



# Aberdeen Local Development Plan Review

## Main Issues Report Response Form 2019

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

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

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

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

Responses to the published documents can be:

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

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



## YOUR DETAILS

Name	Michael Westwater
Organisation (if relevant)	Halliday Fraser Munro
On behalf of (if relevant)	Cognito Oak LLP
Address	
Postcode	
Telephone	
E-mail	

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

If yes, please provide an e-mail address

### PRIVACY STATEMENT

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

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

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

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

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

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

### YOUR DATA, YOUR RIGHTS

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

## YOUR COMMENTS

<p>Which document(s) are you commenting on?</p>	<ul style="list-style-type: none"><li>• Main Issues Report</li><li>• Strategic Environmental Assessment Environmental Report</li><li>• Monitoring Statement</li></ul>	<input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input checked="" 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 attached report setting out in detail the representation to the MIR.

**YOUR COMMENTS CONTINUED**

**ABERDEEN CITY LOCAL DEVELOPMENT PLAN  
RESPONSE TO THE MAIN ISSUES REPORT  
LAND AT CLOVERHILL, MURCAR, BRIDGE OF DON  
B0220**

**MAY 2019**

On behalf of  
COGNITO OAK LLP



**HALLIDAY FRASER MUNRO**  
CHARTERED ARCHITECTS & PLANNING CONSULTANTS



**HALLIDAY FRASER MUNRO**  
CHARTERED ARCHITECTS & PLANNING CONSULTANTS

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Appendix 1 – Proposed site concept layout

Appendix 2 – Savills Aberdeen Commercial Property Market Report



# HALLIDAY FRASER MUNRO

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## 1. Introduction

- 1.1. This report has been prepared by Halliday Fraser Munro, Chartered Architects and Town Planning Consultants on behalf of Cognito Oak LLP, a joint venture between Henry Boot Developments Limited and Wraith Real Estate Limited. It is written in response to the Aberdeen City Local Development Plan Main Issues Report 2019 (MIR).
- 1.2. At the 'Call for Sites' stage in May 2018 a development bid was launched for the land at Cloverhill, Murcar, Bridge of Don identifying the potential for a major residential led mixed-use development in the area.
- 1.3. This representation specifically relates to MIR site:
  - B0220 – Residential (500-600 units), Employment, Community uses.
- 1.4. This report seeks to provide a reasoned and evidence-based justification for a change of use to the current employment land allocation of the site within the proposed plan. Key considerations identified in this report include the specific merits of the site as a viable and deliverable development opportunity, key concerns relating to the officers' assessment of the earlier BID submission and SEA scoring and highlighting concerns with the Council's preferred approach to their housing land strategy and policies going forward. This includes highlighting specific concerns to Question 1 (New Housing Sites) in Section 2 the MIR Settlement Strategy – Housing Allowances and New Sites.

## 2. Site Context and Area Overview

- 2.1. Bridge of Don has grown to be one of Aberdeen's largest suburbs and is a popular place to live. This site is located to the east of the main residential area, between it and the coast, whilst the Core Business Park offers an eastern boundary to this site. In terms of location, the site sits within the urban area, on a site zoned for development and close to residential, employment and the coastal recreational areas. The site area extends to approximately 22 Hectares (56 acres). The Denmore commercial centre is located a short distance to the northwest of the site and employment opportunities sit to the northeast, west and south.
- 2.2. 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. The recent de-trunking of the A92





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adjacent to the site is having a major positive impact on the opportunity presented by this site and supports its rezoning. The A92 can provide direct access to the site via a new junction that will also allow for improved and safe access to the site for pedestrians and cyclists. Linking the site safely across the dual-carriageway will help the Council achieve local aspirational Core Path links identified in the current LDP and could contribute towards vastly improved access to the coastline for the existing community. A speed limit reduction on the A92 will make this road considerably safer and easier to achieve appropriate crossing opportunities.

- 2.3. At present the land at Cloverhill forms part of an expansive concentration of allocated employment land, located at one of the main arrival points into Aberdeen in northeast of the city. This area forms the southern part of the more 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.”** “Central to Energetica is a 30-mile corridor .... which will create a concentration of energy technology companies, **housing and leisure facilities** and offer a tremendous opportunity for powerful growth, diversification and continued prosperity building on the solid knowledge and technology developed around the oil and gas industry.” Therefore, 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”**.
- 2.4. The site at Cloverhill was first allocated for employment land in 2008. That allocation has been maintained through to the current Local Development Plan. It was originally zoned to cover the period from 2000 to 2010 and was considered to have a lifespan of between 15 and 20 years depending on market demand. The City’s development land requirements are clearly in a different place than was the case in 2008 and this site is now more appropriately considered for new uses.
- 2.5. By way of example, to the northeast of the site lies Phase 1 of the Core Business Park which was first granted permission in 2009 and has been slowly developing out with three business units completed on the site to date. The remainder of phase 1 and a further three phases of that business park have yet to be delivered. Land to the north is allocated as LR1 – Land Release for a further potential 27 Hectares of Employment Land between 2027 and 2035. Development of the surrounding business parks has been significantly slower than originally anticipated, the consequence of unforeseen economic and market issues outwith the control of developers and which have affected both the Aberdeen area and wider Scottish markets over the last 10 years. This is relevant to the current overprovision of employment land across the city and wider sub-region. To the southeast of the site lies the Aberdeen Energy Park, which whilst more established, has been expanding northward towards the Core, but has equally been hampered by slower growth than anticipated.
- 2.6. The site is presently used for agricultural purposes and forms part of a wider coastal landscape setting. The land is generally flat and has low value as a local landscape area. There are no Local Nature Conservation sites within proximity. The central and south western part of the site is classified as Green Space Network that is linked to three other Green Space areas. Whilst the site is greenfield in nature, the principle of developing on the site has been long established.



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- 2.7. The site has no technical constraints that would prevent its early development. A series of technical assessments have been carried out at BID stage and subsequently to support the upcoming planning permission in principle application which is being submitted in parallel to this LDP submission.
- 2.8. Bid B0220 is not currently a 'preferred' development option. The Officers' view and associated issues will be examined in more detail in section 3 of this report, however we are concerned that there is a reluctance by the Council to allow for appropriate development in the city, despite the strong demand for new housing development in the area. The Bridge of Don and the Energetica Corridor area is central to the area's development strategy and there is a requirement to support its delivery and vitality by accommodating a broader mix of uses and activities and to ensure there are enough homes being delivered close to jobs for people looking to live in the city.
- 2.9. To summarise, this proposed site is already allocated for development in an area of growth, is highly accessible and able to access jobs, local facilities, is constraint free, available and developable.

