



# 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 Lorimer
Organisation (if relevant)	Ryden LLP
On behalf of (if relevant)	Stewart Milne Homes Ltd
Address	
Postcode	
Telephone	
E-mail	

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



If yes, please provide an e-mail address

### PRIVACY STATEMENT

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

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

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

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

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

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

### YOUR DATA, YOUR RIGHTS

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

## YOUR COMMENTS

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

Please indicate the document and the specific Issue, Question, Site, Policy, Map or Table you are commenting on. Please provide your comments below and explain your reason for supporting, opposing or commenting on this specific part of the document.

Please see attached Paper Apart.

**YOUR COMMENTS CONTINUED**

## **PAPER APART**

# **Representations to the Aberdeen City Local Development Plan 2019 Main Issues Report on behalf of Stewart Milne Homes**

## **Introduction**

Stewart Milne Homes (SMH) welcome the fact that Aberdeen City Council have published their Main Issues Report (March 2019) as an early indicator of key areas of policy change from the extant Local Development Plan (LDP) 2017 and identification of new sites where development may be permitted. This response focuses on the identified policy areas and numerically referenced Main Issues. Separate, site specific responses have been prepared in relation to a number of Development Bids pursued at Pre-MIR Stage by SMH.

At the outset, it should be expressed that there remains a general concern across the Housebuilding Industry over the lack of clarity regarding issues surrounding Housing Land Supply and associated allowances derived from the Strategic Development Plan (SDP), particularly given this document has yet to be formally scrutinised by Scottish Ministers and the figures have not been adopted. A detailed response on this matter has recently been submitted by SMH to the consultation into the Aberdeen City and Shire Proposed SDP and this has been summarised in response to the MIR's proposed Settlement Strategy pertaining to 'Housing Allowances and New Sites'.

Additionally SMH wish to comment and specifically object to a number of Policy matters. The following representations highlight the areas of concern, as well as the associated recommendations and changes which should be factored into the preparation of the Proposed LDP.

## **Vision and Objectives**

My client is generally content with the vision contained within the extant Local Development Plan (LDP) and feels it is worthy of retention, albeit with a number of minor tweaks as proposed within the recent publication of the Proposed Aberdeen City and Shire Strategic Development Plan (SDP) 2018. These changes promote industry diversification and resilience, in recognition of the challenges the North East has experienced through the recent Oil and Gas restructuring. It is acknowledged that the Local Government and Communities Committee voted to retain SDPs during consideration of amendments to the Planning Bill Stage 2, despite the Bill previously outlining that they should be removed from the Planning System. Given these ongoing uncertainties with regard to the future of SDPs, SMH would agree that maintaining strong links and consistency between the LDP and the Aberdeen City and Shire SDP is appropriate, as well as close ties with the Regional Economic Strategy.

## **Local Development Plan Polices and Supplementary Guidance**

It is noted that in cognisance of the proposed abolition of Supplementary Guidance as proposed as part of the new Planning Bill, the MIR suggests that a review of existing Supplementary Guidance (SG) to bring some policy aspects into the next LDP. Such an approach is tentatively welcomed, as SMH feels that the some of the existing SG is cumbersome, overly prescriptive and confusing for local communities. Whether such abolition is carried forward as part of the future of the Bill or not, SMH would welcome such a review and rationalisation of SG. However, it should not be seen as an opportunity to overly complicate the content of LDP Polices, which should remain succinct and understandable for all those engaged with the planning system.

## **Settlement Strategy**

SMH note the settlement strategy outlined within the MIR, which emphasises that any new housing and employment allowances are put forward in line with the Proposed SDP 2018. However, as touched on within the introductory paragraphs above, SMH maintains concerns over the calculation of Housing Need and Demand and the associated Housing Allowances that have been derived from this within the Proposed SDP. This is a result of the identification of a Housing Supply Target (HST) based upon a modified version of the Principal Growth Scenario as contained within Housing Needs and Demand Assessment. SMH have submitted comprehensive responses in response to Housing Need and Demand to the ongoing Review of the SDP, both at MIR and Proposed Plan stage. Whilst some modifications were undertaken between the two stages, which substituted the previous use of a 'Composite' Growth Scenario in favour of a Modified Principal Growth Scenario in setting the HST, it is maintained that the latter still lacks ambition and contradicts the wider growth aspirations for the regional economy.

Considering that the extant SDP set clear aspirations to move toward building 3,000 homes per annum by 2020, setting the HST at 2,200 per annum between 2020 – 2032 is unacceptable. SMH believes that the Proposed SDP should have utilised the High Growth Scenario presented within the Housing Needs and Demand Assessment. This is the only growth scenario which provides any degree of comfort that sufficient growth and delivery will be achieved in the housebuilding industry. Through an ambitious Housing Supply Target, Housing Land Requirement and sufficiently generous additional allowances, this would provide the next LDP the ability to create substantially more allocations across the lifetime of the plan, supplementing the existing supply and thereby creating the optimum conditions to achieve accelerated housing delivery and growth within the industry.

Unlike previous MIRs, it is disappointing that the current document does not identify land supply and the scale of new allocations as a Main Issue in its own right. This would have afforded the Development Industry the opportunity to properly debate the current proposal for only 4,168 new homes to be allocated in the period 2021-2031 within the next LDP. Such an approach is considered all the more crucial given the current status of the Proposed SDP, which has yet to undergo formal scrutiny by Scottish Ministers. In that respect, the content of the SDP and the housing allowances set out therein could be subject to change and increased, should a Reporter appointed to undertake the examination

adopt a different methodology in calculating the Housing Land Requirement in line with unresolved objections from SMH, Homes for Scotland and the wider housebuilding industry. Whilst it is noted that some 640 units have been identified as additional allocations to supplement the existing supply of housing land, it is maintained that this number should be significantly increased to ensure an appropriate supply of housing land.

#### Question 1 – New Housing Sites

In arriving at the 640 unit figure, the MIR sets out the various sources from which it anticipates that new housing could come forward and count toward the 4168 Period 1 (2020 – 32) Allowances. Whilst it is welcomed that constrained greenfield sites identified within the base 2018 HLA have been discounted, SMH objects to the suggestion that some 3,408 units could come forward by way of existing Brownfield sites, as identified within the Brownfield Urban Potential Study undertaken to inform the MIR. Brownfield sites by their very nature can pose issues with deliverability due to constraints such as contamination, demolition requirements and overarching viability issues. This is evident for a number of sites listed within the Brownfield capacity study, which have been allocated for redevelopment for a sustained period of time, yet have failed to come to fruition. Furthermore, a significant proportion of the sites listed within the Study are within private ownership and alternative uses. For example the former 'PC World' on Hutcheon Street, which is listed in the Study as potential redevelopment site is now a Lidl supermarket. Furthermore, 29 St Clement Street is located in the middle of a designated industrial area, therefore its suitability for residential development must be questioned. There is no apparent delivery strategy or timescales identified for these sites to come forward, therefore suggestion that 3,408 units (over 80%) derived from brownfield sites should account towards the SDP allowance of 4168 homes is very concerning. It is maintained that such an approach would contravene Paragraph 119 of Scottish Planning Policy (SPP) which requires local development plans in city regions to allocate a **“range of sites”** which are effective or expected to become effective in the plan period.

Accordingly, and in response to Question 1 – *Do you agree with our preferred housing sites?* SMH is not in agreement with the limited range of sites identified within the MIR. It is considered that the MIR in its current form does not allocate an appropriate mix of sites to ensure a range and choice which are capable of delivery. It should therefore be supplemented with an additional greenfield release, free from constraints and capable of delivery, such as those promoted by SMH as Development Bids at pre-MIR stage and subject to the submission of separate representations to the MIR.

Additionally, there is a high reliance on sites that are currently in either local authority or NHS ownership, approximately half of all preferred sites. These sites have not necessarily been considered surplus to requirements and have the potential to cater for multiple uses. In a lot of cases there is no capacity identified which gives no indication whether the preferred sites are sufficient to deliver the housing land supply alone.

## Question 2 – Housing Allowances beyond 2032

It is noted that Aberdeen City Council do not propose to identify sites for longer term development or “Strategic Reserve”, which is identified as a non-mandatory option within the Proposed SDP. SMH would object to this stance and maintains that to be consistent with the Aberdeenshire Local Development Plan Review, which seeks to conform to the same Strategic Development Plan (SDP), sites should be identified for longer term development following a mid-term review of the LDP. These could either be identified as stand-alone sites that are reserved or indeed subsequent phases of sites identified through the proposed LDP 2022. This would provide more certainty to both the development industry and local communities on the future direction of growth for the City. Indeed, Aberdeen City Council have had a history of identifying strategic reserve sites since as far back as the Aberdeen City-Wide Local Plan 1991, and this has been beneficial for communities and builders alike, to provide certainty and understanding of future growth plans. Such an approach should therefore continue to be undertaken in the preparation of the next LDP, which would also provide additional flexibility to draw down on future allocations should any shortfall in meeting the housing land supply be experienced within the LDP period.

### **Main Issue 1 – Living in the City Centre**

SMH generally welcome the preferred option contained within the MIR to include Policy support for residential use within the City Centre within the main body of the LDP, as opposed to the existing approach which outlines such support within SG. Whilst it doesn't represent a step-change in approach from that of the current LDP, it does place greater emphasis on supporting the aims of the City Centre Masterplan CCMP. As such, in order to deliver the aims and objectives of the City Centre Masterplan and the new LDP policy should provide as much flexibility as possible to attract a range of uses to the city centre to bolster its existing retail offering and therefore tentatively welcomes Policy NC9: City Centre Living contained at Appendix 1 of the MIR. Flexibility must be demonstrated when assessing levels of residential amenity, in recognition of the dense urban form and restrictions in achieving external amenity space, particularly within conversions of existing non-residential buildings.

City centre developments whether conversions or redevelopment of brownfield sites should not be promoted at the expense of new greenfield sites, which are free from constraints and deliverable. Whilst the principles of city centre living are to be supported and encouraged, they are unlikely to significantly support the delivery of new homes as identified within the SDP, across the next LDP plan period. SMH feels this could be a retro step approach and would discourage family housing in the city as occurred during the 90s and 2000's when such policy resulted such housing provision only being catered for in Aberdeenshire.

## Question 15 – Percentage for Art

Whilst SMH recognise the role that art projects can attribute to the placemaking and distinctiveness of the City Centre, objection is taken to the proposal set out within Question 15 and related new Policy NC12: Public Art Contribution contained within Appendix 1 of the MIR. This would require developers



to contribute 1% of construction costs for all developments which incur construction costs of over £1 million. It is felt that such a contribution, on top of ever growing list of Developer Contributions sought from the housebuilding industry would be too onerous and disproportionate. Instead, the focus for the Council should be to ensure the overarching placemaking agenda contained within numerous LDP policies of the LDP are delivered within developments across the city, rather than extracting funds to attempt to deliver aspiration art projects.

Furthermore, there appears to be a discrepancy in relation to the implementation of this policy. The question falls under Main Issue 1 which relates to City Centre Living, which would infer that the intended policy approach to extract public funding would only relate to developments located within the defined Centre boundary. However, the wording of proposed Policy NC12 suggests that all developments will be required to allocate 1% of their construction costs. Notwithstanding SMH's objection to the principle of such a policy, if this was to filter into the next LDP, the Policy should clearly distinguish that it only relates to City Centre development.

#### **Main Issue 4 – Minimum Space Standards for New Residential Development**

It is noted that the MIR seeks to introduce a minimum internal space standard for new residential development across the city in line with the 'Nationally Prescribed Space Standard'. This would see a significant change from the current position, which does not currently enforce such standards, instead adopting a more flexible, design-led approach, which is regulated by other placemaking policies and supplementary guidance. As part of the justification for the proposed change in policy approach appears to be a suggestion that the UK has the smallest homes by floor space area of any European country at 76m<sup>2</sup>. It is noted that the MIR provides no source to back up these statements. In conjunction with HFS, this matter has been further investigated and the 76m<sup>2</sup> appears to be based on historic analysis dating back to an English House Condition Survey undertaken in 1996. Concern is therefore raised at the lack of credible, up-to-date and Scottish based evidence presented to support the Council's preferred option to introduce a minimum space standard.

SMH believes that the current LDP approach, which advocates a design / masterplan-led approach to new development better reflects the spirit of creating a varied and interesting range of new housing, situated to particular site characteristics and circumstances. Overreliance on an overly prescriptive and uniform set space standards could sterilise development and lead to serious viability issues for developers and also the affordability for potential purchasers. It is recognised that this matter is highlighted within both the preferred and alternative options.

Presently, internal space standards are to an extent governed by Building Standards, whereby minimum activity and circulation space standards within new housing are set. Adding another layer of complexity through the introduction of an internal space standard through planning policy would therefore be unnecessary and counterproductive.

SMH would therefore object to implementation of either the Preferred or Alternative Options as contained in relation to Main Issue 4. Instead the current approach should be maintained.

#### Question 16 External Space Standards for new Residential Development

In general, SMH feels that the existing policies of the LDP command appropriate levels of external amenity space within developments. As highlighted above in respect of the proposed introduction of a set of standards for internal space, a similar approach for external space would not be welcomed. Instead new development should be design-led and respond to the specific nature and characteristics of a particular site. Application of a “one size fits all” approach to set for new dwellings, flats and conversions are likely to present issues of unworkability for certain scenarios and would likely lead to conflict with other policy agendas such as attracting significant residential development within the city centre. SMH would instead request a more flexible approach to identifying the exact quantity and quality of amenity on a site by site basis and favour more innovative approaches to the provision of amenity space, particularly within city centre redevelopment schemes where space is much more restrictive. A rigid list of standards is unlikely to achieve this.

#### Question 17- Natural Environment

The MIR proposes to roll forward the existing 2017 LDP policies pertaining to the Natural Environment into the next LDP, albeit consolidated under a more streamlined list of policy topics. SMH are generally supportive of this approach, however maintain a number of concerns over the overly restrictive content and wording of a number of these policies as summaries below. It is therefore contented that a review of the existing policy wording should be undertaken prior to publication of the Proposed Plan.

Policy NE4 – Open Space Provision in New development, which is proposed to be merged into a new Policy NE2: Green and Blue Infrastructure, stipulates that 2.8 hectares per 1,000 people of meaningful and useful open space must be provided in new residential development. Such a requirement advocates a “one size fits all” approach to all sites. This contradicts other parts of the Policy which, recognise the findings of Aberdeen’s Open Space Audit 2010, which proposes a more flexible approach to identifying the exact level and mix of open space and being responsive to the level of existing provision, its quality and accessibility, and on a site by site basis.

Policy NE5 – Trees and Woodlands and its existing supplementary guidance needs to be substantially reviewed as it is not fit currently for purpose, placing overly restrictive policy and guidance which serves to stymie development across the city, rather than promoting a more flexible approach to tree management. The reading of the policy asserts that no development will take place if there is an impact on trees. Such an approach applied within the built up confines of a city, with significant areas of established trees is entirely unworkable. There will undoubtedly be a requirement for tree management on both brownfield and greenfield sites, however it should be guided by appropriate mitigation strategies.

My client, as well as the wider development industry has difficulties engaging with this policy and in particular the details within the Supplementary Guidance. A main area of concern is in relation to “*Proximity of Structures and Infrastructure to Trees*”, which relates to their zone of influence. Strict application of this guidance would have serious implications for the wider delivery aspirations in relation to existing sites and allocations contained within the LDP. Development proposals offer the opportunity to work with existing trees to promote sustainable tree management and supplementary landscaping and planting arrangements to ensure any potential loss is appropriately mitigated. It is therefore requested that this policy be reviewed and it would be beneficial to have input and advice from a third party arboriculturalist. Unless some degree of flexibility is provided, there is a danger it could lead to more rogue measures being adopted by individuals, such as felling unprotected trees on sites prior to lodging planning applications. This is a situation that needs to be avoided, therefore a serious review of this policy and guidance should be undertaken.

