sites from the Green Belt would not undermine its overall purpose.

Policy NE1 – Green Space Network does not rule out development either. Where development would impact on GSN it requests that such development "... maintain and enhance the coherence of the network. In doing so, provision should be made for access across roads for wildlife and outdoor recreation." (page 67, 2017 LDP). That can be achieved here and would be a similar approach to that taken on the residential zoned land immediately south of this site.

Planning and Design

At a national level the Scottish Government are pursuing both a housing delivery and design quality agenda. They are promoting 6 essential qualities of place:

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

Drum Property Group pride themselves on quality of their developments and will continue to embrace that in the delivery of housing on this site.

An essential element of quality of life is location, quality of the landscape that development is set within and the convenience of access to facilities and jobs locally. This site will deliver on all of these.

3.0 SITE CONTEXT

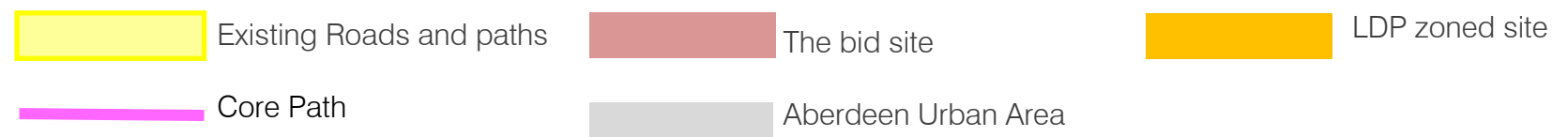
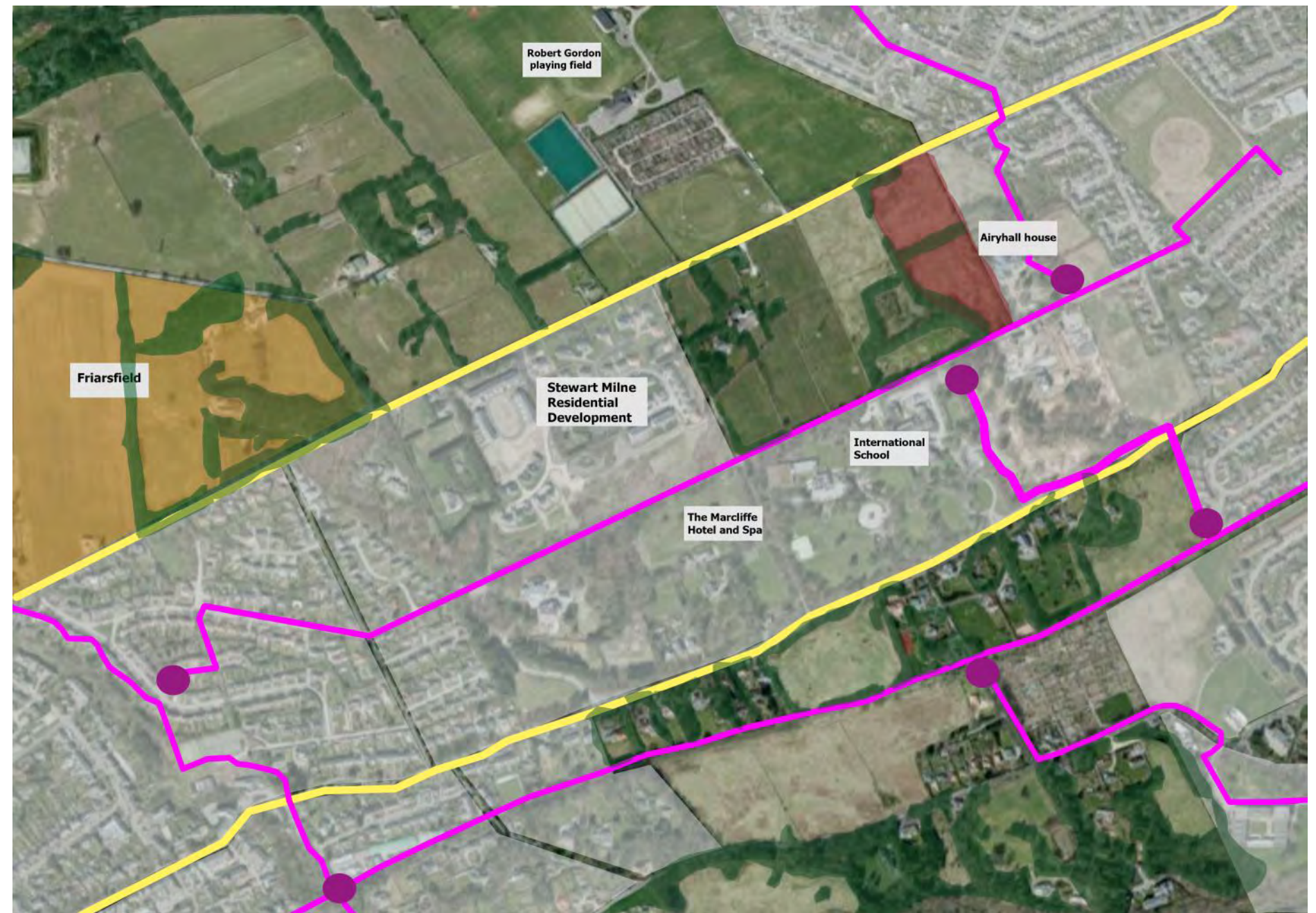
The Urban Area Character Area mainly comprises the areas of Craigiebuckler Braeside, Mannofield, Kaimhill and Garthdee in Aberdeen to the south and east of the site and the eastern component of Cults to the west of the site. Land around the site is primarily residential and educational land-use with a mix of building types and styles in a range of materials .

Plot sizes tend to be large to the south of Airyhall road although development is denser in the areas immediately to the east.

The proposed development site lies within an area that has been designated as Green Belt in the Aberdeen local plan although this full review of the Local Development plan is the opportunity to review that zoning.

Allocation of this site will lead to the rezoning of a partially brownfield site for much needed residential use.







It is not considered that urban coalescence will result from development of the Craigton Road site or that developing the site will materially affect the overall role of the Green Belt in this part of Aberdeen.