### **3. BID Submission and Development Proposals**

- 3.1. The submitted bid considered the character and context of the Bridge of Don and the subject site setting out the reasons why development would be considered sustainable and deliverable in this location. The proposed bid site is not subject to any technical, or environmental planning constraints. This is reflected in the site's allocation for development in successive development plans since 2008.
- 3.2. Following the original BID submission, the proposals for the site have continued to evolve, informed through formal pre-application discussions with Aberdeen City Council and more recently a Proposal of Application Notice and Screening Opinion. Engagement with local residents and businesses, Bridge of Don Community Council and Bridge of Don Thistle Junior Football Club, including two public consultation events has taken place. Both verbal and written feedback has been received through this process and this has also significantly helped to shape the current proposals. The vast majority of the feedback and comments received to the public consultations have been positive, with many respondents focused on the following issues:
  - A desire to see an all-weather sports facility included in the proposals;
  - A recognition that both market and affordable housing is required in the Bridge of Don;
  - A request for more affordable housing to be included;
  - Support for more community facilities and shops locally;
  - Concerns around traffic and a desire to see a pedestrian crossing and reduced speed limit delivered;
  - A preference for housing as opposed to continued concentration of business uses on the site;



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- A desire for more useable green space in the local area.
- 3.3. Most recently discussions have been held with the Council’s Masterplanning team regarding appropriate design solutions in anticipation of submitting a planning application in the very near future. A series of detailed technical reports have also been prepared for the site on issues including Archaeology, Noise Assessment, Habitats and Tree Surveys, Transport and Drainage Impact Assessments. This demonstrates the commitment Cognito Oak LLP has to progressing development on the site. An up to date and current proposed site layout concept diagram is attached at Appendix 1 for information.
- 3.4. The Vision for Cloverhill remains, to *“create a new sustainable coastal community, sitting between the Bridge of Don and Aberdeen beach, providing a high quality, sustainable and healthy lifestyle for its residents, businesses and the wider community”*. However, a key change from the original BID proposals relates to the Ellon Road frontage of the site where Class 4 employment uses had been proposed. This element has been removed following discussions with multiple stakeholders. Proposals for a community recycling centre have also been removed following ongoing discussions.
- 3.5. Key Elements of the proposals are now as follows:
- **Housing**—The site could support a mix of housing types and tenures, including affordable and low-cost options. Approximately 500-600 new homes could be accommodated with other uses contained within the Landscaped Boulevard. This could include up to 5% bungalows and more than 25% affordable housing. This will enable 2<sup>nd</sup> and 3<sup>rd</sup> generation residents to stay in the area, who would otherwise be priced out of owning a home.
  - In line with its location within the Energetica Corridor, Cloverhill will seek to incorporate a range of technologies and construction methods to deliver energy efficient homes.
  - **Community Benefits**—The site could offer benefits for the wider community in the form of open space including an all-weather sports facility, local shops and cafes, new footpath connections and land for community facilities.
  - **Main Street**—Avenue on the edge of the Landscape Boulevard links potential access points, open spaces and mixed use and residential areas
  - **Street Hierarchy**—Secondary streets connect the Main Street with key open spaces, whilst lanes enhance connectivity and remove cars from key frontages.
  - **Linear Park**—Centrally located park forms core element of public open space and contributes towards an aspirational connection between existing residential neighbourhoods, the site and Aberdeen coastline (identified by Aberdeen City Council in their core path network).
  - **Main Square**—A main square provides an urban focal point within the Linear Park and is located on a key crossroad in the street framework.
  - **Silverburn Park**—A secondary park offers a distinct and ecologically diverse public open space within the identified Landscape Boulevard zone.



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- **SUDS**—Potential SUDS areas could be integrated within the landscaped Linear Park and North Park.
- **Landscaped Boulevard**—Opportunity for mixed use zone on Ellon Road, with strong landscape delineation. Follows existing land use patterns and shelters residential use. Buildings and landscape enhance the arrival sequence into Aberdeen and the site.
- **Access**—Potential access points have been identified on Ellon Road. The Primary access would be centrally located at a key core path / pedestrian crossing point. A secondary access could be provided to the south, with options to be formed as left in / left out arrangements.
- **Cycle / Pedestrian Movement**—Pedestrian movement has been prioritised, with a particular focus on potential movement from west to east (following the aspirational core path AP1).
- **Public Transport**—The development would provide opportunities for increased public transport frequencies or new public transport routes to be developed internally within the site.
- **Ellon Road**—The speed limit on the A90 Ellon Road would be reduced to 40mph and the character of the road would replicate that of the existing 40mph A956 Ellon Road to the south of the site. The Primary access junction could incorporate pedestrian crossing provision ensuring safe crossing of the A90 Ellon Road from the site.

#### 4. Main Issues Report and SEA Comments

4.1. We are concerned that several important attributes have been set aside by officers when assessing the merits of development on the site in their preparation of the Main Issues Report. For example, we have concerns about the inconsistency of approach to assessing development proposals in the city and generalisations that have been made on a number of elements. The officers' summary and assessment of the BID states:

*"This site is allocated in the extant local development plan for business and industrial uses (OP2 Berryhill and Murcar). It is part of the 175 hectares of employment land allocated up to 2035. The overall allocations are more than required by the Strategic Development Plan however it is necessary to ensure that 60 hectares of employment land is available at all times. The site also contains a Development Framework that was approved as local planning advice in 2017. Residential and community uses development on the site is therefore considered to be undesirable as it would result in the loss of allocated employment land.*

*The Proposed Strategic Development Plan asks the Local Development Plan to allocate a limited amount of housing land. These allocations should take place on brownfield sites and utilise the current "constrained" supply in the first instance. Reducing travel distances and making walking, cycling and public transport more attractive to people will be important considerations, particularly for any new greenfield development sites that are proposed. In addition, allocations should be small scale in nature, and should not be extensions to any existing, strategic, development sites that have been subject to a masterplanning exercise. Local Development Plans are asked specifically to protect*



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*allocated employment land from other uses. Because of this, the allocation of this site for housing is likely to be contrary to the Proposed Strategic Development Plan.”*

