



# Aberdeen Local Development Plan Review

## Main Issues Report Response Form 2019

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

The MIR has been published alongside a Monitoring Statement and Environmental Report. Copies are available to view at Marischal College, Broad Street, Aberdeen. These, and other supporting documents, are available at: - [www.aberdeencity.gov.uk/alp2022](http://www.aberdeencity.gov.uk/alp2022)

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

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

Responses to the published documents can be:

- made online at:- <http://consultation.aberdeencity.gov.uk/planning/mir2019>;
- emailed to:- [ldp@aberdeencity.gov.uk](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	SCOTT LEITCH
Organisation (if relevant)	HALLIDAY FRASER MUNRO
On behalf of (if relevant)	SCOTT FAMILY
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.

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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"/>
<p>Please indicate the document and the specific Issue, Question, Site, Policy, Map or Table you are commenting on. Please provide your comments below and explain your reason for supporting, opposing or commenting on this specific part of the document.</p> <p><b>Please find attached response to the Main Issues Report in respect of Development Bid site B0915, Land at Sunnyside, Cults.</b></p>		

**ABERDEEN CITY LOCAL DEVELOPMENT PLAN  
RESPONSE TO MAIN ISSUES REPORT  
LAND AT SUNNYSIDE, CULTS  
B0915**

**MAY 2019**

On behalf of  
SCOTT FAMILY



HALLIDAY FRASER MUNRO  
CHARTERED ARCHITECTS & PLANNING CONSULTANTS



**HALLIDAY FRASER MUNRO**

CHARTERED ARCHITECTS & PLANNING CONSULTANTS

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- 3. Housing Land Strategy**
- 4. Conclusion**

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# HALLIDAY FRASER MUNRO

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## 1. Introduction and Bid Summary

- 1.1. This report has been prepared by Halliday Fraser Munro, Town Planning Consultants and Chartered Architects, on behalf of the Scott Family. It is written in response to the Aberdeen City Local Development Plan Main Issues Report 2019 (MIR).
- 1.2. At the 'Call for Sites' stage in May 2018, a development bid was lodged for a 0.3ha area of land at Sunnyside, Cults. The site, bid reference B0915 is currently vacant grazing land. The site is contiguous with existing established housing at Derncleugh to the north and allocated housing land (Friarsfield OP41) to the east.
- 1.3. The B0915 land is proposed to be allocated as future housing land and strategic landscaping / infrastructure as an extension to allocated site OP41 Friarsfield. This would help strengthen the defensible green belt boundary to the west, as sought by the planning authority.
- 1.4. The Sunnyside B0915 land can be developed for around two secluded house plots, integrated as part of the adjacent Friarsfield development, to deliver further housing and strategic landscaping and drainage infrastructure (SUDS) for the OP41 Friarsfield development.
- 1.5. The landowner (our client) is in discussions with CALA Homes (North), the developers of Friarsfield regarding this. CALA Homes (North) have prepared design plan concepts integrating this site.
- 1.6. The B0915 land is not subject to any environmental designations or technical planning constraints.
- 1.7. This provides the background context and justification for the proposed land allocation at Sunnyside, Cults as proposed through the B0915 bid.
- 1.8. Conversely however, the B0915 development bid is not an Officer's preferred option in the Main Issues Report. This is considered in more detail below.

## 2. MIR Bid Assessment Summary

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

*'B0915 – Land at Sunnyside, Cults*

*The bid proposes local scale development for 2 residential units. The site is located within the Green Belt at the western edge of OP41 Friarsfield. Development on this site would be located next to a major development site being built out for approx. 280 units. The woodland to the west of Friarsfield forms a strong and defensible green belt boundary. Although small - this development would erode these features.*



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- 2.2. The Officers' view and associated issues can be broken down and will be examined in more detail below. It is however worthy of note that no insurmountable constraints are attributed to the B0915 bid site. The issues raised relate to the site's current green belt status and what we believe to be an inaccurate assessment of and commentary on the woodland that lies to the west, outwith the B0915 bid site, therefore will be unaffected by development within it. There is scope for this woodland to be enhanced and strengthened as a defensible green belt boundary, should the land be allocated and integrated as housing and strategic landscaping and infrastructure for OP41 Friarsfield.
- 2.3. We also have concerns regarding the Council's approach to housing strategy set out in the MIR in that it over relies on the delivery of brownfield sites. We consider that suitable greenfield allocations should be progressed.
- 2.4. ***'The bid proposes local scale development for 2 residential units. The site is located within the Green Belt at the western edge of OP41 Friarsfield. Development on this site would be located next to a major development site being built out for approx. 280 units.'***

The site is presently Green Belt in the current 2017 Local Development Plan. It is not uncommon for land that is the subject of a development bid to be Green Belt in the extant LDP. This does not however automatically mean that the land contributes to the strategic objectives of the Green Belt in protecting the setting of the City and preventing coalescence between areas. This is certainly the case in respect of the land at Sunnyside, it is a leftover area of poor quality grassland lying between woodland to the west (close to the boundary of the OP58 Countesswells allocation), Friarsfield OP41, Sunnyside Stables and Derncleugh housing to the north east and north and Kirk Brae and further housing to the south. The land does not contribute to the landscape setting of Cults or the wider City therefore its removal from the Green Belt as proposed would have no impact.

The Officers' recognition of the B0915 land as being adjacent to the large OP41 allocation is welcomed and provides justification for its allocation.

We do not therefore consider that the current green belt status of the site represents a valid reason not to allocate the land for future development.

- 2.5. ***'The woodland to the west of Friarsfield forms a strong and defensible green belt boundary. Although small - this development would erode these features.'***

We agree that the woodland west of Friarsfield forms a defensible boundary, linking to woodland at Foggieton / Ladyhill further west. This woodland referred to is however outwith the B0915 bid site, lying to the west side of the Cults Burn. As stated above, the proposal is for development which consciously integrates the Friarsfield housing with abutting strong natural features of the Cults Burn and woodland to the west.





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2.6. In summary we do not believe that any of the issues raised through the MIR assessment of the B0915 as summarised above represent robust reasons not to allocate it.

2.7. The MIR includes a bid assessment summary, with the B0915 site being awarded a score of 39 out of a possible 63. We have reassessed the bid using the Council's criteria and would suggest that a scoring of 56 would be more appropriate. The detailed narrative and reasoning are contained in Appendix 1. Principally the increased scoring is related to confirmation that there is not woodland that forms defensible boundaries within the site, and the land's integrated location adjacent to existing and under construction housing in the northern part of Cults.

### 3. Conclusion

- 3.1 As set out in the preceding sections and the original Development Bid, we believe that the land at Sunnyside, Cults should be zoned as a small-scale residential allocation in the forthcoming 2021 Local Development Plan. The site is within the single ownership of the site proposer and is not subject to any planning, environmental or technical constraints (see Appendix 1 below).
- 3.2. There are no serious constraints to development, concerns raised through the MIR assessment relate to misplaced concerns that the site is strategically important to the Green Belt due to the strong woodland boundary assisting the integration of the OP41 Friarsfield development. This is not the case as the woodland in question lies on the west side of the title boundary and abutting feature of the Cults Burn, outwith the B0915 site.
- 3.3 The Sunnyside B0915 land can be developed for around two secluded house plots, integrated as part of the adjacent Friarsfield development, to deliver further housing and strategic landscaping and drainage infrastructure (SUDS) for the OP41 Friarsfield development.
- 3.4 We have serious concerns regarding the Housing Strategy set out in the MIR and suggest this needs to be addressed through the allocation of additional suitable deliverable housing sites such as that at B0915 Sunnyside. We would ask that the site is included in the forthcoming Proposed Local Development Plan as an allocated site for residential purposes.

#### APPENDIX 1

Criteria	Officers' Score	MIR Scoring Justification	Proposed Score	Justification
Exposure	3	Some trees / shrubs delineate the site. Some development to the north (Derncleugh).	3	Agreed. Site is well related to existing and proposed housing.
Aspect	3	Generally south-east facing, overlooking Friarsfield development site.	3	Agreed, the site enjoys a southerly aspect towards Kirk Brae and Friarsfield that would be appropriate for a residential development integrating strategic landscaping and drainage infrastructure.