### **Main Issue 5 – Electric Vehicle Charging Infrastructure**

SMH wish to highlight their concern in respect to the Preferred option outlined within the MIR which seeks to increase the electrical vehicle charging infrastructure for all new developments that have parking. This would place a significant financial burden on the housebuilding industry in addition to concerns in relation to the capacity of the existing network to accommodate significant new demand. Therefore, the inclusion of an LDP policy requiring all new developments which provide parking to provide for EV charging may exacerbate such issues and require significant network reinforcement if undertaken at scale.

It is understood that the requirements and standards around EV charging points is currently being reviewed as part of a new set of Building Standards which will come into effect in 2021. It is essential that planning policy does not restrict the continual evolution of new technology, which could see the introduction of new charging infrastructure, at significant cost which may become outdated in the near future. Planning policy should not be used to duplicate or pre-empt what Building Standards requirements are or will be and must be cognisant of grid capacity issues to ensure that policies are achievable.

SMH would therefore seek a continuation of the current approach, and to ensure housing and other development sites are adaptable to allow retrofitting of renewable technologies where appropriate rather than a blanket policy approach requiring all new housing developments to include such technology. This would continue to provide flexibility to consider existing capacity and timescales for necessary grid upgrading and advancements in technology, ensuring that the LDP remains adaptable to change and avoid any potential duplication or conflict with regulations coming through under new Building Standards requirements.

## Question 21 – Developer Obligations and Infrastructure Delivery

SMH maintains concern over the existing provisions contained within LDP Policy I1 – Infrastructure Delivery and Planning Obligations. Aberdeen City Council are increasingly utilising planning obligations as a roof tax on the development industry. Objection is also taken to the ever growing list of services and infrastructure which developers are expected to contribute to, which ultimately impacts on the viability of development projects and often results in long and protracted negotiations and significant and unnecessary delays through the preparation of associated S75 Agreements.

The wording of the existing Policy and Supplementary Guidance makes no reference to Scottish Government Circular 3/2012: Planning Applications & Good Neighbour Agreements nor the associated tests set out in that Circular, **all of** which must be met before Planning Obligations can be sought. As presently worded, Policy I1, its supporting text and the Supplementary Guidance on Planning Obligations do not properly reflect Circular 3/2012. The Circular highlights that Planning Obligations have a **limited**, but useful role to play in the development management process. This would imply that Planning Obligations should be the exception, rather than the rule. Unfortunately, experience suggests that Planning Obligations are sought on practically every development, covering a wide range of infrastructure requirements towards community facilities, education, healthcare, etc, even where there is a pre-existing capacity, particularly in relation to education and healthcare. SMH maintain that where there is existing capacity, there should be no obligations sought, as that would conflict with the tests of the Circular.

Greater transparency is required in relation to the methodologies used for calculating the cost of providing community infrastructure. At present the Policy and Guidance does not include sufficient provision to account for individual site and local circumstances. Additionally, if the cost of that infrastructure is ultimately less than the Planning Obligations made then there should be greater scope for the return of any unspent funds within an appropriate timescale.

### **Main Issue 6 – Low and Zero Carbon Generating Technologies and Water Efficiency**

SMH recognise the importance of addressing climate change, however, the requirements set out in Policy R7 – Low and Zero Carbon Buildings and Water Efficiency are too onerous, are not directly reflected within SPP and should, therefore, be more appropriately addressed through stringent Building Regulations rather than through the policies of the Local Development Plan, which should instead be directing the appropriate management of the use of land. The requirements for carbon reduction and the calculation of those reductions are a complex requirement and meeting these requirements at pre-planning stage is not necessary. The Policy is in effect stipulating similar measures as implemented through building warrant regulations which will lead to a duplication of work.

The requirement to install low and zero carbon generating technologies in new residential developments does not flow directly from SPP. Instead, SPP encourages Local Development Plans to take a more holistic view through, for example, heat mapping to identify the potential for co-location of developments with a high heat demand with sources of heat supply. It advises that heat demand sites for particular consideration include high density developments, communities off the gas grid, fuel poor areas and anchor developments, such as hospitals, schools, leisure centres and heat intensive industry. The onus is, therefore, on the planning authority through their Local Development Plans to be more proactive in terms of identifying opportunities for co-location of development

SMH maintains that a “**fabric first**” approach should be adopted ahead of the requirement to install low and zero carbon generating technologies. Such technologies are often unproven and add significantly to the cost of development. This can further exacerbate viability issues for sites which already experience substantial development costs. Furthermore, the development industry is at the forefront of delivering sustainable and energy efficient new homes. The Council should instead focus on measures to implement schemes to improve older housing stock across the city, which are much less energy efficient.

Similarly, and in regard to MIR Question 22, water efficiency measures are more appropriately controlled through Building Regulations rather than through the Local Development Plan, which should instead focus on managing the use of land.

### **Main Issue 7 – Heat Networks**

SMH would object to the Preferred Option 2 contained within Main Issue 7 to include a policy supporting the development of Heat Networks across the city. It is noted that reference is made to the proposed wording of this Policy at Appendix 1, unfortunately however it is not listed there.

Due to the lack of clarity on how these areas will be identified, the criteria for which sites will be required to provide/connect and how they will be funded and maintained SMH cannot support the implementation of such a policy requirement within the next LDP. Accordingly, support is offered for the current approach as detailed within Option 1. This would allow heat networks to come forward for appropriate developments where they are considered viable, but would not require heat networks to be created when these are not feasible, appropriate, or indeed deliverable.

### **Main Issue 8 – West End Office Area**

The West End Office Area forms a substantial specialist employment area on the western fringes of the City Centre, with related existing LDP Policy B3 highlighting it as a “prestigious, high quality office location on the edge of the city centre”, with a focus on promotion of the area for continued Class 4 Office development. It is therefore welcomed that recognition of the recent shift in the market, which has witnessed a number of high profile and established businesses moving from the typical large granite villas which dominate area, in favour of newly built Grade A office accommodation, is provided within Main Issue 8. Whilst the current approach does give some provision for alternative uses, such as

residential, it simply states that these will be assessed “on their own merits”. There are however a substantial number of unlet office buildings on the market within the West End Office area, therefore LDP Policy needs to be more flexible and open to a wider mix of alternative uses. SMH would therefore welcome the Preferred MIR Option which advocates such an approach, which would ultimately stimulate investment and promote vibrant and sustainable new uses for these vacant buildings.

#### Question 25 - Affordable Housing

While SMH are in general agreement with the existing LDP approach, which seeks a benchmark 25% affordable housing requirement from sites of 5 units or more. This reflects the approach adopted within the Proposed SDP and remains in line with SPP. The wording of Policy H5 should however be amended to more properly reflect the requirements of SPP. As worded it seeks to impose a minimum requirement across the City. Also, it does not provide enough flexibility for a reduction in exceptional circumstances.

Furthermore, the provision of affordable housing currently relies too heavily on the delivery of mainstream housing, with the onus placed on landowners to make land available for development. If an unacceptable burden is placed on land values there is likely to be a reluctance on the part of landowners to release land for development. Whilst the supporting text to Policy recognises this to an extent, concern must be expressed regarding the lack of flexibility in approach to delivery, as set out in the text and the associated Supplementary Guidance.

Off-site provision should be viewed as acceptable as onsite provision. In many instances, it is simply not viable to provide affordable housing on-site. This is particularly evident on smaller sites close to the city centre. For example, the factoring costs for shared amenities and open space provision are often not capable of being met by RSLs or the occupiers of affordable housing. Therefore the existing “hierarchy” of preferred delivery mechanisms contained within Supplementary Guidance should be removed, instead opting for additional flexibility and support for delivery across all mechanisms, whether on-site, off-site or commuted payments, depending on the circumstance. The key is the delivery of affordable housing in areas of need. Off-site provision and Commuted sums can therefore play a vital role in the delivery of affordable housing, acting as a catalyst for delivery on specific sites. Accordingly, there should be a wider acceptance of the benefit of all forms of affordable housing delivery mechanisms, not the current overreliance on developers to meet 25% delivery on-site.

With regard to other measures the Council could consider to assist with the delivery of Affordable Housing, the LDP should seek to be more pro-active in terms of identifying and allocating specific sites for affordable housing. Planning Advice Note 2/2010 promotes a number of additional or alternative means of delivering affordable housing, which could be considered by Planning Authorities. These include:

1. *Allocating new sites in Local Development Plans specifically for affordable housing.*
3. *Using Compulsory Purchase powers to support the delivery of a new supply and regeneration.*
4. *Making appropriate surplus Local Authority land or buildings available for affordable housing.*

Given the mechanisms available to Aberdeen City Council as set out above, this should be reflected through the Local Development Plan, as an alternative to the current blanket 25% approach across all sites. In that regard, specific sites should be identified for the provision of affordable housing along with the preferred method by which they will be delivered. The alternatives also clearly support the principle of off-site provision, which should be better reflected in the Policy of the next LDP.

In considering off-site provision and the scale of commuted sums, the Supplementary Guidance makes reference to sub-market areas. This is unacceptable. Aberdeen City, along with its immediate hinterland lying within Aberdeenshire, comprise a single housing market area and it is not appropriate to divide this into sub-market areas. This policy approach is unwarranted and serves to stifle the delivery of affordable housing, rather than encourage it and my client would seek to have it removed from the next plan. Such an approach contravenes SPP and the Strategic Development Plan. If sub-market areas are to be adopted then the Strategic Development Plan should be identifying the housing requirement for those sub-market areas. There is a danger that continuation of such an approach could distort the housing market. Similarly, inconsistencies in the delivery of affordable housing and the calculation of commuted sums in those parts of the Aberdeen Housing Market Area lying within the City and Shire could also distort the market and favour development in certain areas over others. There should be a consistent joined-up approach applied throughout the Aberdeen Housing Market Area comprising both the City and part of the Shire.

The MIR notes suggests that there is a need to review the level of commuted payments. Such a review of the existing commuted sums figures and the low cost home ownership benchmark should however be undertaken in consultation with the development industry and the appropriate forum for that is through the Development Plan process. At present the commuted sum figures listed within the Supplementary Guidance are often in excess of the of private plot values. It must be emphasised that any figure used should be for the duration of the Plan and not be subject to further increases, without a full and informed consultation with the housebuilding industry. My client also feels that the existing benchmark figures need to be reviewed to reflect a continuing surge in build costs and prevailing market conditions.

### **Main Issue 9 – Inclusive Housing Mix**

SMH would object to any deviation away from the current policy approach, which provides housebuilders the flexibility to develop a range of house types and sizes throughout their sites. It is imperative that this continues to be the adopted approach, which allows housebuilders the ability to deliver homes with regard to what will sell in the open market. At present it is felt that the mix across sites is appropriate and the Planning Service already have the ability to influence the range and house types within a development as part of the existing masterplanning process.

In that respect, SMH do not support the introduction of a minimum requirement for a housing mix to be specified by the Planning Authority, either through the Alternative or Preferred Options contained within Main Issue 9. As recognised by the MIR, setting the mix of housing within a private development site could present serious viability issues for sites, if that mix does not accurately reflect market demand. It could lead to units being built and lying unoccupied on sites due to lack of interest from prospective purchasers. The housebuilding industry is best placed to react to deliver the range and mix suitable for particular sites and prevailing market conditions, therefore the current approach set out in Option 1 should be maintained.

Furthermore the Preferred Option suggests that units which are demonstrated to be adaptable for varying needs or designed for lifetime living would be supported in principle. In reality this is an approach currently adopted by my client in the delivery of their new homes. This is a current requirement set out within Building Standards, therefore duplication into Planning Policy wording is not necessary.





# 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 Lorimer
Organisation (if relevant)	Ryden LLP
On behalf of (if relevant)	Stewart Milne Homes Ltd
Address	
Postcode	
Telephone	
E-mail	

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



If yes, please provide an e-mail address

### PRIVACY STATEMENT

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

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

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

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

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

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

### YOUR DATA, YOUR RIGHTS

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

## YOUR COMMENTS

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

Please indicate the document and the specific Issue, Question, Site, Policy, Map or Table you are commenting on. Please provide your comments below and explain your reason for supporting, opposing or commenting on this specific part of the document.

Please see attached Paper Apart.

**YOUR COMMENTS CONTINUED**

## **Representation to the Aberdeen City Local Development Plan 2019 Main Issues Report on behalf of Stewart Milne Homes in relation to Site No: B0921, Sites 4, 5 and 6 of Countesswells Settlement Expansion.**

### **Introduction**

On behalf of Stewart Milne Homes (SMH), objection is taken to the failure of the Main Issues Report (MIR) to identify six parcels of land identified within Development Bid B0921 (sites 2 – 7) as preferred options for development, to supplement the ongoing creation and delivery of the new Countesswells Community as part of an appropriately planned extension to the existing LDP OP38 opportunity site. This response focuses on areas 4, 5 & 6 which should be preferred for future growth within the Proposed Local Development Plan (2022), allowing for a phased development to be delivered following a future interim review of the Plan. A separate but related MIR response has been prepared in relation to areas 2, 3 & 7, which seeks their inclusion for delivery in the first phase, following adoption of the next LDP. A further MIR response has been prepared in relation to land to the North East of Countesswells (Site 1003).

This representation requires to be considered in the context of the Development Bid submitted at the pre-MIR stage and having regard to the indicative Masterplan and Development Strategy which accompanied that Bid, detailing the concept for future growth of the community.

This submission also requires to be read in conjunction with general representations prepared in response to the content of the MIR and, in particular, the response to the proposed Spatial Strategy and Housing Allowances submitted by Stewart Milne Homes and Homes for Scotland. Those representations contend that a more ambitious growth plan should be adopted and additional greenfield land should be allocated for residential development to ensure that a 5 year housing land supply is in place at the end of the Local Development Plan period. They further contend that to be consistent with the Aberdeenshire Local Development Plan Review, which is required to conform to the same Strategic Development Plan (SDP), sites should be identified for longer term development following a mid-term review of the LDP. These could either be stand-alone sites that are reserved or subsequent phases of sites identified through the proposed LDP 2022, such as the proposed settlement expansion sites outlined within B0921.

### **Response to MIR Assessment**

The Development Options Assessment Report, which accompanied the publication of the MIR, provides a scoring matrix for each Bid site and provides a summary justification for the Officers' recommendation as to whether the site should, or should not, be included in the Proposed Plan. Issue is taken with a number of the comments and findings contained therein and are set out in detail below.

The justification contained within the Site Assessment acknowledges that the proposal is separated into 6 separate land parcels identified as sites 2 through 7. As highlighted above, this representation seeks to respond to sites 4, 5 & 6, with a separate response prepared for sites 2, 3 & 7. The justification cites their location within the Greenbelt as reason to deem them undesirable for development and objection is taken to this approach. The Aberdeen City Greenbelt functions as a landscape buffer to protect the setting of the City and surrounding countryside from inappropriate, unplanned development. It should not however be viewed as a barrier to development. As identified by SPP, in developing the spatial strategy, planning authorities should identify the most sustainable locations for longer-term development and, where necessary, review the boundaries of any Greenbelt designations. It is not therefore uncommon for new greenfield sites, located within the Greenbelt to come forward for development. Indeed, such as approach was adopted for the existing Countesswells OP38 allocation.

It is therefore contended that in order to maximise the potential of the significant infrastructure being developed as part of the new Countesswells settlement, an appropriate review of the boundaries of the Greenbelt should be undertaken in and around Countesswells to allow for appropriately planned future expansion. Paragraph 166 of SPP states that “*the relationship between transport and land use has a strong influence on sustainable economic growth*”, therefore it is logical to include the additional land, sought under B0921 in order to maximise the significant level of infrastructure associated with Countesswells and secure the long term-planning of the community, allowing it to expand organically in the future. It is therefore requested that the proposed sites are removed from the Greenbelt to facilitate appropriately planned, organic growth.

