

## Proposed Aberdeen Local Development Plan 2015 Representation Form

Please use this form to make comments on the Proposed Aberdeen Local Development Plan, ensuring that your comments relate to a specific issue, site or policy in either the Proposed Plan, Proposed Supplementary Guidance, Proposed Action Programme or Strategic Environmental Assessment Environmental Report. Please include the relevant paragraph(s) and use a separate form for each issue you wish to raise.

**The consultation period runs between Friday 20<sup>th</sup> March and Monday 1<sup>st</sup> June 2015. Please ensure all representations are with us by 5pm on Monday 1<sup>st</sup> June.**

<b>Name</b>	Mr <input checked="" type="radio"/> Mrs <input type="radio"/> Miss <input type="radio"/> Ms <input type="radio"/> <b>Ian Livingstone</b>
<b>Organisation</b>	<b>Ryden LLP</b>
<b>On behalf of (if relevant)</b>	<b>University of Aberdeen</b>
<b>Address</b>	c/o Ryden LLP 25 Albyn Place Aberdeen
<b>Postcode</b>	<b>AB10 1YL</b>
<b>Telephone</b>	<b>01224 588866</b>
<b>E-mail</b>	<b>ian.livingstone@ryden.co.uk</b>

Please tick if you would like to receive all future correspondence by e-mail

<b>What document are you commenting on?</b>	Proposed Plan	<input checked="" type="checkbox"/>
	Proposed Supplementary Guidance	<input checked="" type="checkbox"/>
	Proposed Action Programme	<input type="checkbox"/>
	Strategic Environmental Assessment Environmental Report	<input type="checkbox"/>
<b>Policy/Site/Issue</b>	Development Option B0203 - Land at Balgownie Development Option B0601 - Land at Hillhead Policy H5 & SG - Affordable Housing	<b>Paragraph(s)</b>

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

See Papers Apart regarding:

1. Promotion of Land at Balgownie for Mixed Use Development
2. Promotion of Land at Hillhead for Residential Development & Recreational Use
3. Affordable Housing Provision

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

See Papers Apart

Please return the completed form by:

- post to the Local Development Plan Team, Aberdeen City Council, Business Hub 4, Ground Floor North, Marischal College, Broad Street, Aberdeen AB10 1AB; or
- email to [ldp@aberdeencity.gov.uk](mailto:ldp@aberdeencity.gov.uk)

The representation form can be filled in, saved, e-mailed and/or printed. You must “save as” to ensure the completed form is saved with the changes you have made. If you need more space, please fill out another representation form or send a word document attachment via e-mail with your completed representation form. **Please ensure all representations are with us by 5pm on Monday 1<sup>st</sup> June.**

Thank you. For more information, please visit [www.aberdeencity.gov.uk/aldp2016](http://www.aberdeencity.gov.uk/aldp2016) or to contact the Local Development Plan Team call 01224 523470.

#### **Data Protection Statement**

The comments you make on the Proposed Plan will be used to inform the Local Development Plan process and the Examination into the Local Development Plan by the Scottish Ministers' Reporter. You must provide your name and address for your representation to be considered valid, and this information will be made publicly available. Other personal contact details such as telephone and e-mail will not be made public, although we will share these with the Reporter, who may use them to contact you about the comments you have made. For more information about how Aberdeen City Council maintains the security of your information, and your rights to access information we hold about you, please contact Andrew Brownrigg (Local Development Plan Team Leader) on 01224 523317.

## **PAPER APART**

**Objection is made on behalf of the University of Aberdeen to the failure of the Proposed Aberdeen Local Development Plan (ADLP) to identify land at Balgownie as an opportunity site for mixed use.**

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

### **Background**

The University of Aberdeen object to the failure of the Proposed Aberdeen Local Development Plan to identify land at Balgownie for mixed use development. The land represents a viable option for development in an accessible location. The site was promoted through the review of the Aberdeen Local Plan 2008, however it was not identified as an opportunity site within the extant ALDP. Subsequently, in response to a call for sites, a Development Bid (Appendix 1) was submitted to Aberdeen City Council in June 2013 to have the site identified within the Main Issues Report (MIR), published in January 2014.

The MIR failed to identify site B0203, Land at Balgownie as a preferred option for development, owing to the *'removal of pitch facilities, Third Don Crossing, urban green space'*. The *'5<sup>th</sup> equal best quality football pitch in Aberdeen'* was also considered to be lost. This 'public perception' of the quality of the football pitch was stated via Sport Scotland's Sports Pitch Strategy of 2003. This document should be discounted as an outdated survey which carries little weight of argument in the context of the development of the University's recreational facilities as well as those under Council ownership which have come into use in the interim period.

Representation (Appendix 2) was made in response to the MIR in March 2014, however, the Council's Policy Team failed to recommend the site's inclusion in the Proposed ALDP to the Communities, Housing & Infrastructure Committee in November 2014. The land remains zoned as Green Space Network and Urban Green Space under Policy NE1 and NE3 respectively. Objection is now made to this. It is firmly contended that the site should be identified for mixed use development incorporating residential, employment and recreational land.

### **Surplus Land**

It should be noted that the University of Aberdeen consider land at Balgownie as being surplus to their requirements. Its disposal, with the benefit of a mixed used allocation, would directly contribute to the consolidation and improvement of their estate infrastructure across Aberdeen, providing an improved university life for its students and as such, enhancing the attractiveness

of the University. In line with paragraph 30 of Scottish Planning Policy (SPP), development plans should *'positively seek opportunities to meet the development needs of the plan area in a way which is flexible enough to adapt to changing circumstances over time'*. It is now obvious that the University's position relative to land at Balgownie has changed considerably due to the development of Aberdeen Sports Village (ASV), which provides a base for its sporting facilities. Owing to this, the now obsolete premises at Balgownie are no longer required.

The indicative masterplan approach illustrated in Appendix 1 remains relevant and 7.5ha of the site, marked 'Area 1', would be retained for recreational use under Policy NE1 and NE3. This represents an opportunity for such a facility to be opened for the benefit of residents of Balgownie and the wider Bridge of Don area. Previously the facilities were exclusive to the University.

Planning consent for the redevelopment of Balgownie Home Farm, marked 'Area 4' in the indicative masterplan, has been secured, with 35 homes currently under construction. Additionally, an application is pending for 40 units immediately north of this development at the former 'One' Sports Centre. These developments are indicative of the Council's willingness to accept residential land use in the area and both sites are now identified within the Proposed ALDP as Opportunity Sites OP11 and OP12 *'for residential development'*.

This is further testament to the changing circumstances and evolution of land at Balgownie, restricting the promoted site area to 15 ha, of which 50% shall remain as recreational use and open space, complemented by employment and residential use. SPP paragraph 40 encourages *'using land within or adjacent to settlements for a mix of uses'*. Redevelopment of land at Balgownie fully complies with such policy and will deliver a sustainable development in the right location.

### Strategic Growth Area

Land at Balgownie falls within the Aberdeen City Strategic Growth Area (SGA) as specified by the Aberdeen City & Shire Strategic Development Plan (SDP) approved in March 2014. As such, it is well placed to contribute to the 75% of all residential and employment development expected within the North East in the period to 2035.

Objectives of the SDP aim to promote sustainable mixed communities and population growth through development in locations which are accessible and effective. Land at Balgownie is also well positioned to contribute to the success of the Energetica Corridor through the addition of 3.6 ha of employment land to the 60ha of stock required to be 'immediately available' at all times. This would enable the expansion of the Aberdeen Science & Technology Park,

recognised within the extant ALDP as a *'successful location'*, adding to employment opportunities in the area to complement housing allocations contributing to the creation of sustainable mixed communities.

The western perimeters of the site are reserved for the route of the Third Don Crossing, estimated for completion in 2017. This will enhance the site's accessibility and enable residential development, such as proposed at 'Area 3' in the western segment of the site, to benefit from improved public transport links with the centre of Aberdeen. SPP encourages *'optimising the use of existing resource capacities, particularly by co-ordinating housing and business development with infrastructure investment including transport'*. Through sensitive landscaping, residential development in this location can integrate appropriately with this transport corridor, the proximity to which should be capitalised upon.

The local Core Path network provides pedestrian links west to Danestone from this area via Core Path 10, 26 and 6, which extends south over the River Don linking to the university. Core Path 12 provides links from the south east of the site to Bridge of Don and beyond, testament to the site's well connected location and in compliance with paragraph 2.2 of SDP which aims to *'help create sustainable mixed communities'* whilst making the *'most efficient use of the transport network, reducing the need for people to travel and making sure that walking, cycling and public transport are attractive choices'*. Mixed use development such as promoted at land at Balgownie has the potential to achieve such objectives and should be encouraged by the Council.

### Strategic Housing Requirements

As a SGA, Aberdeen City is expected to deliver 31,500 new homes in the period to 2035. Including existing allocations to 2016, 21,000 homes are expected to be built on greenfield land by 2035. Land at Balgownie is ideally located to contribute to these housing requirements. The Proposed ALDP currently allocates 20,422 dwellings to be developed on greenfield sites, falling some 578 units short of the SDP target. Further residential allocations at Balgownie Home Farm and Peterculter will not fully address this deficit. It is therefore necessary that additional land for housing is identified to ensure that an effective 5 year supply is maintained, in line with the requirements of SPP.

As identified by the Proposed ALDP through identification of land at OP11 and OP12 for residential use, the principle of such development is accepted and welcomed at Balgownie. Subsequently, the promotion of a mixed use development inclusive of residential adjacent to an emerging major transport corridor in the Third Don Crossing should be identified as an opportunity for the sustainable and appropriate growth of Aberdeen.

Furthermore, the Proposed ALDP continues to rely on large scale areas, allocated under the Council's land release to deliver strategic housing requirements. Delivery at several of these sites, including Greenferns and Loirston continue to be delayed due to various constraints, with development upon effective land at locations such as at Balgownie deemed as a suitable alternative in contributing to achieving housing requirements. In line with SPP paragraph 119, planning authorities should allocate land which can become effective and deliver residential development within a 5 year period.