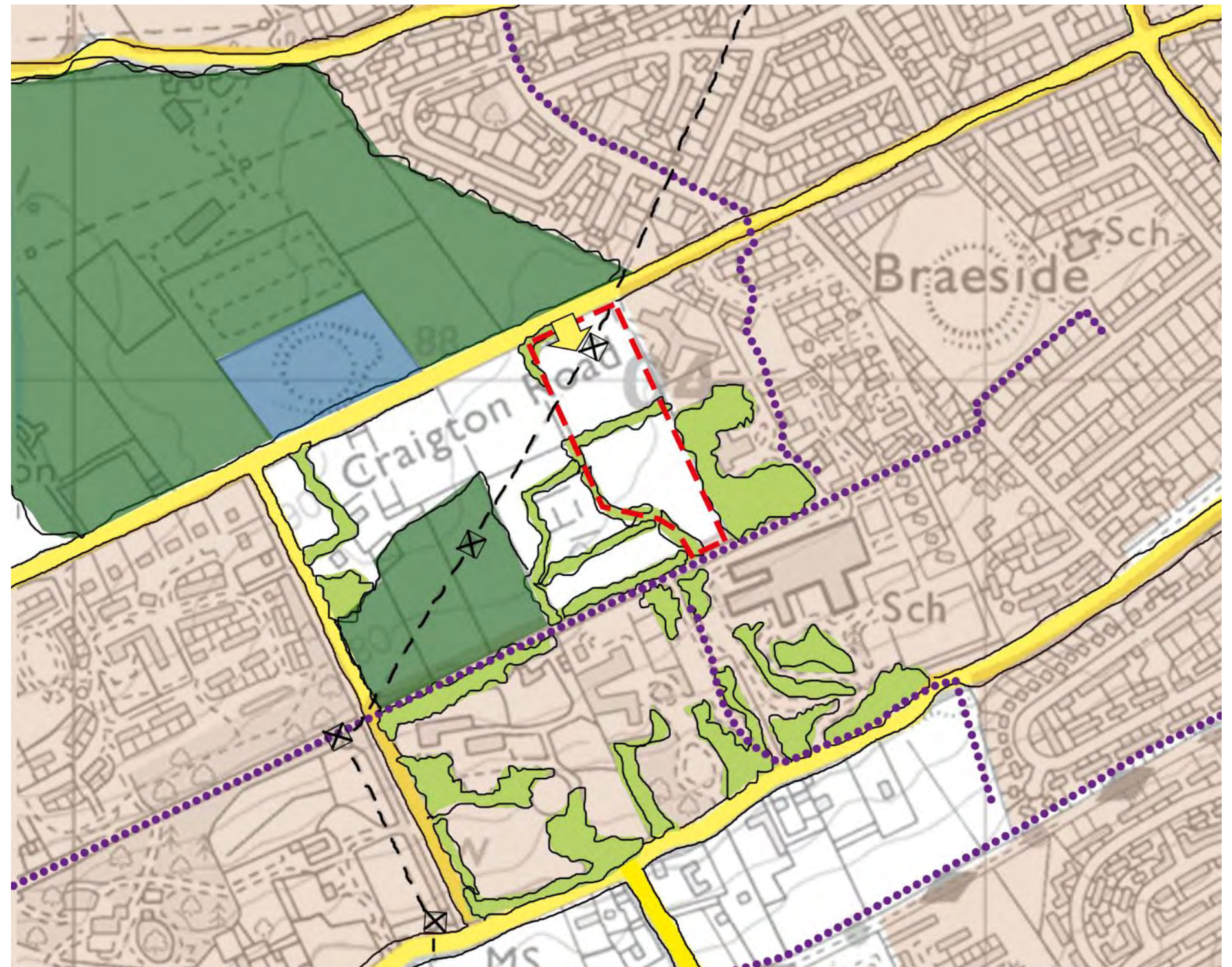


4.0 SITE ANALYSIS: OPPORTUNITIES AND CONSTRAINTS

Opportunities and Constraints Key

1. **Existing Road and Path Network** The site sits between Craighton Road to the north and Airyhall Road to the south with good access to roads and path networks
2. **Site connectivity** The site has excellent connections to the Core Path network
3. **Green Belt and Green Space Network** The site is identified as green belt but should be reconsidered through the current LDP review.
4. **Mature Trees and Woodlands** There are mature trees and woodland within and adjacent to the site. These can provide distinct character to the proposed development and will be protected. They are not a constraint.
5. **South Facing** - making the most of opportunities for solar gain
6. **Conservation Area** The site lies within the Pitfodels Conservation Area. This does not preclude development but will require a greater design focus.
7. **Overhead lines** Large pylons cross the site in a north easterly direction have been considered in this bid

-  Site
-  Existing Roads and paths
-  Core Path
-  Reservoir
-  Green Space Network
-  Access potential



5.0 DESIGN CONCEPT

The land at Craighton Road, Pitfodels represents a deliverable, considered extension to the existing urban edge. The bid site is under the control of Drum Property Group and is immediately available for development with no constraints. The site can be accessed via Craighton Road to the north (main access point) and to the south by Airyhall Road (emergency access point).

The proposed design concept includes a landscape buffer to north and south to reflect the findings of previous LDP reviews and maintain the open visual nature of the edges of the site as seen from Craighton Road and Airyhall Road. The bid includes approximately 30 units.

Woodland will generally be retained with the main access taken from Craighton Road.

- Limiting housing to development pockets
- Retaining woodland on site
- Landscape buffers north + south
- Access from the north/Emergency access to the south
- Extensive on-site open space + path networks
- Appropriate stand off from existing trees



6.0 CONCLUSION

The site is an obvious extension to the existing residential land to the east and through careful design can create a new limited extension to the City where its residents have an exceptional quality of life close to the City. The site is accessible by a range of transport modes.

The proposed would respect the setting and landscape character of the wider area and particularly Pitfodels Conservation Area”

We therefore request that the site is included as an allocation in the forthcoming Aberdeen City Local Development Plan 2021:

‘Land at Airyhall Road/Craigton Road, Pitfodels – suitable for residential development of around 30 houses’ that ...

- Has good connections to the urban edge
- Will respect the landscape and conservation setting
- Retains and manages woodland
- Adopts the 6 qualities of a successful place promoted by The Scottish Government
- Takes access from Craigton road rather than Airyhall (emergency/secondary access only)
- Has clear defensible boundaries;
- Has good access to local footpath networks and urban area of Aberdeen; and
- Will respect the local context and setting



Aberdeen Local Development Plan Review

Main Issues Report Response Form 2019

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

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

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

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

Responses to the published documents can be:

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

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



YOUR DETAILS

Name	STEVE CRAWFORD
Organisation (if relevant)	HALLIDAY FRASER MUNRO
On behalf of (if relevant)	DRUM PROPERTY GROUP
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	<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.

Airyhall/Craigton Road - Please see separate response enclosed in respect of:

- Site B0914

Please also find enclosed the following in support of the response:

- 2018 LDP Bid Document (for reference only)

YOUR COMMENTS CONTINUED

B0914 Craighton Road South 3 - MIR Response – May 2019

- *B0914 – Care Home and Garden Centre*

1. Introduction

Halliday Fraser Munro lodged an LDP bid for the above site on behalf of Drum Property Group – B0914 for a garden centre and care home as an extension to the City’s urban area and to serve the neighbouring and wider community. During the review process Aberdeen City Council officers have suggested that the site should not be preferred and presented an analysis. Their reasons are generally based on the following:

- Its separation role between Aberdeen and Cults;
- The current Green Belt zoning;
- The current Green Space Network zoning;
- The site’s location in Pitfodels Conservation Area and the character of that area; and
- The site’s location in the Dee Valley Landscape Character Area.

These, we believe, are not valid reasons for discounting this site and have responded accordingly in the following pages. B0914 offers an excellent opportunity for a high quality semi-commercial use as garden centre and care home that can support the neighbouring and extensive residential communities of Aberdeen. Overall it represents a small-scale extension to the urban area without impinging significantly on landscape separation and could, as a result of the proposed uses, use or re-use some of the existing walled garden aspects of the site for garden centre purposes.

This area of Aberdeen, and that to the west, includes significant residential development (existing and proposed) which would benefit from the types of uses proposed and help reduce the need for local households to travel to access these types of facilities. The proposed development would also provide additional local job opportunities to help support sustainable lifestyles.

The site should therefore be allocated for a mix of commercial care home and garden centre uses in the Proposed Local Development Plan.

2. MIR Response – B0914 Craigton Road

2.1 Location and Context

This site is located on the south side of Craigton Road and offers an opportunity for a small-scale garden centre and care home development immediately adjacent to the settlement boundary. It represents an obvious small-scale extension westward from Aberdeen and from the recently completed care home and housing development to the east. These neighbouring developments are also located within the Pitfodells Conservation Area with a very similar locational context. The bid document associated with site B0914 set out Drum Property Group's focus on working with development sites and respecting their existing assets and character to create the highest quality development.

“The vision for the Land at Craigton Road, Pitfodells is to create a limited expansion westward from Aberdeen's urban edge, respecting the setting and landscape character of the Pitfodells Conservation Area” (extract, LDP Bid document, 2018)

That vision remains the case. Drum Property Group has a strong track record of delivering award winning and celebrated developments. In Aberdeen the best example is Prime Four Business Park at Kingwells. Through working closely with the City Council and local community that site has been developed in a manner that creates character by re-using or incorporating natural features, respecting the field layout and the Scheduled Ancient Monument to the north and ancient woodland at its edges. That approach has proven very successful. Their approach to this site would accommodate the existing woodland and landscape features to create the very best quality development.

The MIR analysis (Sustainability Checklist – **see review in Appendix 1**) suggests that this location in the Pitfodells Conservation Area should reflect historic development pattern of large country houses set within large plots. The MIR analysis also mentions the derelict cottage and walled garden on site and Pitfodells House and Viewbank House to the south.