- 4.2. This site, although not in line with the current proposed land use, **is already allocated for development** and offers multiple other positive attributes including:
- A long history of evaluation and consultation pointing to its acceptance as a sustainable and deliverable location and direction for future development.
  - Proximity to transport corridors to Aberdeen and surrounding towns and villages to the north and northwest supporting onward connections,
  - Proximity to existing services and employment opportunities available and the ability to complement and enhance these; and
  - Sustainable use of integrated infrastructure improvements.
- 4.3. Regarding the concerns around the loss of marketable business land. The 2017/2018 Employment Land Audit (ELA) identifies the wider (68.4Ha) OP2 area, which includes this site, as “marketable” employment land. Land at Phase 1 of the Core Business Park can be described as “marketable” as it benefits from planning consent and is partially developed. That is not the case for Cloverhill. This site has no planning permission in place for employment uses and is in separate ownership from The Core. As a result, the ELA should perhaps have identified Cloverhill as “established” employment land rather than forming part of the “marketable” employment land supply.
- 4.4. The 2017/2018 ELA reviews the supply and take up of employment land in the context of the Strategic Development Plan requirements for:
- 60ha of marketable land available in Aberdeen City
  - 60ha of marketable land available in the Strategic Growth Areas of Aberdeenshire
  - At least 20ha of this marketable land to be suitable for high quality business use/company headquarters
- 4.5. The ELA demonstrates that these 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. The ELA noted that “In Aberdeen City the level of established land supply has remained unchanged between April 2017 and April 2018 at 286ha.” Furthermore, it is worth noting that “there have been no completions on employment land sites in Aberdeen City over 2017/18 and the only site underway is the new AECC development, the construction of which has continued a second year.” (Source: 2017/2018 Employment Land Audit).
- 4.6. Cloverhill at around 22 hectares represents less than 10% of the overall marketable supply and less than 8% of the overall established employment land supply. Therefore, reallocating it from that supply would still retain more than 200 hectares of marketable employment land. That is equivalent to more than 300% of the Strategic Development Plan requirement. Rezoning Cloverhill for



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residential uses would not therefore impact on the City's marketable supply of employment land or undermine the overall employment land strategy.

- 4.7. The site also sits at the southern end of the Energetica Corridor where employment areas such as the Aberdeen Energy Park and The Core Business Park have been developing. The site at Cloverhill was first allocated for employment land in 2008. That allocation has been maintained through to the current Local Development Plan. It was originally zoned to cover the period from 2000 to 2010 and was considered to have a lifespan of between 15 and 20 years depending on market demand. Phase 1 of the nearby Core Business Park, which was first granted permission in 2009, has been very slowly developing just to the north east of the Cloverhill site. To date only three business units have completed on the site in the 10 years since it gained permission. The remainder of phase 1 and a further three phases of that business park have yet to progress. Land to the north beyond this is allocated as LR1 – Land Release for a further potential 27 Hectares of Employment Land between 2027 and 2035. To the southeast of the site lies the Aberdeen Energy Park, which whilst more established, is expanding northward towards the Core and has equally been hampered by slow growth.
- 4.8. Development of the surrounding business parks has been significantly slower than originally anticipated, the consequence of unforeseen economic and market issues outwith the control of developers and which have affected both the Aberdeen area and wider Scottish markets over the last 10 years. This is relevant to the current overprovision of employment land across the city and wider sub-region. A report has been prepared by Savills which analyses the Aberdeen Commercial Property Market which is attached as Appendix 2 to this report. This report includes a summary of the marketing of the land at and around Cloverhill in Bridge of Don. This concludes that:
- Demand for allocated business land in Aberdeen City has fallen dramatically since the fall in oil price in 2014;
  - Only 11 acres of land purchased in the last 5 years and supply reaching over 350 acres.
  - With the largest volume of supply of both office and industrial premises since records began, there is a depth of second hand (and speculatively built) stock that needs to be absorbed before demand for business land becomes a necessity.
  - Demand from occupiers and developers is expected to be for better connected areas such as Westhill and Dyce.
  - This has only been proven by the severe shortage of interest for Cloverhill from joint agents Savills and Shepherds since the site was introduced to the market in October 2018.
  - Despite marketing the site on platforms across the Country, only 2 enquiries have been logged for business use showing only vague interest in the land.
  - The site has now been allocated for 10 years with no development taking place.
  - In contrast, strong interest has been expressed in the site by a number of housebuilders keen to add additional locations to their existing offering and those currently unrepresented in the City.



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- 4.9. The removal of 22 hectares within this broader employment provision therefore would in no way be detrimental to the marketable supply or the objectives of the Energetica Corridor. The City's development land requirements are clearly in a different place than was the case in 2008 as is the nature and context of the site due to road improvements in the northern part of the city. This site should therefore be more appropriately considered for new uses to ensure that the Energetica Corridor continues to deliver new development in the short-medium term. We believe that the proposed vision and nature of the proposals fully aligns with the aspirations for this area.
- 4.10. *“Energetica provides attractive opportunities to invest in business facilities, leisure and housing with unique place-making planning guidance that will deliver energy efficient, high quality housing and communities among the best in the world. It is an integral part of Aberdeen City and Shire’s work to strengthen its position as a global energy hub, building on the region’s rich oil and gas heritage with opportunities for carbon capture and storage, hydrogen, onshore and offshore renewable energy.” (Source, Aberdeenshire Council website, May 2018).*
- 4.11. Energetica is therefore about more than an employment cluster. 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. Indeed, the delivery of this site for housing would make a positive contribution to the Energetica project, delivering a proportion of the housing required as part of Energetica's stated aim of creating **“a great place to live, visit, work and invest”**. Additionally, by bringing a critical mass of investment and people to this area, Cloverhill would act as a catalyst to reinvigorate the delivery of other aspects of Energetica's ambitious goals.
- 4.12. Instead, we would be concerned if the Council continued to implement more traditional, outdated and unsustainable methods of planning which seek to unnecessarily separate employment uses in concentrated and expansive estates that are distant from homes and other uses. This fails to recognise more modern principles of placemaking which seek to create sustainable, walkable mixed-use communities that generate activity and use day and night. It also sits at odds to the concepts promoted in Scottish Planning Policy, the National Planning Framework 3, Creating Places, Designing Streets and the objectives of the Energetica Corridor. There has also been significant under delivery of housing within the city area which is undermining the “live work” aims of the growth corridor that must be addressed for it to reach its potential. We provide evidence and a critical overview housing land strategy within Section 5 of this report.
- 4.13. The Council has suggested that the site would not comply with the proposed Strategic Development Plan's requirements on Local Development Plans. We set out in Table 1 below a series of responses to these requirements that should be taken into account in the future assessment of this site against the Council's policy requirements.