Land at Balgownie is effective and capable of delivery through phased development as a logical extension to the Bridge of Don area. It is anticipated that the 3.9 ha 'Area 3' could accommodate approximately 100 dwellings when considering the presence of the Third Don Crossing and in line with the recommended 30 dwellings per hectare recommended by the SDP. The University encourage the provision of student and key worker accommodation within 'Area 3' delivered as affordable housing. A willingness to accept this principle has been shown by the Council relative to the development at Balgownie Home Farm, included in the Proposed ALDP as OP11. The site is located in an optimum location to avail from excellent existing and emerging transport and pedestrian linkages with Aberdeen City Centre and the University itself, making it ideally placed for student and key worker housing.

The site is highly accessible and will contribute to the sustainable development of the area and enable population growth, in accordance with the objectives of the SDP. The inclusion of employment represents potential to reduce commuting in the area. A mixed use allocation would bring economic benefit to the area and enhance opportunities within the Energetica Corridor.

#### Design & Energy

As a proposed new development, the Balgownie site possesses the potential to make a positive contribution to the built and physical appearance of the area. The mixed composition of the site should be considered paramount in its assessment, proposals for which would fit well with the existing built environment and landscape. High quality designed homes of mixed typology have the potential to utilise the south facing orientation of the site in order to maximise solar gain and contribute to the Proposed SDP objective of achieving carbon neutral homes by 2020.

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

The redevelopment of land at Balgownie would be fully compliant with the content of SPP and the development plan. The retention of 'Area 1' as Green Space Network (NE1) and Urban Green Space (NE3) would ensure that 50% of the promoted area remains for recreational and



open space usage and provide the opportunity for the facility's regeneration. This would benefit the residents of Bridge of Don and consolidate the mixed use context of the area.

'Area 2' is a logical expansion to the successful Aberdeen Science & Technology Park which should be welcomed by the Council. This will enhance the availability of employment land and opportunities in the SGA and the Energetica Corridor whilst complementing residential allocations in the area.

'Area 3' is optimally located to benefit from the Third Don Crossing and will provide excellent links to Aberdeen City Centre to the south as well as the A90, located a short distance to the north. Incorporating student and key worker accommodation on site will meet an identified need and enhance the attributes of the University, which is easily accessible from Balgownie. Residential development would be of a high quality, reflective of that emerging at OP11 and would benefit from the adjacent recreation and sporting facilities lying immediately to the east.

The site, which remains surplus to University requirements, is developable and effective in the short term and would enable the delivery of vital housing units, thus helping to achieve the requirements set out in the SDP. The mixed use allocation of the site would respect its local context whilst enabling population growth and the creation of sustainable communities, making it the right development in the right location, in line with SPP. Therefore, based on the forgoing, it is requested that the site's current zoning be altered to a mixed use development encompassing student and key worker accommodation within the Aberdeen Local Development Plan 2016.



**University of Aberdeen**

**Development Bid for land at  
Balgownie**

**June 2013**

**Ryden LLP**

**25 Albyn Place**

**Aberdeen**

**AB10 1YL**

**Tel; 01224 588866**

**Fax; 01224 589669**

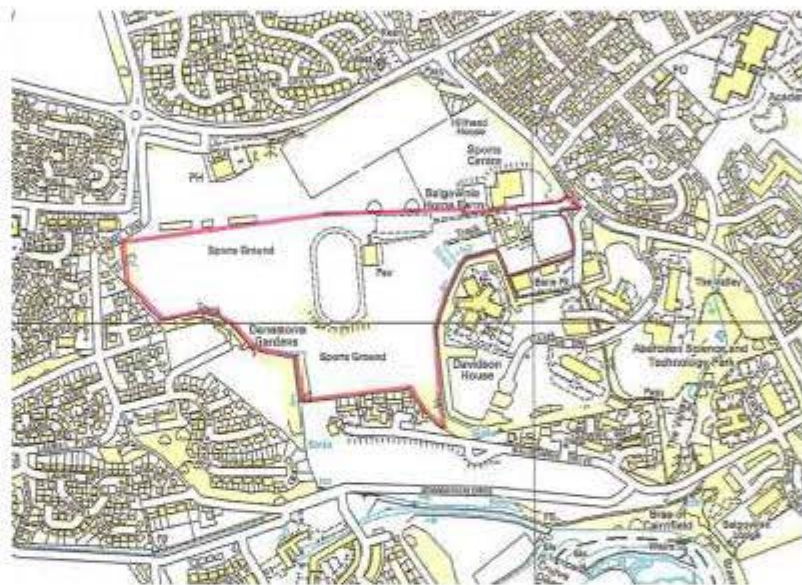
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## 1.0 INTRODUCTION

- 1.1 This development bid is submitted on behalf of the University of Aberdeen who own land at Balgownie Playing Fields, to the north of Aberdeen, at the Bridge of Don, as highlighted in Figure 1 below.

Figure 1: Site Location Plan



- 1.2 The University of Aberdeen was founded in 1495. It opened with 36 staff in 1497 and boasted the first chair of medicine in the English speaking world. A second University was founded in 1593 and until Kings College and Marischal College were united to form the University of Aberdeen in 1860, the City had two Universities. It is the third oldest University in Scotland with a student population of 14,500, studying 700 programmes across 85 subject areas. The University community represents 10% of the City's population.
- 1.3 One of the key development priorities of the University relates to physical infrastructure. This includes the need to work independently and in partnership to provide a suitable physical infrastructure within which cultural engagement can flourish. This includes developing infrastructure to enhance the University's support for cultural and community activity, in particular through major capital projects such as the new library and sports facilities.
- 1.4 The University are currently undertaking an ambitious capital investment programme to create appropriate physical infrastructure for staff and students. This

has amounted to over £200 million invested over the last decade, generating considerable employment opportunities for local industries. This investment has been led by three flagship projects, one of which is the Aberdeen Sports Village which opened in August 2009. The capital investment programme for the next decade is equally ambitious with more than £200 million allocated to be spent over the next ten years.

- 1.5 Aberdeen Sports Village is a joint development between the University, Aberdeen City Council and SportScotland who themselves have invested £7 million in this development due to their desire for a regional sports facility in the City. This world-class facility providing a host of sporting amenities previously unavailable in the area, resulting in top class sporting facilities for the whole of the City, not just the University. These include: a sports hall with space for 9 badminton courts, a third-generation indoor football pitch; a new athletics arena; an indoor athletics area; hockey pitches; squash courts; a gym; studio space; a fitness suite and performance clinic; and a café and crèche facilities. The facility also includes significantly improved disabled access. An aquatics centre with a 50m swimming pool is due to open in early 2014.
- 1.6 Bridge of Don is a suburb located 4 miles north of Aberdeen City Centre. Within the last 30 years, it has become one of the largest suburbs in Europe with an estimated population of over 22,000. It is well served by a number of facilities, including shops; restaurants; hotels; exhibition centre; library; swimming pool; two secondary schools; eight primary schools; a park and ride facility; and a number of industrial estates. It lies on the southern tip of the Energetica corridor, which looks to create a sustainable, low carbon investment location along the 30-mile strip of coastline to Peterhead.
- 1.7 Given the sites strategic location within the built up area of Bridge of Don, the bid site is an ideal location for development and can therefore contribute to the land requirements and objectives identified through the Strategic Development Plan. Further justification is provided below.

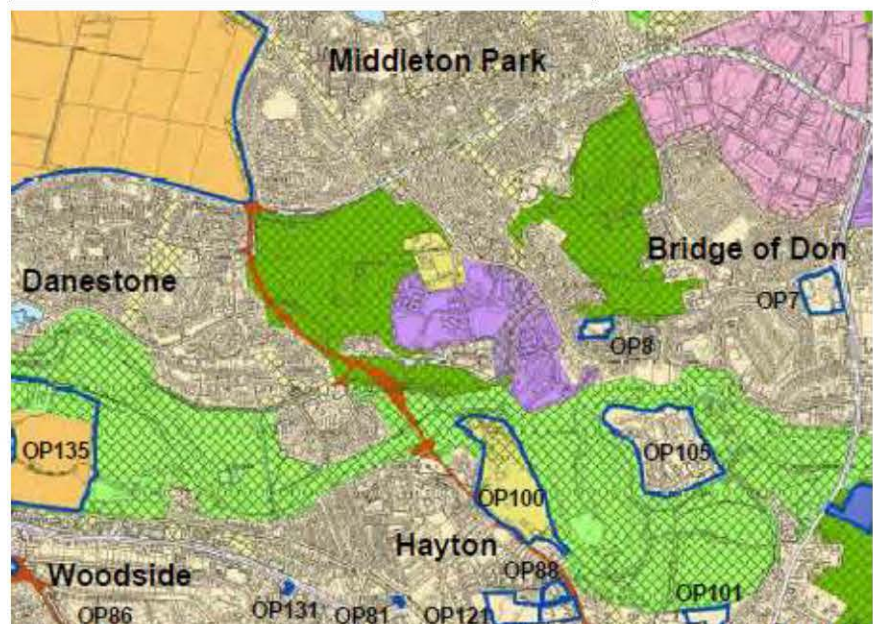
## **2.0 SITE DESCRIPTION AND PROPOSALS**

- 2.1 The Balgownie Playing Fields lie within a predominantly residential area within Bridge of Don. The land covered by this bid extends to approximately 16.7 hectares (41.2 acres) and is bound to the north by the remainder of the Balgownie site which is owned by Aberdeen City Council and beyond this the A90/Parkway; to

the south by residential dwellings and beyond this the River Don; to the west by further residential dwellings. To the east the site is bound by Balgownie Road; residential dwellings; a mixed use area comprising a bowling alley and five aside football pitches, and the Aberdeen Science and Technology Park.