The site does include a derelict cottage and walled garden, but these elements just make the site a partial brownfield site and support its development rather than detract from it. The walled garden is evidence of the site being historically used for horticulture and further supports the use as a garden centre.

The Pastmap/Canmore websites (operated by Historic Environment Scotland) recognise the walled garden as “... the N side of a walled garden, possibly belonging to Airy Hall (now Airyhall), a house which stands some 160m to the ENE. The N wall of the garden, which forms the S side of the range, seems to stand to its full height, but the remaining parts of the range have been heavily robbed and the garden has been open-sided to the S. The range is depicted as roofed on both the 1st and 2nd editions of the OS 6-inch map (Aberdeenshire, 1869, sheet lxxxvi and 1904, sheet lxxxvi.NW).”

Historic buildings off-site are not relevant to the allocation of this site.



Figure 1 – Site Photos 2019 – showing brownfield nature of parts of the site (cottage and walled garden), onsite pylons and the neighbouring development to the east

The Pitfodels Conservation Area was originally designated in October 1977 and reduced in scale in 1993. It covers 191 hectares and its significance has been summarised as *“the sub-division of the Pitfodels Estate ... from 1845 ... led to a number of small feus. Large detached villas were erected in these plots set in spacious landscaped gardens with generous tree planting. These properties reflected the growing wealth of Aberdeen’s bourgeoisie who colonised this semi-rural suburb.”* (Source: Pitfodels Conservation Area Character Appraisal and Management Plan, ACC January 2015)

We are, however, in changed times. The large pylon line that now crosses the site came about well after 1845 and now dominates this part of the Conservation Area, particularly this site. The land to the east of this site is within the Conservation Area but has recently been developed for uses similar to that now proposed. The neighbouring Care Home development was approved as a development plan departure despite being located within the Conservation Area and being of a similar nature to the B0914 site. That decision clearly indicates a general view that this area is not sacrosanct and has seen change over the years that could allow for appropriate development.

Other development of sites such as Woodlands Hospital and the International School have fundamentally changed the character of this area. It is no longer dominated by north/south plots with single very large houses but has a character that reflects a mix of modern mainstream homes, large modern buildings and far more efficient use of development sites that are effectively part of the City. Aberdeen no longer needs very large detached villas set in large feus to serve the wants of the wealthy bourgeoisie. Although that is the history of this part of Aberdeen it doesn’t reflect today’s

requirements for new housing or planning for a mix of uses that support sustainable development. Any future redevelopment of this site can, however, be managed positively to maintain the general and historically important landscape characteristics.

An essential element of quality of life is location, the quality of the landscape that development is set within and the convenience of access to jobs and facilities. This site delivers on all of these by providing uses that serve the local area, options for these uses to connect with the wider countryside and provide local job opportunities. This small site off Craigton Road site could easily accommodate development whilst retaining much of the important characteristics of the Conservation Area. The bid document included the retention of trees on site and retention or re-use of dry-stone dikes. It respected the Reporters' findings during previous LDP reviews with the land immediately adjacent to Craigton Road and Airyhall Road retained as green space buffers (see figures 2 and 3).



Figure 2 – Site Analysis and Site Evaluation Sketch - retaining significant green space, woodland and site features (extracts from original Call for Sites bid document)

Conservation and development are not mutually exclusive. By controlling the use and reuse of on-site features the proposed development can respect the Conservation Area context and deliver countryside-based and community support uses in a sustainable location close to the City's existing and new housing areas.

The MIR analysis suggests that although there is development to the east and south, the proposed development comprises a different pattern to that. Figure 2 above shows the development at Woodlands Hospital to the west of the site, housing areas to the east and in particular the new care home immediately to the east. These clearly demonstrate that development of the nature proposed does already exist in the area. The proposed pattern of development is not therefore unusual, and elements of the garden centre reflect the horticultural past of the site.

The urban area to the south is a different character but has a clear separation from the proposal site by mature woodland and Airyhall Road. The specific character of that road will not alter as a result of this development as access is proposed to be taken from Craigton Road. The area to the south is also very much developed and allocated through the current LDP for further residential compatible use.

The MIR review also recognises that the development would contribute to a better mix of land use in the area although our view is that this will have a greater positive impact than suggested in the MIR scoring.

Appendix 1 includes a full review of the MIR scoring matrix and identifies a new proposed scoring for some elements. That review suggests that the site generally scores much more favourably than the MIR suggests, further supporting its allocation for the uses proposed.

2.2 Nature Conservation and Landscape

MIR analysis suggests an ancient woodland designation off site to the south west and no TPOs, but trees protected as a result of location in the Conservation Area with mature trees on-site. It also suggests that the site is identified as Green Belt and Green Space Network and potentially has designated protected species on site. These are considered below.

2.2.1 Woodland

The ancient woodland offsite will not be affected so is not relevant.

On-site mature woodland is generally to be retained with any overall impact on woodland limited with replacement planting where required – See indicative layout below. The garden centre element proposes to re-use the walled garden area for horticultural purposes, reflecting past use of the site. Remaining woodland is proposed to be retained as far as possible with associated replacement planting where appropriate. The resulting overall impact on woodland across the whole site will allow for ongoing management of the tree resource to keep it healthy and improve its longevity. An analysis of the existing woodland stock suggests that woodland management, selective felling and replanting in appropriate locations across the site would be beneficial.



Figure 3 – Indicative Layout (extract from original Call for Sites bid document 2018)

Linear tree belt features, the central “clump” of trees and existing stone dykes can therefore be incorporated into the design as far as possible to help tie it in with the wider landscape and Conservation Area features and help retain and create a sense of place for the proposed residential care home and the garden centre.

Development of the site will also increase formal options for public access to these areas of woodland. We note that the site is already used by members of the public, primarily for walking and a network of informal paths similar to those shown below already exist. Development of the site will maintain access to the site, specifically to the retained central green spaces and walled garden areas, from neighbouring residential areas.



Figure 4 – Informal Paths – to be retained, consolidated or improved

Some limited woodland replacement planting and stone dyke relocation may be required but that will enable improvements to these elements in a planned manner.

2.2.2 Green Belt and Green Space Network

MIR analysis suggests that the site forms part of the Green Belt buffer between Braeside and Cults, and that areas of open space are typical of the Pitfodels Conservation Area and Lower Deeside Landscape Character Type and Dee Valley Landscape Character.

This is not typical open space. It includes brownfield elements and large pylons (see Figure 1) with woodland visually shielding much of the proposed development area. Development here would not therefore have the major impact suggested, especially as the types of uses proposed will also require substantial areas of open space to support plant nursery and sales activity.

We note the comments on the location within the Greenbelt and suggest that Aberdeen City Council should be carrying out a full Greenbelt review if this is going to be used as justification for not allocating a site. Supporting any form of development in and around the City will require a rezoning of land from Greenbelt to other uses. The obvious process to carry out this rezoning and evaluation of Greenbelt is the LDP review. Fundamentally, using zonings in the previous plan to rule out new opportunities in the next plan runs contrary to the LDP review process. Each bid should be fully considered against planning related criteria, including an up-to-date Greenbelt review, and rezoned if considered acceptable.

Green Space Network does not rule out development and the site could be designed to strengthen north-south green links. Green Space Network could be integrated into the design as GSN regularly covers existing areas that include development. It's also worthwhile noting that the now developed sites immediately adjacent to the east were previously GSN.

2.2.3 Protected Species

Any greenfield site that includes woodland in or adjacent to it has the potential to house protected species. There is, however, a tried and tested methodology for surveying, analysing and dealing with protected species. This issue is therefore not solely related to this site but to any greenfield site considered for development and is usually easily dealt with at the planning application stage.

Secondly, the most sensitive areas of the site i.e. the more natural woodland area around the currently derelict walled garden and the southern enclosed spaces, are to be retained and will continue to offer opportunities to support a wide range of wildlife. The opportunity to improve the ecological diversity of the wider site is therefore significant.

The possibility of protected species is therefore not an issue at this stage of the planning process.