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Slope	2	Contour lines show site slopes to south (9% / 1:11).	2	Agreed.
Flood Risk	2	Surface water flood risk from burn that runs along north boundary.	2	The site is adjacent to the Cults Burn, however this sits at a lower level than the site. Strategic landscaping and drainage infrastructure could further mitigate against any flood risk. The management of the burn and its banks could be improved through the allocation of the site.
Drainage	2	Some evidence of poor drainage.	2	Could be addressed through allocation of land.
Built/Cultural Elements	3	Some agricultural buildings north of the site with open fields east; development site located here.	3	Agreed, no impacts, however buildings are residential not agricultural.
Natural Conservation	2	Site located in Green Belt / GSN. Bullfinch recorded within 100m of site (NESBReC). Site associated with bat habitat / activity. Part of a wider woodland area.	3	The site does not strategically contribute to the Green Belt. The site is not the subject of GSN zoning, this applies to land west of the Burn. Proposal would not necessarily disturb wildlife, this would be enhanced with the site with the site integrating strategic landscaping within its housing designs.
Landscape Features	1	Agricultural land visible to east at present, development of OP41 ongoing. The woodland to the west of Friarsfield forms a strong and defensible green belt boundary. Although small - this development would erode these features.	3	Landscape features will change as OP41 is completed. Woodland with strong boundary is to the west outwith the bid site, so no impact envisaged.
Landscape Fit	2	Site lies within Lower Deeside Character Area. Site sits in close proximity to OP41 Friarsfield.	3	The site benefits from existing contiguous boundaries with existing housing and OP41. No issues with integration



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				into the landscape. The development presents the opportunity to strengthen the defensible green belt boundaries.
Relationship to existing settlement	2	Site is located north of Cults. Site sits adjacent to OP41 Friarsfield.	3	Agreed, the site is well related to Cults. It has both defensible natural boundaries and boundaries contiguous with existing and proposed housing.
Land Use Mix / Balance / Service Thresholds	1	No significant effects.	2	Proposals would be in line and integrated with the neighbouring residential land use.
Accessibility	1	Private road access. No pavements, no cycle lane. Closest bus stop is 0.5 miles (Countesswells Terrace, east).	2	Unsure of relevance of private access but incorrect. Pavements existing on south west side of Kirk Brae in addition to pedestrian and cycle linkages through OP41. Bus stop reference assumed to be typo. Regular bus services available on North Deeside Road 1km to south.
Proximity to facilities / shopping / health / recreation	1	Site is located on outskirts of city area; Cults Medical Centre is 1.5 miles south and Great Western Medical Practice is 1.5 miles east. Cults district centre is closest for shopping/ amenities.	2	Access to Cults district Centre on North Deeside Road 1km to south.
Direct footpath / cycle connection to community and recreation facilities and resources	2	Denwood to Cults Core Path and Hazledene Road to Countesswells Road Core Path close by, west. Hazlehead Park further north.	3	The site is well connected to the existing extensive core path network so should gain a higher score.
Proximity of employment opportunities	1	PrimeFour at Kingwells and Arnhall Business Park in Westhill for general employment opportunities. Direct commuting route to	2	Higher score suggested due to range of scope for access to employment opportunities.



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		Aberdeen via Countesswells Road.		
Contamination	3	None shown.	3	Agreed.
Land Use Conflict	3	None anticipated.	3	Agreed, good fit with surrounding uses.
Physical Infrastructural Capacity	2	Proposer indicates some infrastructure capacity.	3	Agreed, but higher score suggested due to scope to connect to adjacent upgraded infrastructure.
Physical Infrastructure Future	2	Proposer indicates some infrastructure capacity.	3	Agreed, but higher score suggested due to scope to connect to adjacent upgraded infrastructure.
Service Infrastructure Capacity	3	Cults PS – 2019 115%, 2020 119%, 2021 118%, 2022 120% Cults Academy – 2019 95%, 2020 97%, 2021 102%, 2022 104%. Two houses are unlikely to have any significant impact.	3	Agreed.
Other Constraints	3	None known.	3	Agreed.
	<b>39</b>		<b>56</b>	



# Aberdeen Local Development Plan Review

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On behalf of (if relevant)	
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-------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------

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

Please find attached response to the Main Issues Report in respect of Development Bid site B0916 Craigton, Peterculter and the Housing Land Strategy.

**ABERDEEN CITY LOCAL DEVELOPMENT PLAN  
RESPONSE TO MAIN ISSUES REPORT  
CRAIGTON, PETERCULTER  
B0916**

**MAY 2019**

On behalf of  
SCOTT FAMILY





HALLIDAY FRASER MUNRO  
CHARTERED ARCHITECTS & PLANNING CONSULTANTS



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**Appendix 1 – Updated Bid Assessment**



# HALLIDAY FRASER MUNRO

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## 1. Introduction and Bid Summary

- 1.1. This report has been prepared by Halliday Fraser Munro, Town Planning Consultants and Chartered Architects, on behalf of the Scott Family. It is written in response to the Aberdeen City Local Development Plan Main Issues Report 2019 (MIR).
- 1.2. At the 'Call for Sites' stage in May 2018, a development bid was lodged for a 1.9ha area of land at Craigton, Peterculter, adjacent to Malcolm Road (B979). The site, bid reference B0916 is currently vacant grazing land.
- 1.3. The land shares contiguous boundaries with housing on what is presently the northern edge of the defined Peterculter settlement, and the allocated OP52 housing site on the east side of Malcolm Road. This arrangement offers the opportunity for integrated access arrangements to allow futureproofing of the roads network for local development. The site is ideally placed to accommodate a measured northern extension to the Peterculter settlement and accordingly the landowner (our client) is in discussions with respected national housebuilders already active in the area who have expressed an interest in developing here. They share the view that this is a highly marketable and deliverable site, based principally on the location and minimal infrastructure required to develop the site. There are six existing houses on the western and north eastern site boundaries, along with established trees.
- 1.4. The B0916 land is proposed to be allocated as a future housing site suitable for up to 20 houses as an extension to the northern edge of the established settlement of Peterculter.
- 1.5. The land is not subject to any environmental designations or technical planning constraints. The B0916 land was previously a preferred employment land allocation in the 2004 Finalised Local Plan. This allocation was however ultimately removed from the adopted Local Plan due to concerns regarding traffic on Malcolm Road and the B979 / A93 junction. This confirms that the site was identified as a suitable development option but was not allocated due to traffic concerns. The current roads / junction situation is markedly different at present in that the opening of the AWPR has substantially reduced the amount of traffic on the B979. In addition, the type of traffic generated by employment land (HGVs) that resulted in the traffic concern would have a much greater impact on the junction than traffic generated by 20 houses on a site served by a public bus service. Furthermore, the allocated OP52 site opposite is being built out.
- 1.6. At the 'call for sites' stage, ACC stated that they would welcome development bid proposals for smaller scale developments of less than 100 houses. At 20 houses, the B0916 proposal is in line with this strategy as a suitable small-scale extension to the edge of Peterculter.
- 1.7. The site is close to the allocated OP51 site at Peterculter Burn. A planning application for housing on this site (reference 180262) proposed the use of the 'Shoddy' road along the southern boundary of the B0916 Craigton site as a secondary access. Our client supports this proposal, that confirms there



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is scope for infrastructure upgrades to be shared between developments in the area and provision for a suitable access off the B979.

- 1.8. This provides the background context and justification for the housing allocation at Craigton, Peterculter as proposed through the B0916 bid.
- 1.9. Conversely however, the B0916 Craigton development bid for 20 houses is not an Officer's preferred option in the Main Issues Report. This is considered in more detail below.