It is disappointing that the MIR Assessment suggests that the proposed sites would be “**visually intrusive**” and create a “**detrimental impact on the landscape**” as a determining factor for not including the expansion sites as preferred options for development. This also appears to have had a significant bearing on the scoring matrix against the sites, which is discussed in greater depth under the related heading below. Such assertions are strongly contested and considered to be overstated, particularly when considering the proximity and close relationship the land parcels have when viewed in the context of the existing OP38 allocation. Accordingly, sites 4, 5 & 6 should be assessed in relation to the rapidly emerging new urban community at Countesswells. It has been accepted that the new community will alter the landscape as it previously existed as undeveloped agricultural land. This has been acknowledged through allocations within the previous 2012 LDP, the extant 2017 LDP, as well as approval of the Development Framework and Phase 1 Masterplan for the site. As identified within the Development Bid, a number of applications have and continue to be progressed for the site, securing the ongoing delivery of the initial phases of development. This entire process has been landscape-led, with substantial consultation undertaken with the local community providing valuable input into the perceived design and layout of the development.

The additional sites for expansion are located immediately adjacent to the OP38 boundary and have been identified through similar landscape analysis, as the most suitable to allow for future organic growth of the settlement. They offer excellent connectivity, allowing for a natural integration to the existing network of streets and open space and would therefore be viewed as a logical expansion to the existing Countesswells boundary. Existing woodland and shelter belts would be retained and

supplemented through proposed structure planting thereby creating further opportunities to visually contain the proposed pockets of growth and mitigate any negative impacts on the character of the surrounding landscape.

The MIR suggests that the development of the proposed expansion sites would, “**lead to loss of woodland and disturbance to designated species and their habitats**”. This is however entirely misleading and suggests a failure on the part of Officers to appropriately consider the supporting information and masterplan submitted with the Development Bid at pre-MIR stage. This clearly demonstrates that there would be no associated loss of woodland as a result of the development of sites 4, 5 & 6. In fact, where there are existing pockets of woodland and shelterbelts, these would be actively retained to ensure an appropriate landscape feature and backdrop for the development. The woodland would be enhanced and supplemented through additional planting to help define the structure of the proposed sites. This would also facilitate the movement of species and promote appropriate habitat connectivity by bolstering the existing network.

As acknowledged within the MIR Assessment, all six land parcels promoted through Bid site B0921 were subject to Examination as part of the preparation of the extant LDP. It is therefore welcomed that the Assessment highlights that with regard to site 4, the Reporter accepted that it lies immediately adjoining the OP38 Countesswells boundary, and benefits from a backdrop of trees to the north and west, making it a credible enlargement of the main site, should such a requirement arise. This clearly demonstrates that the suitability of site 4 for expansion of Countesswells has previously been accepted. It is therefore disappointing that the MIR fails to acknowledge this potential through recognition as a preferred site for development. It suggests that the requirement to expand the boundaries of OP38 are not appropriate at this time, as the Proposed SDP recommends that the expansion of existing masterplanned sites should not be considered for allocation. SMH have submitted representations objecting to the approach set out within the Proposed SDP. Separate representations have also been submitted to the general content of the MIR and its Spatial Strategy / Housing Allowances, maintaining that a range of sites of varying scales should be allocated to ensure an appropriate land supply at all times, as advocated by Scottish Planning Policy.

With regard to sites 5 and 6, the Reporter considered they would not be suitable for development due to a perception that they would constitute, “**a finger of development projecting westwards into the green belt**” and the MIR Assessment suggests that they would not relate well to the main Countesswells site or the rural character of the surrounding area. However, as identified within the Development Bid, both Sites 5 and 6 offer close connections to the centre of Countesswells and also Site 4 and are together promoted to ensure a new rural to urban arrival sequence from the west, typical of many small settlements throughout Scotland. This would allow for the creation of a gradually increasing density of development, nestled between Countesswells and Foggieton Woods, thus affording the sites a natural backdrop of trees which would help absorb the development into the landscape.

The importance of reducing travel distances and making walking, cycling and public transport more attractive to people are considered by the assessment to be important considerations, particularly for any new greenfield development. This is not disputed and, indeed, these considerations have been fundamental to the creation of the new Countesswells Community, having been promoted through the Development Framework, Phase 1 Masterplan and approved planning applications which are now being delivered on site. These principles have also been fully embraced in the consideration of the proposed settlement expansion sites.

As such, contrary to the MIR Assessment, the sites would be neither “**remote from existing urban areas and facilities**”, nor “**car dependant**”. The sites would incorporate a sympathetic mix of housing at a range of development densities deemed suitable to the characteristics of each individual site. All six of the proposed sites would be located within walking distance (1600m) to the broad range of employment opportunities, retail and community facilities being delivered as part of the sustainable new neighbourhood centre at Countesswells. This falls within the threshold for walking and cycling distance specified in PAN75: Planning for Transport and demonstrates that the site will be fully integrated into the robust network of footpaths linking the site to the new community and beyond via sustainable modes of travel. Additionally, all areas of the proposed site would be located within 400m from public transport provision, with recent contractual agreement having been signed between Countesswells Development Ltd and Stagecoach for the phased delivery of new bus services to the emerging community.

Furthermore, the site benefits from being positioned within close proximity to the AWPR as well as the Park & Ride facility at Kingswells offering further public transport links along the AWPR to key employment locations to the south at Altens and Cove, and northwards to Dyce and Bridge of Don, as well as Aberdeen Airport and the new Exhibition and Conference Centre.

### **Response to Scoring Matrix**

The following section seeks to respond to the Scoring Matrix which has been utilised to inform the Council's justification for non-inclusion of the Countesswells Expansion sites within the MIR Assessment. This will review and comment on the criteria whereby a particular site, or indeed a number of the proposed sites have been notably marked down.

#### Slope

It is noted that sites 5 and 6 have a slope of 1 in 7 and have been scored down for this reason. Whilst the sites slope north to south, they would be relatively contained and nestled between two substantial areas of mature woodland at Countesswells and Foggieton Woods. This would afford the site a south facing aspect and expansive views out over the Dee Valley. Any associated cut and fill / excavation works would be kept to a minimum to facilitate the modest expansion of the settlement into these two development areas.



## Natural Conservation

All 3 areas (sites 4, 5 & 6) have been scored down in respect of this criteria. The justification cites the presence of Ancient Woodland located in close proximity to the sites and Greenspace Network designation as justification for the low scores. As has been highlighted above, there would be no proposed woodland or Ancient Woodland removal associated with any of the proposed sites. Woodland would be retained, strengthened and enhanced to bolster existing Ancient woodland designations and improve linkages and opportunity for movement of species.

Similarly, one of the fundamental principles established through the development at Countesswells is the strengthening of existing landscape features, enhanced through ongoing management as part of the large scale delivery of public open space. These principles have also been carried through into the proposed Masterplan to facilitate the organic growth of the settlement. In that respect, the existing Greenspace network will be enhanced through increased accessibility and delivery of high quality public open space, incorporating the Core Path network, play areas, as well as areas of existing woodland and proposed new woodland structure planting. Contrary to the scoring matrix which suggests negative impacts to priority habitats, the proposed sites promote the retention of landscape corridors through which wildlife can migrate, thereby respecting the existing Green Space Network designation and ensuring reinforcement of established priority habitats.

Reference is made to the River Dee catchment area within the assessment, however, no comment is provided in relation to why the sites have been scored down on that basis. The River Dee Catchment forms an expansive area, covering all of Aberdeen City and a significant portion of Aberdeenshire. Any development will be required to demonstrate to the satisfaction of SEPA and Scottish Natural Heritage that it will not have an adverse impact on the River Dee Special Area of Conservation, as was demonstrated and accepted for the wider Countesswells development which lies within the River Dee Catchment. With regard to water abstraction, whether the development is in Deeside or elsewhere within the city this is an issue that will require to be addressed as the supplies drawn from the ground waters of the River Dee serve an expansive area covering the majority of the city, not just the Deeside corridor. It should not, therefore, be used as a reason to discount development in this area.

## Landscape Features

The Scoring Matrix picks up on a number of existing features present across all three of the proposed sites. These typically relate to stone dyke field boundaries and mature trees. It should however be stressed that any notable landscape features will be retained and incorporated into the development to provide character and appropriate reference to the new development blocks, areas of open space and woodland.

### Landscape Fit

It appears somewhat odd that site 4 has been scored down with regard to landscape fit, when it had previously been accepted by the Reporter to form a credible enlargement of the main Countesswells site. For the Council to then suggest they are “disjointed” from the main site completely contradicts the Reporter’s assessment, as well as the Council’s own acceptance that the site would be well related to the OP38 designation, as identified within the subsequent ‘Relationship to existing settlement’ criteria.

The scoring matrix fails to appreciate that sites 5 and 6 offer close connections to the centre of Countesswells and are promoted to ensure a new rural to urban arrival sequence from the west, which will be visually dictated by carefully increasing densities on approach to the heart of the new Community. Both sites benefit from being positioned between Countesswells and Foggieton Woods, thus affording a natural backdrop of trees which would help absorb the development into the landscape.

### Relationship to Existing Settlement

It is noted and welcomed that all 3 sites are recognised within the scoring matrix to be well related to the existing OP38 allocation. It is also recognised that all sites are noted for being remote from the existing settlement of Cults. This however is the intention of the development, which will form an organic expansion of the new Countesswells Community and should indeed remain separated from Cults.

### Land Use Mix / Balance/ Service Thresholds

Disappointingly all three sites has been marked down on this criteria, with suggestion made that they are unlikely to contribute to a better mix of land uses. The matrix fails to appreciate that the sites will provide a mix of housing (including affordable housing), open space, enhanced woodland planting and connectivity between the new community, surrounding recreational areas and the wider countryside. It is therefore maintained that the sites should have scored higher within this criteria in recognition of the sustainable mix of residential and recreational uses being promoted.

### Accessibility and Proximity to Facilities

As regards accessibility from public transport the matrix scoring suggests the sites are remote from existing bus stops and regular services. It is disappointing that it fails to consider the fundamental planning requirement for the new Countesswells community is the provision of a Public Transport Strategy, setting out the phased delivery of bus services to coincide with the growth of the new community. A contractual agreement is now in place with Stagecoach to deliver these phased services, with the first bus route scheduled to be rolled out this summer (2019). Accordingly, Countesswells will be inherently accessible for sustainable modes of transport, with the proposed sites positioned immediately adjacent to the wider site, thus offering the opportunity for those services to be extended as the community grows.

To suggest that the site has a limited range of available facilities within 800m of the site is rather short-sighted and referencing Bielside as the closest facilities represents a poor presentation of the facts. Countesswells will deliver circa 10ha of employment land and community facilities as part of residential-led mixed use new community, in line with its LDP allocation and adopted Development Framework. A number of planning applications have already been taken forward securing consent for the initial phases of delivery of commercial premises to serve the new development. Furthermore, a total of three new schools are being delivered as part of the new community.

Initially, this will see the delivery of a new primary school located within the neighbourhood centre to the north of Countesswells, scheduled to open in 2021. The new primary school will benefit from a highly prominent and accessible position overlooking the Cults Burn network park, serving the central and northern parts of the community. Thereafter, a further primary school and new Countesswells Academy will be delivered as part of a community campus, with provision of sports and other community facilities. The campus will be located in a prominent location at the eastern end of the Central Park, becoming a fully integrated resource for the wider community. The new schools will contain provision for the educational demands of the new community, as well as capacity to allow for additional organic growth of the settlement. A new medical centre will also be delivered in the early phases, with GP and dental practices and a site has been offered to NHS Grampian as an interim facility. The proposed bid site will be closely connected to these employment and community uses, located within a short walk from new village centre and would link via the new network of footpaths being created. It is therefore disappointing that the site did not score higher in these criteria.

#### Land Use Conflict

Reference is made to the overhead pylons which cross the Countesswells site from a north west to south east direction, travelling through a small portion of site B1003. These are recognised as a constraint within the Development Framework and as such, a large area of parkland has been created along the corridor of the pylons where no development has taken place. A similar approach has been adopted for the proposed sites, which locate new housing outwith the location of the pylons, thereby resulting in no associated land use conflict. With regard to the area of forestry adjacent to Site 4, this would be retained and form a suitable backdrop for the development. As highlighted above, this was previously recognised as a significant benefit by the Reporter at Examination stage.

#### Service Infrastructure Capacity

Similarly, with regard to schooling it is concerning that the scoring matrix fails to acknowledge that the development of these future expansion sites would be allocated to Countesswells and not Cults and Airyhall schools as is suggested, with low scores being attributed due to existing capacity issues at those schools. As highlighted above, the construction of two new primary schools and a new secondary school are required to serve the new Countesswells community. The proposed sites will make use of these facilities which will contain more than appropriate capacity to absorb the future growth of the settlement as promoted.

## **Summary and Recommendations**

Stewart Milne Homes contend, as set out with their representations and those of Homes for Scotland, that additional land requires to be identified for residential development within the next LDP. This should comprise land for development in the first period of the Plan with sites reserved for longer term development.

The land identified for the future organic growth of Countesswells, as set out in the Development Bid and Development Strategy, has the capacity to accommodate an appropriately planned and modest extension to the new settlement within the next LDP. The information clearly demonstrates the capacity of the landscape to accommodate this growth, with significant new structure planting ensuring the development will be appropriately absorbed with minimal visual impacts of the character of the area.

Sites 4, 5 and 6 present an excellent opportunity to capitalise on the significant levels of infrastructure being delivered to accommodate the new community. The sites are located immediately adjacent to the existing OP38 LDP allocation and would form an integrated part of the wider Countesswells development, offering access to employment, local retail, community facilities and schools within walking distance from each of the sites via connections to the intricate network of footpaths being created. Bus stops would also be located within 400m of the site.

On the basis of all of the above and the previously submitted Development Bid it is considered that the expansion sites should be allocated for development. In recognition of current build out rates for the wider development of Countesswells, it is respectfully requested that these sites be identified in the proposed Local Development Plan 2022 for future release, to be delivered following an interim review of the LDP.



# 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 Lorimer
Organisation (if relevant)	Ryden LLP
On behalf of (if relevant)	Stewart Milne Homes Ltd
Address	
Postcode	
Telephone	
E-mail	

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



If yes, please provide an e-mail address

### PRIVACY STATEMENT

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

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

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

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

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

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

### YOUR DATA, YOUR RIGHTS

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

## YOUR COMMENTS

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

Please indicate the document and the specific Issue, Question, Site, Policy, Map or Table you are commenting on. Please provide your comments below and explain your reason for supporting, opposing or commenting on this specific part of the document.

Please see attached Paper Apart.

**YOUR COMMENTS CONTINUED**



## **Representation to the Aberdeen City Local Development Plan 2019 Main Issues Report on behalf of Stewart Milne Homes in relation to Site No: B0921, Sites 2, 3 and 7 of Countesswells Settlement Expansion.**

### **Introduction**

On behalf of Stewart Milne Homes (SMH), objection is taken to the failure of the Main Issues Report (MIR) to identify six parcels of land identified within Development Bid B0921 (sites 2 – 7) as preferred options for development, to supplement the ongoing creation and delivery of the new Countesswells Community as part of an appropriately planned extension to the existing LDP OP38 opportunity site. This response focuses on areas 2, 3 & 7 which should be preferred for development within the Proposed Local Development Plan (2022), allowing for a phased delivery following the adoption of the next LDP. A separate but related MIR response has been prepared in relation to areas 3, 4 & 6, which seeks their inclusion for future growth to be delivered following an interim review of the LDP. A further MIR response has been prepared in relation to land to the North East of Countesswells (Site 1003).

This representation requires to be considered in the context of the Development Bid submitted at the pre-MIR stage and having regard to the indicative Masterplan and Development Strategy which accompanied that Bid, detailing the concept for future growth of the community.

This submission also requires to be read in conjunction with general representations prepared in response to the content of the MIR and, in particular, the response to the proposed Spatial Strategy and Housing Allowances submitted by Stewart Milne Homes and Homes for Scotland. Those representations contend that a more ambitious growth plan should be adopted and additional greenfield land should be allocated for residential development to ensure that a 5 year housing land supply is in place at the end of the Local Development Plan period. They further contend that to be consistent with the Aberdeenshire Local Development Plan Review, which is required to conform to the same Strategic Development Plan (SDP), sites should be identified for longer term development following a mid-term review of the LDP. These could either be stand-alone sites that are reserved or subsequent phases of sites identified through the proposed LDP 2022, such as the proposed settlement expansion sites outlined within B0921.