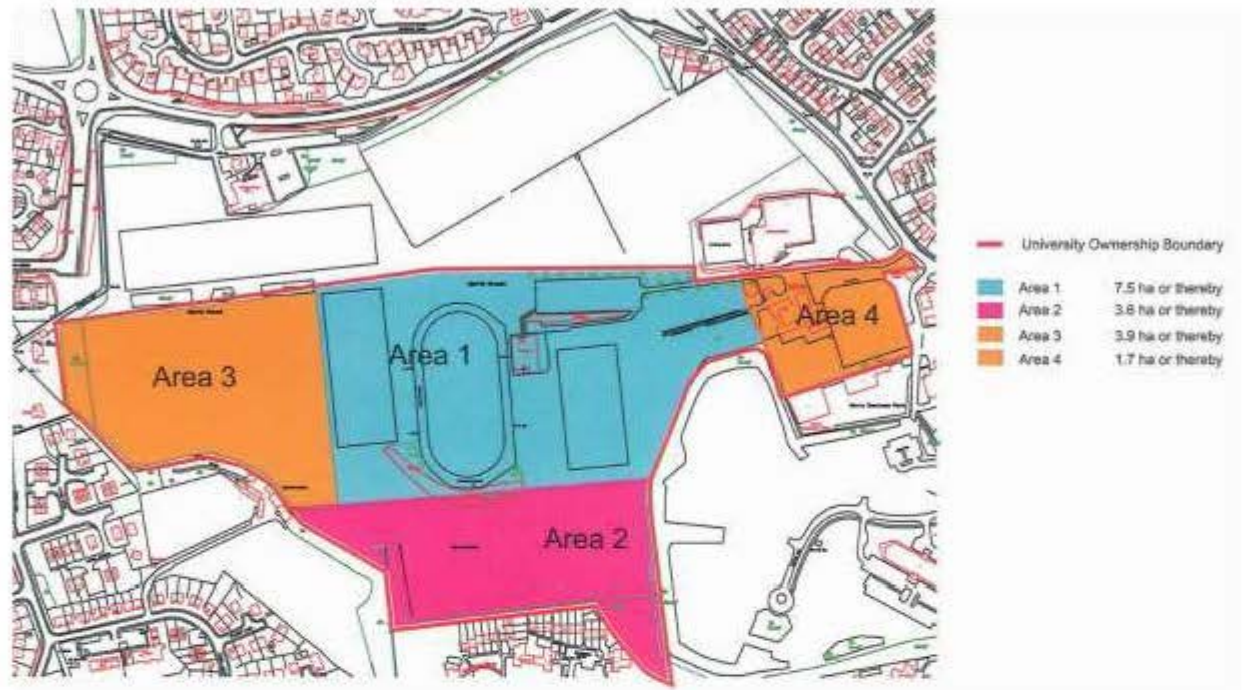
- 2.2 In topographic terms, the site slopes from a high point of approximately 55 metres AOD in the north east corner north to a low point of around 40 metres AOD in the south. The site has a number of different tiers with large parts of the site generally flat. The aspect of the site is south facing.
- 2.3 The majority of the landscaping on the site exists along the eastern and western boundaries, with further pockets of landscaping and tree belts throughout the site. The majority of the site is open due to the use of the site being for playing field purposes. Balgownie Playing Fields were used by the University of Aberdeen and plaed host to football, shinty and gaelic football. The site consists of a number of grass pitches, running track, changing facilities, a pavilion and car park. Some of the facilities, including the running track and pavilion are dilapidated and require significant upgrading. The remainder of the site is used for informal purposes.
- 2.4 The site is identified in the extant Aberdeen City Local Development Plan as part of the Green Space Network (Policy NE1) and as Urban Green Space (Policy NE3). An extract of the proposals map is shown in Figure 2 below.

Figure 2: Aberdeen City Local Development Plan 2012



- 2.5 The proposals involve a mixed use development, comprising residential use, improved sporting and leisure facilities and potentially an extension to the Aberdeen Science and Technology Park. Access could be gained from a number of locations, including Balgownie Drive to the east; and, Laurel Lane or The Science and Technology Park to the west. Land would also be made available to implement the Third Don Crossing which would provide an additional point of access to the site.
- 2.6 Figure 3 below highlights an indicative masterplan for the site. Area 2 to the south of the site, which extends to approximately 3.6 hectares, is considered suitable for a potential extension to the Aberdeen Science and Technology Park. Access would be taken from the Park. Land in Area 3, to the west, extending to approximately 3.9 hectares is suitable for residential use considering it is immediately adjacent to the existing built up area. At a rate of 30 dwellings per hectare, this area could accommodate up to 117 dwellings. Also, land to the west of the bid site has been the subject of a Compulsory Purchase Order to achieve the Third Don Crossing proposals. Land to the east in Area 4, extending to approximately 1.7 hectares, is currently the subject of a residential development. At a similar density, this could accommodate approximately 50 dwellings. Land in the centre of the site at Area 1 would be retained for sporting/leisure facilities and managed open space to provide a focal point for the development. Use of this area would be shared with Aberdeen Football Club and other community users. This would tie in with the remaining open space to the north in the ownership of Aberdeen City Council.
- 2.7 The University wishes to stress that, whilst this bid site as a whole is very ambitious and forward thinking, the four separate component areas are effective sites individually and not dependent on each other. This gives the whole site a flexibility that is required by an effective site, one that can respond to changing market conditions and types of development.

**Figure 3: Indicative Masterplan**



### 3.0 SCOTTISH PLANNING POLICY

3.1 The 2010 consolidated document on Scottish Planning Policy (SPP) places sustainable economic growth at the heart of town planning policy in Scotland. It is designed to encourage the right development in the right place, which enables social, environmental and economic benefits to result from land use change. This "triple-bottom line" approach to spatial planning is recognised as the best way to promote sustainability which will help this generation meet its needs without compromising future generations' ability to meet theirs.

3.2 Paragraph 3 of SPP explains that the purpose of planning is to guide the future development and use of land.

*"Planning is about where development should happen, where it should not and how it interacts with its surroundings".*

3.3 Development plans are discussed in paragraphs 10 – 21 of SPP. In monitoring development plans, SPP directs local authorities to focus on key assumptions previously made and whether or not they remain valid and whether or not land allocations proved viable. Monitoring plans are a key practice for local authorities and should set the direction for the future review of the plan.



- 3.4 SPP is split into various subject policies that deal with the composite elements of town planning. The first of these that concerns this development bid is housing. SPP affirms the Scottish Government's commitment to providing new homes and ensures that the planning system is fully committed to supporting this aim. A generous supply of effective housing land is one of the ways planning authorities can support this aim. Development plans should provide a housing land supply that is effective and robust enough to ensure that there are no unnecessary impediments to housing developments coming forward.
- 3.5 The key aspect of a local authority's housing land supply should be flexibility. In this sense, the supply of housing land should be adaptable to changing conditions and able to react to external circumstances or failures within existing supply. SPP also directs local authorities towards the possibilities of the siting of specific housing land requirements in an attempt to achieve other non-housing policy objectives, such as promoting active lifestyles and place-making.
- 3.6 High-quality design of new residential development is a key policy objective of the Scottish Government and should guide the whole process of delivering new housing. The aim for this policy is to create places that are distinctive, with a good mix of integrated land uses including homes of varied types and tenures. Fundamental to this policy is the integration with new residential development of active travel solutions, including walking and cycling as well as public transport. This will reduce reliance on the private car and encourage easy access to local services and promote healthy lifestyles.
- 3.7 To this end, SPP promotes new housing land that is located within or adjacent to existing settlements. This helps to reduce costs in terms of servicing sites but also helps to sustain local services, schools, shops and community facilities, as well as encouraging investment in new services. Paragraph 40 explains that the *"settlement strategy set out in the development plan should promote a more sustainable pattern of growth for an area, taking account of the scale and type of development pressure and the need for growth and regeneration"*.
- 3.8 SPP makes it clear that affordable housing needs should be met within the housing market area that the need is based. It sets a benchmark of 25% of new housing to be affordable yet allows for an increased allocation where the housing need and demand assessments identifies areas with acute need.

- 3.9 SPP encourages development to consider carefully the opportunities to strengthen local ecosystems, such as habitat networks and wildlife corridors, which re-establish broken links and fragmented ecologies. Open space, which enables the enjoyment and appreciation of natural heritage, can have a profound impact on the sustainability of new developments. Landscapes constantly change and evolve and the aim of Scottish Planning Policy is to facilitate this change whilst enhancing the distinctive character of places. What is clear from careful reading of Scottish Planning Policy is that, whilst concerns over landscape and natural heritage conservation may act as a constraint on development, more often than not, careful planning and design can minimise potential conflict and maximise the potential for positive enhancement of the natural environment.
- 3.10 The links between spatial planning and transport are vital to ensuring new development contributes towards sustainable economic growth. These links are addressed by SPP, which aims to encourage new patterns of travel behaviour that are more active (i.e. walking and cycling) or more sustainable (public transport and car-sharing). The planning system in Scotland should support a pattern of development which limits the need for car-based travel and supports a range of travel options.
- 3.11 This theme is explored more thoroughly in Planning Advice Note 75: Planning for Transport. It recommends local authorities create accessibility profiles for sites in the production of development plans. The profile should reflect the catchment areas served, likely quality of service and result in indicators of accessibility. A maximum threshold of 1600m from local services and 400m from bus stops should be achieved by new developments.
- 3.12 Open Space and Physical activity is addressed by SPP in paragraphs 149 and 150. These paragraphs stress the importance of open space relative to the health and well-being of the population and encourage easy access to a range of facilities that will allow people to engage in physical activity in the most convenient way. SPP encourages local authorities to support the enhancement of open spaces and proposals that safeguard and protect open space from inappropriate development.
- 3.13 The outcomes of these subject policies should be to encourage sustainable and well-designed places that are accessible to as many people within the community as possible. The key to a successful place does not just rest with the buildings themselves, but the function of the space between buildings and their ability to adapt to the changing circumstances of local residents and visitors. These

outcomes form the basis of all planning policy documents including for Aberdeen City.