## 2. MIR Bid Assessment Summary

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

*'B0916 Craigton*

*This development would be residential in nature. The site is within the Green Belt, and forms part of the green space network, which, without mitigation, may result in some loss or disturbance of wildlife habitat or species. The site is considered to be undesirable for development. Development on this site would also (without mitigation measures) impact on the surrounding landscape. Any development would be isolated to the main settlement of Peterculter and it is not well connected to services and facilities.*

- 2.2. The Officers' view and associated issues can be broken down and will be examined in more detail below. It is however worthy of note that no insurmountable constraints are attributed to the B0916 bid site. The issues raised relate to the site's location and the perceived impact on the landscape of housing on the site and disturbance to wildlife. The location of the site will be examined in more detail below, however in short, we consider that the concerns regarding landscape impact and impacts on wildlife are overstated and unfounded.
- 2.3. We also have concerns regarding the Council's approach to housing strategy set out in the MIR and consider that some suitable greenfield allocations should be progressed. The reasons for this are set out in section 3 below.
- 2.4. ***'This development would be residential in nature. The site is within the Green Belt, and forms part of the green space network, which, without mitigation, may result in some loss or disturbance of wildlife habitat or species. The site is considered to be undesirable for development.'***

The site is presently Green Belt in the current 2017 Local Development Plan. It is not uncommon for land that is the subject of a development bid to be green belt in the extant LDP. This does not however automatically mean that the land contributes to the strategic objectives of the Green Belt in protecting the setting of the City and preventing coalescence between areas. This is certainly the case in respect of the land at Craigton, that is surrounded by existing housing. Extending the settlement boundary of Peterculter northwards by 140m, as is effectively proposed through this bid will have no



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impact on the setting of Peterculter or Aberdeen. The principle of this has already been demonstrated through the allocation of the OP52 / B0902 site for housing on the east side of Malcolm Road and the B0916 site's previous allocation in the 2004 Finalised Local Plan.

It is recognised that the site is currently zoned as 'Green Space Network' in the 2017 LDP. The 'GSN' zoning extends to all land west of Peterculter to the City administrative boundary, including part of the allocated OP51 development site. Site OP52 was also GSN prior to its allocation in the 2017 LDP, as with green belt, this is not uncommon. A large area of land north of the Craigton site running east – west is also zoned as GSN, so the removal of this land from the GSN will not have any strategic impacts on the GSN function.

There is no evidence of notable wildlife or protected species on the site. The B0916 land is a field surrounded by houses, adjacent to a main road on the edge of a village. We would therefore question its value in terms of wildlife habitat. The Officers' assessment text appears to suggest that all land designated as GSN provides a valuable wildlife habitat. This is not the case, GSN includes a range of land types and characters. The current LDP and Scottish Natural Heritage's 'Sitelink' resource confirms the land is not the subject of any natural heritage designations.

As set out in the bid document and associated indicative layout plan, landscaped green corridors can be accommodated along the site boundaries to ensure the essence of the GSN can be retained as necessary. The development proposals will be designed in such a way to encourage biodiversity.

We do not therefore consider that the current green belt / GSN status of the site, or its environmental habitat value, which we believe is being overstated, represent valid reasons not to allocate the land for future development.

- 2.5. ***'Development on this site would also (without mitigation measures) impact on the surrounding landscape. Any development would be isolated to the main settlement of Peterculter and it is not well connected to services and facilities.'***

The site in its current form has the character of being a field surrounded by housing on the northern edge of Peterculter.

In terms of mitigation measures, strategic boundary planting is proposed. When the site is viewed from the west, from the A93 road, the land sits behind the cluster of housing on the site's western edge, which also has substantial woodland around it. The B0916 site also benefits from the backdrop of the woodland and rising landform at Tillyloch to the east on the opposite side of Malcolm Road.



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Fig 1: B0916 Craigton site viewed from A93 (west) and outlined in red – note backdrop of woodland, landform and buildings.

Similar issues were considered through the 2008 Local Plan preparation process when the B0916 site was promoted for employment and housing use. In considering these, the Scottish Government Reporter stated:

*(The site) 'makes no more than a modest contribution to the landscape setting of Peterculter... and concluded that there was no evidence to demonstrate that development on the objection site would be unacceptable in terms of flood risk, bio diversity or pollution and the effect of development on the appearance of the locality could be ameliorated if substantial planting were established on the site boundaries and if the site could be levelled to ensure that the height of the buildings was not exaggerated. The Reporter concluded that with such measures in place development would have little effect on the landscape as experienced by persons approaching Peterculter from the north. A more significant effect might be experienced by those approaching Peterculter from the west along the A93 but even this could be addressed through appropriate materials.'*

- 2.6. We support this view and believe this is still the case in that there will be no adverse landscape impact from development from either the north or west of Peterculter. We also echo the statement from the Reporter in that there is no evidence to suggest that there are issues to suggest this is a wildlife habitat or supports protected species and this remains the case (see para 2.4 above).
- 2.7. In terms of the final comment regarding 'isolation' from the Peterculter settlement and the site being 'not well-connected to services or facilities', we would comment as follows:
- 2.8. The site is directly opposite LDP allocation OP52 Malcolm Road for eight houses. Although subject to environmental designations including ancient woodland, OP52 was therefore considered suitable as



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a site for housing to the north west of Peterculter. Housing on the B0916 Craigton site would share the same locational characteristics.

- 2.9. B0916 is 240m from the public bus service that links Peterculter to Aberdeen City Centre and beyond. This is easy walking distance and well below the accepted distance of 400m. The site is 900m from the defined neighbourhood centre of Peterculter and its associated range of retail, services and facilities.
- 2.10. In summary we do not believe that any of the issues raised through the MIR assessment of the B0916 site represent robust reasons not to allocate it.
- 2.11. The MIR includes a bid assessment summary, with the B0916 site being awarded a score of 47 out of a possible 63. We have reassessed the bid using the Council's criteria and would suggest that a scoring of 57 would be more appropriate. The detailed narrative and reasoning are contained in Appendix 1. Principally the increased scoring is related to the site's acceptable location adjacent to existing and under construction housing in north west Peterculter.

### **3. Housing Land Strategy**

- 3.1. The housing strategy contained within the MIR relies heavily on existing allocated sites, additional brownfield sites coming forward over the lifetime of the plan and a very limited set of additional allocations. We do not believe that this approach will assist in halting the continued shortfall in housing delivery across the City and will not meet the housing delivery requirements of the Strategic Development Plan.
- 3.2. The MIR housing strategy is a continuation of the existing strategy that has now been in place for two LDPs. That existing strategy has not delivered the City's housing needs and in an economy where greater ambition is required to drive future success, we do not support a do-minimum housing strategy. This LDP is the first to incorporate a functioning bypass, the biggest step change in infrastructure in a generation within Aberdeen.
- 3.3. Our client has serious concerns about the range and scale of housing that can be delivered on the back of that do-minimum strategy, the practicality of relying on difficult brownfield sites and the relationship between that strategy, the SDP in its final form when approved later this year and national policy on delivering more housing more effectively. Scottish Planning Policy sets out requirements for LDPs to identify a generous supply of land for each housing market area within the plan area to support the achievement of the housing land requirement across all tenures, maintaining at least a 5-year supply of effective housing land at all times and to have a sharp focus on the delivery of allocated sites embedded in action programmes, informed by strong engagement with stakeholders.





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- 3.4. The latter emphasis on deliverable housing sites is essential in the LDP review process if the planning system is going to provide a positive, realistic and flexible approach to housing development required by SPP.
- 3.5. The MIR is accompanied by a Brownfield Urban Capacity Study Update (BUCS Update -November 2018) but that does not identify whether the sites it contains are effective or constrained, which is a fundamental consideration. Many of the brownfield sites have been available for a number of years and have not been developed, likely due to a number of reasons such as remediation costs and land assembly. Relying on these sites as an integral element of housing land supply is uncertain and therefore inappropriate.
- 3.6. Paragraph 119 of SPP also requires that LDPs "... in city regions should allocate a range of sites which are effective or expected to become effective in the plan period to meet the housing land requirement of the strategic development plan up to year 10 from the expected year of adoption. They should provide for a minimum of 5 years effective land supply at all times. In allocating sites, planning authorities should be confident that land can be brought forward for development within the plan period and that the range of sites allocated will enable the housing supply target to be met". That calculation is generally based on annual Housing Land Audits (HLA) and although these can provide an element of certainty up to year 5, they are inherently inaccurate and over-optimistic the further from the base year that the housing delivery is forecast. This can be demonstrated quite clearly from an analysis of HLAs over a number of years (see Table 1 below).
- 3.7. The decaying confidence in housing predictions over time demonstrates that Aberdeen City Council cannot have confidence that the scale of development required can be brought forward by just relying on predictions in HLAs. The planning authority should instead take a realistic view of historic delivery trends against that projected in HLAs and allocate enough land to take up any expected shortfall. The housing figures proposed in the current MIR instead make limited allocations that will not make significant difference to housing delivery in the area over the life of the plan.