2.3 Infrastructure

This is an extension to the existing City extents, making best and sustainable use of the current infrastructure without the need to introduce major new infrastructure. Upgrades to the existing infrastructure will be made as required.

2.4 Site Scoring/Development Options Assessment Review

The MIR gives this site a score of 53 out of a maximum of 63 in its sustainability scoring checklist. This is already a high sustainability score for a greenfield site and many of the checklist questions score the site at its maximum. Those criteria which mark the site less than full marks have been reviewed and an analysis is included in **Appendix 1**. The suggested reviewed scoring is now suggested to increase to 61 out of 63 making this site a very high scoring site in the MIR Sustainability Checklist Review. Comments on each point are included in Appendix 1 and reflected in the body of this MIR response.

5. Conclusion

Drum Property Group do not agree with the justification presented in the MIR to reject the bid B0914. They see this bid as offering a real opportunity to deliver new facilities that serve the local area. As a limited extension to the western edge of the City the site benefits from existing infrastructure, a substantial local population and good access to the wider countryside. The uses are compatible with the site's current and historic context.

We note its location in the Pitfodels Conservation Area. However, this part of the conservation area is of a mixed character and has seen recent development immediately adjacent to the proposed bid site as well as some very large-scale educational facilities to the south. The site includes large pylons, brownfield elements and woodland that would help screen development on site. It is not an unspoilt green field and development here could be integrated successfully into the landscape.

Drum Property Group has a strong track record of delivering award winning and celebrated developments. They work closely with planning authorities and the local community to develop in a manner that retains or creates character by re-using or incorporating natural features, respecting the site context and making best use of resources. That approach has proven very successful. Their approach to this site would accommodate the existing woodland and landscape features to create the very best quality development.

Site B0914 offers a highly deliverable site in a sustainable location that serves a substantial proportion of Aberdeen's population. It will bring additional benefits over and above the introduction of new local facilities, offering new employment opportunities and a local choice for elderly care and household gardening requirements.

Attachments:

- *Response Form; and*
- *2018 LDP Bid document (for reference purposes)*

APPENDIX 1: DEVELOPMENT OPTIONS ASSESSMENT REPORT

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

The site assessment process undertaken by Officers comprised an assessment of sites against a sustainability checklist and used the outcomes of the strategic environmental assessment to inform the decision on whether a site was suitable. Site B0914 has been assessed and identified as 'undesirable'. The tables below provide a review of the officer's assessment, and reconsider the site scoring of the proposed site. The table includes the score given by Officers, and a 'Proposed Score' reflecting the additional justification provided in the table.

Table 1: B0914 Craigton Road South Sustainability Checklist Review Assessment

Criteria	Officers Score (max. 3)	Proposed Score	Justification
Exposure	3	3	The site is well protected by established tree belts.
Aspect	3	3	The site is south facing.
Slope	3	3	The site is gently sloping.
Flood Risk	3	3	SEPA maps indicate no flooding on the site.
Drainage	3	3	The site is well drained.
Built/Cultural Elements	1	3	<p><i>MIR analysis suggests that location in the Pitfodels Conservation Area should reflect historic development pattern of large country houses set within large plots. It also mentions the derelict cottage and walled garden on site and Pitfodels House and Viewbank House to the south.</i></p> <p>See section 2 of the main response. This site is an extension of the City, includes brownfield elements and retains the majority of woodland on and off-site. Areas to the east, also within the Conservation Area, have recently been developed and the form of development in the immediate area is mixed. The scoring should reflect this.</p>
Natural Conservation	1	3	<p><i>MIR analysis suggests an ancient woodland designation off site to the south west, no TPOs but trees protected as a result of location in the Conservation Area, mature trees on site, Green Belt and Green Space Network and potentially designated species on site.</i></p> <p>See Section 2 of the main response. Woodland off-site is not relevant, existing woodland needs managed to improve its lifespan and the majority of that woodland is not within the site in any event.</p> <p>A green Belt review is probably required but any greenfield site proposed to be allocated will require the removal of Green Belt land from that zoning.</p> <p>Green Space Network does not rule out development and the site could be designed to strengthen north-south</p>

			<p>green links. Green Space Network could be integrated into the design as GSN regularly covers existing areas that include development. It's also worthwhile noting that the now developed sites immediately adjacent to the east were previously GSN.</p> <p>Designated species surveys at the planning application stage would determine if there are any issues but the main natural woodland spaces are being retained. None of these issues would rule out development.</p>
Landscape Features	2	3	<p><i>MIR analysis suggests that linear tree belt features and central clump of trees and existing stone dykes will be affected.</i></p> <p>Significant on-site woodland will be retained, and the site can accommodate new compensatory woodland planting where required. Stone dykes will be retained or relocated to maintain site characteristics.</p>
Landscape Fit	1	3	<p><i>MIR analysis suggests that the site forms part of the Green Belt buffer between Braeside and Cults, and that areas of open space are typical of the Pitfodels Conservation Area and Lower Deeside Landscape Character Type and Dee Valley Landscape Character.</i></p> <p>This is not a typical area of open space for the Conservation Area. It includes large electricity pylons and areas of previously developed land in parts. Much of it is screened by woodland that is intended to be retained. The site also has a history of horticultural use.</p>
Relationship to existing settlement	3	3	<p><i>MIR analysis recognises that the proposed settlement pattern would be similar to the existing modern settlement pattern.</i></p>
Land Use Mix / Balance / Service Thresholds	2	2	<p><i>The MIR review recognises that the development would add additional care and employment facilities to the area.</i></p>
Accessibility	2	3	<p>A bus stop is located within 400m of the site. The other housing bids on this site scored 3 on this issue. This bid should be scored the same.</p>
Proximity to facilities / shopping / health / recreation	3	3	<p>Agreed</p>
Direct footpath / cycle connection to community and recreation facilities and resources	3	3	<p>The site has good access including core path access.</p>

Proximity of employment opportunities	3	3	Due to the nature of the proposals access to services is not considered to be a constraint.
Contamination	3	3	No known contamination.
Land Use Conflict	3	3	No known land use conflict.
Physical Infrastructural Capacity	3	3	Infrastructure available.
Physical Infrastructure Future	2	3	<p><i>MIR analysis seems to mark this aspect down as it not currently available but could be available.</i></p> <p>As a site immediately adjacent to the existing built up area of Aberdeen it will be reasonably straightforward to provide adequate infrastructure, especially for a site of this scale.</p>
Service Infrastructure Capacity	3	3	Agreed
Other Constraints	2	2	<p><i>MIR analysis suggests that there are pylons running east to west across the site.</i></p> <p>There are pylons but these are not an absolute constraint on development. That pylon line already runs across the City's built up area to the north east, essentially through existing housing areas.</p>
	53	61	



DRUM
PROPERTY GROUP
DEVELOPMENT & INVESTMENT

LAND AT CRAIGTON ROAD/AIRYHALL ROAD, PITFODELS

LOCAL DEVELOPMENT PLAN BID
MAY 2018

PREPARED BY HALLIDAY FRASER MUNRO FOR DRUM PROPERTY
GROUP



EXECUTIVE SUMMARY

The purpose of this document is to support the Local Development Plan bid submission, which has been prepared on behalf of Drum Property, the developer by Halliday Fraser Munro Architects and Planning Consultants

The site on the south side of Craigton Road, Pitfodels offers an excellent opportunity for a high quality environment to house semi-urban uses of a garden centre and a care home . An obvious extension to Aberdeen westwards of the recently completed care home and Bancon Development it respects the site and its context. It also provides the new development with a setting that can enhance the development users' quality of life by providing direct access to green spaces.

The proposals presented in this document have been developed following a review of the site, planning context, an analysis of the opportunities and constraints of the site with the integration of new development as an appropriate extension to the Craigton Road, allowing a new land use whilst respecting the character of neighbouring green belt.

Drum Property Group pride themselves on quality of their developments and will continue to embrace that in the delivery of new environment on this site.

An essential element of quality of life is location, quality of the landscape that development is set within and the convenience of access to facilities and jobs locally. This site will deliver on all of these.