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Proposed SDP requirements on LDPs	Our response to these
Allocate a limited amount of housing land;	The reallocation of this site for housing would be a limited addition to the overall housing land supply.
Allocations should take place on brownfield sites and utilise the current “constrained” supply in the first instance.	<p>The site <b>is already allocated for development</b>, albeit for a different proposed use and should be considered before allocating any new sites.</p> <p>Relying on a current constrained supply will not allow the LDP to fulfil SPP requirements to maintain an effective supply of housing land at all times.</p>
Reducing travel distances and making walking, cycling and public transport more attractive to people will be important considerations, particularly for any new greenfield development sites	<p>The site is located on a main entry point and established transport corridor into the city from the north offering high accessibility potential by multi-modal forms of transport including enhanced bus services, cycle and footpath provision.</p> <p>Cloverhill is located close to employment land and established business parks offers the potential to co-locate homes and communities close to places of work helping support more sustainable lifestyles and reducing the need to travel.</p> <p>The site is fully deliverable and could make a positive and major contribution to addressing the city’s housing requirements in a desirable location where people would choose to live.</p>
Allocations should be small scale in nature	<p>The site could be considered small - medium in scale compared with some other allocations in the city and wider city region, for example at Grandhome, Chapelton and Countesswells.</p> <p>The typical arguments in favour of allocation of small sites apply equally to Cloverhill, in that it is a highly deliverable site with demonstrably manageable infrastructure and servicing requirements, with minimal barriers to delivery.</p>





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Should not be extensions to any existing, strategic, development sites that have been subject to a masterplanning exercise	<p><u>Cloverhill would not be an extension</u> to any existing, strategic, housing development sites that have been subject to a masterplanning exercise.</p> <p>Instead it would open up another site allowing other developers to deliver new housing at pace.</p>
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**Table 1 - Proposed SDP requirements and how these would be addressed**

4.14. Beyond the requirements of the Proposed SDP, the site also offers the following additional benefits which are expanded upon further in this report:

- It could support a mix of tenures and house types including much needed affordable housing;
- the small residential population in and around the site already can be consolidated and would benefit from co-location with new homes, improved points of access and infrastructure and new facilities and open spaces.
- development of the site would support the Council’s aspirations for east/west core path links between the beach and the existing community at Bridge of Don.
- de-trunking of the dual carriageway and proposed speed reductions will change the character of the area and creates the opportunity to better and more safely connect this area of land with the Bridge of Don.
- development would add new facilities to the area complementing and enhancing what is there at present to the benefit of the communities in the area and making the wider area more sustainable.

4.15. In addressing the Council’s MIR BIDs scoring matrix for the site, we would note some inconsistencies in approach and would respond to the lower scoring elements as follows:

4.16. **Exposure** - The points relating to the exposure of the site to the coast and the current lack of shelter from trees or landforms in this area, a landscape and visual impact assessment and a supporting landscape strategy have been prepared in support of the residential led development for the site. These have been prepared following feedback from Aberdeen City Council as plans for the site have evolved from the initial BID. These demonstrate the potential for landscape enhancement on the site providing a combination of structural and useable greenspaces increasing the shelter of the site for potential residents.

4.17. **Aspect** - In relation to the concerns relating to the east facing aspect of the site, we are unclear how the scoring is reflective that the site is proposed for development already and how a change to predominant residential use would specifically affect this?



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- 4.18. **Flood Risk** – The Council note that the Silver Burn flows across the southwestern part of the site and the Glashieburn is culverted through the central area. SEPA flood maps indicate a number of areas of surface water flooding over the site. A Flood Risk Assessment has been carried out by Fairhurst for the site reviewing existing watercourses crossing the site, along with existing surface water sewers. New surface water sewers will be provided, in accordance with Scottish Water’s specification, throughout the proposed development. Sustainable Drainage System (SuDS) will be provided, including source control measures where practicable. Surface water sewers will discharge to a number of extended detention basins, which will provide treatment and attenuation of the surface water run-off. The basins will discharge at a controlled rate, not greater than the greenfield run-off rate, to the existing watercourses which flow through the site. We therefore do not believe that flooding is a significant constraint to new development. Given the principle of development is already established on the site, flooding issues would have to be resolved for any development forthcoming anyway and so it is unclear if the scoring is reflective of this?
- 4.19. **Landscape Fit** – The Council has commented “whilst there is little context for urban development here, it is zoned for employment land. There is a risk that development could result in the loss of views of the sea on one of the main gateways into Aberdeen.” A landscape and visual impact assessment and a supporting landscape strategy have been prepared in support of the residential led development for the site. The views to and from the site are considered as part of this and have informed the layout of the proposed masterplan for the site. This demonstrates the potential to improve the approach into Aberdeen and act as a high-quality gateway and for landscape enhancement on the site providing a combination of structural and useable greenspaces. This would increase the shelter of the site for new residents. The Silver Burn and existing on-site landscape features to be retained and enhanced to create a sense of place and encourage ecological diversity. Woodland planting and new landscape features will help integrate the development into the existing landscape and separate it from the employment uses to the east. We therefore believe that the proposed development can fit into its landscape context and indeed could help enhance the setting and gateway entry into Aberdeen.
- 4.20. The Murcar Framework for industrial development as adopted by the Council and covering the subject site requires a planted buffer strip alongside the A92 that would limit current views of the sea. The delivery of intended large scale employment premises on the site, in terms of height and massing would also restrict views to the sea. We would be concerned if the Council is suggesting that the house-led mixed use proposal would have a greater impact than the present allocation for the site in terms of landscape fit. Lower density housing and a new access from the A92 would improve views to the sea when compared to the industrial development currently allocated and the associated required buffer strip.
- 4.21. **Relationship to existing settlement** – The Council state that “if Findlay Farm and the Core are developed it would result in the area being entirely surrounded by employment uses. The A90 is a considerable barrier hindering penetration into the urban areas to the west.” There are a number



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of elements here that we believe are taken out of context and fail to acknowledge the information provided already. Firstly, there is a small residential population within and around the site already that would be consolidated with the development area. During public consultation many of these residents suggested that developing the site for housing would be much more compatible with the existing housing on site. Additionally, they also confirmed that the existing residents would benefit from co-location with new homes, improved points of access and infrastructure and new facilities and open spaces.