### **Response to MIR Assessment**

The Development Options Assessment Report, which accompanied the publication of the MIR, provides a scoring matrix for each Bid site and provides a summary justification for the Officers' recommendation as to whether the site should, or should not, be included in the Proposed Plan. Issue is taken with a number of the comments and findings contained therein and are set out in detail below.

The justification contained within the Site Assessment acknowledges that the proposal is separated into 6 separate land parcels identified as sites 2 through 7. As highlighted above, this representation seeks to respond to sites 2, 3 & 7, with a separate response prepared for sites 4, 5 & 6. The justification cites their location within the Greenbelt as reason to deem them undesirable for development and objection is taken to this approach. The Aberdeen City Greenbelt functions as a landscape buffer to protect the setting of the City and surrounding countryside from inappropriate, unplanned development. It should not however be viewed as a barrier to development. As identified by SPP, in developing the spatial strategy, planning authorities should identify the most sustainable locations for longer-term development and, where necessary, review the boundaries of any Greenbelt designations. It is not therefore uncommon for new greenfield sites, located within the Greenbelt to come forward for development. Indeed, such as approach was adopted for the existing Countesswells OP38 allocation.

It is therefore contended that in order to maximise the potential of the significant infrastructure being developed as part of the new Countesswells settlement, an appropriate review of the boundaries of the Greenbelt should be undertaken in and around Countesswells to allow for appropriately planned future expansion. Paragraph 166 of SPP states that “*the relationship between transport and land use has a strong influence on sustainable economic growth*”, therefore it is logical to include the additional land, sought under B0921 in order to maximise the significant level of infrastructure associated with Countesswells and secure the long term-planning of the community, allowing it to expand organically in the future. It is therefore requested that the proposed sites are removed from the Greenbelt to facilitate this growth. Given their proximity to the existing allocation and lack of constraints, this would facilitate an immediate direction for organic growth following adoption of the new LDP, sites 2, 3 and 7 should be identified for development in the first phase of the new LDP.

It is disappointing that the MIR Assessment suggests that the proposed sites would be “**visually intrusive**” and create a “**detrimental impact on the landscape**” as a determining factor for not including the expansion sites as preferred options for development. This also appears to have had a significant bearing on the scoring matrix against the sites, which is discussed in greater depth under the related heading below. Such assertions are strongly contested and considered to be overstated, particularly when considering the proximity and close relationship the land parcels have when viewed in the context of the existing OP38 allocation. Accordingly, sites 2, 3 & 7 should be assessed in relation to the rapidly emerging new urban community at Countesswells. It has been accepted that the new community will alter the landscape as it previously existed as undeveloped agricultural land. This has been acknowledged through allocations within the previous 2012 LDP, the extant 2017 LDP, as well as approval of the Development Framework and Phase 1 Masterplan for the site. As identified within the Development Bid, a number of applications have and continue to be progressed for the site, securing the ongoing delivery of the initial phases of development. This entire process has been landscape-led, with substantial consultation undertaken with the local community providing valuable input into the perceived design and layout of the development.

The additional sites for expansion are located immediately adjacent to the OP38 boundary and have been identified through similar landscape analysis, as the most suitable to allow for future organic growth of the settlement. They offer excellent connectivity, allowing for a natural integration to the existing network of streets and open space and would therefore be viewed as a logical expansion to the existing Countesswells boundary. Existing woodland and shelter belts would be retained and supplemented through proposed structure planting thereby creating further opportunities to visually contain the proposed pockets of growth and mitigate any negative impacts on the character of the surrounding landscape.

The MIR suggests that the development of the proposed expansion sites would, “**lead to loss of woodland and disturbance to designated species and their habitats**”. This is however entirely misleading and suggests a failure on the part of Officers to appropriately consider the supporting information and masterplan submitted with the Development Bid at pre-MIR stage. This clearly demonstrates that there would be no associated loss of woodland as a result of the development of sites 2, 3 and 7. In fact, where there are existing pockets of woodland and shelterbelts, these would be actively retained to ensure an appropriate landscape feature and backdrop for the development. The woodland would be enhanced and supplemented through additional planting to help define the structure of the proposed sites. This would also facilitate the movement of species and promote appropriate habitat connectivity by bolstering the existing network.

As acknowledged within the MIR Assessment, all six land parcels promoted through Bid site B0921 were subject to Examination as part of the preparation of the extant LDP. It is therefore welcomed that the Assessment highlights that with regard to site 3, the Reporter accepted that it lay south west and immediately adjoining the OP38 Countesswells boundary, was well screened by trees and would be acceptable as part of an enlargement of that allocation, should such a requirement arise. This clearly demonstrates the suitability of site 3 for expansion of Countesswells has previously been accepted. It is therefore disappointing that the MIR fails to acknowledge this potential through recognition as a preferred site for development. It suggests that the requirement to expand the boundaries of OP38 are not appropriate at this time, as the Proposed SDP recommends that the expansion of existing masterplanned sites should not be considered for allocation. SMH have submitted representations objecting to the approach set out within the Proposed SDP. Separate representations have also been submitted to the general content of the MIR and its Spatial Strategy / Housing Allowances, maintaining that a range of sites of varying scales should be allocated to ensure an appropriate land supply at all times, as advocated by Scottish Planning Policy.

Sites 2 and 7 were however considered to be a “major intrusion into the Greenbelt separating Cults, the new Development at Countesswells, and the existing built up area of Aberdeen lying to the East, which could lead to unacceptable landscape impacts. It is contended however that sites 2 and 7 form a logical south eastern expansion to the OP38 allocation at Countesswells and any landscape impacts associated with the development of these sites would be minimal and read as a modest expansion to the new community. Any potential for coalescence with Cults and the built up area of Aberdeen would be protected through existing woodland and proposed strategic landscaping along the south and eastern boundaries as identified within the Masterplan submitted in support of the Development Bid. A

large swathe of open space would also run central to sites 2 and 7, linking with the adjacent parklands being created as part of the wider Countesswells development, as well as existing woodland and Greenspace Networks located to the north and south.

The importance of reducing travel distances and making walking, cycling and public transport more attractive to people are considered by the assessment to be important considerations, particularly for any new greenfield development. This is not disputed and, indeed, these considerations have been fundamental to the creation of the new Countesswells Community, having been promoted through the Development Framework, Phase 1 Masterplan and approved planning applications which are now being delivered on site. These principles have also been fully embraced in the consideration of the proposed settlement expansion sites.

As such, contrary to the MIR Assessment, the sites would be neither “**remote from existing urban areas and facilities**”, nor “**car dependant**”. The sites would incorporate a sympathetic mix of housing at a range of development densities deemed suitable to the characteristics of each individual site. All six of the proposed sites would be located within walking distance (1600m) to the broad range of employment opportunities, retail and community facilities being delivered as part of the sustainable new neighbourhood centre at Countesswells. This falls within the threshold for walking and cycling distance specified in PAN75: Planning for Transport and demonstrates that the site will be fully integrated into the robust network of footpaths linking the site to the new community and beyond via sustainable modes of travel. Additionally, all areas of the proposed site would be located within 400m from public transport provision, with recent contractual agreement having been signed between Countesswells Development Ltd and Stagecoach for the phased delivery of new bus services to the emerging community.

Furthermore, the site benefits from being positioned within close proximity to the AWPR as well as the Park & Ride facility at Kingswells offering further public transport links along the AWPR to key employment locations to the south at Altens and Cove, and northwards to Dyce and Bridge of Don, as well as Aberdeen Airport and the new Exhibition and Conference Centre.

### **Response to Scoring Matrix**

The following section seeks to respond to the Scoring Matrix which has been utilised to inform the Council’s justification for non-inclusion of the Countesswells Expansion sites within the MIR Assessment. This will review and comment on the criteria whereby a particular site, or indeed a number of the proposed sites have been notably marked down. It is noted that sites 2, 3 & 7 scored relatively high in the majority of the assessment criteria, further demonstrating their suitability as areas that could absorb the natural growth of Countesswells, following adoption of the next LDP.

### Drainage

Site 3 is highlighted as having an area of wet ground to the south and an existing water course behind the tree belt at the north east of the site. Significant sustainable drainage infrastructure is currently being delivered as part of the wider Countesswells development. Site 3 lies immediately adjacent to the OP38

boundary and will benefit from connections into this infrastructure to ensure appropriate attenuation and discharge of surface water. As with all existing watercourses located within the development, these will be protected by appropriate buffer strips to ensure there is no detrimental impacts posed by the development.

### Built and Cultural Elements

Site 3 has again been marked down slightly due to potential impacts on listed buildings which lie between 190 and 330m north west of the site. Given the distances involved and existing woodland which wraps around Site 3 to the north and west, there would be no loss or disturbance to any surrounding built and cultural heritage assets. For that reason site 3 should not have been scored down on such basis.

### Natural Conservation

All 3 areas (sites 2, 3 &7) have been scored down in respect of this criteria. The justification cites the presence of Ancient Woodland located in close proximity to the sites and Greenspace Network designation as justification for the low scores. As has been highlighted above, there would be no proposed woodland or Ancient Woodland removal associated with any of the proposed sites. Woodland would be retained, strengthened and enhanced to bolster existing Ancient woodland designations and improve linkages and opportunity for movement of species.

Similarly, one of the fundamental principles established through the development at Countesswells is the strengthening of existing landscape features, enhanced through ongoing management as part of the large scale delivery of public open space. These principles have also been carried through into the proposed Masterplan to facilitate the organic growth of the settlement. In that respect, the existing Greenspace network will be enhanced through increased accessibility and delivery of high quality public open space, incorporating the Core Path network, play areas, as well as areas of existing woodland and proposed new woodland structure planting. Contrary to the scoring matrix which suggests negative impacts to priority habitats, the proposed sites promote the retention of landscape corridors through which wildlife can migrate, thereby respecting the existing Green Space Network designation and ensuring reinforcement of established priority habitats.

Reference is made to the River Dee catchment area within the assessment, however, no comment is provided in relation to why the sites have been scored down on that basis. The River Dee Catchment forms an expansive area, covering all of Aberdeen City and a significant portion of Aberdeenshire. Any development will be required to demonstrate to the satisfaction of SEPA and Scottish Natural Heritage that it will not have an adverse impact on the River Dee Special Area of Conservation, as was demonstrated and accepted for the wider Countesswells development which lies within the River Dee Catchment. With regard to water abstraction, whether the development is in Deeside or elsewhere within the city this is an issue that will require to be addressed as the supplies drawn from the ground waters of the River Dee serve an expansive area covering the majority of the city, not just the Deeside corridor. It should not, therefore, be used as a reason to discount development in this area.

### Landscape Features

The Scoring Matrix picks up on a number of existing features present across all three of the proposed sites. These typically relate to stone dyke field boundaries and mature trees. It should however be stressed that any notable landscape features will be retained and incorporated into the development to provide character and appropriate reference to the new development blocks, areas of open space and woodland.

### Landscape Fit

Whilst site 2 would be visible from Countesswells Road and Hazlehead Golf Course, it would be read in conjunction with the wider residential-led, mixed use development of Countesswells, which lies immediately to the west of the site. Views to the south would be mitigated through proposed structure planting.

It appears somewhat odd that site 3 has been scored down with regard to landscape fit, when it had previously been accepted by the Reporter to form a credible enlargement of the main Countesswells site. For the Council to then suggest they are “disjointed” from the main site completely contradicts the Reporter’s assessment, as well as the Council’s own acceptance that the site would be well related to the OP38 designation, as identified within the subsequent ‘Relationship to existing settlement’ criteria.

Landscape fit in respect of site 7 (Thornhill) was addressed in significant detail within the Development Strategy which accompanied the Bid. It demonstrated that the site would provide a sustainable expansion opportunity for Countesswells, offering a sensitive development set within open space, green linkages and connections, which would be read in conjunction with the urban form associated with the wider OP38 site. As highlighted within the scoring matrix, it is visually well contained from approaching roads and wider views from the south along Deeside.

### Relationship to Existing Settlement

It is noted and welcomed that all 3 sites are recognised within the scoring matrix to be well related to the existing OP38 allocation. It is also recognised that all sites are noted for being remote from the existing settlement of Cults. This however is the intention of the development, which will form an organic expansion of the new Countesswells Community and should indeed remain separated from Cults. This appears to contradict the MIR Assessment suggestion that sites 2 and 7 would be a major intrusion into the area of Greenspace separating Cults, when in reality it has been acknowledged that the two areas would be separated.

### Land Use Mix / Balance/ Service Thresholds

Disappointingly all three sites has been marked down on this criteria, with suggestion made that they are unlikely to contribute to a better mix of land uses. The matrix fails to appreciate that the sites will provide a mix of housing (including affordable housing), open space, enhanced woodland planting and connectivity between the new community, surrounding recreational areas and the wider countryside. It is therefore maintained that the sites should have scored higher within this criteria in recognition of the sustainable mix of residential and recreational uses being promoted.

### Accessibility and Proximity to Facilities

As regards accessibility from public transport the matrix scoring suggests the sites are remote from existing bus stops and regular services. It is disappointing that it fails to consider the fundamental planning requirement for the new Countesswells community is the provision of a Public Transport Strategy, setting out the phased delivery of bus services to coincide with the growth of the new community. A contractual agreement is now in place with Stagecoach to deliver these phased services, with the first bus route scheduled to be rolled out this summer (2019). Accordingly, Countesswells will be inherently accessible for sustainable modes of transport, with the proposed sites positioned immediately adjacent to the wider site, thus offering the opportunity for those services to be extended as the community grows.

To suggest that the site has a limited range of available facilities within 800m of the site is rather short-sighted and referencing Bieldside as the closest facilities represents a poor presentation of the facts. Countesswells will deliver circa 10ha of employment land and community facilities as part of residential-led mixed use new community, in line with its LDP allocation and adopted Development Framework. A number of planning applications have already been taken forward securing consent for the initial phases of delivery of commercial premises to serve the new development. Furthermore, a total of three new schools are being delivered as part of the new community. Initially, this will see the delivery of a new primary school located within the neighbourhood centre to the north of Countesswells, scheduled to open in 2021. The new primary school will benefit from a highly prominent and accessible position overlooking the Cults Burn network park, serving the central and northern parts of the community. Thereafter, a further primary school and new Countesswells Academy will be delivered as part of a community campus, with provision of sports and other community facilities. The campus will be located in a prominent location at the eastern end of the Central Park, becoming a fully integrated resource for the wider community. The new schools will contain provision for the educational demands of the new community, as well as capacity to allow for additional organic growth of the settlement. A new medical centre will also be delivered in the early phases, with GP and dental practices and a site has been offered to NHS Grampian as an interim facility. The proposed bid site will be closely connected to these employment and community uses, located within a short walk from new village centre and would link via the new network of footpaths being created. It is therefore disappointing that the site did not score higher in these criteria.

### Land Use Conflict

Reference is made to the overhead pylons which cross the Countesswells site from a north west to south east direction, travelling through a small portion of site B1003. These are recognised as a constraint within the Development Framework and as such, a large area of parkland has been created along the corridor of the pylons where no development has taken place. A similar approach has been adopted for the proposed site, which located new housing outwith the location of the pylons, thereby resulting in no associated land use conflict. It should also be noted that contrary to suggestion within the Scoring matrix, there are no overhead lines in proximity to Site 3, which should not have been scored down in that regard.

### Service Infrastructure Capacity

Similarly, with regard to schooling it is concerning that the scoring matrix fails to acknowledge that the development of these future expansion sites would be allocated to Countesswells and not Cults and Airyhall schools as is suggested, with low scores being attributed due to existing capacity issues at those schools. As highlighted above, the construction of two new primary schools and a new secondary school are required to serve the new Countesswells community. The proposed sites will make use of these facilities which will contain more than appropriate capacity to absorb the future growth of the settlement as promoted.

### **Summary and Recommendations**

Stewart Milne Homes contend, as set out with their representations and those of Homes for Scotland, that additional land requires to be identified for residential development within the next LDP. This should comprise land for development in the first period of the Plan with sites reserved for longer term development.