“The vision for the Land at Craigton Road, Pitfodels is to create a limited expansion westwards from Aberdeen’s urban edge, respecting the setting and landscape character of the Pitfodels Conservation Area”

1.0 SITE DESCRIPTION

The bid site is located between Craighton Road and Airyhall Road, within the Pitfodells Conservation Area .

The site sits south of Craighton road, Robert Gordon College's playing fields, areas of stone wall and a covered raised reservoir; It sits to the north of Woodbank (Shell social and sports club), the Marcliffe Hotel and the International School campus all of which front onto North Deeside Road; and immediately to the west of the adjacent Airyhall House and Northcote Lodge care home development.

To the west of the site are open fields, limited housing and beyond that the residential development at Woodland Gardens.

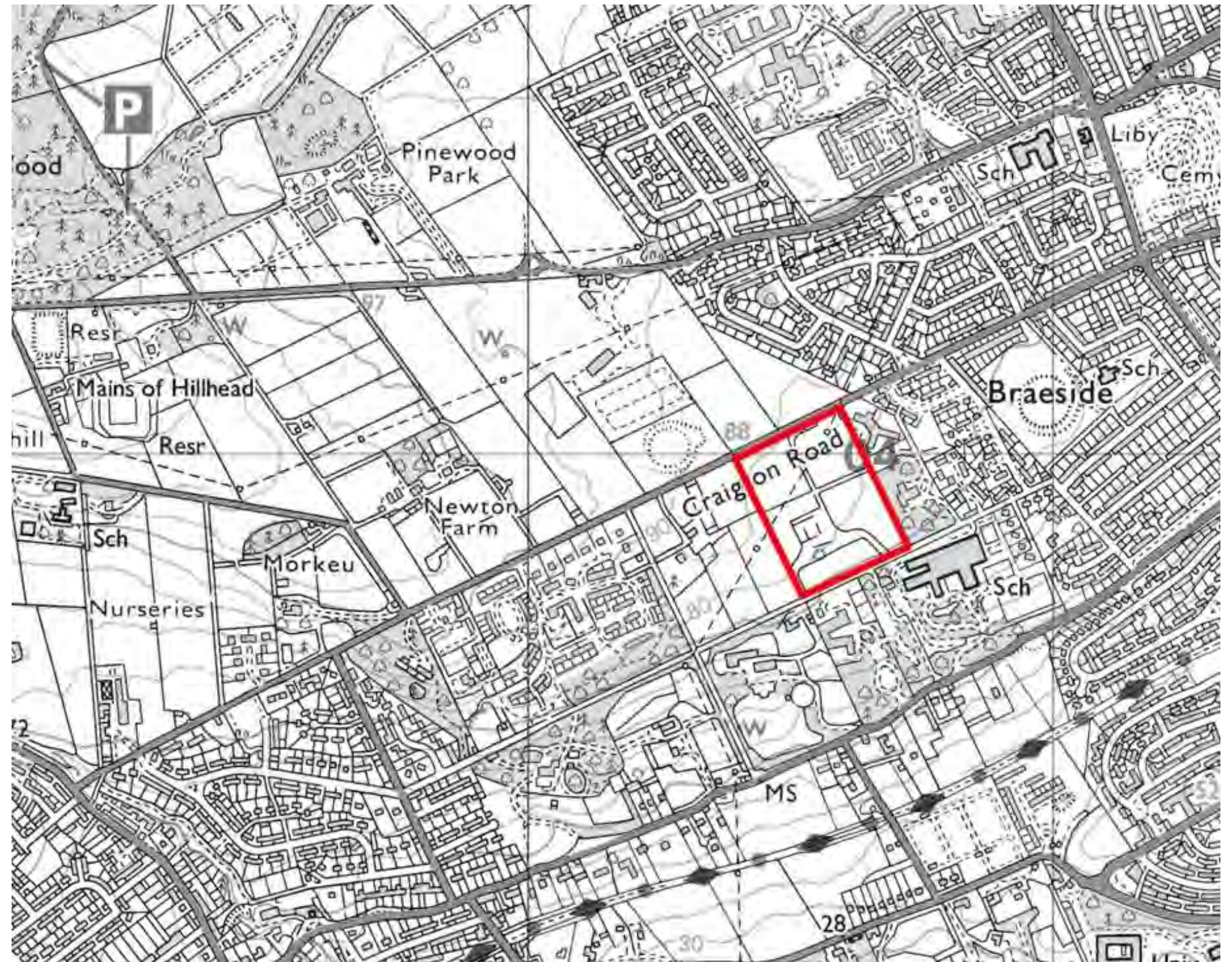
The existing unused agricultural land extends to 6.62 ha and comprises a redundant steading building to the north, the remains of a walled garden towards its centre and a paddock to the south of the site.

The proposed site includes avenues of mature trees and woodland. These provide a wooded character to Airyhall Road and screen the majority of views south from the site. Woodland is generally to be retained but will be subject to full detailed review if allocated to allow proper management and protection of the woodland resource.

The site is diagonally traversed by a 33kV overhead power line running from the north east to south west. The site is generally flat, falling gently to the south towards Airyhall Road. Main access to the site would be taken from Craighton road.

The two large residential areas of Cults and Aberdeen are a complex mix of urban and urban fringe land-uses creating the general area character of the proposed development.

The site offers opportunities for development of a garden centre on the eastern side and a new care home adjacent to the existing care home in clear pockets that would retain much of the site character and respect its location with the Pitfodells Conservation Area.





The redundant steading building to the North of the site - (Source: Google Maps)



View to the site from Craigton Road- (Source: Google Maps)



Robert Gordon Play ground opposite the site - (Source: Google Maps)



The southern boundary of the site (Airyhall Road)- (Source: Google Maps)

2.0 PLANNING CONTEXT

Planning History

This partial brownfield site has been the subject of previous LDP bids but as part of a much larger land parcel for housing use. This bid, however, is now on a much reduced site and excludes land to the west. Elements of the justification from ACC (see below) for not including the site previously have been considered in preparing this bid.

Issues previously considered:

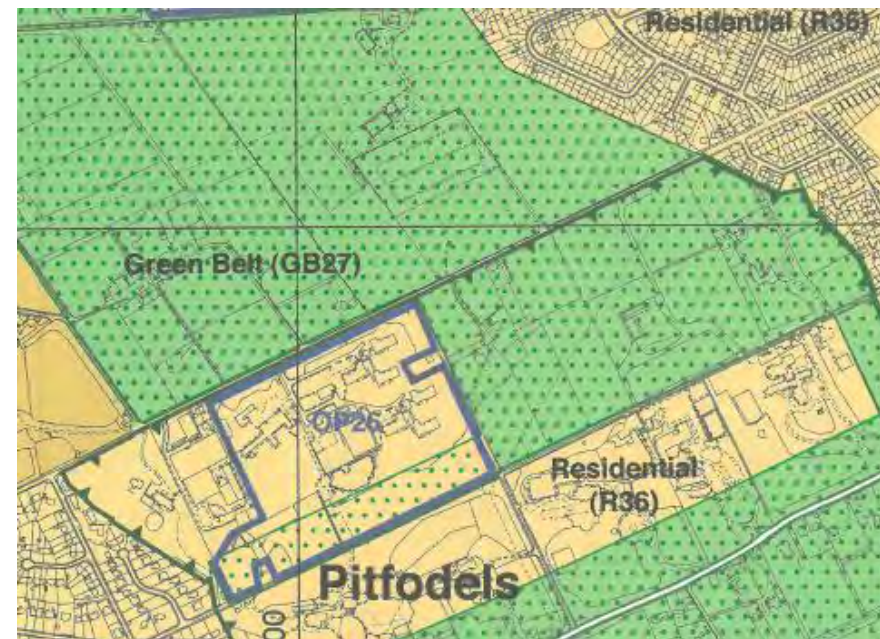
- Separation and coalescence
- Trees
- Architectural features
- Established wildlife and recreational functions
- Housing numbers

These have all been reconsidered in this bid.

Land use zoning and Function

It's quite clear that the function of this part of Aberdeen has altered over the years and the zoning in relation to that function has also altered. The series of extracts below show that this area has altered over the last few LDP reviews.