- 4.22. Access to the business land to the east is taken from separate and dedicated access points, from the Murcar Roundabout to the north and from the Energy Park to the south and would effectively bypass around the proposed new neighbourhood without necessarily impacting upon it. Development of the site would support the Council's own aspirations for east/west core path links between the beach and the existing community at Bridge of Don improving the relationship with the existing settlement. Furthermore, the de-trunking of the dual carriageway and proposed speed reductions will change the character of the area and create the opportunity to better and more safely connect Cloverhill and surrounding employment areas with the Bridge of Don. We would also note that the recent AECC consent for housing further south of this site sets a precedent in establishing east of the dual carriageway as a general location for new housing, adjacent to existing employment uses. The site therefore sits within the urban area, on a site zoned for development and close to residential, retail, employment and coastal recreational areas offering homes close to jobs/recreation and reducing the overall need to travel to access employment and services.
- 4.23. Furthermore, we also believe that the current view by the Council sits at odds with the aspirations for the Energetica corridor which is seeking to **“provide attractive opportunities to invest in business facilities, leisure and housing with unique place-making planning guidance that will deliver energy efficient, high quality housing and communities among the best in the world.”** Another key aspiration is for Energetica to **“become a place where work and home are brought closer together in a more balanced and rewarding way”**. The type and scale of the proposed development fits with the Energetica Corridor concept to promote modern, healthy lifestyles to support the growing renewable and sustainable energy industries. The Bridge of Don and the Energetica Corridor area is central to the area's development strategy and there is a requirement to support its delivery and vitality by accommodating a broader mix of uses and activities and to ensure there are enough homes being delivered close to jobs for people looking to live in the city. A masterplanned approach will ensure that the development offers a high-quality environment, accessible to all and in a form that encourages social interaction but also ensures privacy and good residential amenity (high density core with a mix of uses, moving to medium-density areas and all linked by safe and accessible footpaths).
- 4.24. **Accessibility** – The Council has noted that “Bus routes (50/51, 260/263, 267/268) going into Aberdeen City and out to Ellon, Mintlaw and Fraserburgh run along Ellon Road. The closest bus stop is currently more than 800m away.” A Transport Assessment is currently being prepared, supported by discussions with the Council's roads department, which should demonstrate that the delivery of



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residential uses on this site would improve the opportunity to enhance bus and active travel along and around the Ellon Road. This includes the potential to deliver new bus stops on the A92 that would be within 400m walking distance of all areas of the site. However, there is also an opportunity to provide bus links into and through the site and this is accommodated on the proposed masterplan. Therefore, the site's location on a main entry point and established transport corridor into the city from the north offers considerable accessibility potential by multi-modal forms of transport including enhanced bus services. This compares favourably to some of the other major development areas in and around the city.

**4.25. Direct footpath / cycle connection to community and recreation facilities and resources** – The Council assessment states “No footpaths within the site. Core Path 107 (Dubford Road to Ellon Road) is less than 500m to the east. Blackdog to Union Street cycle route runs alongside footpaths on the A90 Ellon Road.” A series of footpath and cycle links are proposed throughout the site allowing for the delivery of a sustainable and walkable community. Discussions with Roads officials confirm the potential to boost core path links through the site and to enhance the cycleway link between the city and Blackdog to the north. There is also an opportunity to enhance connectivity between existing residential neighbourhoods and the coastline and to provide a ‘safe route to school’ across Ellon Road by introducing a new traffic light controlled crossing point. Therefore, the site's location on a main entry point and established transport corridor into the city from the north offers considerable accessibility potential by multi-modal forms of transport including enhanced cycle and footpath provision which would result from the development proposals benefiting existing and future residents in and around the area.

**4.26. Land Use Conflict** – The Council's assessment states that the “area could be surrounded by employment uses and residential development could constrain some of the uses that could otherwise go there.” There are numerous examples in and around the city where housing and employment uses are located in relatively close proximity to one another without any adverse impacts occurring. We are also aware of other uses being introduced into existing employment areas, including for example the gym and nursery facilities to the south of the site within the Aberdeen Energy Park demonstrating that other uses are acceptable. For Cloverhill, careful consideration has taken place supported by the preparation of a noise assessment, landscape visual impact assessment and a landscape strategy. These have been prepared to support the impending planning application and demonstrate that the proposed residential uses on the site would be acceptable. It is worth pointing out that there is an existing small residential population living within the area in and around the site that would be consolidated if the proposed development went ahead. This includes homes on land to the east adjacent to and within the allocated and approved Core Business Park, such as the property at Ironfields. There is already a conflict with the employment uses in this area due to the presence of these properties. This has clearly been addressed or demonstrated to be manageable as surrounding business parks have been approved. We believe, supported by recent public consultation, that existing residences would benefit from co-location with new homes, improved points of access and infrastructure and new facilities and open spaces.



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- 4.27. The delivery of housing on this site need not undermine the larger sites that form part of the City's housing strategy as the City's housing market requires choice as well as capacity. And, as discussed earlier in this report, the reallocation of this site would have a low impact on the city's marketable employment land supply. Discussions with officials at ACC have helped determine a housing mix aimed at diversifying the variety of housing in the Bridge of Don, including potential for bungalows, affordable housing, flats, smaller housing units and family homes.
- 4.28. A complementary mix of uses on site will help to create a new attractive, sustainably located and resilient neighbourhood with community facilities to benefit the new residents and wider area. Local retail, community and opens space/sports provision would also be delivered to help establish a sense of community and social inclusion which would also benefit those employed in surrounding business and industrial parks. The proposed provision of a new all-weather football pitch, supporting local youth football, and the inclusion of a Men's Shed not only support a recognised local need, but also support general wellbeing, social and health benefits; helping to reduce isolation and loneliness and empowering local communities. Local retail and services are also proposed to support the proposed community and create convenient access to everyday goods (milk/bread/papers) and services as well as creating local employment opportunities.
- 4.29. **Service Infrastructure Capacity (Education)** – The site currently sits within the Scotstown Primary and Bridge of Don Academy catchment areas. The MIR analysis states “Scotstown Primary School is within capacity (68%) will remain so in the long term (78% in 2025). Bridge of Don Academy has capacity at present (73%) however it is forecast to go over capacity in 2025 (101%). Given the development is for 500-600 units, the schools would most likely not be able to cater for this.” We have been involved in discussions with officials at the Council regarding the provision of education infrastructure. Whilst the site is currently zoned within the Scotstown P.S. catchment area, the closest primary school to the site is Greenbrae and there could be potential for rezoning over time. The developers are prepared to make appropriate contributions that would allow for increased capacity at local schools to support any increase in catchment population resultant from this proposed development. We are firmly of the view that solutions exist to expand the the capacity at local schools through extensions to the existing buildings and that the development could be phased in such a way that capacity increases could be gradual and managed appropriately.
- 4.30. The **Strategic Environmental Assessment (SEA)** assesses the site based on its current employment land allocation and on the principle of the housing led development of 500-600 homes. This identifies potential negative effects (post mitigation) in the soils, climate change mitigation and non-designated landscape features and key landscape interests categories. The supporting technical reports that will support the upcoming planning application will address any potential negative impacts and will seek to demonstrate several positive impacts compared to the proposed employment use. These include improved access to and through the site and the potential for improved ecological habitats through the proposed landscape solution to the site for example. We



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believe that with further detail and supporting information and through careful design and masterplanning, existing environmental elements of the site can be positively enhanced.

### 5. Housing Land Strategy

5.1. 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. Cognito Oak LLP are concerned that this approach will support a continued shortfall in housing delivery across the City and will not meet national or regional housing delivery requirements. They do not support the Housing strategy approach adopted in the MIR for reasons set out in this response.