#### **4.0 STRATEGIC PLANNING**

##### **Aberdeen City and Shire Structure Plan 2009**

- 4.1 The Aberdeen City and Shire Structure Plan approved by Scottish Ministers in 2009 sets growth targets for the city region and promotes a spatial strategy designed to accommodate this growth in the most sustainable locations. It identifies a requirement for 72,000 houses within the Structure Plan area over the period to 2030. Aberdeen City is identified as one of three Strategic Growth Areas (SGAs) which will be the main focus for development in that period. Around half of all new development is likely to be located in Aberdeen City. Of those 36,000 houses required within the City it is envisaged that 21,000 will be provided on greenfield sites with a further 15,000 split between brownfield sites and identified regeneration areas within the City. In terms of phasing of greenfield housing, 12,000 are anticipated to be required between 2007 and 2016; 5,000 between 2017 and 2023 and 4,000 between 2024 and 2030.
- 4.2 The Structure Plan advocates sustainable mixed communities with new housing and developments for employment and commercial use well related to each other to improve people's quality of life and opportunity. One of the targets to meet the sustainable mixed communities objective is for all housing development over 1 hectare in the Strategic Growth Areas to be in line with approved supplementary guidance and generally have no less than 30 dwellings per hectare.
- 4.3 With regard to economic growth, the plans objective is to provide opportunities which encourage economic development and create new employment in a range of areas that are both appropriate and attractive to the nature of different industries. The Plan seeks to ensure that at least 60 hectares of land available to businesses at all times in a range of locations within the City. New employment land allocations in the City between 2007 and 2023 require to total 105 hectares, with 70 hectares identified as strategic reserve land to come forward in the period between 2024 and 2030.

### Proposed Aberdeen City and Shire Strategic Development Plan

- 4.4 The proposed SDP for the Aberdeen city region was published in February 2013 for consultation. It is expected that a finalised Plan will be sent to Scottish Ministers in the coming weeks for approval. The Plan sustains many of the fundamental principles contained in the Structure Plan. As in the preceding Structure Plan, Aberdeen City is identified as a Strategic Growth Area with around half of all new development in the SDP area to be located here.
- 4.5 The Plan acknowledges the scale of growth expected in the City region, and anticipates that a significant proportion of development will be located on greenfield sites. The housing and employment allowances for Aberdeen are set out in the table below.

**Figure 4: SDP Land Allowances**

	Housing Allowances		
	Existing LDP allocations to 2016	2017 – 2026	2027 – 2035
Brownfield	4,500	3,000	3,000
Greenfield	12,000	5,000	4,000
	Employment land allowances (hectares)		
	105		70

- 4.6 Economic Growth is a key objective for the SDP. The Plan looks to provide opportunities which encourage economic development and create new employment in a range of areas that are both appropriate for and attractive to the needs of different industries. It acknowledges the success of the area's economy during the recent global downturn and looks to capitalise on this by continuing to diversify the economy into other key sectors such as life sciences, food and drink and tourism.
- 4.7 On sustainable development and climate change, this objective looks at the energy resource use in new developments and stipulates the need for employing energy saving technologies in all new development. The target for this policy is for all new buildings to be carbon neutral by 2020. Transportation use, as it impacts on climate change, is another focus of this policy and new developments are encouraged to consider a proposal's impact on the environment from increased unsustainable forms of transport.

4.8 With regard to population growth, the region's population has risen in recent years and the plan is based on the assumption that this will continue to grow up to 500,000 people by 2035. However, as many stakeholders have argued during the recent consultation on the proposed plan, these projections significantly underestimate the anticipated population growth published by the National Records of Scotland (NRS). They project the population of the Aberdeen City and Shire Strategic Development Plan Area to rise to 567,800 by 2035. This is reinforced by the projections for household growth published by the NRS which is set to increase by 35% over the period from 2010 – 2035. Overall, whilst the SDP sets an annual average housing requirement of 2,159 units for the period 2011 – 2035, according to realistic projections, this figure is more likely to be 2,815 units a year, creating an annual shortfall of 656 units across the plan period. Over the plan period, this points to a requirement for an additional 16,400 houses for which the Local Development Plan Review should be seeking to identify sites for.

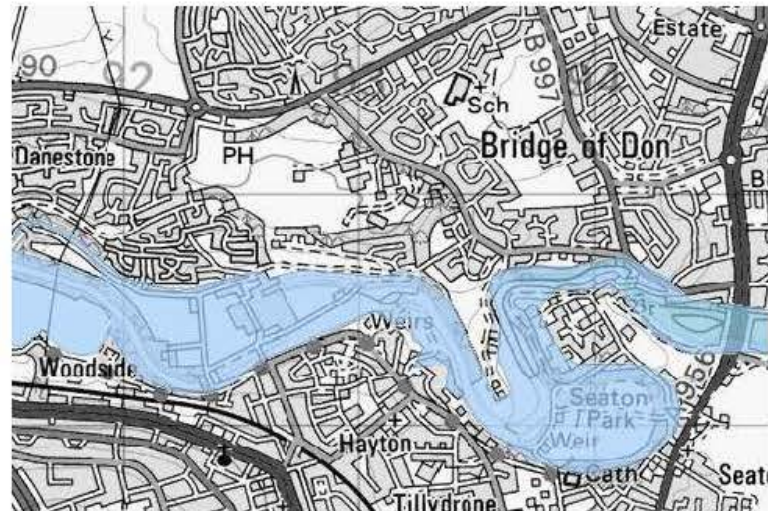
4.9 Another key objective of the plan is the creation of sustainable mixed communities, where housing, jobs, services and recreation facilities are available to as wide a range of people within existing settlements as possible. The Plan states that within the SGAs, services and facilities for the community must be part of a development. Employment and commercial use must be well integrated with new housing to maximise the benefits for the environment and the quality of life of local residents.

## 5.0 SERVICES

5.1 Mains drainage and gas are available in the surrounding area. An extension would be required to service the development of the site.

5.2 SEPA's Flood Risk Map is shown below in figure 5. The extent of the flood risk associated with the site ends at the boundary of the site. Given the difference in levels along the southern boundary there is no flood risk associated with the site.

Figure 5: Flood Risk



- 5.3 Braehead Primary School was created in 2007 following the amalgamation of Balgownie and Upper Westfield schools. The 2012 based school roll forecasts indicate that Braehead Primary School has a capacity of 279 pupils. In 2012, it was operating at 61% of capacity. This was forecast to increase to 69% of capacity by 2017. If 450 houses were developed on the site, this would push the primary school beyond its capacity. Developer contributions could therefore be provided to alleviate this.

## **6.0 DEVELOPMENT JUSTIFICATION**

- 6.1 The development of green belt land is necessary to allow the future growth of the City and this is acknowledged in the Strategic Development Plan<sup>1</sup>. There is a strong argument that available land within the built up area should be developed in advance of sites on the periphery. This is an example of such a site and in the first instance, there is a strong justification for the removal of this site from its current Urban Green Space/ Green Space Network designation. Policy NE3 in the extant Local Development Plan states that the redevelopment of Urban Green Space will only be permitted where an equivalent and equally convenient area for public access is made available.
- 6.2 This land is owned and used by the University of Aberdeen as sports pitches, however current usage is low. The University in conjunction with Aberdeen City Council and SportScotland have built a new, state-of-the-art Aberdeen Sports

<sup>1</sup> Proposed SDP, paragraph 3.16

Village at Linksfield, which opened in August 2009. This includes a full size indoor sports pitch; 135 metre indoor running track; 9 court size hall; 4 squash courts; performance gym; 2 exercise studios; floodlit outdoor pitch; 400 metre outdoor running track; sports science facilities; café and conference facilities. The indoor Astroturf pitch is one of the first of its kind in Scotland, thereby highlighting the national importance of the Aberdeen Sports Village.

- 6.3 It provides a modern facility which significantly improves both the range and quality of sports facilities in the City. It is argued that the provision of this facility more than meets the requirements of the extant Local Development Plan Policy NE3 in relation to Urban Green Space. The Aberdeen Sports Village will provide everything and more that the Balgownie pitches currently provide. Future development plans for the Aberdeen Sports Village include the new Aquatics Centre, to be opened in February next year, as well as further expansion to accommodate growing demand. All future investment in sport and leisure facilities by the University, the City Council and SportsScotland in the north of the city will be focused on this facility. Therefore, all other facilities in the surrounding area will be underused, unviable and no longer supported by investment or patronage. This makes the bid site an ideal location for redevelopment.
- 6.4 SPP paragraphs 149 – 150 on Open Space and Physical Activity supports the extant Local Development Plan position in that it states that sports pitches can be redeveloped where it can be demonstrated that the playing field which would be lost would be replaced by a playing field of comparable or greater benefit for sport in a location which is convenient for its users. As previously highlighted, the replacement is the Aberdeen Sports Village and is of much higher quality, with a wider variety of sporting opportunities available. It is in a convenient location, approximately 3.5 kilometres from the bid site. It is also located to the north of the City, therefore users of the current pitches will not have significant distances to travel to access the new facilities. It enhances public access to high quality sporting facilities because it is available to the whole of the city rather than just University students. Disabled access has also been improved enabling people with mobility issues to benefit from the facilities as well. It should also be remembered that sports facilities will continue to be provided on this site. These will be refined therefore providing an improvement to the facilities in this area.
- 6.5 Now that the Aberdeen Sports Village has been established, the Balgownie pitches are surplus to requirements and should be identified for appropriate alternative uses in the Aberdeen City Local Development Plan. Any funds realised by the University

through the development of this site will be used towards other University infrastructure, which could include sporting facilities in the City.