The land identified for the future organic growth of Countesswells, as set out in the Development Bid and Development Strategy, has the capacity to accommodate an appropriately planned and modest extension to the new settlement within the next LDP. The information clearly demonstrates the capacity of the landscape to accommodate this growth, with significant new structure planting ensuring the development will be appropriately absorbed with minimal visual impacts of the character of the area.

Sites 2, 3, and 7 present an excellent opportunity to capitalise on the significant levels of infrastructure being delivered to accommodate the new community. The sites are located immediately adjacent to the existing OP38 LDP allocation and would form an integrated part of the wider Countesswells development, offering access to employment, local retail, community facilities and schools within walking distance from each of the sites via connections to the intricate network of footpaths being created. Bus stops would also be located within 400m of the site.



On the basis of all of the above and the previously submitted Development Bid it is considered that the expansion sites should be allocated for development. In recognition of their close relationship with the existing OP38 allocation boundary and their relative lack of constraints, it is respectfully requested that these sites be identified in the proposed Local Development Plan 2022, for delivery in the first phase following adoption of the LDP.



# 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 Lorimer
Organisation (if relevant)	Ryden LLP
On behalf of (if relevant)	Stewart Milne Homes Ltd
Address	
Postcode	
Telephone	
E-mail	

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



If yes, please provide an e-mail address

### PRIVACY STATEMENT

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

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

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

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

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

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

### YOUR DATA, YOUR RIGHTS

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

## YOUR COMMENTS

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

Please indicate the document and the specific Issue, Question, Site, Policy, Map or Table you are commenting on. Please provide your comments below and explain your reason for supporting, opposing or commenting on this specific part of the document.

Please see attached Paper Apart.

**YOUR COMMENTS CONTINUED**

## **Representation to the Aberdeen City Local Development Plan 2019 Main Issues Report on behalf of Stewart Milne Homes in relation to Site No: B1003, Land at Phase 1 North East Countesswells**

### **Introduction**

On behalf of Stewart Milne Homes (SMH), objection is taken to the failure of the Main Issues Report (MIR) to identify Site No: B1003, Land at Phase 1 North East Countesswells, Aberdeen as a preferred site for a residential development of approximately 355 new homes, to supplement the ongoing creation and delivery of the new Countesswells Community as part of extant LDP OP38 opportunity site. The site should be preferred for a phased development commencing in the first Plan period and allocated in the Proposed Local Development Plan (LDP) 2022.

This representation requires to be considered in the context of the Development Bid submitted at the pre-MIR stage and having regard to the indicative Masterplan which accompanied that Bid, detailing the concept for future growth of the community. A supporting addendum to accompany SMH's Development Strategy, submitted with the Development Bid at pre-MIR stage is provided as an appendix to this representation. It contains supplementary information to address key landscape issues raised in the MIR.

This submission also requires to be read in conjunction with general representations prepared in response to the content of the MIR and, in particular, the response to the proposed Spatial Strategy and Housing Allowances submitted by Stewart Milne Homes and Homes for Scotland. Those representations contend that a more ambitious growth plan should be adopted and additional greenfield land should be allocated for residential development to ensure that a 5 year housing land supply is in place at the end of the Local Development Plan period. They further contend that to be consistent with the Aberdeenshire Local Development Plan Review, which seeks to conform to the same Strategic Development Plan (SDP), sites should be identified for longer term development following a mid-term review of the LDP. These could either be stand-alone sites that are reserved or subsequent phases of sites identified through the proposed LDP 2022.

### **Response to MIR Assessment**

The Development Options Assessment Report, which accompanied the publication of the MIR, provides a scoring matrix for each Bid site and provides a summary justification for the Officers' recommendation as to whether the site should, or should not, be included in the Proposed Plan. Issue is taken with a number of the comments and findings contained therein and are set out in detail below.

The justification contained within the Site Assessment acknowledges that the site is relatively flat, would not impact on any built / cultural elements or historic designations and would be, "**well related to the emerging residential development at Countesswells**". Such recognition is welcomed, however it is concerning that the assessment fails to recognise that the site is contained within the adopted Development Framework boundary for Countesswells and it also benefits from extant Planning Permission in Principle for the creation of a residential-led, mixed use new community.

Additionally, Permission in Principle exists for the upgrade of the Jessiefield junction on the A944 to the north, with construction of an all-vehicle eastern access to serve the new community. This access will intersect directly through the proposed site. Omission of these key points has a negative influence on the scores applied to a number of the criteria against which the site is assessed, particularly with regard to landscape impact and the significant weight the Council appears to place on existing Greenbelt and Greenspace Network designations. Had greater consideration been given to the existing planning status of the site, it is contended that the Development Bid would have scored higher within the Officers' Assessment.

Notwithstanding, the scoring appears to have had little influence on the decision to include or exclude sites. Instead, this appears to have been driven by scale rather than the qualities of a particular site as is highlighted within the justification, referencing the Proposed SDP which suggests the new LDP allocations, "**should be small scale in nature and not extensions to any existing strategic development sites**". SMH have submitted representations objecting to the approach set out within the Proposed SDP and as highlighted above, separate representations submitted to the general content of the MIR and its Spatial Strategy / Housing Allowances which maintain that a range of sites of varying scales should be allocated, as advocated by Scottish Planning Policy.

The justification focusses on the site's current Greenbelt and Greenspace Network zonings as reason for non-inclusion. It is acknowledged that the site lies within the Greenbelt, which functions as a landscape buffer to protect the setting of the City and surrounding countryside from inappropriate, unplanned development. It should not however be viewed as a barrier to development. As identified by SPP, in developing the spatial strategy, planning authorities should identify the most sustainable locations for longer-term development and, where necessary, review the boundaries of any Greenbelt designations. It is not therefore uncommon, for new greenfield sites, located within the Greenbelt to come forward for development. Indeed, such an approach was adopted for the existing Countesswells OP38 allocation. In recognition that the site lies within an adopted Development Framework Boundary, with Planning Permission in Principle which will see the delivery of a major new access into the Community, the Greenbelt designation is no longer considered fit for purpose and should be removed for the proposed site.

The justification also fails to recognise that the character of the Greenspace Network will also be altered by the provision of the new arterial access, which will dissect through this area from the new upgraded Jessiefield junction. The site would allow the Greenspace Network designation to be rationalised and bolstered through improved access and connectivity with the robust network of greenspace and parkland being created as part of the wider development of Countesswells. Appropriate linkages will be provided through to the existing recreational activities at Hazlehead Park. The development offers the opportunity to provide a welcoming gateway to the new settlement on approach from the north, with sympathetically designed and landscaped new development parcels. Accordingly, the Greenspace Network designation should be viewed as an opportunity rather than a constraint to site B1003.

The Council's assessment of the site suggests that it is **“exposed with a north facing aspect and as a result of its topography and elevation would likely have a significant impact on landscape character”**. The Landscape & Visual Appraisal prepared in support of this response to the MIR and attached at Appendix 1, concludes that the site is well suited to accommodating the proposed development. It references the adopted Development Framework for Countesswells, which highlights extensive woodland structure planting at the edges of the proposal site area. The potential landscape and visual effects would be substantially reduced once the woodland planting matures, thereby serving to enclose the proposed development and mitigate any associated visual impacts. It is therefore maintained that the character of the landscape would only be altered at a site level and surrounding areas of the same character type would be largely unaffected by the proposed development due to the lack of intervisibility, potential to experience change and the mitigating impacts secured by the woodland structure planting.

Contrary to the MIR Assessment, the LVIA attached at Appendix 1 demonstrates that that potential landscape and visual effects from the surrounding area would be substantially mitigated, thus allowing for the sensitive introduction of additional development parcels to the north east of Countesswells contained within Bid Site B1003. The development will be read as a modest expansion to the existing urban form and setting of the emerging new development at Countesswells, providing context and a welcoming new approach along a principal point of access to the new community.

The MIR Assessment appears to overemphasise the quality of the woodland associated with the proposed site. This is a commercial plantation with limited recreational or ecological value. The area is scheduled to be clear felled as part of ongoing woodland management. This was a fundamental reason for aligning the new primary access road through this area. Therefore to suggest that the development would **“sever the Greenspace Network in this location”**, which would have a, **“significant impact upon nature conservation, resulting in the loss/disturbance of wildlife habitat and species”** is therefore overstating the facts. In reality, areas of higher quality woodland (both in terms of mix of species and access) which currently lie to the south of the site are to be retained and managed as part of the park area, as was identified within the indicative concept for future growth of the settlement submitted with the Development Bid at pre-MIR stage and reiterated within Appendix 1. Therefore, contrary to the suggestion that the proposal would **“sever the Greenspace Network in this location and pose threats to natural designations”**, retention of this area of higher quality woodland and integration with the proposed areas of new woodland planting and creation of substantial areas of public open space will ensure the Green Space Network, connecting Hazlehead and Countesswells, is retained and enhanced. Access to the woodland and Green Space Network across this area will be improved both for recreational purposes and also through strengthened wildlife corridors as part of proposal, thereby benefiting natural designations and important wildlife/species habitats.

The importance of reducing travel distances and making walking, cycling and public transport more attractive to people are considered by the assessment to be important considerations, particularly for any new greenfield development. This is not disputed and, indeed, these considerations have been fundamental to the creation of the new Countesswells Community, having been promoted through the Development Framework, Phase 1 Masterplan and early planning applications which are now being



delivered on site. These principles have also been fully embraced in the consideration of the proposed site to the north east of the new community. The development would incorporate a sympathetic mix of new housing, located within walking distance (1600m) to the broad range of employment opportunities located at Prime 4, in addition to local employment, retail and community facilities being delivered as part of the sustainable new neighbourhood centre at Countesswells. This falls within the threshold for walking and cycling distance specified in PAN75: Planning for Transport and demonstrates that the site will be fully integrated into the robust network of footpaths linking the site to the new community and beyond via sustainable modes of travel. Additionally, all areas of the proposed site would be located within 400m from public transport provision, with recent contractual agreement having been signed between Countesswells Development Ltd and Stagecoach for the phased delivery of new bus services to the emerging community.

Furthermore, the site benefits from being positioned within close proximity to the AWPR as well as the Park & Ride facility at Kingswells offering further public transport links along the AWPR to key employment locations to the south at Altens and Cove, and northwards to Dyce and Bridge of Don as well as Aberdeen Airport and the new Exhibition and Conference Centre.

## **Response to Scoring Matrix**

### Exposure / Aspect

With regard to the scoring matrix it is noted that the site has been marked down in respect of a number of the assessment criteria, which appear to correlate with the key areas of concern outlined within the preceding justification. It highlights that the site has a north facing aspect and perceived lack of shelter from northerly winds through topography and vegetation. However, as can be clearly see from the illustrative masterplan at Figure 17 of Appendix 1, the site would be inextricably linked to the wider consented Countesswells development, with existing development parcels enveloping the site to the immediate west, south and south east. As with the surrounding development, the new housing proposed will be orientated to avoid any predominately north facing aspects, with properties and private gardens laid out to maximise southerly outlooks, solar gain opportunities and frontage with the new primary street. As highlighted within the previous development bid, the site would be afforded excellent shelter from northerly winds, being protected by existing trees as well as proposed strategic woodland planting offering further shelter and context to the development.

### Natural Conservation and Landscape Features / Fit

Whilst it is acknowledged that site is designated as Green Space Network and there is some identified priority habitats associated with existing areas of woodland and some tree loss that would be required to facilitate the development. However, as set above the site forms part of a commercial woodland which is identified for felling. The higher quality woodland to the south will be retained to form an integral part of the landscape framework for the development. A key principle identified in the supporting landscaping response provided at Appendix 1 is the strengthening of existing landscape features, enhanced through ongoing management as part of the proposed open space. A new parkland area of

public open space will be provided, connecting the Cults Burn park to Hazlehead Park. Whilst reducing the area of Green Space Network the functionality, accessibility and quality of the public space will be enhanced, incorporating the Core Path link, a play area and areas of existing woodland including woodland blocks and provision of structure planting. This will also enable the retention of landscape corridors through which wildlife can migrate, thereby respecting the existing Green Space Network designation.

Issues of landscape fit have been addressed above and more fully in the submitted Development Bid and detailed assessment of landscape impacts included within supporting Appendix 1. For the reasons stated therein it is not accepted that development would significantly intrude into the surrounding landscape and as such, the site should have been scored higher in that regard. It is therefore contented that the site would be well contained within the surrounding landscape and any associated impacts would be at a site level. Rather than creating a detrimental visual impact, the development will be appreciated as part of a modest expansion to the existing urban form and setting of the new Countesswells Community. The development will be well screened from wider views from the city by strategic woodland planting.

#### Land Use Mix / Balance/ Service Thresholds

Disappointingly the site has been marked down on this criteria, with suggestion made that the site is unlikely to contribute to a better mix of land uses. The matrix fails to appreciate that the site will provide a mix of housing (including affordable housing), open space, enhanced woodland planting and connectivity between the new community, surrounding recreational areas and the wider countryside. It is therefore maintained that the site should have scored higher within this criteria in recognition of the sustainable mix of residential and recreational uses being promoted.

#### Accessibility and Proximity to Facilities

As regards accessibility from public transport the matrix notes that the site does not currently benefit from direct linkage to the existing bus network within 400- 800m. It highlights that the closest bus top is situated some 900m to the north east on Skene Road (A944). It suggests that the Countesswells development “may” provide sustainable options in the long term, however this fails to emphasise that a fundamental planning requirement for the new community is the provision of a Public Transport Strategy, setting out the phased delivery of bus services and the new community grows. As expressed above, a contractual agreement is now in place with Stagecoach to deliver these phased services, with the first bus route scheduled to be rolled out this summer (2019). Accordingly, Countesswells will be inherently accessible for sustainable modes of transport, with the proposed site positioned as a new gateway to the development, whereby linkages to the public transport connections within the wider development could be readily integrated along this route. The site should really have scored higher in that regard.

It is welcomed that the scoring matrix acknowledges that the site is surrounded by a well-connected network of core paths. As part of the proposed site, the alignment of Core Path 57 would be retained and enhanced, located within high quality areas of open space in keeping with the Cults Burn Park. However, to suggest that the site has a limited range of available facilities within 800m of the site is rather short-sighted. Countesswells will deliver circa 10ha of employment land and community facilities as part of residential-led mixed use new community, in line with its LDP allocation and adopted Development Framework. A number of planning applications have already been taken forward securing consent for the initial phases of delivery of commercial premises to serve the new development. Furthermore, a total of three new schools are being delivered as part of the new community.

Initially, this will see the delivery of a new primary school located within the neighbourhood centre to the north of Countesswells, scheduled to open in 2021. The new primary school will benefit from a highly prominent and accessible position overlooking the Cults Burn network park, serving the central and northern parts of the community. Thereafter, a further primary school and new Countesswells Academy will be delivered as part of a community campus, with provision of sports and other community facilities. The campus will be located in a prominent location at the eastern end of the Central Park, becoming a fully integrated resource for the wider community. The new schools will contain provision for the educational demands of the new community, as well as capacity to allow for additional organic growth of the settlement. A new medical centre will also be delivered in the early phases, with GP and dental practices and a site has been offered to NHS Grampian as an interim facility. The proposed bid site will be closely connected to these employment and community uses, located within a short walk from new village centre and would link via the new network of footpaths being created. It is therefore disappointing that the site did not score higher in these criteria.

#### Land Use Conflict

Reference is made to the overhead pylons which cross the Countesswells site from a north west to south east direction, travelling through a small portion of site B1003. These are recognised as a constraint within the Development Framework and as such, a large area of parkland has been created along the corridor of the pylons where no development has taken place. A similar approach has been adopted for the proposed site, which located new housing outwith the location of the pylons, thereby resulting in no associated land use conflict.

#### Service Infrastructure Capacity

Similarly, whilst the scoring matrix acknowledges that the site is allocated to Countesswells with regard to schooling, this is not reflected in the scoring as such. As highlighted above, the construction of two new primary schools and a new secondary school are required to serve the new community. The proposed site will make us of these facilities which will contain more than appropriate capacity to absorb this modest expansion to the settlement.