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

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

5.3. Cognito Oak LLP have serious concerns about the range and scale of housing that can be delivered on the back of that do-minimum strategy, the practicality of delivering identified brownfield sites and the relationship between that strategy, the SDP in its final form when approved later this year and national policy on delivering more housing more effectively.

5.4. 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"*.

5.5. 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



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- 5.6. The latter emphasis on **deliverable housing sites** is essential in the LDP review process if the planning system is going to provide a positive, realistic and flexible approach to housing development required by SPP. Land requirements can be met from a number of sources and according to SPP “... *most notably sites from the established supply which are effective or expected to become effective in the plan period, sites with planning permission, proposed new land allocations, and in some cases a proportion of windfall development*”. In respect of the latter that expected contribution must be **realistic and based on clear evidence of past completions and sound assumptions about likely future trends**. SPP 2014 specifically requires that, in urban areas, this should be informed by an urban capacity study. The MIR is accompanied by a Brownfield Urban Capacity Study Update (November 2018) but that does not identify whether the sites it contains are effective or constrained.
- 5.7. Paragraph 119 of SPP also requires that LDPs “... *in city regions should allocate a range of sites which are effective or expected to become effective in the plan period to meet the housing land requirement of the strategic development plan up to year 10 from the expected year of adoption. They should provide for a minimum of 5 years effective land supply at all times. In allocating sites, planning authorities should be confident that land can be brought forward for development within the plan period and that the range of sites allocated will enable the housing supply target to be met*”. That calculation is generally based on annual Housing Land Audits (HLA) and although these can provide an element of certainty up to year 5, they are inherently inaccurate and over-optimistic the further from the base year that the housing delivery is forecast. This can be demonstrated quite clearly from an analysis of HLAs over a number of years (see Table 2 below). This demonstrates that Aberdeen City Council cannot have confidence that the scale of development required can be brought forward by just relying on predictions in HLAs. **The planning authority should instead take a realistic view of historic delivery trends against that projected in HLAs and allocate enough land to take up any expected shortfall**. The housing figures proposed in the current MIR instead make limited allocations that will not make significant difference to housing delivery in the area over the life of the plan.



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

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

5.8. Table 2 shows extracts from various HLAs and compares predicted housing delivery against actual housing delivery (in red). 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 fewer over that period than anticipated in the most recent agreed 2018 HLA.

5.9. This evidence clearly points to:

- Housing delivery on currently allocated sites that falls below medium-term HLA predictions;





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- 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.

5.10. 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.

5.11. The site at Cloverhill (B0220) is located in a popular and marketable location and would contribute to highly deliverable and sustainable housing development at a settlement level. Housing completions in this area would be deliverable due to the lack of technical constraints associated with the site and the proposed mix of accommodation, including affordable housing.

### 5.12. Housing Land Supply

5.12.1 The Proposed Strategic Development Plan (PSDP) is particularly important to the LDP as it sets the future housing requirements that are to be addressed by the 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.

5.12.2 The PSDP Housing Strategy relied almost entirely on existing allocations in the early years of the plan, pushing some of the need identified in the HNDA to later years. It also relied on existing allocations to deliver more homes than they have been doing over the last few years. That over-reliance on an unrealistic delivery rate is also an issue for the LDP. Aberdeen City Council should recognise these low rates of delivery in addressing housing requirements. Table 3 below illustrates how larger sites have not delivered as expected over the years. Evidence suggests that this will continue to be the case moving forward. 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.**



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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
	<b>TOTALS</b>		<b>11150</b>	<b>328</b>	<b>10822</b>	<b>593</b>	<b>10229</b>	<b>1175</b>	<b>9054</b>
			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
	Elton	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
	Elswick/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
	<b>TOTALS</b>		<b>6910</b>	<b>230</b>	<b>6680</b>	<b>351</b>	<b>6559</b>	<b>420</b>	<b>6490</b>
			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)

5.12.3 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.



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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
<b>Total</b>	<b>10,910</b>	<b>336</b>	<b>10,574</b>

**Table 4: Delivery Rates for large sites – Aberdeen City (Source – Housing Land Audit Series and 2012 LDPs, Aberdeen City and Aberdeenshire Councils.)**

5.12.4 Table 4 above shows that of the 7 large allocations considered only 336 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: K/EL/H/001 Site Description: Chapelton - New Settlement															
	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2023+	2024+	2025+
2011 HLA			constrained					1845 (post 2018)							
2012 HLA		150	350	394	370	370	211	0							
2013 HLA		0	0	75	125	200	200	200	200	845 (beyond 2020)					
2014 HLA			0	75	125	200	200	200	200	200	2845 (+2021)				
2015 HLA				120	150	170	200	200	200	200	200	2605 (+2022)			
2016 HLA				62	60	80	100	120	150	200	200	200	2873 (+ 2023)		
2017 HLA					45	80	80	80	100	100	120	150	150	3078 (+ 2024)	
2018 HLA						19	70	60	80	80	80	80	80	80	3309 (beyond 2025)

**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)**

5.12.5 Taking Countesswells as an example, Table 5 above shows that the site has consistently pushed back expected completions since it was first allocated in 2012. Based on the 2012 Housing Land Audit forecasts, the site has underdelivered by 1349 units. Other large housing sites have similar deliverability issues and have created a housing backlog where supply has not kept up with housing need. The City Council should allocate additional LDP sites to help fill the housing delivery gap.



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### 5.13 Over-Reliance on Brownfield Sites

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

5.13.2 The 2018 BUCS:

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

5.13.3 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 sub-headings:

### 5.14 Site Context and End Use

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



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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 potential only
Urban	OP87	Pittodrie Stadium	6	Future timing tied in to delivery of new stadium
Urban	OP95	Triple Kirks	0.14	PRS not mainstream residential
Urban	N/A	Former PC World, Hutcheon Street	0.82	Now Lidl so not available for housing

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

## 5.15 Site Effectiveness

5.15.1 The effectiveness of the list of brownfield sites is critical to their inclusion within the housing land supply figures. The BUCS has stated that effectiveness has not been considered as the SDP does not specify that brownfield sites should be effective. The rationale behind that approach does not match the general requirements set out in SPP or wider accepted methodologies for calculating a realistic and effecting housing land supply. If brownfield sites are not effective, then they simply should not be considered as part of the housing allowance. 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 isn't included.

5.15.2 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



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identify effective and deliverable housing sites but can consider brownfield and constrained sites if they meet the effective and deliverable criteria. The current strategy of relying on brownfield sites for at least 82% of the new housing allocations is not a balanced approach and is likely to fail. On top of that at least 50% of the MIR preferred sites are also brownfield taking that brownfield reliance up to 90% or above. On a purely proportional basis this is an over-reliance on brownfield sites.