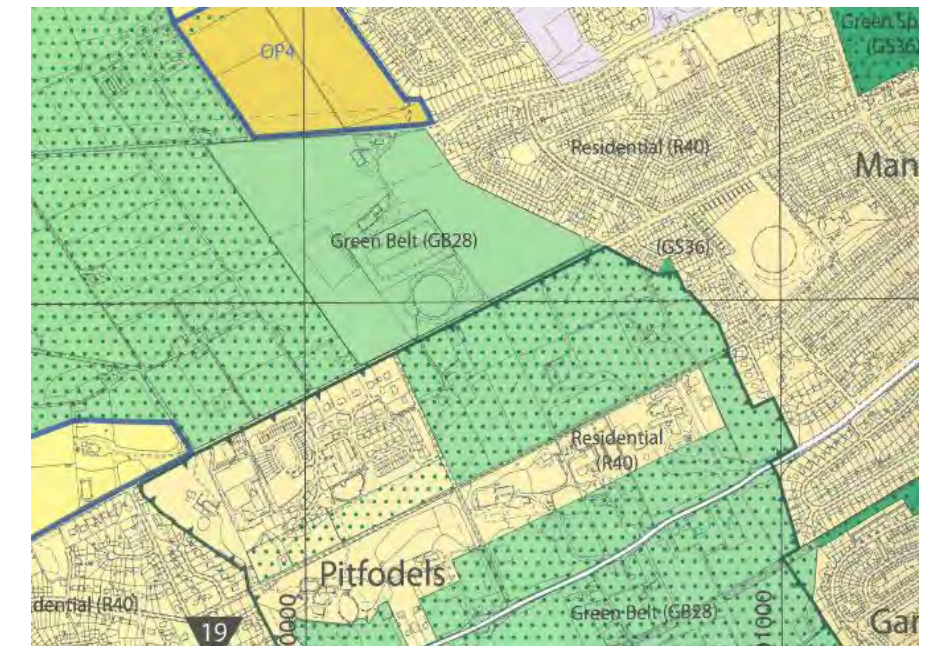
2004 Finalised Local Plan



Whole site identified as green belt and green space network. Land

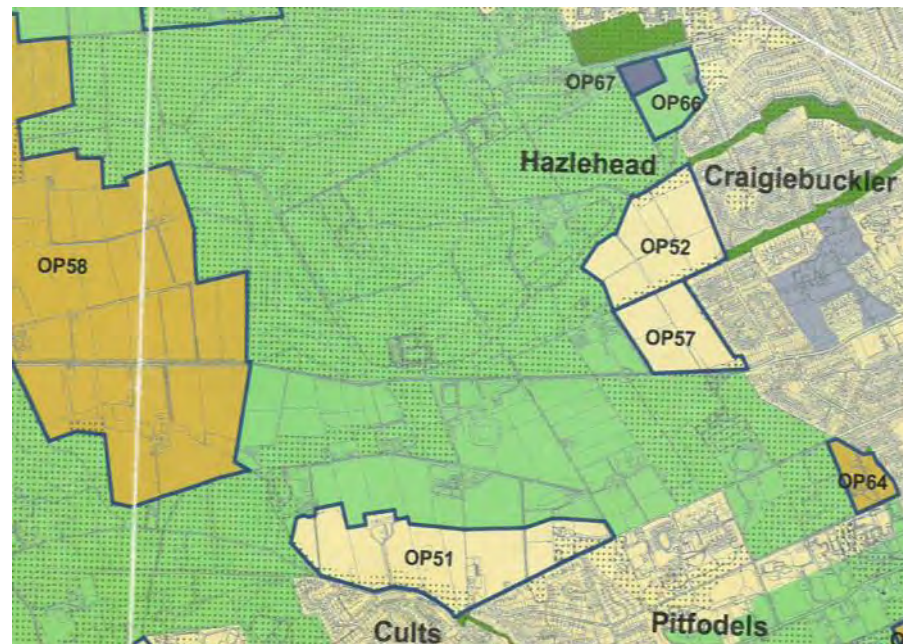
to the south allocated for low density housing protecting landscape and tree belts.

2008 Finalised Plan



site remains unallocated but land to the north is removed from the

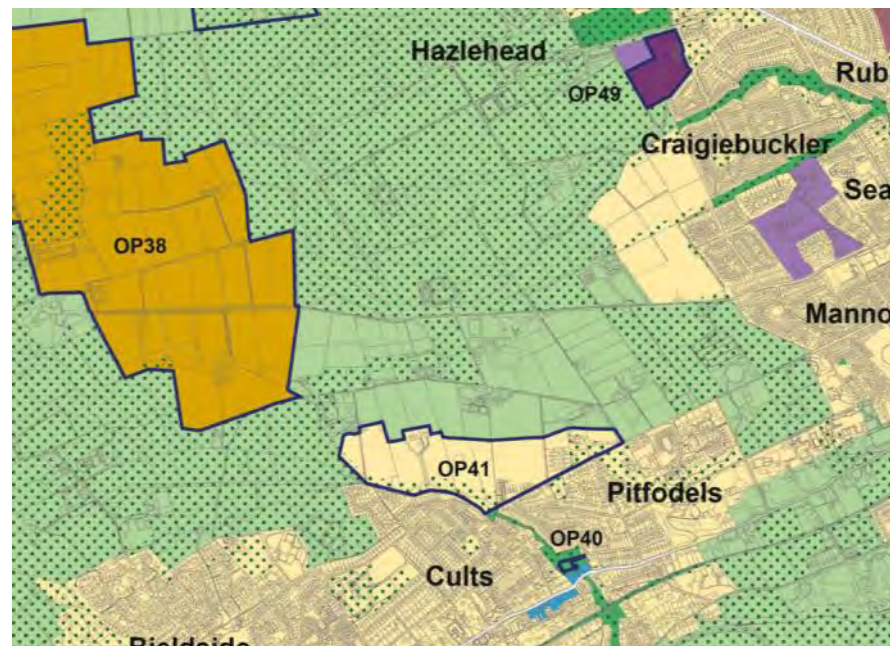
2012 Local Development Plan



The land immediately to the east (previously allocated as green belt and green space network) with a similar character to the proposed site is zoned as OP64, an opportunity for development of 20 homes on a Council owned site.

The inclusion of OP64 in 2012 ALDP has extended the edge of the city further to the west and now immediately adjacent to this site.

2017 City Local Development Plan



The current LDP identifies this area as Green Belt and Green Space Network, within the Pitfodels Conservation Area and closely related to Core Paths.

Allocating this site for development would require a rezoning away from Green Belt but this would not be unusual in a local development plan review, especially one where greenfield housing states of 100 units as less are being encouraged. Developing the site, however, would retain the key important landscape elements.

The 2017 LDP allocates Friarsfield as a development site (OP41—29.2 hectares for 280 homes). This established the Friarsfield area as a housing development zone in the current land use strategy for the City.

GSN does not rule out development but requires that it considers the character and function of the GSN in that area. In this case it is the woodland avenues that define the character. These will be protected if this site is allocated. The types of uses proposed are also commonly found on sites where open spaces and access to them is available. Garden centres in particular require outdoor space in areas that are also close to their potential customers to provide convenient and sustainable access options.

Planning Review Summary

The proposal for the Craigton Road bid site will have very little impact on the landscape and the character of the wider area.

It would retain on site woodland and landscape buffers to the north and south to help retain the woodland character to the to the south of the site.

Land Use Zoning

The site is presently zoned as Green Belt and Green Space Network (GSN). Green Belt release is required to meet the Council's stated request for new greenfield sites of 100 houses or less. The Local Plan Review process is the mechanism where such releases can be considered. Green Belt policy protects land for 4 main reasons. These are:

- to maintain the distinct identity of Aberdeen and the communities within and around the City;
- to safeguard the Green Belt to help avoid coalescence and sprawling development on the edge of the city;
- to maintain Aberdeen's landscape setting and
- to provide access to open space.