	2014	2015	2016	2017	2018	2019	2020	2021	2022
<b>2019 HLA (draft)</b>									
Units delivered	684	795	833	1,174	1,173				
Units estimated									
<b>2018 HLA</b>									
Units estimated					1,314	1,529	1,610	1,641	1,189
<b>2017 HLA</b>									
Units estimated				1,274					
<b>2016 HLA</b>									
Units estimated			1,175						
<b>2015 HLA</b>									
Units estimated		1,086							
<b>2014 HLA</b>									
Units estimated	775								





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

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

3.8. Table 1 above shows extracts from various HLAs and compares predicted housing delivery (in red) against actual housing delivery. It shows:

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

This evidence clearly points to:

- Housing delivery on currently allocated sites that falls below medium-term HLA predictions;
- Over-optimism on housing delivery that becomes less accurate the further in the future it predicts; and
- A need for a greater supply and range of housing allocations to supplement existing allocated sites and help deliver more housing over the life of the Plan.

The MIR strategy of limiting allocations therefore doesn't reflect historical trends in housing delivery. Evidence from HLAs indicates quite clearly that a realistic approach to deliver SDP housing requirements would need to allocate additional land in a variety of marketable locations.

3.9 The PSDP Housing Strategy relied almost entirely on existing allocations in the early years of the plan, pushing some of the need identified in the HNDA to later years. It also relied on existing allocations to deliver more homes than they have been doing over the last few years. That over-reliance on an unrealistic delivery rate is also clearly an issue for the LDP. Aberdeen City Council should recognise these low rates of delivery in addressing housing requirements. Evidence suggests that this will continue to be the case. Relying on sites that will deliver slowly over the years will exacerbate



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housing backlog issues. Increased delivery will only be achieved by allocating additional and deliverable housing sites including areas for future growth (Strategic Reserve).

3.10. Over 66% of region’s housing shortfall is within the Aberdeen City boundary. Many larger residential allocations haven’t met their original allocated expectations for the period 2007-2016. The original expected delivery rates are set out in column 4 (2007-2016) from the Housing Land Audit with the remaining columns reporting actual delivery as shown in respective Housing Land Audits. The cumulative shortfall in housing delivery over this period is 15,544 across both Council areas and both housing market areas. This substantial under delivery simply re-emphasises the fact that reliance on large sites will not meet the housing delivery targets and does not provide the range of housing in a range of locations that people want to see. Table 2 below offers an Aberdeen City sites perspective.

<b>Example Major Sites in City AHMA (incl. 2012 LDP REF)</b>	<b>Allocation to 2018</b>	<b>Actual Delivered to 2018 (as per draft 2019 HLA)</b>	<b>Shortfall in delivery</b>
Greenferns OP45	740	0	740
Craibstone South OP29	850	0	850
Rowett South OP30	1,280	0	1,280
Greenferns Landward OP31	850	0	850
Loirston OP77	1,260	0	1,260
Grandhome OP12	3,440	32	3,408
Countesswells OP58	2,490	304	2,186
<b>Total</b>	<b>10,910</b>	<b>336</b>	<b>10,574</b>

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

3.11. Table 2 above shows that of the seven large allocations considered only 336 homes have been delivered to date. Persistently relying on these large sites to deliver without recognising the longer lead-in times to their delivery will simply exacerbate under delivery of housing.

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

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



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effective then it is considered to be “constrained” and not counted. That test should be applied to any site and only effective sites should be included as a housing allocation.

- 3.14. The proposed SDP states “4.18 Local Development Plans must identify allocations for the period 2020 to 2032 which are deliverable within the timeframe of this period” and although it also suggests “New allocations should consider opportunities to reuse brownfield land and attempt to utilise the current “constrained” supply in the first instance...” it recognises that “...some new development will need to take place on greenfield sites in order to help deliver our Vision and future strategy for growth”. In other words, the Plan must identify effective and deliverable housing sites but can consider brownfield and constrained sites if they meet the effective and deliverable criteria. The current strategy of relying on brownfield sites for at least 82% of the proposed new housing allocations is not balanced approach and likely to fail. On top of that at least 50% of the MIR preferred sites are also brownfield taking the overall brownfield reliance up to 90% in the MIR additional housing allowances. On a purely proportional basis this is a clear over-reliance on brownfield sites.
- 3.15. Brownfield sites are more difficult to develop, have complex servicing needs, have significantly greater contextual issues to overcome, can include more convoluted ownership and are proportionately more costly to develop.

Brownfield sites cannot therefore be counted on to deliver much needed housing in the City. They should be included as an extra layer of flexibility to supplement more reliably deliverable housing allocations.

- 3.16. In summary, our client believes that the Council should allocate additional housing land to meet the shortfalls specified in this response. Specifically:
- Additional housing land of around 250 homes per year (3,000 over the period 1 allowances 2020 to 2032) should be allocated to account for cumulative lack of delivery inherent in Aberdeen’s housing land audit predictions. A recent Scottish Government Study (Housing Land Audits 2019) identified this as an issue with a common feature of HLAs being “The decay of programming over time ... with short term projections difficult and “a significant degree of uncertainty” when programming completions beyond 2-3 years”;
  - Brownfield sites should be discounted from the overall calculation of available housing land and instead treat them as windfall sites;
  - Even if included the brownfield figures used are an extreme best-case scenario and should be discounted heavily to reflect actual opportunity with additional housing land (at least 682 homes) to account for the lack of generosity within the brownfield land figures.

#### **4. Conclusion**

- 4.1 As set out in the preceding sections and the original Development Bid, the We believe that the future development proposed at Craigton, Peterculter is ideally placed to accommodate an appropriate, small-scale residential allocation in the forthcoming 2021 Local Development Plan. The site is within



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the single ownership of the site proposer and is not subject to any planning, environmental or technical constraints.

4.2. There are no serious constraints to development, concerns raised through the MIR assessment relate concerns regarding wider landscape impacts and ecology, issues that were previously discounted when the site was supported as a development option in 2004. At this time the site was not allocated for employment use due to concerns with HGV traffic impact on Malcolm Road. These issues are no longer relevant given the existence of the AWPR freeing up capacity on Malcolm Road and the proposed residential use on the site. The site should be regarded as an appropriate, effective opportunity in the 2022 Local Development Plan. There is no evidence available to suggest that this should not be done.

4.2 As set out above, we have serious concerns regarding the Housing Strategy set out in the MIR and suggest this needs to be addressed through the allocation of additional suitable deliverable housing sites such as that at B0916 Craigton. We would ask that the site is included in the forthcoming Proposed Local Development Plan as set out in the original bid document.

## APPENDIX 1

Criteria	Officers' Score	MIR Scoring Justification	Proposed Score	Justification
Exposure	2	Most of the site is well sheltered due to topography and trees on the road boundary. The site rises in the middle and is more exposed at this point.	2	Agreed.
Aspect	3	The site is mainly south, south west and south east facing, sloping from the top 'hump'.	3	Agreed, the site enjoys a southerly aspect that would be appropriate for a residential development.
Slope	2	The main slope of the site is less than 1 in 22. The site is not flat and rises up to a main 'hump' within the middle of the site.	3	The site contours would be levelled out to allow development.
Flood Risk	2	The SEPA flood maps indicted there is a high likelihood of surface water flooding at the eastern corner of the site. The indicative plan indicates this area will not be developed.	2	Agreed.
Drainage	2	The majority of the site is freely drained, however the south east and eastern edge of the site does appear to have some drainage issues where the ground was relatively wet and 'rushes' were present.	2	Agreed, although drainage will be managed through SUDS as a result of development.