- 5.15.3 Brownfield sites are often difficult to develop, have complex servicing needs, have significantly greater contextual issues to overcome, can include more convoluted ownership, can be contaminated 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 housing land allowance (around 82%) will undermine the PLDP's ability to increase the delivery of housing and therefore runs contrary to national and strategic requirements to focus on allocating deliverable housing sites. Brownfield development requires specific policy-based support such as the current but temporary relaxation of affordable housing contributions from such sites in the City Centre. Even with that relaxation brownfield sites are proving difficult to develop in a viable manner. Relying on such sites as a key element of the City's housing strategy is not appropriate.
- 5.15.4 The scale of the site will also make a huge difference to its deliverability. Many of the City's smaller housebuilders are no longer operating. Larger and national housebuilders have specific requirements when it comes to housing sites and many will simply not consider smaller sites. Of the full list of sites in BUCS 2018 15 (approximately 1/3) are under 0.5Ha, another 10 are between 0.5ha and 1ha. At that scale they are likely to be suitable only for flattened development.
- 5.15.5 Brownfield sites cannot therefore be counted on to deliver much needed housing in the City. **They should be included as an extra layer of flexibility to supplement more reliably deliverable housing allocations.** SPP (in Paragraph 123) More specifically it states, "***A site is only considered effective where it can be demonstrated that within five years it will be free of constraints and can be developed for housing***".

### 5.16 Housing Density

- 5.16.1 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.



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- 5.16.2 BUCS density figures are based on examples between 1997 and 2011 when the housing market was generally much more buoyant than at present and flatted development was more prevalent. Flatted development now has much less market appeal resulting in lower density developments. Densities between 1997 and 2011 are therefore less relevant and should be revisited to reflect the last 10 years rather than the 10 years prior to that.
- 5.16.3 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.

### 5.17 Capacity Assumptions & Lack of Generosity Margin

- 5.17.1 Density leads on to assumed site capacities. The MIR adopts the highest possible site capacity for all identified brownfield sites and subtracts that from the required PSDP Housing Allowance. That simply will not yield a true reflection of the actual capacities of these sites or the real timescale for doing so. The MIR assumes an extreme best-case scenario for the brownfield site contribution to the housing allowances whereas the reality will be significantly less.
- 5.17.2 When identifying housing allowances development plans should first identify the housing requirement and then add to that a generosity margin of between 10% and 20% to allow flexibility should sites not come forward. In simply assuming the best possible scenario for brownfield sites that inbuilt generosity margin in the SDP housing allowances is ignored. The MIR assumes 3,408 brownfield housing units can be delivered from the BUCS sites. As stated above that is a best-case scenario. Traditionally, to achieve a delivered housing figure of 3,408, a greater housing allocation would be adopted. If that was the higher generosity margin of 20% then the MIR would have to allocate a further 682 units. So even if brownfield sites remain a part of the Period 1 Housing Allowances, they can't be considered to deliver the full 3,408 units suggested but rather, at the most, 2,786 units.



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### 6 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, Cloverhill, Bridge of Don (REF) offers a deliverable and sustainable extension to the existing urban area on an existing allocated site.

##### 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.





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### 7 Conclusions

- 7.1 The inclusion or otherwise of this site for development is a matter of strategy rather than detail. The site is allocated and therefore the principle for developing the site is well established. Changing the proposed allocation uses would provide an effective site for the delivery of much needed housing in the city without compromising the availability of marketable employment land where there is currently an overprovision. The lack of housing delivery is a recognised issue in Aberdeen and the wider city region and this site, located in a highly sustainable location with access to the transport networks and as well as close to existing local services.
- 7.2 It offers the potential for future development introducing housing and other complementary mixed uses into in an area that would benefit from enhanced facilities and placemaking and where the landscape could accommodate development with minimal impact. It is simply proposing to develop an existing allocated site for a different use.
- 7.3 The site is deliverable, represents the measured expansion of a defined settlement and will bring benefits to the wider community. It has no real constraints and reflects the existing character of Bridge of Don in the immediate vicinity. It should therefore be identified as an allocation that could accommodate between 500 – 600 housing units in phases to ensure that there is a ready supply of housing in this strategic growth corridor.
- 7.4 On the housing land strategy, 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 Commercial Property Market

During a period of peak market conditions in 2012 – 2014, Aberdeen's commercial property market experienced record levels of take up met by a significant shortage of supply. Pre-lets and forward commitments accounted for a large amount of commercial development, a characteristic which made Aberdeen almost unique in terms of its market dynamic.

In times of peak demand, the lucrative returns which could be made in higher value office parks attracted many developers to the city. The office sector witnessed far more speculative development than any other, and lower value industrial schemes were often overlooked in favour of office development. This led to an increase in land values to approximately £450,000 - £600,000 per acre for serviced land within well located business parks.

However, speculative development brought an unprecedented amount of supply to the market, particularly in the office sector both in the city centre and out of town business parks. The net effect was a considerable amount of new build office accommodation introduced to the market in 2014 as the oil price began to fall and demand tailed off significantly. To compound these problems, the reduction in head count by many oil and gas companies resulted in them seeking to dispose of unnecessary (and often expensive) office accommodation. There are very few occupiers who have not sought to dispose of surplus office accommodation or have significant vacancies within the facilities they already own or lease.

Unsurprisingly, the office market is presently characterised by significant over supply, and little in the way of noteworthy occupational demand. Office supply across the city extends to approximately 2.7million sq ft, the highest level of supply since records began. This compares to less than 500,000 sq ft at the peak of the market.

In 2014 office take up in the city was in excess of 1,000,000 sq ft. This number dropped over 50% in 2015 (c. 400,000 sq ft) and then reduced by over half again to just 180,000 sq ft in 2016, - the lowest level experienced in the city since detailed records began and well below the 10 year average of approximately 650,000 sq ft. We saw a marked improvement in 2017, when office take up rose to c. 405,000 sq ft (a similar level to 2015, but still less than half of the peak in the market).

In 2018, the market recorded office take up of c. 388,000 sq ft which was broadly in line with 2017's figure, however there were no significant relocations in the year and this figure has consequently been made up of a larger number of smaller transactions. 2019 has had a very slow start with only 37,000 sq ft with an average deal size of approximately 2,200 sq ft, compared to an average of 14,585 in 2014.

Whilst on the one hand, a greater number of smaller transactions portrays a healthier market, and one which is less susceptible to fluctuation, the absence of any large active requirements does support the view that we are unlikely to see any sizeable increase of take up in the short / medium term and pre-lets / Design & Builds are no longer a feature of the office market.