Identity - This area of Aberdeen has changed considerably over recent years. The land immediately to the east is now built out and land to the south now includes the relocated International School. Retaining landscape buffers to the north and south would help retain the identity of this part of Aberdeen that can be characterised as development set within the landscape.

Coalescence and Sprawling Development - The site does not create coalescence or sprawling development for the same reasons as set out above. Aberdeen has already expanded westwards in **this** vicinity and the restricted scale of this development together with the proposed landscape treatment would not create coalescence or sprawling development.

Landscape Setting - The landscape setting of Aberdeen is not undermined by this proposal. The site is a field with a large pylon crossing it and woodland avenues set to the south and west. Developing this site with appropriate landscape treatment, retaining and managing the woodland and introducing development-free zones to the north and south will maintain, and in terms of the woodland will improve, the contribution to the local landscape from this site.

Access to Open Space - The site is presently used informally by local residents, in the main for walking their dogs. Development of the site will include a more formalised path network that can improve access to the managed and improved on-site open spaces (e.g. the walled garden) and safer access through the site to local core and other path networks. The proposal will alter the type of open space available on site but provide easier, safer and more formalised footpath networks to that open space.

This review has not identified any concerns in relation to the function of the Green Belt for this bid site. The rezoning of this specific bid sites from the Green Belt would not undermine its overall purpose.

Policy NE1 – Green Space Network does not rule out development either. Where development would impact on GSN it requests that such development "... *maintain and enhance the coherence of the network. In doing so, provision should be made for access across roads for wildlife and outdoor recreation.*" (page 67, 2017 LDP). That can be achieved here and would be a similar approach to that taken on the residential zoned land immediately south of this site.

Indeed the uses suggested in this bid and shown in the indicative site plan would retain much of the site's character. The garden centre in particular would make use of a presently underused set of fields for horticultural associated uses.

Planning and Design

At a national level the Scottish Government are pursuing design quality agenda. They are promoting 6 essential qualities of place:

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

Drum Property Group pride themselves on quality of their developments and will continue to embrace that in the delivery of housing on this site.

An essential element of quality of life is location, quality of the landscape that development is set within and the convenience of access to facilities and jobs locally. This site will deliver on all of these for the neighbouring community and residents of the proposed care home.

3.0 SITE CONTEXT

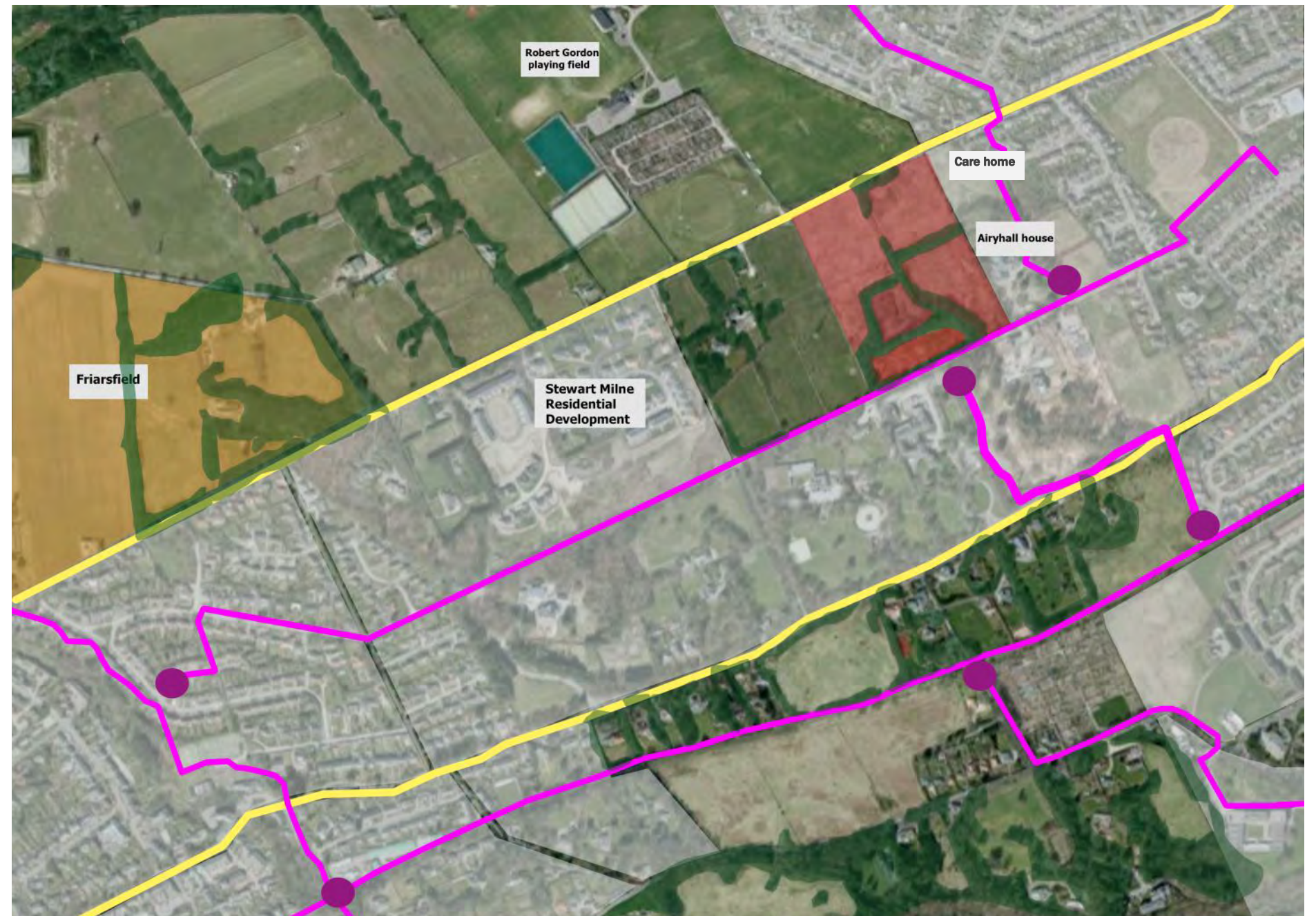
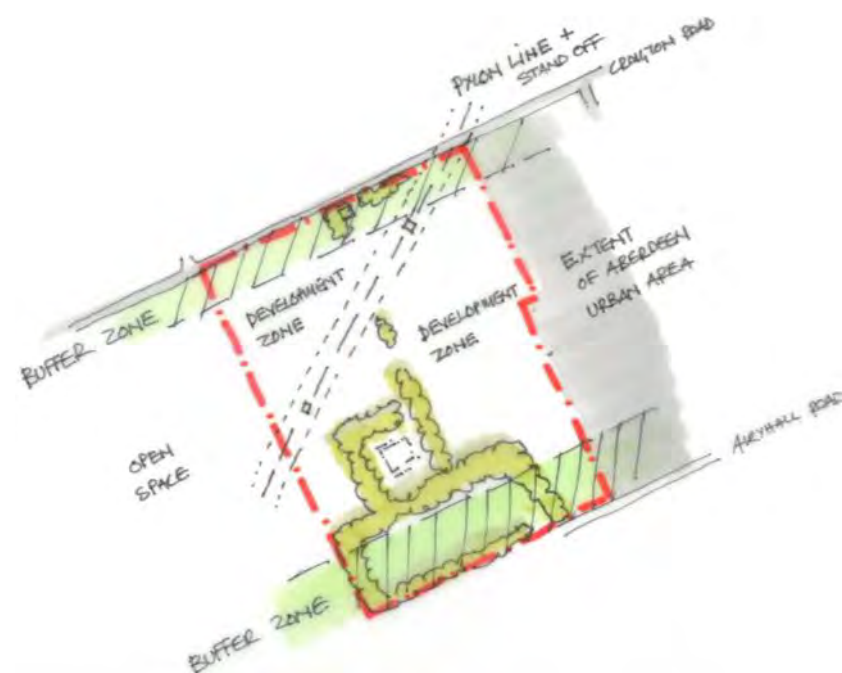
The Urban Area Character Area mainly comprises the areas of Craigiebuckler Braeside, Mannofield, Kaimhill and Garthdee in Aberdeen to the south and east of the site and the eastern component of Cults to the west of the site. Land around the site is primarily residential and educational land-use with a mix of building types and styles in a range of materials .