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Built/Cultural Elements	3	There is no loss or disturbance to built or cultural elements.	3	Agreed.
Natural Conservation	2	The site forms part of the green space network. TPO 253 is adjacent to the eaten edge. There is ancient woodland to the east, across Malcolm Road. There would be some loss or disturbance of wildlife habitat or species at this site. Designated Species (Red Squirrel) recorded within 100m of the site)	3	The site does not strategically contribute to the Green space Network and this zoning could be removed. The trees along the eastern boundary of the site are the subject of TPO 253. They would be retained as part of the development. Some of the ancient woodland across Malcolm Road is the allocated OP52 site, meaning the site with the more onerous environmental constraints has been allocated. There is no evidence of wildlife or ecology value (see paras 2.4 and 2.5 above).
Landscape Features	3	Development on this site would result in no loss or disturbance to landscape features.	3	Agreed.
Landscape Fit	1	Development will intrude slightly into the landscape. Development would be visible from the A93 and would be seen as a cluster of housing, rather than isolated units, or linear residential development. The track to the south forms a more distinctive green belt boundary than this proposal.	3	The site benefits from existing defensible boundaries. When viewed from the west, the rising landform of Tillyoch behind the site, and the existing housing and trees east of the site minimise landscape impacts.
Relationship to existing settlement	2	A development on this site would be partially related to the existing settlement of Peterculter. The site is opposite OP52, across Malcolm Road. Existing housing around the site is predominantly isolated and detached in a peripheral setting. The area of hard standing car parking area between Crombie Park and the site dissects the site from the rest of Peterculter.	3	The site is well related to Peterculter. It has defensible boundaries, boundaries contiguous with existing housing and has a pavement along its eastern side on Malcolm Road.



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Land Use Mix / Balance / Service Thresholds	1	The development would not add to the land use mix, as it is adding residential uses to a predominantly residential area	2	The neighbouring residential land use would aid the integration of housing on this site.
Accessibility	2	A bus stop is located with 400-800 metres of the site.	3	Incorrect. The nearest bus stop is 230m from the site on Johnston Gardens / Malcolm Road. This provides a regular service to Aberdeen City.
Proximity to facilities / shopping / health / recreation	1	The closest facilities are more the 800 metres from the site.	2	Agreed, however the Peterculter neighbourhood centre with all its services and facilities is within safe walking distance from the site.
Direct footpath / cycle connection to community and recreation facilities and resources	2	There is a limited range of available footpaths/cycle path connections to the community, recreation and employment facilities. Core path 52 is at the southern boundary of the site. Other path forms the wester and norther edge of the site	3	The site is well connected to the existing extensive core path network so should gain a higher score. Peterculter neighbourhood centre with all its services and facilities is within safe walking distance from the site.
Proximity of employment opportunities	2	There are no significant employment opportunities within 1.6 kilometers of the site.	3	Employment opportunities are available in Westhill, Kingswells and at Countesswells in the future. These are directly linked to Peterculter by the B979 and overall connectivity in the area is assisted by the AWPR's existence.
Contamination	3	There are no known contamination or waste tipping present on the site.	3	Agreed.
Land Use Conflict	3	There will be no expected conflict with adjacent land use. The Culter Football Club grounds are located opposite the site to the south, however it is not expected these will cause significant land use conflict.	3	Agreed.





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Physical Infrastructural Capacity	3	Proposer indicates the site has connections to utilities. infrastructure capacity.	3	Agreed.
Physical Infrastructure Future	3	The proposer indicates fibre optic broadband is available. The development will satisfy low and zero carbon through design layout and building fabric.	3	Agreed.
Service Infrastructure Capacity	2	The site lies within the area zoned for Culter Primary and Cults Academy. Culter Primary School has capacity; however, Cults Academy will be over capacity by 2021. Other	2	School capacities in the area will be revised in the near future with the provision of primary and secondary education facilities at Countesswells OP58. This will create additional capacity. Developer Obligations from new development will also assist in generating capacity.
Other Constraints	3	No known other constraints.	3	Agreed.
	<b>49</b>		<b>57</b>	



# 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	SCOTT LEITCH
Organisation (if relevant)	HALLIDAY FRASER MUNRO
On behalf of (if relevant)	
Address	
Postcode	
Telephone	
E-mail	

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



If yes, please provide an e-mail address

### 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

<b>Which document(s) are you commenting on?</b>	<ul style="list-style-type: none"><li>• <b>Main Issues Report</b></li><li>• <b>Strategic Environmental Assessment Environmental Report</b></li><li>• <b>Monitoring Statement</b></li></ul>	<input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
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Please indicate the document and the specific Issue, Question, Site, Policy, Map or Table you are commenting on. Please provide your comments below and explain your reason for supporting, opposing or commenting on this specific part of the document.

Please find attached response to the Main Issues Report in respect of Development Bid site B0917, Land at Inchgarth Mews, Cults and the Housing Land Strategy.

**ABERDEEN CITY LOCAL DEVELOPMENT PLAN  
RESPONSE TO MAIN ISSUES REPORT  
LAND EAST OF INCHGARTH MEWS  
B0917**

**MAY 2019**

On behalf of  
SCOTT FAMILY



HALLIDAY FRASER MUNRO  
CHARTERED ARCHITECTS & PLANNING CONSULTANTS



**HALLIDAY FRASER MUNRO**

CHARTERED ARCHITECTS & PLANNING CONSULTANTS

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- 2. MIR Bid Assessment Summary**
- 3. Housing Land Strategy**
- 4. Conclusion**

**Appendix 1 – Updated Bid Assessment**



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## 1. Introduction and Bid Summary

- 1.1. This report has been prepared by Halliday Fraser Munro, Town Planning Consultants and Chartered Architects, on behalf of the Scott Family. It is written in response to the Aberdeen City Local Development Plan Main Issues Report 2019 (MIR).
- 1.2. At the 'Call for Sites' stage in May 2018, a development bid (B0917) was lodged for a 4.4ha area of land at Inchgarth, Aberdeen. The land lies between the Inchgarth Mews housing cluster to the west and Inchgarth House to the east. The site benefits from strong defensible boundaries set by the aforementioned properties and Inchgarth Road to the north (mature tree belts and stone boundary wall) and the Inchgarth Reservoir to the south.
- 1.3. The land is non-productive scrubby grassland, effectively a paddock well screened by mature trees on three sides. Although the site is contiguous with the suburban area of Cults to the west and the lower density residential plots of Pitfodels to the east, the land benefits from an extremely secluded aspect. It is ideally placed to accommodate a low density, sensitively designed, high quality residential development that retains and celebrates the existing site features of the stone walls and trees. The landowner (our client) is in discussions with respected, award-winning national housebuilders already active in the area who have expressed an interest in developing here. These developers have actively sought out our client and have formally expressed an interest in developing the full extent of the site. They share the view that this is a special, highly marketable and deliverable site, based principally on the location and minimal infrastructure required to develop the site.
- 1.4. The B0917 land is proposed to be allocated as a future housing site suitable for around 15 houses as an individual pocket of housing on the eastern edge of Cults.
- 1.5. The land is not subject to any environmental designations or technical planning constraints.
- 1.6. At the 'call for sites' stage, ACC stated that they would welcome development bid proposals for smaller scale developments of less than 100 houses. At 15 houses, the B0917 proposal is in line with this strategy as a suitable small-scale development on a well-located site with mature, established site boundaries.
- 1.7. The site is currently zoned as Green Belt and Green Space Network in the extant 2017 Local Development Plan. It is not unusual for land promoted for future housing to be currently zoned as such. The B0917 site does however share contiguous boundaries with the zoned urban residential area of Cults to the north west.
- 1.8. It is noted that the land to the north of the bid site, between Inchgarth Road and North Deeside Road is the subject of an LDP bid for an allocation (B0944) for retirement housing, care home and retail provision. This proposal (also reflected in current planning application 181224/PPP) presents scope for a more holistic masterplanned approach to future development in the area along with the



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B0917 proposals, for example future-proofing the local road and access design options. Such an integrated approach is supported by the Council's Transportation Service. The B0917 land does benefit from existing access rights directly off Inchgarth Road that must be accounted for in any designs, in order to maintain satisfying our client's title burdens.