## **Summary and Recommendations**


Stewart Milne Homes contend, as set out with their representations and those of Homes for Scotland, that additional land requires to be identified for residential development within the next LDP. This should comprise land for development in the first period of the Plan with sites reserved for longer term development.

The land at North East Countesswells, as set out in the Development Bid, accompanying Masterplan and Landscape Assessment contained at Appendix 1, has the capacity to accommodate an appropriately planned and modest extension to the new settlement within the next LDP and align with the boundaries of the existing PPIIP consent. The information clearly demonstrates the capacity of the landscape to accommodate development, with significant new structure planting ensuring the development will be appropriately absorbed with minimal visual impacts of the character of the area.

The land to the north west of Countesswells presents an excellent opportunity to capitalise on the significant levels of infrastructure being delivered to accommodate the new community. The site is located on a principal access into the settlement which would create a new welcoming gateway approach to the community. The site would be a well-integrated part of the wider Countesswells development, offering access to employment, local retail, community facilities and schools all within 800m from the site via connections to the intricate network of footpaths. Bus stops would also be located within 400m of the site.

On the basis of all of the above and the previously submitted Development Bid it is considered that the site should be allocated for development. Accordingly, it is respectfully requested that this site be identified in the Proposed Local Development Plan 2022 as an expansion to the existing OP38 allocation, as set out in the Development Bid.

## **APPENDIX 1**



# Land at Phase 1 North East Countesswells

---

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

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

Client: Stewart Milne Homes

Date: May 2019

open

optimised environments

Prepared on behalf of:

STEWART  
**Milne**  
HOMES

# > contents

<b>1.</b>	<b>Introduction</b>	<b>pg. 1</b>
1.1	Purpose of this document	pg. 1
1.2	Summary of main issues	pg. 1
1.3	Adopted Development Framework	pg. 2
1.4	Proposed Development Framework	pg. 3
<b>2.</b>	<b>Landscape and Visual Appraisal</b>	<b>pg. 4</b>
1.5.1	Landscape Context	pg. 4
1.5.2	Visual Context	pg. 4
1.5.3	Conclusion	pg. 5
<b>3.</b>	<b>Proposed expansion</b>	<b>pg. 13</b>
3.1	Response to MIR	pg. 13
3.2	Key development principles	pg. 14
<b>4.</b>	<b>Conclusion</b>	<b>pg. 15</b>

---

# 1. Introduction

## 1.1 Purpose of this document

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

It has been prepared as an addendum to accompany SMH's Development Strategy, Response to the Aberdeen City Council Local Development Plan - Call for Sites submitted May 2018 and contains supplementary information to address the key issues raised in the MIR and further assist in demonstrating the effectiveness and appropriateness of land at North East Countesswells (MIR REF B1003) to form a logical extension to the existing Countesswells Development within the 2021 LDP.

The land at North East Countesswells (MIR REF B1003), identified on figure 1 opposite, measures 20.83ha. The site is bounded by the Countesswells development area to the west and south, agricultural land to the north and Hazlehead park to the east.

## 1.2 Summary of main issues

Based on the May 2018 submission, the MIR notes that the site scores well in most of the selection criteria-'*The site is predominantly flat, would not result in the loss of any built/cultural elements of historical designations, and would be well related to the emerging residential development at Countesswells*'.

However, the MIR does note the following issues relating to the landscape character and setting as reasons why the proposed site is unsuitable for development:

- *The site proposed for development would be located on currently zoned Greenbelt and Greenspace Network;*
- *The site is exposed with a north facing aspect, and as a result of its topography and elevation, would likely have a significant impact on landscape character; and*
- *The proposals would sever the Green Space Network in this location and would pose threats to natural designations within and surrounding the site, both during and post construction.*

The supporting information presented in this addendum seeks to address the points above and demonstrate how the site could form a logical and deliverable expansion to Countesswells.

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

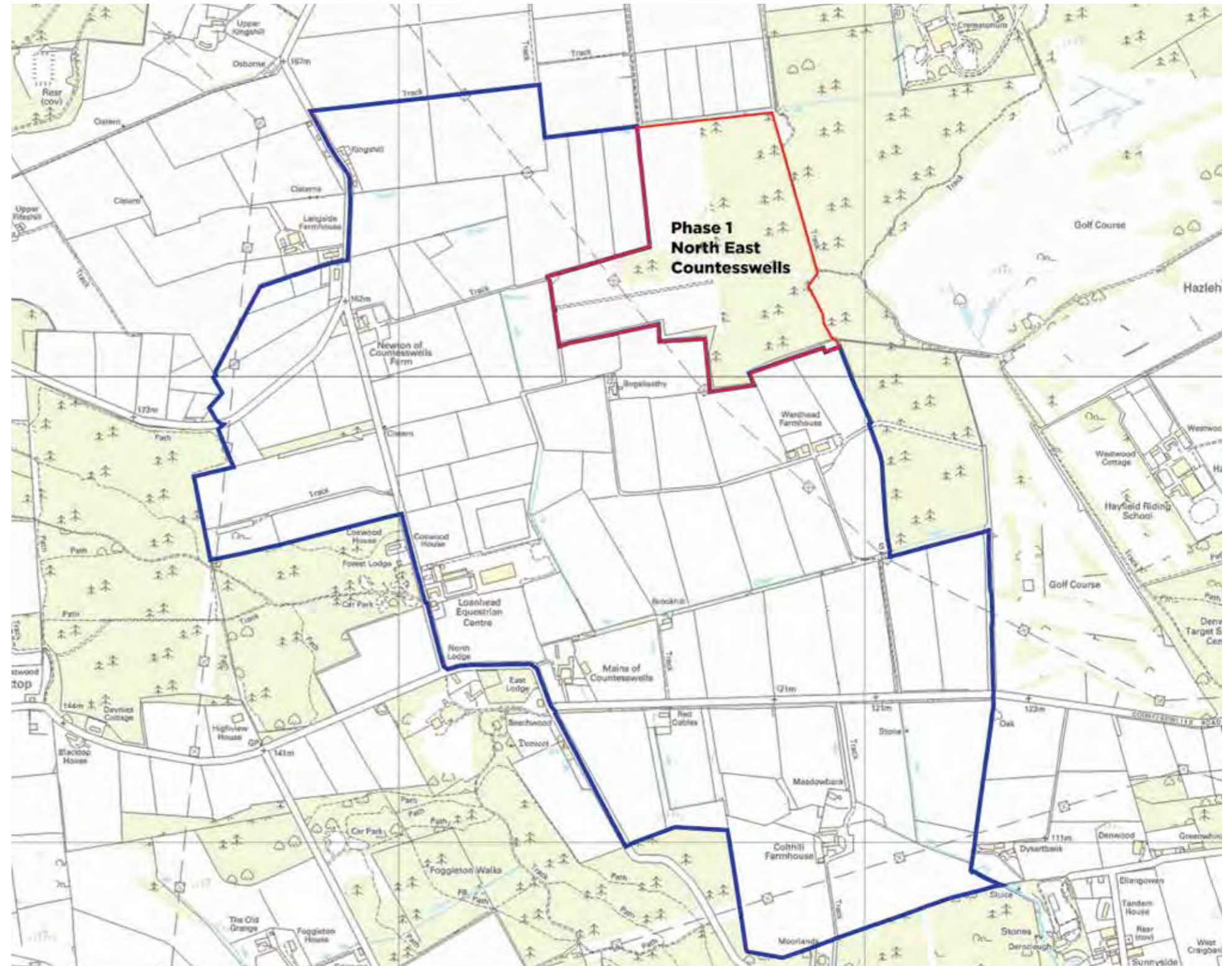


figure. 01: North East Countesswells site boundary.



### 1.3 Adopted Development Framework

The plan opposite identifies the proposed North East site in the context of the adopted Countesswells Development Framework. The site is located to the east of the Countesswells development, with agricultural land to the north and Hazlehead Park to the east.

The site area is currently plantation woodland (containing a mix of coniferous species) which is planned to be felled/harvested as part of a management strategy. Core Path 57 passes through the site area connecting Hazlehead Park to the Cults Burn Park within Countesswells.

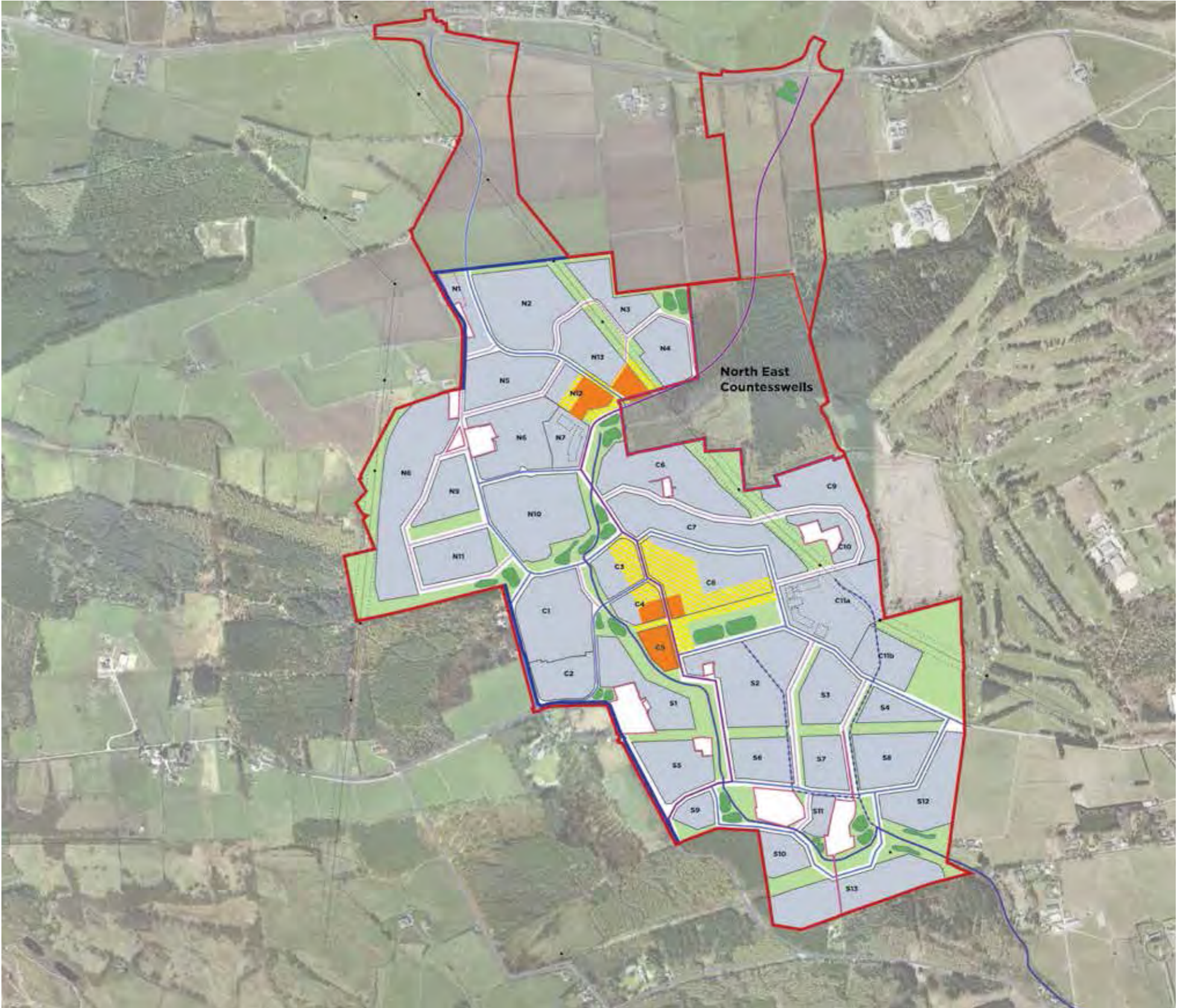


figure. 02: Countesswells Development Framework.

## 1.4 Proposed Development Framework

The plan opposite illustrates how the North East site could be developed as a logical long term extension to Countesswells.

The plan is an update of the proposal submitted in May 2018 and has been prepared in response to the issues raised in the MIR Development Options Assessment.

The proposed extension to Countesswells would deliver approximately 10.50ha of developable land, providing up to 350 new homes as part of the Countesswells development as well as large areas of public open space, greenspace and woodland ensuring the proposal is well contained and fits within the landscape setting.

The following section of the document describes the Landscape and Visual Appraisal (LVA) which has been carried to form the response to the key issues identified in the MIR. The LVA has shaped the proposed plan opposite to further demonstrate how the site could be developed without negatively affecting the Greenbelt, Green Space Network or landscape character of the area.

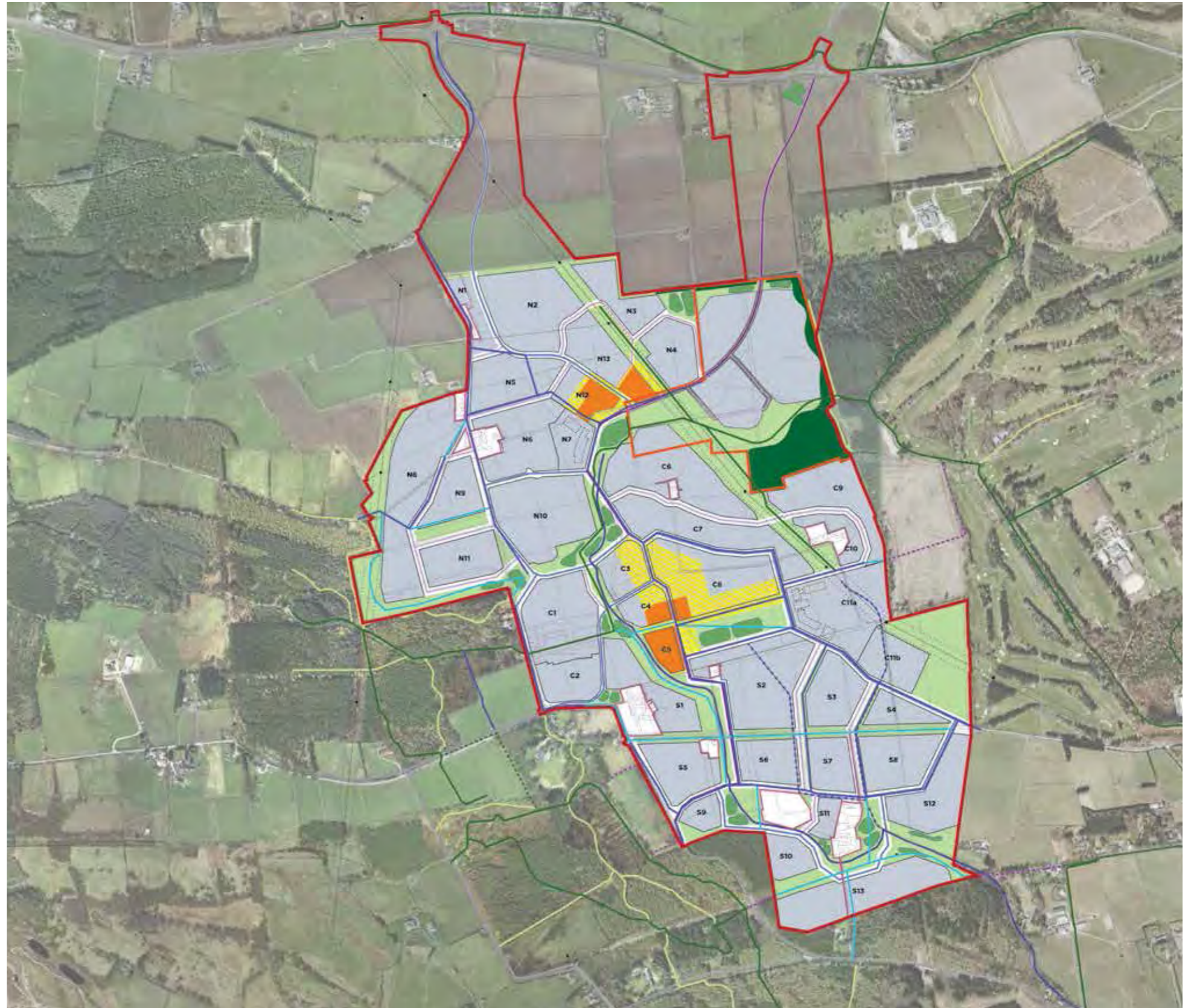


figure. 03: Updated Countesswells Development Framework incorporating North East site.