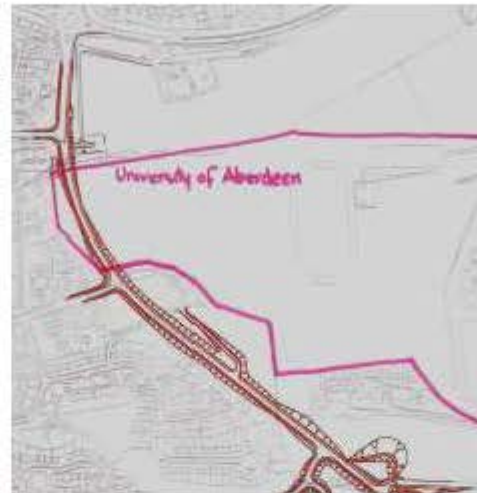
- 6.6 The strategic location of the site within one of the Strategic Growth Areas and adjacent to a major transport network through the City, makes it an ideal location for development. The site is located within the Energetica corridor, a key economic development initiative for the City region. This bid site is also an infill site surrounded on all sides by development, including both residential properties and business uses at the Aberdeen Science and Technology Park.
- 6.7 The proposals for the redevelopment of this site would sit comfortably with the surrounding uses. It would help realise the housing objectives of the Proposed Strategic Development Plan, due to its location within the city, where around half of new development is proposed. It would contribute to the Greenfield housing allocations for the city. Any extension to the Science and Technology Park would contribute to the employment land requirements of the Proposed Strategic Development Plan. It is close to existing transport links and enjoys pedestrian links with the surrounding area. The uses proposed would meet the sustainable mixed communities objective of the Proposed Strategic Development Plan and provide the integration of a mix of uses to reduce the need to travel. The majority of the site will be retained for football/leisure purposes and managed open space and offer opportunities for continued use of the site for sporting and recreational use, currently used by Aberdeen Football Club. The site to the north in the ownership of Aberdeen City Council will ensure a large element of greenery and open space is retained.
- 6.8 Further to this it is argued that there would be no significant loss to the landscape character and amenity of the site and adjoining areas, as the new uses would sit well with those existing. Access to the site and new development and facilities would be maintained and enhanced. The site is of no significant wildlife or heritage value and there would be no significant loss to any areas of landscaping or mature trees. Therefore, there is justification for the redevelopment of this site for alternative purposes.
- 6.9 The Third Don Crossing is identified in the Proposed Strategic Development Plan as an important improvement in the transport infrastructure in the City, required to serve new development<sup>2</sup>. Proposals for the Third Don Crossing include the creation of a new road to the west of the bid site, commencing at the existing roundabout on the A90/Parkway to the north east of the site as shown in Figure 6.

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<sup>2</sup> Proposed SDP, paragraph 3.18



Figure 6: Third Don Crossing Proposals



- 6.10 University owned land has been acquired to achieve this via Compulsory Purchase Order. The development of this site can therefore provide land required to deliver the Third Don Crossing. The provision of this crossing is the driver for opening up development and aiding growth to the north of the City, thereby contributing to the land requirements for Aberdeen City. The land at Balgownie is therefore significant in creating an opportunity for development in this area.
- 6.11 SPP specifically encourages the coordination of housing land provision with improvements in transport infrastructure, as a means of promoting sustainable economic growth. In this case, the improvements in infrastructure would be the provision of the Third Don Crossing. The provision of residential development on this site, along with other community facilities and potential extension to the Science and Technology Park would make efficient use of this improvement and be entirely in line with this policy.
- 6.12 The site is well-connected and close to a wide range of services within walking distance. There are a number of employment areas located within 1.6 km of the bid site for people living on the proposed development site. Aberdeen Science and Technology Park is located immediately adjacent and Bridge of Don Industrial Estate is approximately 1.1 km to the west. The site is accessible to bus and road networks in the area, providing clear linkages with other parts of the City. Bus stops are located on Balgownie Road, Balgownie Drive and Fairview Street, and all are within the 400m requirements contained within PAN75. Shops can be found on Braehead Way, approximately 600m from the site and Bridge of Don Academy is closer at approximately 400m. Braehead Primary School includes community

facilities and an all weather pitch. A pub and carvery restaurant are located to the north of the site on the Parkway.

- 6.13 The site is surrounded by footpath connections with the wider area, encouraging active travel and healthy lifestyles. The Council's Core Path Network runs along Fairview Street to the west of the site and along the Parkway to the north. Cycle pathways will form part of the proposals on the access road to the Third Don Crossing leading to safer and quicker cycle routes through the city.
- 6.14 With regard to the natural environment, the current use of the site is for playing fields. Therefore, the wildlife habitats on the site would be concentrated in the trees and woodlands around the site. These would be retained where possible. Much of the site will be retained for sports facilities and open space, with the areas of open space providing continued and improved habitats for wildlife to thrive. Trees located on the site are mostly along the boundaries of the site. Nevertheless, there are some small areas of landscaping within the site. These will be retained where possible if worthy of retention. The retention of these features would add maturity to the proposals and a tree survey would be undertaken prior to development to determine their significance.
- 6.15 It is argued that development would not be intrusive in the surrounding landscape. The site is bound by existing development to the east, west and south and by landscaping along the eastern and western boundaries. Any development would be both well screened and seen in the context of the adjacent uses. In addition to this from the south, the flats at Balgownie Drive are the highest point and these are visible to the surrounding area. They screen the site lying to the north and therefore the playing fields are not visible from this point. Any development would therefore be well integrated into the existing built landscape with minimum visual impact.

## **7.0 CONCLUSIONS AND RECOMMENDATIONS**

- 7.1 Sports pitches can be redeveloped when they are replaced by playing fields of comparable or greater benefit for sport. The development of the Aberdeen Sports Village at Linksfield provides state-of-the-art sports facilities. The range of sporting amenities has been significantly enhanced for the whole community, providing facilities which were previously unavailable in the City.

- 7.2 Linksfield is also located in the north of the City, accessible by a range of means of transport and the provision of this facility justifies the redevelopment of part of the Balgownie playing fields which will be surplus to requirements. It should be highlighted that sports facilities will be retained and enhanced on this site also.
- 7.3 The proposals involve a mix of uses which would not only meet the anticipated land requirements identified through the Proposed Strategic Development Plan, but would contribute to a sustainable mixed use development in line with the objectives of the SDP. The majority of the site would be retained for continuing football/leisure use and maintained open space providing a focal point to development and retaining a sense of greenness in the development.
- 7.4 Monies achieved through the redevelopment of the site would contribute towards other University infrastructure which could include sports facilities in the City. The proceeds of a private sale to developers will be reinvested back into the City, most likely directed towards the improvement plans for Aberdeen Sports Village. Therefore, not only will the redevelopment of the Balgownie playing fields provide improved sports facilities on site, but could potentially contribute to funding for the enhancement of further facilities in the City.
- 7.5 The bid site is a suitable location for development at the heart of Bridge of Don, surrounded by existing development of varying types. Development of this site would constitute infill development and would fit well in the surrounding landscape. It could be integrated well in the surrounding network of footpaths and roads and is accessible to a wide variety of services and by a range of means of transport. It is a good example of sustainable development and therefore has significant potential.
- 7.6 Land covered by this bid site is required to deliver the Third Don Crossing, which is essential in improving accessibility to the north of the city and facilitating development opportunities. Housing would be developed in coordination with improvements in infrastructure which is encouraged through SPP.
- 7.7 On the basis of the above, this land at Balgownie playing fields should be considered favourably as a location for development within the review of the Aberdeen City Local Development Plan to meet the requirements for the Aberdeen City area as identified in the Strategic Development Plan.

## **PAPER APART 2**

### **Representation to Aberdeen City Council on behalf of the University of Aberdeen in Response to the failure of the Main Issues Report to identify Development Option B0203 Land at Balgownie, Bridge of Don as a Preferred Site for Mixed Use Development**

#### **Introduction**

The University of Aberdeen object to the failure of the Mains Issues Report (MIR) to identify site B0203, Land at Balgownie as a preferred option within the document published in January 2014. It is maintained that the site should be identified for mixed use development incorporating residential, employment and recreational land. It should be noted that the University of Aberdeen consider this site as being surplus to their requirements and that its disposal shall directly contribute to the consolidation and improvement of their estate infrastructure across Aberdeen, providing an improved university life for its students.

The original Development Bid of June 2013 was recommended within the local authority's response as 'undesirable' stating the '*removal of pitch facilities, Third Don Crossing, urban green space*' as reasons for exclusion in this instance, with the '*5<sup>th</sup> equal best quality football pitch in Aberdeen*' also considered to be lost. This 'public perception' of the quality of the football pitch was stated via Sport Scotland's Sports Pitch Strategy of 2003. This document should be discounted in this instance and considered as an outdated survey which should carry little weight of argument.

#### **Open Space Provision**

As specified by the indicative site masterplan, 45% of the area equating to 7.5ha of open space, shall be retained through the proposed designation. It is recommended that this land should continue to remain under the allocation of Urban Green Space (NE3) and fall within the Green Space Network (NE1) as per the extant Local Development Plan (LDP) 2012. The retention of this recreational land is likely to serve as an enhanced opportunity to the residents of the Bridge of Don who shall benefit from an accessible sports facility which was previously exclusive to the University of Aberdeen.

The facility at Balgownie has now been superseded by the development of Aberdeen Sports Village (ASV) at Linkfield, now in its Third Phase, which has been constructed through a joint venture with Aberdeen City Council and Sport Scotland who have invested substantially in the project. This complex offers state of the art provision both indoor and outdoor, providing a central base for University sports clubs. Hence, the facility at Balgownie, which is already in need of financial investment in order to upgrade its current condition, shall be deemed redundant by varsity sporting clubs. ASV is located in close proximity to the University of Aberdeen main campus on King Street and represents a more accessible option of which students can avail.

The Council's response to the latest Development Option bid for land at Balgownie states that '*the development of the open space and playing fields at Balgownie was not justified and that the*

*development of new facilities at the Sports Village would not compensate for the loss of provisions at the Bridge of Don*. The response then states that this assessment remains to be appropriate. This response is now outdated within the context of the Proposed Strategic Development Plan (SDP) and LDP as it was formulated and issued by the Reporter in 2010. These opinions should now be thoroughly reassessed accounting for the extent of provisions at ASV presently and materialising in the near future. The relocation of University facilities to ASV and the retention of 45% of the bid site for open space and playing field provision provides local residents with additional amenities which were previously exclusive to the University; making a positive contribution to local recreation.