- 1.9. This provides the background context and justification for the housing allocation at Inchgarth as proposed through the B0917 bid.
- 1.10. Conversely however, the B0917 Inchgarth development bid for 15 houses is not an Officer's preferred option in the Main Issues Report. This is considered in more detail below.

## **2. MIR Bid Assessment Summary**

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

*'This local scale development site would be located on a currently zoned Green Belt and Green Space Network site. The proposer indicates 15 units could be delivered. The site is located close to the River Dee Corridor LNCS. Development on this site would also impact on the surrounding landscape, and any development would only be partially related to the main settlement of Cults. The area helps to maintain the separate identities of Cults and Aberdeen and the overall landscape setting of the city. It therefore provides a valuable green belt role. There is limited connectivity to services and public transport. The site is considered to be undesirable for development.'*

- 2.2. The Officers' view and associated issues can be broken down and will be examined in more detail below. It is however worthy of note that no insurmountable constraints are attributed to the B0917 bid site. The issues raised relate to the site's location and perceived contribution to the Green Belt in this location and wider landscape impacts. The location of the site will be examined in more detail below, however in short, we consider that the concerns regarding landscape impact and potential impacts on the River Dee Local Nature Conservation Site, and perceived lack of connectivity to Cults are overstated and unfounded.
- 2.3. We also have concerns regarding the Council's approach to housing strategy set out in the MIR and consider that some suitable greenfield allocations should be progressed. The reasons for this are set out in section 3 below.
- 2.4. ***'This local scale development site would be located on a currently zoned Green Belt and Green Space Network site. The proposer indicates 15 units could be delivered. The site is located close to the River Dee Corridor LNCS... Development on this site would also impact on the surrounding landscape, and any development would only be partially related to the main settlement of Cults. The area helps to maintain the separate identities of Cults and Aberdeen and the overall landscape setting of the city. It therefore provides a valuable green belt role.'***



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The site is presently Green Belt and Green Space Network in the current 2017 Local Development Plan. It is not uncommon for land that is the subject of a development bid to be green belt in the extant LDP. This does not however automatically mean that the land contributes to the strategic objectives of the Green Belt in protecting the setting of the City and preventing coalescence between areas. We would suggest that given the established, defensible boundaries around the B0917 site, it has the capacity to accommodate small-scale residential development as proposed. With the exception of the possible creation of a new integrated junction access off Inchgarth Road, the character and appearance of the site from Inchgarth Road would remain unaltered.

In considering the role and function of the Green Belt in this area, and specifically views of the City from south of the River Dee, there remains a great swathe of 38ha of Green Belt land between the north bank of the Dee and properties on Inchgarth Road, including the B0917 site. Development on B0917 as described would not alter this position. Due to the mature tree belts along the south of the B0917 site, development would not be visible from the south, and would not therefore impact on the Green Belt function in this location.

In terms of the Green Space Network, there is scope for this to be retained around the edges of the B0917 site as part of the development. We consider that the mature trees that are the important features here providing a sense of enclosure, sense of separation, biodiversity and backdrop and these will be retained and enhanced. A modest development sitting within the existing site envelope would not detract from the functioning role of the trees in a wider sense and the overall objective of the Green Belt / GSN objectives are still observed.

The Officers' assessment states that the site is close to the River Dee Corridor LNCS (Local Nature Conservation Site), designated to protect the natural features and habitat of the river and surrounding land. It is noted that this designation applies to the River Dee and the Inchgarth Reservoir. There would still however be a landscape buffer of 60m between any housing development on B0917 and the LNCS, therefore it is not anticipated that the allocation or development of this site would impact on the LNCS.

As set out in the bid document and associated indicative layout plan, landscaped green corridors can be accommodated along the site boundaries to ensure the essence of the GSN can be retained as necessary. As part of a planning application, a Landscape and Visual Impact Assessment can be carried out to confirm the absence of any landscape impacts.

We do not therefore consider that the current green belt / GSN status of the site, or its proximity to the River Dee LNCS, represent valid reasons not to allocate the land for small-scale future housing development.

The Officers' bid assessment matrix, under 'Landscape Features', refers to the site's location within the 'River Dee valley prime landscape' and contributing to the sense of place in that location. The extract below from SNH's Landscape Character Assessments confirms that the entire area between





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Cults and Garthdee / Airyhall 'Pitfodels' falls within this designation. This means that the general Pitfodels area, comprising a considerable amount of low-density housing is within the 'River Dee valley prime landscape'. This designation does not therefore preclude appropriately designed development, such as that proposed on site B0917, especially when considering the low density proposals when compared with the neighbouring Inchgarth Mews development.

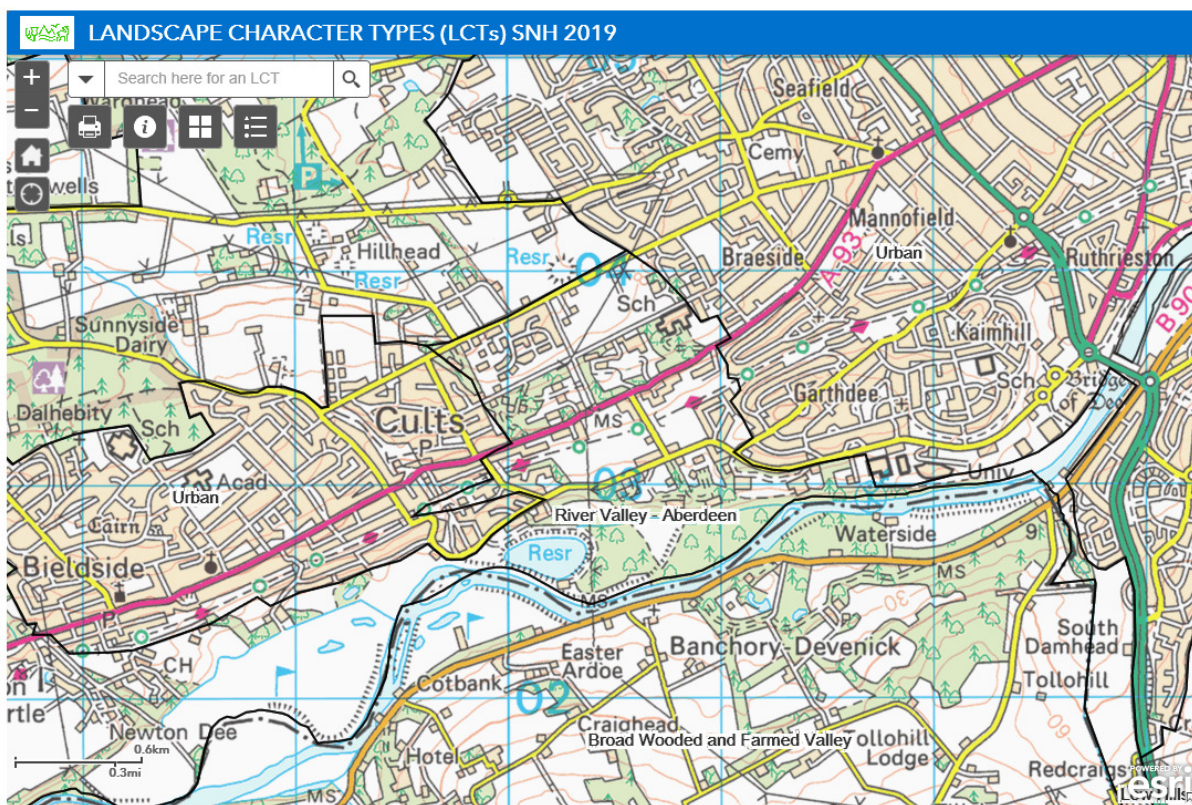


Figure 1 – Extract from SNH's Landscape Character Assessment.

**2.5. 'Development would only be partially related to the main settlement of Cults. ... There is limited connectivity to services and public transport.'**

The B0917 site at Inchgarth is an enviable opportunity for future housing in that it is secluded with well-established natural boundaries, but is also well connected to Cults and Garthdee in terms of access to services and facilities for future residents.