Plot sizes tend to be large to the south of Airyhall road although development is denser in the areas immediately to the east.

The proposed development site lies within an area that has been designated as Green Belt in the Aberdeen local plan although this full review of the Local Development plan is the opportunity to review that zoning.

Allocation of this site will lead to the rezoning of a partially brownfield site for much needed residential use.

It is not considered that urban coalescence will result from development of the Craighton Road site or that developing the site will materially affect the overall role of the Green Belt in this part of Aberdeen.









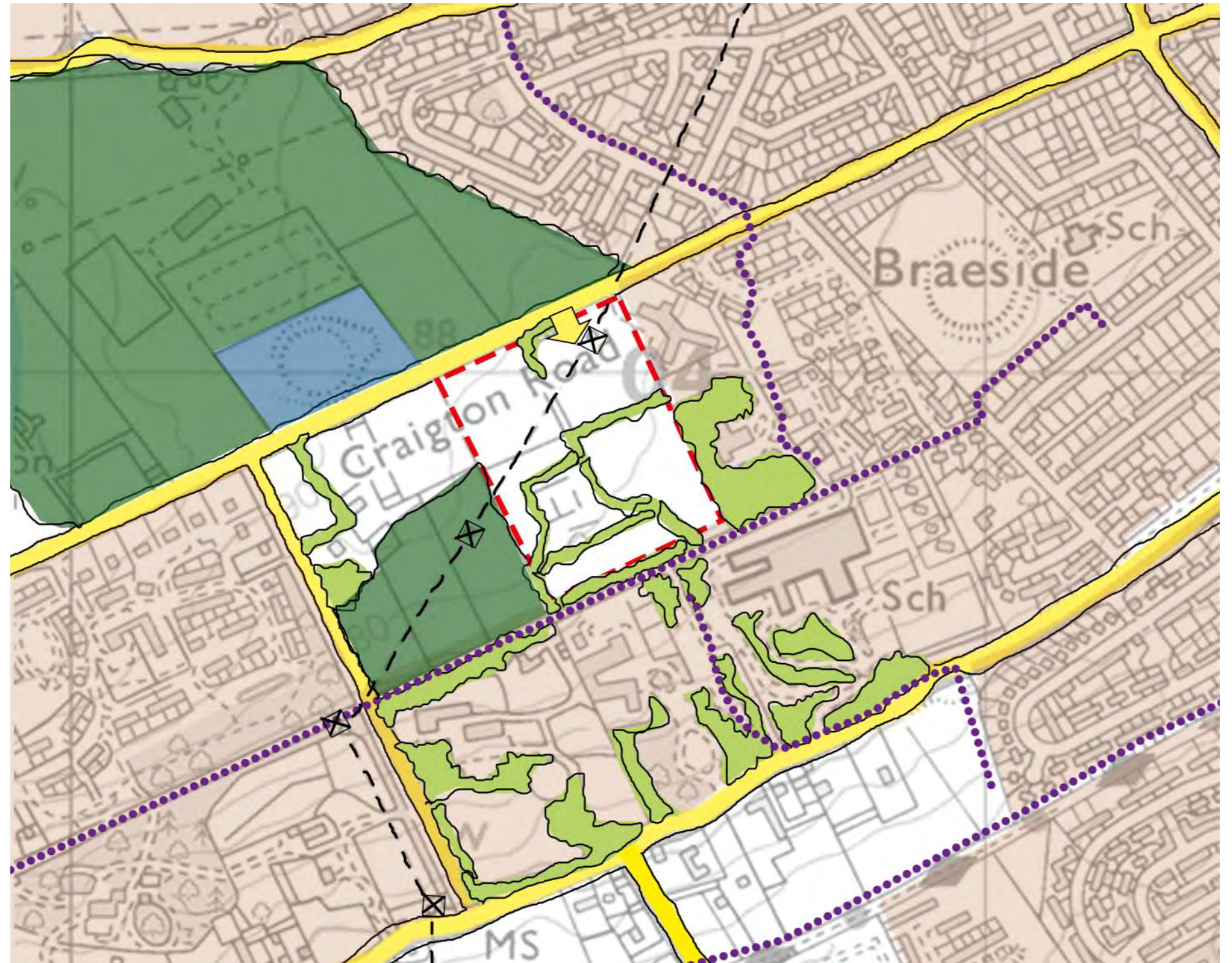
- Existing Roads and paths
- The bid site
- LDP zoned site
- Core Path
- Aberdeen Urban Area

4.0 SITE ANALYSIS: OPPORTUNITIES AND CONSTRAINTS

Opportunities and Constraints Key

1. **Existing Road and Path Network** The site sits between Craighton Road to the north and Airyhall Road to the south with good access to roads and path networks
2. **Site connectivity** The site has excellent connections to the Core Path network
3. **Green Belt and Green Space Network** The site is identified within green belt but should be reconsidered through the current LDP review.
4. **Mature Trees and Woodlands** There are mature trees and woodland within the site. These can provide distinct character to the proposed development and will be protected. They are not a significant constraint.
5. **South Facing** - making the most of opportunities for solar gain
6. **Conservation Area** The site lies within the Pitfodels Conservation Area. This does not preclude development but will require a greater design focus.
7. **Overhead lines** Large pylons cross the site in a north easterly direction have been considered in this bid

-  Site
-  Existing Roads and paths
-  Core Path
-  Reservoir
-  Green Space Network
-  Access potential



5.0 DESIGN CONCEPT AND INDICATIVE SITE PLAN

The land at Craighton Road, Pitfodels represents a deliverable, considered extension to the existing urban edge. The bid site is under the control of Drum Property Group and is immediately available for development with no constraints. The site can be accessed via Craighton Road to the north (main access point) and to the south by Airyhall Road (emergency access point).

The proposed design concept includes a landscape buffer to north and south to reflect the findings of previous LDP reviews and maintain the open visual nature of the edges of the site as seen from Craighton Road and Airyhall Road. The includes a garden centre to the north west of the site and a residential care home adjacent to the existing care home to the east of the site.

Woodland will generally be retained with the main access taken from Craighton Road.

- Limiting the development to the clear pockets
- Retaining woodland on site
- Landscape buffers north + south
- Access from the north/Emergency access to the south
- Extensive on-site open space + path networks
- Appropriate stand off from existing trees



6.0 CONCLUSION

The site is an obvious extension to the existing development to the east and through careful design can create a new but limited extension to the City that respects its setting. The site is accessible by a range of transport modes and close to a large populated area of the city, enhancing the sustainability of the proposed uses.

The success of the adjacent care home and the continuing demand for such facilities suggest that more sites will be required to house such developments across the City. The site lends itself to this use and could provide extensive access to the open spaces, recreational walks and local facilities. This use is already established immediately adjacent.

Garden centres by their nature are best located in green areas close to the urban area. Their space requirements and horticultural focus mean that growing and outdoor space is essential. They offer other services too that are easy to access if located, as this is, close to population centres and within easy walking distances of those.

The proposal would not have adverse impact on trees and the surrounding green space network. Therefore, the use of part of the site as a garden centre business is entirely compatible with the area character.

Both uses would respect the setting and landscape character of the wider area of Pitfodels Conservation Area.

These uses would also contribute to creating sustainable mixed communities by providing local facilities, local job opportunities and services in an area that is predominantly residential.

The site is therefore proposed to be zoned for a combination of care home and garden centre.

‘Land at Airyhall Road/Craigton Road, Pitfodels is suitable for Garden Centre and Care Home Centre that ...

- Has good connections to the urban edge
- Will respect the landscape and conservation setting
- Retains and manages woodland
- Adopts the 6 qualities of a successful places promoted by The Scottish Government
- Takes access from Craigton road rather than Airyhall (emergency/secondary access only)
- Has clear defensible boundaries;
- Has good access to local footpath networks and urban area of Aberdeen; and
- Will respect the local context and setting