Less speculative industrial premises were built during the 2012 – 2014 'boom' period, and therefore this sector weathered better than the office sector when oil price began to fall. However, as occupiers reduced head count and demand for new premises fell, supply began to rise and is currently at approximately 2.6million sq ft across the City.

Occupier demand for industrial premises over the past 2 years has been concentrated at the smaller end of the market. The average deal size in 2016 and 2017 was 9,300 sq ft and 8,865 sq ft respectively compared to 17,000 sq ft at the peak of the market, when pre-lets were a dominant feature. The take up figure for Q1 2019 equated to 132,996 sq ft, with the average deal size falling to 5,542 sq ft.

Due to the absence of pre-let activity there is nothing driving or supporting the commercial development market. While 14 pre-lets were agreed for industrial premises on business allocated land in 2014 alone, only one pre-let of approximately 22,000 sq ft was agreed in 2018 at Kingshill Business Park, Westhill and, in 2019, there is only one pre-let deal under offer accounting for 100,000 sq ft in Dyce. This is largely due to the changes to occupiers size requirements and lease length commitment (from 10 – 20 years to 5). Developers will not commit to a design and build for small facilities, and further require a lease commitment of 10 – 15 years to ensure they meet investor criteria to facilitate a sale.

We believe the Design and Build/pre-let market for both office and industrial sectors will remain very subdued for a number of years and therefore there is very limited appetite for land from developers. Equally, there is very limited appetite for land from owner occupiers.

### **Employment Land Market**

For the reasons discussed above, there has been very limited take up of allocated business land within the last 5 years. We are aware of only 11.09 acres of land sold from 2014 to 2019 and are aware of 23.3 acres currently under offer. A lack of demand, coupled with limited appetite from developers to deliver speculative projects, has meant development of the existing allocated sites has been significantly slower than anticipated.

Equally, there is very limited appetite for land from owner occupiers. We are aware of a handful of occupiers actively seeking employment land, and these requirements are typically for 1 – 2 acre plots. Developers are reluctant to sell off plots of land for commercial development to individual occupiers as there is ultimately less profit potential in comparison to building a facility leasing it and then selling the investment.

# Market Report

## Cloverhill



As a result, despite marketing programmes, and a willingness to accept reduced pricing in the region of £300-350,000 per acre for serviced land, there remains a depth of supply of allocated business land available across Aberdeen. We have set out below the approximate existing supply at each site, excluding Cloverhill, at the time of writing (May 2019)

Site	Available Land (Acres)
The Core	21
Badentoy North	30
Aberdeen Gateway	60
Aberdeen One	7.5
City South	20
Harbour Board Altens	8
D2, Dyce	10
ABZ Dyce	40
Blackdog	71
Cairnrobin	40
Aberdeen Energy Park	35
Kingshill	5
Prime Four	30
<b>Total</b>	<b>378</b>

As with the commercial property market, there is locational preferences from developers and self build owner occupiers. We would rank these as follows:

- 1. Dyce** -Lying adjacent to the airport and one of the main AWPR junctions, Dyce is a popular choice for occupiers and developers. D2 and ABZ Business Parks performed well at the height of the market and are a preferred option for pre-lets / design & build projects.
- 2. Westhill / Kingswells** - As the Centre of Excellence for the Subsea sector Westhill is continuing to attract both office and industrial occupiers who have active requirements in the market. Westhill and Kingswells are now very well connected in the middle of all business location due to the AWPR and they generally provide modern business parks with readily available land.
- 3. Aberdeen South** – A well-established industrial location which now lies at the edge of the AWPR.
- 4. Bridge of Don** – An older industrial estate providing predominantly industrial premises with no real demand for offices. The AWPR does improve the area but as the junction is located north of Bridge of Don, many argue that the area benefits the least from the road therefore perception of poor accessibility may not have improved.

### Cloverhill

Looking in particular at Cloverhill, the site has been allocated for business use and available in the market for a decade. During this time the previous owners had discussions with various potential business occupiers and developers without success. Since the land was purchased by Cognito Oak LLP, Savills, jointly with Shepherds, re-introduced the site to the market in October 2018 and have had very limited interest for business use.

At the time of writing (May 2019), the agents provided the following enquiry schedule showing vague interest from only 2 parties for business use:

Date of Initial Contact	Savills / Shepherd	Contact Name & Company	Details of enquiry	Actions
12 Nov 2018	Savills	P&C – London Based Agent	Enquiry through Estates Gazette requesting further details of site. Preparing a schedule of all commercial sites in Scotland for 50 acres +, on behalf of client.	Savills called to discuss. Agent added to list of potential options however client chose not to take further.
8 Dec 2018	Savills	P&C – Local business	Local business looking for 1-2acres of land near Aberdeen, Ellon or Peterhead and requested further information on Cloverhill.	Savills provided marketing particulars. Contact to consider alongside a list of other sites. Confirmed Cloverhill was not of interest.

This contrasts dramatically with the keen interest numerous housebuilders have taken in the land, with active discussions on-going with a number of parties keen to build houses on the site as soon as possible.

Cloverhill forms part of a cluster of allocated business land in Bridge of Don, including The Core and Aberdeen Energy Park. Blackdog is located a short distance to the North. In total, this equates to 177 acres of available land in the surrounding area with no active requirements for allocated business land in Bridge of Don.

As indicated above, the opening of the AWPR in December is likely to have less impact on Bridge of Don than other established industrial and business park location, as the junction lies to the North of the suburb, at Blackdog. With no speculative development occurring in the area and little in the way of noteworthy occupational demand to account for pre-lets or forward commitments in the current market, it is difficult to see how this volume of allocated business land could be brought to fruition over the next 20 years if it is not considered for alternative uses.



### Conclusion

Demand for allocated business land in Aberdeen City has fallen dramatically since the fall in oil price in 2014, with only 11 acres of land purchased in the last 5 years and supply reaching over 350 acres.

With the largest volume of supply of both office and industrial premises since records began, there is a depth of second hand (and speculatively built) stock that needs to be absorbed before demand for business land becomes a necessity. Even then, we expect demand from occupiers and developers to be for better connected areas such as Westhill and Dyce.

This has only been proven by the severe shortage of interest for Cloverhill from joint agents Savills and Shepherds since the site was introduced to the market in October 2018. Despite marketing the site on platforms across the Country, only 2 enquiries have been logged for business use. Indeed, the site has now been allocated for 10 years with no development taking place.

In contrast, strong interest has been expressed in the site by a number of housebuilders keen to add additional locations to their existing offering and those currently unrepresented in the City. Housebuilders are attracted by the deliverability of Cloverhill. The site has very limited barriers to development and therefore will allow them to deliver homes in the near future.