The Pitfodels Station Road and Westerton Road provide a useful link to North Deeside Road and beyond, and we understand that the B0944 bid / planning application 181224/PPP includes proposals for a new, purpose built link that will further improve connectivity in the area. Bus stops on North Deeside Road are located 390m from the Inchgarth site, easy walking distance along Westerton Road. These provide access to the regular 19 service bus to the city centre and beyond, and to the Deeside buses serving Banchory and Braemar. We do not therefore agree that there is limited connectivity to public transport. The B0917 site is only 700m from Gray's School of Art and the RGU main campus beyond, one of the main employers in Aberdeen. This provides realistic



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scope for people living at Inchgarth to walk or cycle to work at RGU. The Cults neighbourhood centre with various shops, services and facilities (Tesco / Sainsburys / Costa / Cults Hotel) lies 750m from the B0917 site, along safe, established footpaths. The site is also close to the Deeside Way, providing access to an important leisure and commuting resource for the area, and existing footpaths south of the site along the River Dee. The land to the north of Inchgarth Road, immediately opposite the B0917 site is zoned in the 2017 LDP as part of the Cults urban residential area.

Having regard to the above, we fail to see how the site is not related to Cults nor benefits from connectivity to services and public transport.

- 2.6. In summary we do not believe that any of the issues raised through the MIR assessment of the B0917 site represent robust reasons not to allocate it.
- 2.7. The MIR includes a bid assessment summary, with the B0917 site being awarded a score of 43 out of a possible 63. We have reassessed the bid using the Council's criteria and would suggest that a scoring of 58 would be more appropriate. The detailed narrative and reasoning are contained in Appendix 1. Principally the increased scoring is related to the site's capacity to accommodate small-scale development whilst retaining the established boundary features of woodland and stone walls, limiting any impact on the wider landscape and the site's acceptable location and its linkages to Cults and existing services.

### **3. Housing Land Strategy**

- 3.1. The housing strategy contained within the MIR relies heavily on existing allocated sites, additional brownfield sites coming forward over the lifetime of the plan and a very limited set of additional allocations. We do not believe that this approach will assist in halting the continued shortfall in housing delivery across the City and will not meet the housing delivery requirements of the Strategic Development Plan.
- 3.2. The MIR housing strategy is a continuation of the existing strategy that has now been in place for two LDPs. That existing strategy has not delivered the City's housing needs and in an economy where greater ambition is required to drive future success, we do not support a do-minimum housing strategy.
- 3.3. Our client has serious concerns about the range and scale of housing that can be delivered on the back of that do-minimum strategy, the practicality of relying on difficult brownfield sites and the relationship between that strategy, the SDP in its final form when approved later this year and national policy on delivering more housing more effectively. Scottish Planning Policy sets out requirements for LDPs to identify a generous supply of land for each housing market area within the plan area to support the achievement of the housing land requirement across all tenures, maintaining at least a 5-year supply of effective housing land at all times and to have a sharp focus



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on the delivery of allocated sites embedded in action programmes, informed by strong engagement with stakeholders.

- 3.4. The latter emphasis on deliverable housing sites is essential in the LDP review process if the planning system is going to provide a positive, realistic and flexible approach to housing development required by SPP.
- 3.5. The MIR is accompanied by a Brownfield Urban Capacity Study Update (BUCS Update - November 2018) but that does not identify whether the sites it contains are effective or constrained, which is a fundamental consideration. Many of the brownfield sites have been available for a number of years and have not been developed, likely due to a number of reasons such as remediation costs and land assembly. Relying on these sites as an integral element of housing land supply is uncertain and therefore inappropriate.
- 3.6. Paragraph 119 of SPP also requires that LDPs "... in city regions should allocate a range of sites which are effective or expected to become effective in the plan period to meet the housing land requirement of the strategic development plan up to year 10 from the expected year of adoption. They should provide for a minimum of 5 years effective land supply at all times. In allocating sites, planning authorities should be confident that land can be brought forward for development within the plan period and that the range of sites allocated will enable the housing supply target to be met". That calculation is generally based on annual Housing Land Audits (HLA) and although these can provide an element of certainty up to year 5, they are inherently inaccurate and over-optimistic the further from the base year that the housing delivery is forecast. This can be demonstrated quite clearly from an analysis of HLAs over a number of years (see Table 1 below).
- 3.7. The decaying confidence in housing predictions over time demonstrates that Aberdeen City Council cannot have confidence that the scale of development required can be brought forward by just relying on predictions in HLAs. The planning authority should instead take a realistic view of historic delivery trends against that projected in HLAs and allocate enough land to take up any expected shortfall. The housing figures proposed in the current MIR instead make limited allocations that will not make significant difference to housing delivery in the area over the life of the plan.

	2014	2015	2016	2017	2018	2019	2020	2021	2022
<b>2019 HLA (draft)</b>									
Units delivered	684	795	833	1,174	1,173				
Units estimated									
<b>2018 HLA</b>									
Units estimated					1,314	1,529	1,610	1,641	1,189
<b>2017 HLA</b>									
Units estimated				1,274					
<b>2016 HLA</b>									
Units estimated			1,175						





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<b>2015 HLA</b> <b>Units estimated</b>		1,086							
<b>2014 HLA</b> <b>Units estimated</b>	775								
<b>Difference between predicted &amp; actual housing delivery</b> <i>(averages -357 units/annum)</i>	-91 (-12%)	-291 (-27%)	-342 (-29%)	-100 (-8%)	-141 (-11%)				
<b>5 year Average difference (-17%) applied 2019-2022</b>						1,269	1,336	1,362	987
<b>No. of Housing Units anticipated less than predicted</b>						-260	-274	-279	-202

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

3.8. Table 1 above shows extracts from various HLAs and compares predicted housing delivery (in red) against actual housing delivery. It shows:

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

This evidence clearly points to:

- Housing delivery on currently allocated sites that falls below medium-term HLA predictions;
- Over-optimism on housing delivery that becomes less accurate the further in the future it predicts; and
- A need for a greater supply and range of housing allocations to supplement existing allocated sites and help deliver more housing over the life of the Plan.

The MIR strategy of limiting allocations therefore doesn't reflect historical trends in housing delivery. Evidence from HLAs indicates quite clearly that a realistic approach to deliver SDP housing requirements would need to allocate additional land in a variety of marketable locations.

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



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reliance on an unrealistic delivery rate is also clearly an issue for the LDP. Aberdeen City Council should recognise these low rates of delivery in addressing housing requirements. Evidence suggests that this will continue to be the case. Relying on sites that will deliver slowly over the years will exacerbate housing backlog issues. Increased delivery will only be achieved by allocating additional and deliverable housing sites including areas for future growth (Strategic Reserve).

3.10. Over 66% of the region’s housing shortfall is within the Aberdeen City area. Many larger residential allocations haven’t met their original allocated expectations for the period 2007-2016. The original expected delivery rates are set out in column 4 (2007-2016) from the Housing Land Audit with the remaining columns reporting actual delivery as shown in respective Housing Land Audits. The cumulative shortfall in housing delivery over this period is 15,544 across both Council areas and both housing market areas. This substantial under delivery simply re-emphasises the fact that reliance on large sites will not meet the housing delivery targets and does not provide the range of housing in a range of locations that people want to see. Table 2 below offers an Aberdeen City sites perspective.