# 2. Landscape and Visual Appraisal

The landscape and visual analysis presented in this section of the report, whilst representing a cross section of receptor types and sensitivities in the area, is intended as a preliminary appraisal.

## 1.5.1 Landscape Context

The site is entirely wooded but lies within a wider area of agricultural and rural character to the south of Kingswells and immediately north-west of the emerging Countesswells development. It would occupy an area of plantation forest that borders the larger wooded area of Hazlehead Park. The site area is elevated to the surrounding landscape but is on a plateau and so there is little undulation within the site area itself. The emerging large scale residential area of Countesswells is continuing to transform the rural landscape immediately to the west of the site area and will eventually bound the site area along its south-west boundary. An overhead electricity line crosses the west of the site in a broadly north - south orientation. The access road that will connect the emerging Countesswells development with the A944 at the Jessiefield roundabout, cuts through the Boatwynd site area. In itself this infrastructure would result in the removal of large areas of the plantation woodland currently found in the site area. The Aberdeen Crematorium lies to the north east of the site beyond a further block of woodland that separates it from the site area.

There are no scenic landscape designations on or close to the site. The site is in an area of Greenbelt land that covers the vast majority of the landscape that surrounds Aberdeen. The Countesswells development area to the west of the site, previously in Greenbelt, is shown as Land Release Policy 1 (LRP1) in the 2017 LDP. The site area is also within an area of Greenspace Network identified across the Hazlehead Park area (see figure 6).

A core path cuts across the site area joining a network of core paths that connects Hazlehead Park (through Countesswells) to the woods at Blacktop, Cairnhill Wood, Ladyhill and Den Wood, most of which are also identified as Ancient Woodland.

Landscape character areas (LCAs) are as defined and described in Scotland's digital map-based national character assessment (published in 2019). The proposal site area lies entirely within the Wooded Estates - Aberdeen LCA (9), the key characteristics of which area listed as follows (see figure 5):

- A gently undulating landform becoming more rolling to the west.
- Well-wooded with large areas of broadleaf woodland, mixed plantations and policy plantings.
- Some areas of pasture are present with these often used as horse paddocks closer to the urban area.
- A golf course, sports fields and former nurseries occur close to the city.

- Dispersed small farmsteads and other residential buildings are often well screened by woodland.
- Hazlehead Park and many of the larger woodlands across this type are well used for recreation.
- Views tend to be short range being strongly contained by woodland.
- Nearby urban areas are often well-screened by woodland and this can give a sense of detachment from the city.

In the Landscape Character Assessment of Aberdeen, SNH report No 80 (1996), the site area was previously identified as lying within a broadly identified area of Open Farmland known as Kingshill/Bogskeathy (Area 18). The 2019 update incorporates the site area into the area previously identified as Wooded Farmland known as Hazlehead (area 19) which is now titled Wooded Estates - Aberdeen LCA (9).

Development considerations have not yet been published as part of the 2019 characterisation update and it is understood that these will follow as part of the digital dataset. The 1996 Aberdeenshire Character Assessment contained the following guidance on 'Sensitivity to Landscape Change' for the Wooded Farmland - Hazlehead (area 19). Proposal responses to this guidance also provided below:

### *Visibility*

LCA guidance - 'This area has a low visibility from outside because it is surrounded by woodland.'

Proposal Response - The site area also has low visibility from the outside due to its wooded character. The proposal seeks to provide similar wooded boundary as existing which when planting matures would screen built development from landscape context outwith the site area.

LCA guidance - 'it is a popular recreational resource that has a high level of visibility from within.'

Proposal Response - The site area is not regarded to be a popular recreational resource and there is currently no visibility from within.

### *Built Development*

Despite the flat land and screening effect of the woodland, the predominant recreational landuse acts as a constraint to development.

Proposal Response - The site area land use is commercial plantation.

Existing buildings consist of sports pavilions and occasional cottages (some of which have been converted to commercial use), generally located close to the woodland.

Proposal Response - The proposal in the Development Framework positions

built development within a wooded enclosure that follows the existing wooded edge of the plantation.

The existing level of commercial / recreational activities, i.e. the garden centre and riding school, have little significant affect upon the landscape due to their location within woodland.

Proposal Response - The proposal seeks to provide similar wooded boundary as existing which when planting matures would screen built development from landscape context outwith the site area and would therefore also have little effect upon the surrounding landscape.

## 1.5.2 Visual Context

The site area by its nature as plantation woodland is visually impenetrable. Views from the surrounding area are therefore of the edges of the site and the existing woodland edge.

The existing woodland on the proposal site is a recognisable feature of the wider landscape, particularly in views from the north where the plantation woodland can be seen on the southern horizon from the settled edges of Kingswells and the Lang Stracht. Other than from Brimmond Hill (see figure 4), there are no opportunities from where the site area can be appreciated in its wider context from an elevated perspective.

As a result of these site characteristics, the potential visual effect of housing development would be extremely restricted. This is best illustrated in the key views selected for this appraisal -

- close views from the north, south and west edges of the site area (see viewpoints 1, 2 & 3);
- views towards the site within the context of the existing and emerging development at Countesswells (see viewpoints 4 & 5);
- views across surrounding rural landscape from the north (see viewpoints 7 & 8); and
- restricted views from the south (see viewpoint 6).

(see figure 7 Viewpoint Plan and viewpoint photographs on figures 8 - 15).

As the site and wider settlement context of Kingswells and Countesswells is visible from Brimmond Hill, it is anticipated that this longer view is a key view in relation to the further potential expansion in the Countesswells area. This is also a key view in considering the wider context of other areas of settlement expansion around Aberdeen more generally which are also visible from this key viewpoint location.

### 1.5.3 Conclusion

The proposal site would add an area of development to the north-east of the emerging housing development at Countesswells. The existing woodland on the proposal site is a recognisable feature of the landscape, particularly in views from the north where the plantation woodland can be seen on the southern horizon.

Following the recommendations proposed within the Development Framework for woodland structure planting at the edges of the proposal site area, the potential landscape and visual effects would be substantially reduced once the woodland planting at these edges matures (within approximately 10-15 years). The character of the landscape would therefore only be altered at a site level and surrounding areas of the same character type would be largely unaffected by a proposed development due to the lack of intervisibility or potential to experience change. Visual effects would also be extremely limited once proposed planting has established. It is considered likely therefore that potential landscape and visual effects from the surrounding area would be substantially mitigated if the proposed landscape structure shown on the Development Framework proposals is adhered to.

An LVIA was carried out for the Countesswells development in 2014 by Ironside Farrar. The LVIA concluded that although significant adverse effects would occur *'where currently undeveloped open areas are lost. Significant impacts will be fairly localised due to the limited visibility of the site in its location.'* Given the limited nature of the residual landscape and visual effect considered to arise for the proposal site, it is considered that proposals presented within the Development Framework would not likely introduce any further effects in the wider area either singularly or cumulatively (subject to detailed design).

On the whole, landscape and visual change for this site is considered to be extremely limited as a result of the limited visual influence that the proposal would have on the surrounding landscape context and following the broad landscape structure proposals indicated in the Development Framework.

The following considerations and potential landscape mitigation, are also applicable in relation to settlement expansion in this area:

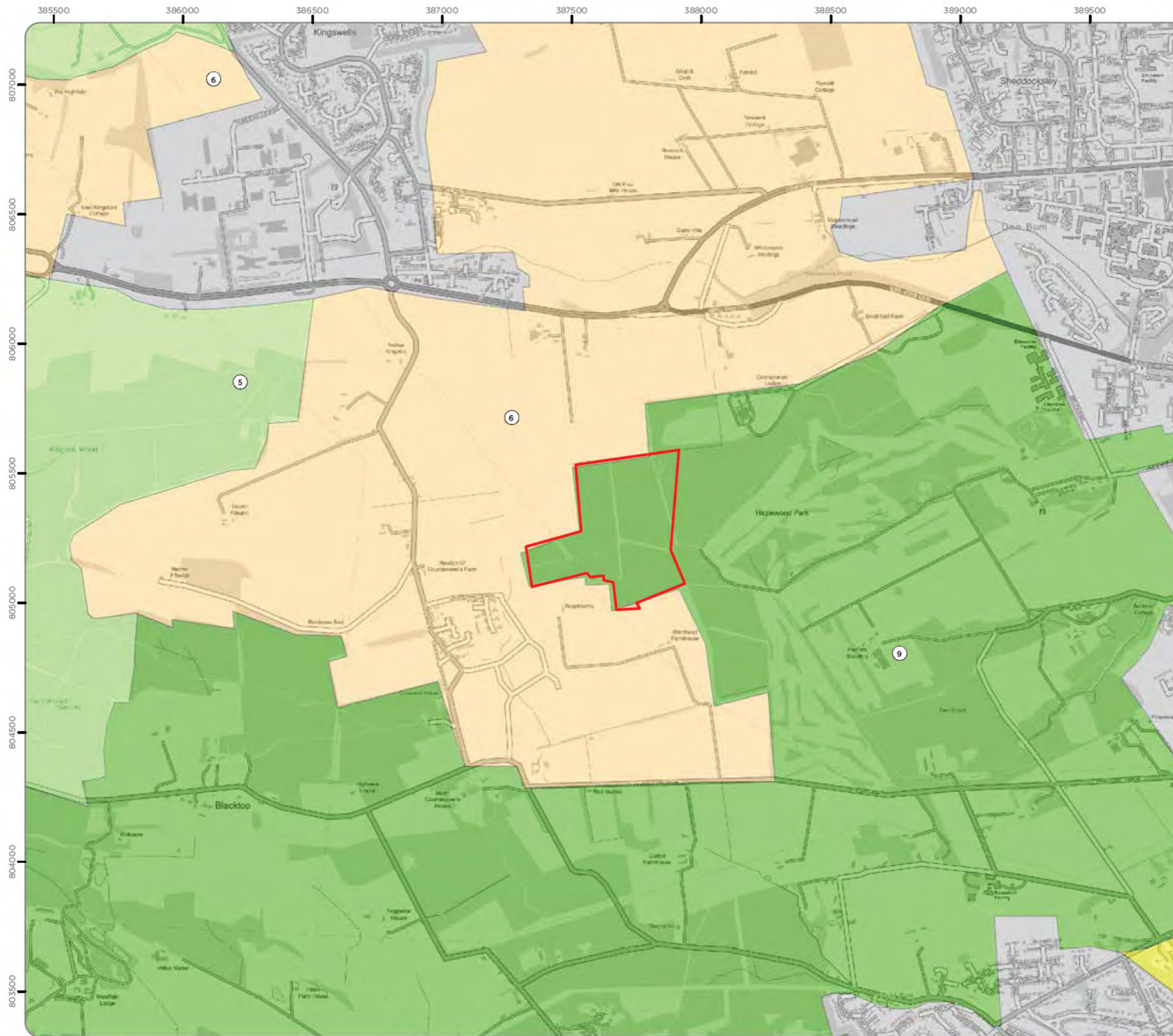
- The Development Framework proposes a woodland edge to the site area to maintain as much of the existing woodland edge character of the site;
- Landscape structure and open space within the illustrative development framework would separate compartments of development across the site area;
- The Development Framework proposes landscape areas following the linear infrastructure that cuts through the proposal site (including along the Countesswells access road to the A944 and along the existing overhead line route); and
- Landscape proposals in line with the existing and emerging landscape plans for the wider development area of Countesswells would help to integrate development proposals. This is particularly relevant (but not limited) to the western edge of the proposal site.

The above considerations and potential mitigation for the proposals indicate that the site has the potential to meet the 'Sensitivity to Landscape Change' guidance listed in the Landscape Character assessment of Aberdeen (1996) for the character typology in which the site area is now identified as within.

In conclusion, it is considered that proposals as described in the 'Illustrative Development Framework' for the site provide the potential to introduce further housing development within the immediate context of the emerging Countesswells development with very minimal residual landscape and visual effects.



figure. 04: View from Brimmond Hill towards Countesswells and the proposal site at Boatwynd



**Legend**

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

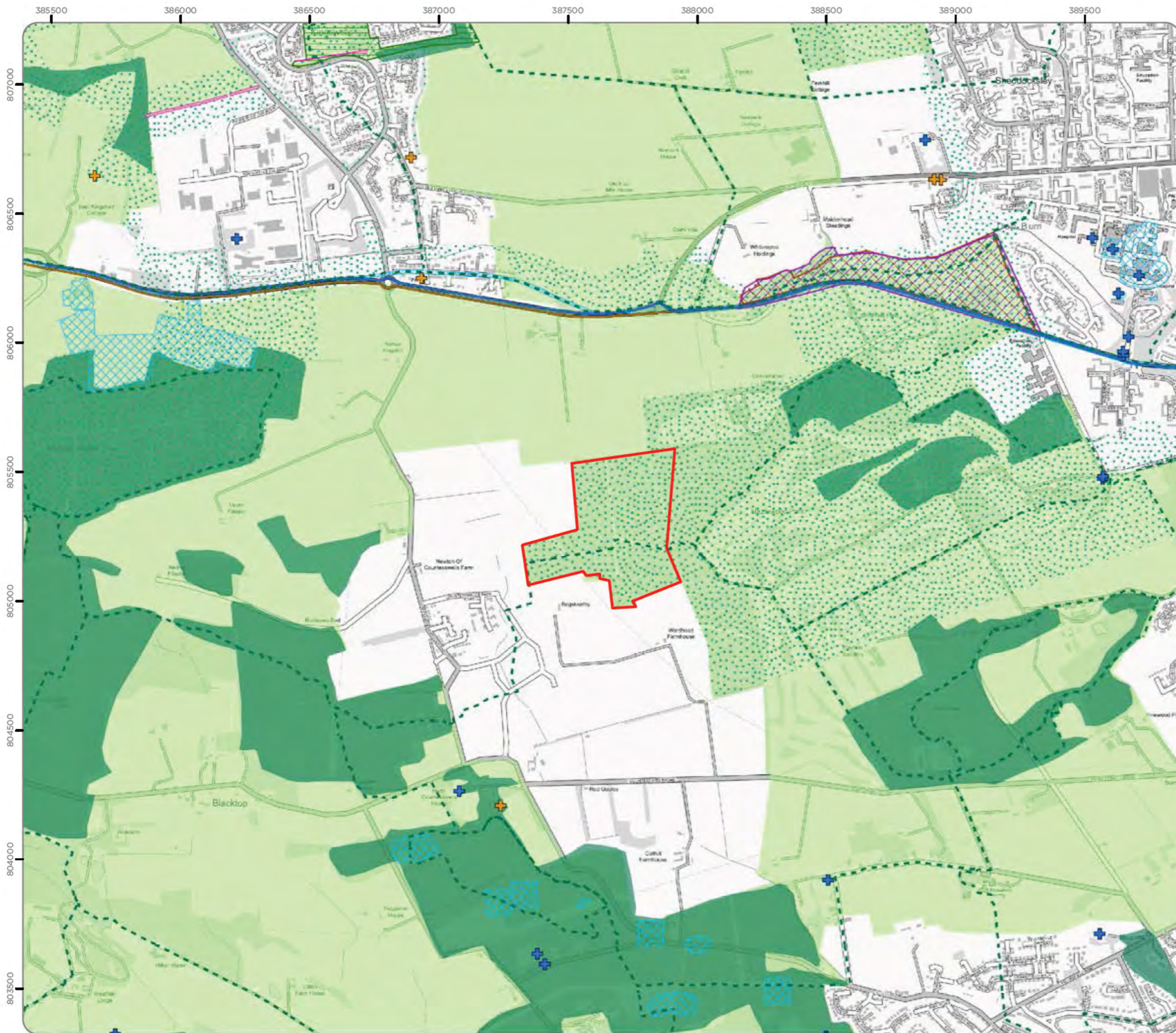


**BOATWYND, COUNTESSWELLS**

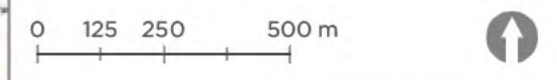
**Figure. 5: Landscape Character**

Ref No: 181194	Created By: JM	Rev No: 1
Scale: 1:15,000	Drawing Size: A3	Date: 02/05/2019
Coordinate System: BNG OS GB 1936 Datum		