Within the Introduction of the MIR (Pages 4&5), direct reference is made to the importance of the LDP mirroring and utilising the themes of national and strategic guidance as a basis for local development. It is believed that through the retention of 7.5ha of the site as managed open space, the proposal reflects the objectives of the emerging National Planning Framework (NPF3) and the Proposed SDP pertaining to the protection of valued assets and resources through the creation of mixed communities in order to address the urgent challenge of sustainable development and climate change. The area shall remain as a focal point of the site and retains the use of leisure and recreation, referred to by the Proposed SDP as a vital ingredient for the creation of successful mixed community development.

It is requested that the segment of the site, referred to as Area 1 in the indicative masterplan of the Development Bid and to be retained for playing field use, remains designated as Urban Green Space and Green Space Network in the Proposed Aberdeen Local Development Plan. A balanced, mixed use proposal is sought for inclusion within the Proposed LDP, with the focal point of recreation and open space provision projecting a focus on the local community as promoted by the Proposed SDP.

## **Housing Provision**

Within the aforementioned local authority response to the Development Bid, it is stated that there *'is no numerical justification to allocate further housing sites'*. This comment is refuted in this instance.

The Proposed SDP recognises the responsibility of Aberdeen City in providing 36,000 new dwellings by 2030, with 21,000 located on greenfield land. Furthermore, the MIR refers to pressures upon the private rented property within Aberdeen and encourages the development of private rented accommodation to facilitate young professionals and key workers. This approach is welcomed by the University of Aberdeen especially within areas within close proximity to the institution, such as Balgownie, in order to attract and maintain high quality staff and students. The case for the provision of additional allocation of sites for homes is set out within Paper Part 1, accompanying this document.

The proposed indicative masterplan pertaining to the site allocates two areas of land which are considered as being suitable for residential development equating to 33% of the site. 'Area 3' occupies the western extremes of the site, is comprised of 3.9 ha which has the potential to support in the region of 117 dwellings at a rate of 30 per ha as specified within the Proposed SDP. 'Area 4' is located within the eastern aspect of the site and covers approximately 1.7 ha, capable of providing approximately 50

dwellings. This area has been identified within the Brownfield Urban Capacity Study (2013) and is currently subject to a planning application under consideration of the local authority.

It is also maintained that the land at Balgownie offers a more viable alternative to 'Preferred Development Options' for greenfield housing development as specified within Table 3 of the MIR. The proposed bid promotes development upon infill land within an urban area in a highly accessible location relating to the criteria of sustainable mixed communities as encouraged by the Proposed SDP and avoids the development of highly valued green belt land whilst retaining almost half of the site for recreational use.

This assessment galvanises the argument for the inclusion of the site within the Proposed LDP under a mixed use designation due to the potential it possesses in meeting the greenfield housing needs set out within the Proposed SDP.

### **Employment Land**

The southern segment of the site is comprised of approximately 3.6 ha of land promoted for employment use, equating to 21% of the total area. It is intended that this shall incorporate an expansion of the existing Aberdeen Science & Technology Park which borders the site to the southeast.

This proposed expansion of the existing Park would be a favourable development option as it is stated within the extant LDP that the current location has *'proved to be a successful location'*. Additional development within the confines of the Balgownie site offers a prudent area for expansion, adding to specialised employment opportunities within the Bridge of Don area.

The importance of the Energetica project between Aberdeen and Peterhead is referred to within NPF3 and the Proposed SDP. An extension of the Science & Technology Park would consolidate its position within the growth corridor promoting the Proposed SDP objective of providing a strong framework for investment and helping to grow and diversify the regional economy.

In this instance it is deemed that this proposed allocation for employment land would make a positive contribution to the promotion of efficient use along the route of the Third Don Crossing whilst adding to the creation of a *'global hub for the energy sector'*. Through this inclusion, an addition shall be made to the required 105 ha of employment designated by the current Structure Plan up to 2026.

Furthermore, the integration of employment land into the development option supplements the mixed use element of the site, hence having a valuable input into the creation of a sustainable community.

### **Third Don Crossing**

It is considered that stating the Third Don Crossing as a reason for refusal of the inclusion of the site within the Proposed LDP is unsubstantiated. On the contrary, the proposed new road should represent

an opportunity which can assist the growth of the site at Balgownie as well as contribute to the Aberdeen City Strategic Growth Area (SGA).

The western periphery of the site has been designated as Land for Transport (T1) by the extant Local Development Plan, relating to the route of the Third Don Crossing, and is currently subject to a Compulsory Purchase Order scheme. An area of the proposed site shall be lost through the implementation of the new route running north from the city centre to meet the A90 at the roundabout to the northwest of the Balgownie site.

The close proximity of the route shall provide an opportunity to enhance the accessibility of the proposed area of residential development, serving to improve the connectivity of the site. As stated by the Proposed SDP, access to the transport network is an important factor when deciding whether a site is suitable for development. It can be firmly reasoned that the location of the site adheres to the approach adopted by the Proposed SDP when analysing accessibility and proximity to local road and transport networks and services, and concurs with those regulations detailed within PAN 75: Planning for Transport.

The route of the Third Don Crossing, running south, passes within close proximity to the main University buildings within Old Aberdeen. Therefore, this location represents an ideal opportunity for the promotion and harmonious existence of student and key worker accommodation on the Balgownie site, the residents of which would benefit from the Third Don Crossing's accessibility to the University hence promoting ease of movement to areas of employment and education. Additional walking networks linking Balgownie with the main University campus through Brig o' Balgownie, Hillhead and Seaton Park promotes a sequential pedestrian facility of which students and employees alike can utilise.

It is accepted that there may be a lower number of dwellings provided on site due to the proposed orientation of the route; however, the residential area which does materialise shall benefit from enhanced connectivity, adding to the viability of the proposal as a mixed use designation. This will serve to consolidate this well-served area which presently benefits from excellent access to local roads, bus routes, core paths and cycle networks which are located within the immediate vicinity of the site.

## **Design & Energy**

As a proposed new development, the Balgownie site possesses the potential to make a positive contribution to the built and physical appearance of the area. High quality designed homes of mixed typology have the potential to utilise the south facing orientation of the site in order to maximise solar gain and contribute to the Proposed SDP objective of achieving carbon neutral homes by 2020.

## **Summary**

As detailed by the reasons above, the University of Aberdeen objects to the failure of the MIR to identify the Land at Balgownie as a preferred site for Mixed Use development.

The site concurs with the Proposed Strategic Development Plan's objectives pertaining to the promotion of sustainable mixed use communities and giving priority to mixed use development which respect character and local identity. It is believed that an appropriate balance of residential and employment land has been sensitively identified in combination with the retention of a large proportion of the existing green space which shall be improved with the intention of providing a more efficient and attractive land use to enhance the quality of life of local residents.

The introduction of the site for residential development has the opportunity to mitigate the shortfall in greenfield housing allowances up to 2030 as portrayed within Table 2 of the MIR. The inclusion of the Residential Area (H1) brownfield site at the steading of Balgownie illustrates the potential of the site for additional housing within the proposed development option area. The promotion of student or key worker accommodation on site is encouraged due to strong links and ease of access to the University of Aberdeen enhanced by the proposed Third Don Crossing. This represents an on-site option for affordable housing needs and is further discussed within Paper Apart 4, pertaining to Issue 8 of the MIR: Affordable Housing.

The accessibility of the site and its future potential cannot be overstated. The addition of the Third Don Crossing will only serve to promote the area to a greater extent through increasing potential for further inward investment and its consolidation as a productive entity within the Aberdeen City Strategic Growth Area and Energetica corridor.

Ultimately, the site represents a more prudent alternative to greenfield housing when compared with the 'preferred' sites designated by the MIR, some of which are deemed inaccessible and involve the loss of green belt land. These sites have also scored lower within the assessment Checklist than the proposed mixed use site at Balgownie, which scored 52 out of a possible 60, representing a more viable alternative. The inclusion of the bid site represents the opportunity to demonstrate a flexible approach to planning for housing as promoted by NPF3 and its proposed use shall deliver an effective site with minimal development constraints.

## **Recommendation**

On the basis of all of the above, it is recommended that the land at Balgownie is included within the Proposed LDP as an opportunity site for mixed use development encompassing student and key worker accommodation.



## **PAPER APART**

**Objection is made on behalf of the University of Aberdeen to the failure of the Proposed Aberdeen Local Development Plan (ADLP) to identify land at the Hillhead Centre as an opportunity site for residential development.**

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

### **Background**

The University of Aberdeen object to the failure of the Proposed Aberdeen Local Development Plan to identify land at Hillhead for residential development and open space provision. The land represents a viable option for development in an accessible location which will complements surrounding land uses. The site was promoted through the review of the Aberdeen Local Plan 2008 and again through the LDP 2012. Unfortunately, it was not identified as an opportunity site within the extant ALDP. Subsequently, in response to a call for sites, a Development Bid (Appendix 1) was submitted to Aberdeen City Council in June 2013 to have the site identified within the Main Issues Report (MIR), published in January 2014.

The MIR failed to identify site B0601, Hillhead Centre as a preferred option for development, owing to the constraints of the setting of the River Don and the Old Aberdeen Conservation Area as well as the perceived loss of tree cover and open space as a result of development.

Representation (Appendix 2) was made in response to the MIR in March 2014, however, the Council's Policy Team failed to recommend the site's inclusion in the Proposed ALDP to the Communities, Housing & Infrastructure Committee in November 2014. The land remains zoned as Green Space Network and Green Belt under Policy NE1 and NE2 respectively. Objection is now made to this. It is firmly contended that the site no longer complies with Green Belt policy criteria and that its redevelopment would maximise use of existing land resource which would consolidate the University's stock of student and key worker accommodation in an accessible location close to the main King Street campus. As such, the Hillhead Centre should be identified for residential development and open space provision.