<b>Example Major Sites in City AHMA (incl. 2012 LDP REF)</b>	<b>Allocation to 2018</b>	<b>Actual Delivered to 2018 (as per draft 2019 HLA)</b>	<b>Shortfall in delivery</b>
Greenferns OP45	740	0	740
Craibstone South OP29	850	0	850
Rowett South OP30	1,280	0	1,280
Greenferns Landward OP31	850	0	850
Loirston OP77	1,260	0	1,260
Grandhome OP12	3,440	32	3,408
Countesswells OP58	2,490	304	2,186
<b>Total</b>	<b>10,910</b>	<b>336</b>	<b>10,574</b>

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

- 3.11. Table 2 above shows that of the seven large allocations considered only 336 homes have been delivered to date. Persistently relying on these large sites to deliver without recognising the longer lead-in times to their delivery will simply exacerbate under delivery of housing.
- 3.12. Our client is also concerned that the MIR housing strategy relies far too heavily on a supply of brownfield housing sites and assumes delivery of 3,408 brownfield units between 2020 and 2032 (High Indicative Density Range - HIDR). These brownfield sites are set out in the November 2018 Brownfield Urban Capacity Study (BUCS).
- 3.13. The “effectiveness” of the list of brownfield sites is critical to their inclusion within the housing land supply figures. The BUCS has stated that site effectiveness has not been considered as the does not specify that brownfield sites have to be effective. The rationale behind that approach does not



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match the expectations set out in SPP or wider accepted methodologies for calculating a realistic and “effective” housing land supply. If brownfield sites are not effective, then they simply should not be considered as part of the City’s housing allowances. If a site is not effective or capable of becoming effective then it is considered to be “constrained” and not counted. That test should be applied to any site and only effective sites should be included as a housing allocation.

3.14. The proposed SDP states “4.18 Local Development Plans must identify allocations for the period 2020 to 2032 which are deliverable within the timeframe of this period” and although it also suggests “New allocations should consider opportunities to reuse brownfield land and attempt to utilise the current “constrained” supply in the first instance...” it recognises that “...some new development will need to take place on greenfield sites in order to help deliver our Vision and future strategy for growth”. In other words, the Plan must identify effective and deliverable housing sites but can consider brownfield and constrained sites if they meet the effective and deliverable criteria. The current strategy of relying on brownfield sites for at least 82% of the proposed new housing allocations is not a balanced approach and likely to fail. On top of that at least 50% of the MIR preferred sites are also brownfield taking the overall brownfield reliance up to 90% in the MIR additional housing allowances. On a purely proportional basis this is a clear over-reliance on brownfield sites.

3.15. Brownfield sites are more difficult to develop, have complex servicing needs, have significantly greater contextual issues to overcome, can include more convoluted ownership and are proportionately more costly to develop.

Brownfield sites cannot therefore be counted on to deliver much needed housing in the City. They should be included as an extra layer of flexibility to supplement more reliably deliverable housing allocations.

3.16. In summary, our client believes that the Council should allocate additional housing land to meet the shortfalls specified in this response. Specifically:

- Additional housing land of around 250 homes per year (3,000 over the period 1 allowances 2020 to 2032) should be allocated to account for cumulative lack of delivery inherent in Aberdeen’s housing land audit predictions. A recent Scottish Government Study (Housing Land Audits 2019) identified this as an issue with a common feature of HLAs being “The decay of programming over time ... with short term projections difficult and “a significant degree of uncertainty” when programming completions beyond 2-3 years”;
- Brownfield sites should be discounted from the overall calculation of available housing land and instead treat them as windfall sites;
- Even if included the brownfield figures used are an extreme best-case scenario and should be discounted heavily to reflect actual opportunity with additional housing land (at least 682 homes) to account for the lack of generosity within the brownfield land figures.



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## 4. Conclusion

- 4.1. As set out in the preceding sections and the original Development Bid, we believe that the B0917 site, land east of Inchgarth Mews is ideally placed to accommodate a deliverable, low density and well laid out, appropriate, small-scale residential allocation in the forthcoming 2022 Local Development Plan. The site is within the single ownership of the site proposer and is not subject to any planning, environmental or technical constraints.
- 4.2. There are no serious constraints to development, concerns raised through the MIR assessment regarding wider landscape and Green Belt impacts are unfounded when the wider area and context (scale of the landscape) is considered. The perceived lack of connectivity to Cults and the public transport network are also incorrect and unsubstantiated. The site should be regarded as an appropriate, effective opportunity in the 2022 Local Development Plan. There is no evidence available to suggest that this should not be done.
- 4.3. As set out above, we have serious concerns regarding the Housing Strategy set out in the MIR and suggest this needs to be addressed through the allocation of additional suitable deliverable housing sites such as that at B0917 Inchgarth. We would ask that the site is included in the forthcoming Proposed Local Development Plan as set out in the original bid document.

## APPENDIX 1

Criteria	Officers' Score	MIR Scoring Justification	Proposed Score	Justification
Exposure	3	Site boundary is delineated by woodland. Little visibility from roadside.	3	Agreed, and also visibility from the south is limited.
Aspect	3	Site slope indicates south-facing.	3	Agreed, the site enjoys a southerly aspect that would be appropriate for a residential development.
Slope	2	Southerly slope toward River Dee; approx. 11% (1:9) slope. Some undulation.	3	The existing slope is minimal and would be retained through development.
Flood Risk	2	There is an area of surface water flooding close to the eastern boundary of the site.	2	Our clients, as owners of the land with detailed knowledge of it can confirm there is no flooding issue.
Drainage	2	The area appears well drained	3	Agreed, although drainage will be managed through SUDS as a result of



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				development, score should be increased.
Built/Cultural Elements	3	Inchgarth House Listed Cat C building located east of the site.	3	Agreed, no impacts predicted.
Natural Conservation	2	River Dee corridor LNCS located within south side of site. Bat survey may be required. Protected species may be an issue.	3	Incorrect – LNCS is outwith bid site. There is no evidence of protected species on site however surveys can be undertaken at the appropriate stage in the planning process.
Landscape Features	2	The site is enclosed by woodland. It is part of the River Dee valley prime landscape and contributes to the sense of place in that location.	3	Woodland would be retained as part of the development. Do not agree there would be a detrimental impact on the landscape character, see para 2.4 above.
Landscape Fit	1	Part of site is 'Valley' prime landscape character, part is 'Lower Deeside' character area.	2	Do not agree there would be a detrimental impact on the landscape character, see para 2.4 above.
Relationship to existing settlement	1	Site is located between Cults and the city's western edge. It helps to maintain the separate identities of Cults and Aberdeen and the overall landscape setting of the city. It therefore provides a valuable green belt role.	2	Do not agree that development will detrimentally impact on the separation between Aberdeen and Cults (see para 2.4 above), nor does it have a valuable green belt role.
Land Use Mix / Balance / Service Thresholds	1	Small scale residential development. Prominent land use is low density residential in addition to Green Belt/ GSN.	3	Low density residential use proposed in line with existing character of surrounding area.
Accessibility	1	North is Inchgarth Road. Single side pavement on Inchgarth Rd, no cycle lane. Bus stops (services 19, 119, 201, 202, 203) and cycle lane on N Deeside Rd 0.6 miles north of site.	3	Incorrect. The nearest bus stop is 390m from the site on North Deeside Road. This provides a regular service to Aberdeen City and beyond. Cycle route available on Deeside Way, closer than North Deeside Road.
Proximity to facilities / shopping /	1	Cults District Centre (shops, library, medical centre) located half a mile west. Old Deeside	2	Agreed, Cults District Centre with all its services and facilities is within safe





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health / recreation		Line core path and LNCS north of site.		walking distance from the site.
Direct footpath / cycle connection to community and recreation facilities and resources	3	Core Path and cycle route Old Deeside Line (no.66) lies immediately to the north of the site.	3	Agreed, the site has good access to the Deeside Way.
Proximity of employment opportunities	2	With the exception of Robert Gordons University, there are limited employment areas nearby.	3	RGU is a major employer and the site is accessible by bus to the city centre for other employment opportunities.
Contamination	3	None shown.	3	Agreed.
Land Use Conflict	3	None anticipated with residential use.	3	Agreed.
Physical Infrastructural Capacity	2	Bid submission indicates there is infrastructure capacity.	3	Agreed, score should be increased.
Physical Infrastructure Future	2	Bid submission indicates there is infrastructure capacity.	3	Agreed.
Service Infrastructure Capacity	2	The site lies within the area zoned for Culter Primary and Cults Academy. Culter Primary School has capacity; however, Cults Academy will be over capacity by 2021. Other	2	School capacities in the area will be revised in the near future with the provision of primary and secondary education facilities at Countesswells OP58. This will create additional capacity. Developer Obligations from new development will also assist in generating capacity.
Other Constraints	3	No known other constraints.	3	Agreed.
	<b>49</b>		<b>58</b>	