- Legend**
- Site Boundary
  - + B Listed Building
  - + C Listed Building
  - Core Path
  - ~ Deeside Tourist Route
  - ~ Highland Tourist Route
  - Scheduled Ancient Monument
  - Canmore Historic Site
  - Local Nature Conservation Site
  - Local Nature Reserve
  - Greenspace Network
  - Urban Greenspace
  - Ancient Woodland
  - Greenbelt

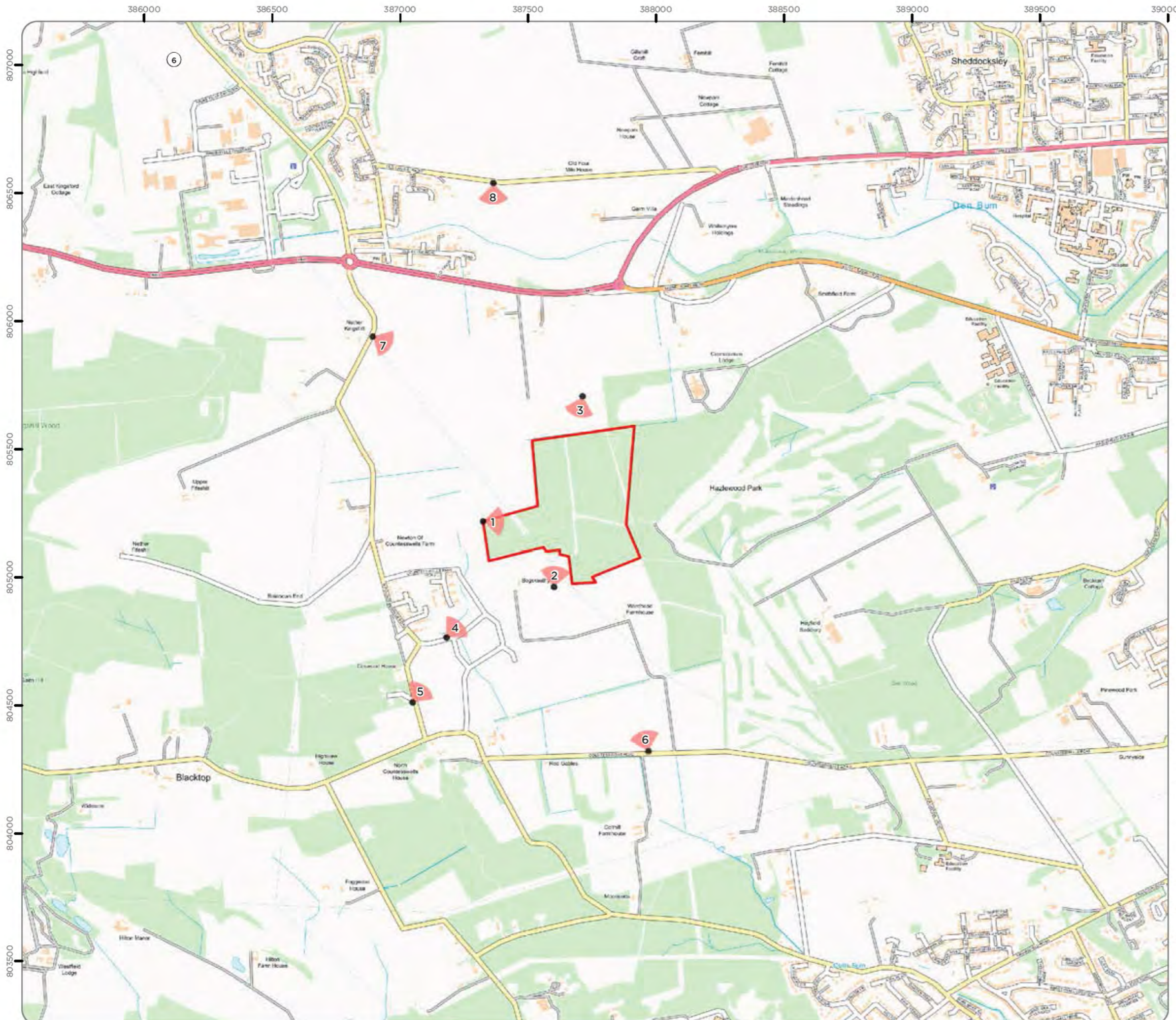


**BOATWYND, COUNTESSWELLS**

**Figure. 6: Landscape Designations**

Ref No: 181194	Created By: JM	Rev No: 1
Scale: 1:15,000	Drawing Size: A3	Date: 02/05/2019
Coordinate System: BNG OS GB 1936 Datum		





- Legend**
- Site Boundary
  - Viewpoint

- 1 Western edge of site area
- 2 Bogskeathy
- 3 North of site area
- 4 Countesswells
- 5 FCS car park
- 6 Countesswells Rd
- 7 North Countesswells Rd
- 8 Lang Stracht

0 125 250 500 m



**BOATWYND, COUNTESSWELLS**

**Figure. 7: Appraisal Viewpoints**

Ref No: 181194	Created By: JM	Rev No: 1
Scale: 1:15,000	Drawing Size: A3	Date: 02/05/2019
Coordinate System: BNG OS GB 1936 Datum		



# > Viewpoint Photography



Figure. 8: VP01 - Western edge of site area



Figure. 9: VP02 - Bogskeathy





Figure. 10: VP03 - FCS Car Park



Figure. 11: VP04 - Countesswells Road



Figure. 12: VP05 - North of Site Area



Figure. 13: VP06 - Countesswells



Figure. 14: VP07 - North Countesswells Road



Figure. 15: VP08 - Lang Stracht

# 3. Proposed expansion

## 3.1 Response to MIR

The proposed Development Framework, figure 16 opposite, demonstrates how the site could provide the potential to introduce further housing development within the immediate context of the emerging Countesswells development with very minimal residual landscape and visual effects.

The updated plan opposite has been prepared with input from the LVA to respond to the issues identified in the MIR Options Assessment.

**The site proposed for development would be located on currently zoned Greenbelt and Greenspace Network.**

There are no scenic landscape designations on or close to the site. The site is in an area of Greenbelt land that covers the vast majority of the landscape that surrounds Aberdeen. The Countesswells development area to the west of the site was also previously in Greenbelt, is shown as Land Release Policy 1 (LRP1) in the 2017 LDP. The site area is also within an area of Greenspace Network identified across the Hazlehead Park area.

The site should be removed from the Greenbelt with clear boundaries established to allow the sustainable growth of Countesswells. This would also allow the Green Space Network to be enhanced and improved access to the area without negatively impacting upon the Hazlehead LNCS.

**The site is exposed with a north facing aspect, and as a result of its topography and elevation, would likely have a significant impact on landscape character.**

The LVA has established that on the whole, landscape and visual change for this site is considered to be extremely limited as a result of the limited visual influence that the proposal would have on the surrounding landscape context and following the broad landscape structure proposals indicated in the Development Framework. The structural woodland proposed along the north and east of the site, along with the existing woodland to the south would act to enclose development in this area and limit views to the site.

**The proposals would sever the Green Space Network in this location and would pose threats to natural designations within and surrounding the site, both during and post construction.**

The existing plantation woodland has limited ecological or recreational value and will be felled as part of a planned forestry regime for the area. The areas of higher quality woodland (both in terms of mix of species and access) to the south of the area are to be retained and managed as part of the park area. Combined with the proposed areas of new woodland planting and significant areas of public open space this will ensure the Green Space Network, connecting Hazlehead and Countesswells, is retained and enhanced. Access to the woodland and Green Space Network across this area will be improved through the proposed development, including the Core Path link and new areas of public park.

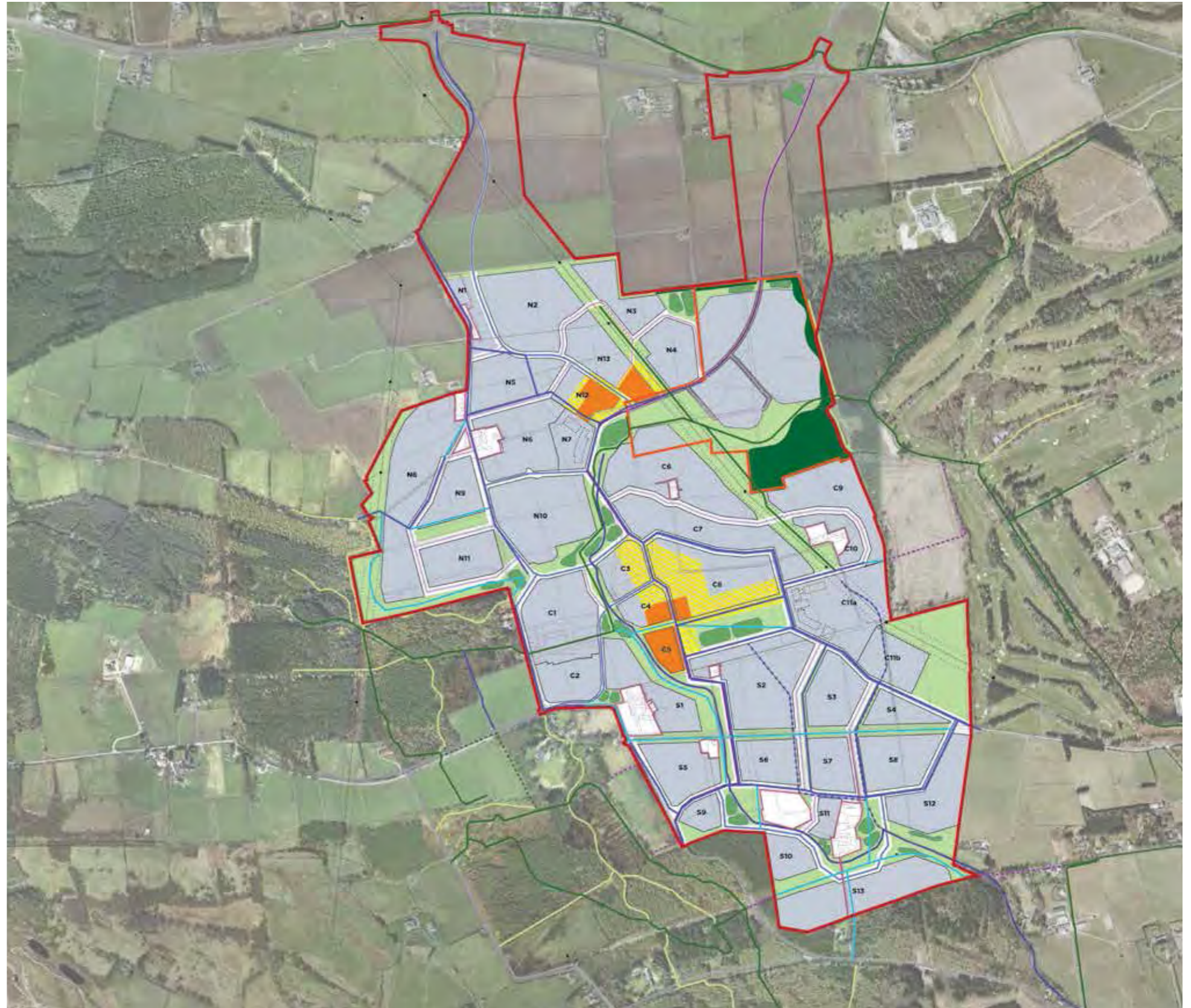


figure. 16: Countesswells Development Framework.

### 3.2 Key development principles

The illustrative plan opposite has been prepared to demonstrate how development in the North East site could be developed to address the issues raised in the MIR and to compliment the existing Masterplan proposals for Countesswells. Whilst this is not a definitive plan for the site and demonstrates one possible interpretation of the development framework, it provides a realistic and reliable base which been utilised for testing the site. It is included again to provide further assurance that development would be well integrated as part of the overall Countesswells development with good access to transport links, schools, shops and community facilities.

The plan also highlights how a strong landscape structure would ensure development in this location would have minimal impact on the wider landscape setting, enclosed by woodland on three sides, views to the site would be limited.

Finally the plan demonstrates how the development structure would provide high quality areas of public open space maintaining the established Green Network connecting Hazlehead to Countesswells through the Cults Burn park.

#### The key principles for the area include;

1. Structural woodland to the north. A woodland edge is proposed to the north to enclose the site and provide shelter. SUDs can also be provided in this area.
2. A woodland edge is proposed to the east to further enclose the site area and minimise impact upon the Hazlehead LNCS.
3. The primary street should have a wooded character, providing a transition into Countesswells.
4. Through removing the site from the Greenbelt, the opportunity exists to make efficient use of the land either side of the street for development.
5. The alignment of Core Path 57 would be retained and enhanced as part of the development, located within high quality areas of open space in keeping with the Cults Burn Park.
6. The higher quality areas of existing woodland to the south of the site area are to be retained and enhanced through ongoing management as part of the proposed open space.
7. A new parkland area of public open space will be provided, connecting the Cults Burn park to Hazlehead Park. Whilst reducing the area of Green network the accessibility and quality of the public space will be enhanced, incorporating the Core Path link, a play area and areas of existing woodland.
8. Development in the north east area would be a well integrated part of Countesswells. Development here would all be within 800m of the primary school and local shops and 400m of a proposed bus stop.



figure. 17: Proposed Illustrative Masterplan of North East (Boatwynd) Site.

# 4. Conclusion

The response to the key issues from the MIR Options Assessment set out in this document underpins SMH view that development at Countesswells North East (Boatwynd) can be accommodated without significant impact of the landscape character and in a manner that would positively enhance the Green Space Network. Further the study illustrates how development could make a unique and positive contribution to the Countesswells development.

The LVA has established that on the whole, landscape and visual change for this site is considered to be extremely limited as a result of the limited visual influence that the proposal would have on the surrounding landscape context and following the broad landscape structure proposals indicated in the Development Framework. The structural woodland proposed along the north and east of the site, along with the existing woodland to the south would act to enclose development in this area and limit views to the site.

The existing plantation woodland has limited ecological or recreational value and will be felled as part of a planned forestry regime for the area. The areas of higher quality woodland (both in terms of mix of species and access) to the south of the area are to be retained and managed. Combined with the proposed areas of new woodland planting and significant areas of public open space this will ensure the Green Space Network, connecting Hazlehead and Countesswells, is retained and enhanced. Access to the woodland and Green Space Network across this area will be improved through the proposed development, including the Core Path link and new areas of public park.

In summary SMH believe the site at Countesswells North East (Boatwynd) should be removed from the Greenbelt and allocated for mixed use development as part of a future phase of Countesswells. SMH believes that the study area has the capacity to accommodate upto 350 new homes as part of Countesswells. This representation has been prepared to demonstrate how sensitive development on the site can complement Green Belt and Green Space Network objectives whilst securing significant wider public benefit in terms of improved open space and green linkages.



figure. 18: Proposed Illustrative Countesswells Masterplan including North East (Boatwynd) site

**optimised environments ltd.**

**Edinburgh**

Quartermile Two | 2 Lister Square | Edinburgh | EH3 9GL  
t 0131 221 5920 | w [optimisedenvironments.com](http://optimisedenvironments.com)

**London**

Unit 6 | 36-42 New Inn Yard | Shoreditch | London | EC2A 3EY  
t 0203 984 4022

**Manchester**

13 Swan Street | Manchester | M4 5JJ  
t 0161 696 7550

---

Optimised Environments Ltd. Registered in Scotland SC359690.  
Registered address: Quartermile Two | 2 Lister Square | Edinburgh | EH3 9GL