### **Surplus Land**

It should be noted that the University of Aberdeen consider land at Hillhead Centre as being surplus to requirements. The development of Aberdeen Sports Village (ASV) at Linksfield now provides a base for University sports and more than sufficiently mitigates for the loss of facilities at Hillhead. In any event, the facilities at Hillhead are of declining quality and require

upgrading. However, the University is not in a financial position to make such an investment as a result of large scale outlays incurred by the development of ASV. These high quality, contemporary facilities fully compensate for the loss of those at Hillhead. As such, the zoning and disposal of Hillhead for residential development incorporating student and key worker accommodation would contribute to the consolidation and improvement of University estate infrastructure across Aberdeen and in turn, providing an improved university life for its students.

In line with the policy principles of Scottish Planning Policy (SPP) it would result in *'development that contributes to sustainable development'* and the efficient *'use of existing resource capacities'* as encouraged by paragraph 40. Further to this, SPP advises that development plans should be *'flexible enough to adapt to changing circumstances over time'*. It is evident that the situation which now faces the University in the context of the provision of sports facilities has evolved, with the Hillhead Centre now deemed as surplus to requirements. It is firmly contended that as a result, the Aberdeen Local Development Plan 2016 should recognise this changing situation and identify the Hillhead Centre as an opportunity site for residential use and open space provision. Doing so will ensure that the 2016 ALDP aligns with the provisions of SPP.

#### Brownfield Land

Considering the reuse of brownfield land in preference to that of greenfield is an overarching objective of national, strategic and local planning policy, as promoted by SPP. The redevelopment of the Hillhead Centre for residential use will reduce pressure on greenfield land and result in a more efficient *'use of existing resource capacities'*. The Strategic Development Plan (SDP) expects 40% of all development within Aberdeen City to take place on brownfield land in the period to 2035. At present, only 16% of the Established Housing Land Supply is located on brownfield land, as confirmed by the 2014 Housing Land Audit.

It is firmly contended that the Hillhead Centre represents brownfield land and should be recognised as such by the Council. It has been previously developed and currently comprises of a single football field, hockey pitch, two tennis courts and ancillary changing facilities within a central pavilion. A non-descript area of hard standing occupies the southern segment of the site immediately to the south of the hockey pitch and is primarily used for informal car parking. As such, the Hillhead Centre should be included in the Brownfield Urban Capacity Study which is due to be updated and published as an ancillary document to the 2016 ALDP. Identification of the Hillhead Centre as brownfield land is logical and would allow an efficient redevelopment of the site as an extension to the existing student accommodation adjacent at Hillhead halls of residence. The site is underutilised in its current state and is a viable development opportunity

and hence should be realised as such by the Council. This is firm justification for the site's allocation for development within the 2016 ADLP.

### Current Zoning

As mentioned above, the area of land at the Hillhead Centre remains zoned under Policy NE1 Green Space Network and NE2 Green Belt within the Proposed ALDP. Green belt designation prevents any development on site other than in exceptional circumstances or where, as in this case, the development has been ascertained as being essential for recreational uses. It is now contended that recreational use of this land is no longer deemed 'essential' and therefore fails to meet LDP criteria pertaining to green belt designation.

The facility at Balgownie has now been superseded by the development of ASV which offers state of the art provisions both indoor and outdoor, functioning as a central base for University sports clubs. As a result, the facility at Hillhead Centre is deemed redundant by varsity sporting clubs as the facilities at ASV sufficiently mitigate the loss of recreational facilities at Hillhead. Therefore it is no longer deemed essential that sporting facilities at Hillhead are retained. The site possesses the potential to be redeveloped which will benefit the growth and expansion of the University in the long term, enhancing its appeal to prospective students.

In addition to this, the site no longer complies with the criteria of Green Belt policy. It does not prevent coalescence of Aberdeen and an adjacent settlement; it does not enhance the City's landscape character and setting; and it does not direct planned growth to the most appropriate locations or support regeneration. The allocation of the Hillhead Centre for residential use would ensure the appropriate growth of Aberdeen and complement the surrounding land uses through sustainable development which would consolidate the estate of the University.

A substantial area of woodland falls within the northern segment of the site and accommodates part of the local Core Path network, with linear woodland defining the northeast/eastern site boundary flanking the River Don. Consistent with the Development Bid of June 2013, all woodland features within the parameters of the site shall be maintained, therefore mitigating loss of tree cover and open space, mitigating the concerns of the Council. The retention of woodland features will safeguard the biodiversity of the site and its integration within the existing Green Space Network and surrounding urban green spaces such as Seaton Park and the Local Nature Reserve at the Mouth of the Don. The existing Core Path network will be enhanced through developer contributions arising from development at the Hillhead Centre. Through retention of the northern segment of the site in its current use as open space, the proposals are in compliance with the objectives of the SDP by protecting valued assets and resources through sustainable development.

It is obvious that there is no justification for the retention of this land within the Green Belt identified in Proposed ALDP. The Hillhead Centre should be promoted for land release prior to that of land on the periphery of the city which will possess greater amenity value and more appropriately fit with the purpose and function of green belt. The nature of the site in its current use undermines its green belt designation and justifies the removal of its current zoning. Accordingly, the Hillhead Centre should be identified as an opportunity for residential development including accommodation for students and key workers which will maximise the land resource potential and enhance the University estate.

### Strategic Housing Requirements

Aberdeen City is expected to deliver 31,500 new homes in the period to 2035. Including existing allocations to 2016, 21,000 homes are expected to be built on greenfield land by 2035. The redevelopment of the Hillhead Centre can directly contribute to achieving these housing requirements. The Proposed ALDP currently allocates 20,422 dwellings to be developed on greenfield sites, falling some 578 units short of the SDP target. Further residential allocations at Balgownie Home Farm and Peterculter will not fully address this deficit. It is therefore necessary that additional land for housing is identified to ensure that an effective 5 year supply is maintained, in line with the requirements of SPP.

Furthermore, the Proposed ALDP continues to rely on large scale areas, allocated under the Council's land release to deliver strategic housing requirements. Delivery at several of these sites, including Greenferns and Loirston continue to be delayed due to various constraints, with development upon effective land at locations such as at Hillhead deemed as a suitable alternative in contributing to achieving housing requirements. In line with SPP paragraph 119, planning authorities should allocate land which can become effective and deliver residential development within a 5 year period. The inclusion of the Hillhead Centre within the emerging Brownfield Urban Capacity Study will reduce pressures of allocating housing land upon greenfield sites, many of which are currently experiencing delays in delivery, in conflict with the SPP.

The bid site lies directly east of the Hillhead Halls of Residence, owned and operated by the University of Aberdeen. This area is allocated within the extant ALDP as OP105, however it is proposed as zoned housing land under Policy H1 within the Proposed ADLP. The Council therefore accept the future presence of student accommodation at Hillhead and have recently shown a willingness to accept the provision of student and key worker accommodation as affordable housing within the development at Balgownie Home Farm. The designation of the Hillhead Centre as an opportunity site for residential development has the potential to provide a logical expansion to the adjacent halls of residence and enhance the quality of life for student living in the area, whilst contributing to meeting strategic housing requirements.

## Accessibility

The site is highly accessible and served well by public transport. First Bus service number 20 links the area to the city centre, with bus stops within 400m of the site found on King Street served by routes 1, 2 & X40. Due to current surrounding land uses and the adjacent halls of residence at Hillhead and its allocation within the extant ALDP, Hillhead is clearly recognised as an ideal location for residential development. A range of retail services are located close by, the site is approximately 850m from the main University campus on King Street with ASV located 1.6km from the Hillhead Centre, in compliance with the thresholds recommended by PAN 75: Planning for Transport. The main University campus on King Street is easily reached via Don Street and King Street itself and alternative links via Seaton Park.

The retention of open space within the northern segment of the site will consolidate links with the Core Path network linking with the River Don and Old Aberdeen Conservation Area. Through sensitive design and strategic landscaping residential development of the Hillhead Centre can integrate with its surrounding built and natural context, resulting in sustainable development in line with SPP.

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

As mentioned above, the Hillhead Centre is now surplus to University requirements due to superior recreational facilities existing at ASV which fully mitigate the loss of the provision at the Hillhead Centre. The redevelopment of the site for residential use would result in an efficient reuse of brownfield land to accommodate student and key worker accommodation, complementing the adjacent halls of residence and contributing to strategic housing requirements.

The setting of the River Don and the Old Aberdeen Conservation Area will be respected through sensitive design, layout and the retention of all woodland upon the site. Therefore the retention of the northern segment of the site under Policy NE1 Green Space Network is welcomed. However, it is clear that the Hillhead Centre no longer serves the purpose and function of Green Belt as in its current format it fails to enhance the character and setting of Aberdeen or prevent coalescence. It also fails in directing planned growth, such as proposed, to an appropriate location. Persisting with such a zoning within the 2016 ALDP is unsustainable and shall prevent the organic growth of Aberdeen which would benefit the University and its existing and prospective students and staff.

Based on the foregoing it is requested that the Hillhead Centre is identified within the Aberdeen Local Development Plan 2016 as an opportunity site for residential development incorporating student and key worker accommodation and open space provision. Doing so would promote

sustainable development of brownfield land in an accessible location and contribute to meeting strategic housing requirements.



**University of Aberdeen**

**Development Bid for land at the  
Hillhead Centre**

**June 2013**

**Ryden LLP**

**25 Albyn Place**

**Aberdeen**

**AB10 1YL**

**Tel; 01224 588866**

**Fax; 01224 589669**

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## 1.0 INTRODUCTION

- 1.1 This development bid is submitted on behalf of the University of Aberdeen who own land at the Hillhead Centre, to the north of Aberdeen, as highlighted in Figure 1 below.

**Figure 1: Site Location Plan**



- 1.2 The University of Aberdeen was founded in 1495. It opened with 36 staff in 1497 and boasted the first chair of medicine in the English speaking world. A second University was founded in 1593 and until Kings College and Marischal College were united to form the University of Aberdeen in 1860, the City had two Universities. It is the third oldest University in Scotland with a student population of 14,500, studying 700 programmes across 85 subject areas. The University community represents 10% of the City's population. A recent report has estimated the University contributes around £377 million annually to the economy of the North East of Scotland and supports over 8,000 full-time jobs across the region<sup>1</sup>.
- 1.3 One of the key development priorities of the University relates to physical infrastructure. This includes the need to work independently and in partnership to provide a suitable physical infrastructure within which cultural engagement can flourish. This includes developing infrastructure to enhance the University's support

<sup>1</sup> "Economic Impact of the University of Aberdeen", Biggar Economics, 2009

for cultural and community activity, in particular through major capital projects such as the new library, sports facilities and student accommodation.

- 1.4 Hillhead campus, which adjoins the bid site, consists of a number of separate halls of residence. This campus was first opened in 1968 and comprises a number of single bed, self catering units totally 2,164. It is currently subject of a comprehensive refurbishment programme designed to update the facility to cater for the changing needs of students today. It is an ambitious programme and will ensure that the University is able to offer potential students an attractive and modern accommodation that is able to support higher education learning in the 21<sup>st</sup> Century. However, capacity at this site is limited with no further opportunities to expand student accommodation once the current development is complete.
- 1.5 The bid site is located adjacent to Hillhead campus within Old Aberdeen, to the north of the City. Seaton Park is within close proximity to the site. The main University Campus is located approximately 850 metres away. For a long time, this area was isolated on the edge of the City. However, since the 1960's and 70's housing developments have surrounded the area, namely Tillydrone and the Bridge of Don.
- 1.6 Considering that the site has existing development it should be removed from its current Green Belt and Green Space Network designation. Also, given the sites strategic location within the built up area of Seaton and along one of the main transport corridors through the city, the bid site is an ideal location for development. Further justification is provided in section 6.0.

## **2.0 SITE DESCRIPTION AND PROPOSALS**

- 2.1 The site extends to approximately 4.5 hectares (11.1 acres) and can be accessed from Don Street, which itself leads directly to King Street. King Street is one of the main routes through the City connecting Union Street with the A90 to the north.
- 2.2 The site is bound to the north by Don Street, which leads to the historic Brig of Balgownie and a cluster of residential dwellings; to the east by the breakwaters of the River Don; to the south by open space, residential dwellings, a supermarket and restaurant; and to the west by Don Street and beyond this Seaton Park and the University's Hillhead Halls of Residence, which is zoned as a residential area in the extant Local Plan.

- 2.3 In topographic terms the southern part of the site slopes from north west to south east, with the northern part falling south east to north west. The majority of the site is south east facing. Mature trees line the northern boundary ensuring it is well screened from the Bridge of Don.
- 2.4 Existing sporting facilities occupy part of the site. The Hillhead Centre boasts two large fully floodlit pitches; one grass and the other astroturf which was recently resurfaced. There are also changing and parking facilities. To the south of the Astroturf pitch is an area of rough hardstanding and to the north of the changing facilities is an underused tennis court, which is in poor condition. The remainder of the site is wooded. The wooded area is coloured green in Figure 1 and is an area of amenity ground that contributes positively to the character of the local area. The University has no plans to develop this area and would retain it as amenity ground within which the wider campus sits. Figure 2 shows an aerial photograph of the site.

Figure 2: Aerial Photograph



- 2.5 Within the extant Aberdeen Local Development Plan, the site is identified as Green Space Network (NE1) and Green Belt (Policy NE2). An extract of the Local Plan is shown in Figure 3 below. Current policy states that no development will be permitted in the green belt for purposes other than those essential for agriculture, forestry, recreation, mineral extraction or restoration or land renewal. Green Space Network land consists of areas of land that are considered to have particular value

in terms of recreation, public access, wildlife or landscape together with links between such areas.

Figure 3: Aberdeen City Local Development Plan 2012



- 2.6 The site also lies within the Old Aberdeen Conservation Area. This is an area of special architectural or historic interest, the character and appearance of which it is desirable to preserve or enhance. This Conservation Area focuses mainly on the historic buildings around the University's Kings College Campus, but extends as far as the bid site and the River Don. The main aim of the conservation area status is to protect important buildings and the character of the area.
- 2.7 The proposals for the site include its removal from the Green Belt and Green Space Network. In addition to this, student accommodation and/ or mainstream residential development is proposed. There is also the potential for the restoration of Rose Cottage, which is currently a derelict stone cottage lying to the north of the site, adjacent to existing residential properties. Any development will be built so as not to affect the important areas of landscaping on the site.

### 3.0 SCOTTISH PLANNING POLICY

3.1 The 2010 consolidated document on Scottish Planning Policy (SPP) places sustainable economic growth at the heart of town planning policy in Scotland. It is designed to encourage the right development in the right place, which enables social, environmental and economic benefits to result from land use change. This “triple-bottom line” approach to spatial planning is recognised as the best way to promote sustainability which will help this generation meet its needs without compromising future generations’ ability to meet theirs.

3.2 Paragraph 3 of SPP explains that the purpose of planning is to guide the future development and use of land.

*“Planning is about where development should happen, where it should not and how it interacts with its surroundings”.*

3.3 Development plans are discussed in paragraphs 10 – 21 of SPP. In monitoring development plans, SPP directs local authorities to focus on key assumptions previously made and whether or not they remain valid and whether or not land allocations proved viable. Monitoring plans are a key practice for local authorities and should set the direction for the future review of the plan.

3.4 SPP is split into various subject policies that deal with the composite elements of town planning. The first of these that concerns this development bid is housing. SPP affirms the Scottish Government’s commitment to providing new homes and ensures that the planning system is fully committed to supporting this aim. A generous supply of effective housing land is one of the ways planning authorities can support this aim. Development plans should provide a housing land supply that is effective and robust enough to ensure that there are no unnecessary impediments to housing developments coming forward.

3.5 The key aspect of a local authority’s housing land supply should be flexibility. In this sense, the supply of housing land should be adaptable to changing conditions and able to react to external circumstances or failures within existing supply. SPP also directs local authorities towards the possibilities of the siting of specific housing land requirements in an attempt to achieve other non-housing policy objectives, such as promoting active lifestyles and place-making.

3.6 High-quality design of new residential development is a key policy objective of the Scottish Government and should guide the whole process of delivering new

- housing. The aim for this policy is to create places that are distinctive, with a good mix of integrated land uses including homes of varied types and tenures. Fundamental to this policy is the integration with new residential development of active travel solutions, including walking and cycling as well as public transport. This will reduce reliance on the private car and encourage easy access to local services and promote healthy lifestyles.
- 3.7 To this end, SPP promotes new housing land that is located within or adjacent to existing settlements. This helps to reduce costs in terms of servicing sites but also helps to sustain local services, schools, shops and community facilities, as well as encouraging investment in new services. Paragraph 40 explains that the *“settlement strategy set out in the development plan should promote a more sustainable pattern of growth for an area, taking account of the scale and type of development pressure and the need for growth and regeneration”*.
- 3.8 SPP makes it clear that affordable housing needs should be met within the housing market area that the need is based. It sets a benchmark of 25% of new housing to be affordable yet allows for an increased allocation where the housing need and demand assessments identifies areas with acute need.
- 3.9 Economic development is an important consideration for the planning system in Scotland, and SPP promotes a proactive and flexible approach to the diverse locational needs of different businesses. It is essential that the planning system does not create any unnecessary barriers to the realisation of new economic opportunities.
- 3.10 SPP encourages development to consider carefully the opportunities to strengthen local ecosystems, such as habitat networks and wildlife corridors, which re-establish broken links and fragmented ecologies. Open space, which enables the enjoyment and appreciation of natural heritage, can have a profound impact on the sustainability of new developments. Landscapes constantly change and evolve and the aim of Scottish Planning Policy is to facilitate this change whilst enhancing the distinctive character of places. What is clear from careful reading of Scottish Planning Policy is that, whilst concerns over landscape and natural heritage conservation may act as a constraint on development, more often than not, careful planning and design can minimise potential conflict and maximise the potential for positive enhancement of the natural environment.
- 3.11 The links between spatial planning and transport are vital to ensuring new development contributes towards sustainable economic growth. These links are

addressed by SPP, which aims to encourage new patterns of travel behaviour that are more active (i.e. walking and cycling) or more sustainable (public transport and car-sharing). The planning system in Scotland should support a pattern of development which limits the need for car-based travel and supports a range of travel options.

- 3.12 This theme is explored more thoroughly in Planning Advice Note 75: Planning for Transport. It recommends local authorities create accessibility profiles for sites in the production of development plans. The profile should reflect the catchment areas served, likely quality of service and result in indicators of accessibility. A maximum threshold of 1600m from local services and 400m from bus stops should be achieved by new developments.
- 3.13 The outcomes of these subject policies should be to encourage sustainable and well-designed places that are accessible to as many people within the community as possible. The key to a successful place does not just rest with the buildings themselves, but the function of the space between buildings and their ability to adapt to the changing circumstances of local residents and visitors. These outcomes form the basis of all planning policy documents including for Aberdeen City.

#### **4.0 STRATEGIC PLANNING**

##### **Aberdeen City and Shire Structure Plan 2009**

- 4.1 The Aberdeen City and Shire Structure Plan approved by Scottish Ministers in 2009 sets growth targets for the city region and promotes a spatial strategy designed to accommodate this growth in the most sustainable locations. It identifies a requirement for 72,000 houses within the Structure Plan area over the period to 2030. Aberdeen City is identified as one of three Strategic Growth Areas (SGAs) which will be the main focus for development in that period. Around half of all new development is likely to be located in Aberdeen City. Of those 36,000 houses required within the City it is envisaged that 21,000 will be provided on greenfield sites with a further 15,000 split between brownfield sites and identified regeneration areas within the City. In terms of phasing of greenfield housing, 12,000 are anticipated to be required between 2007 and 2016; 5,000 between 2017 and 2023 and 4,000 between 2024 and 2030.

- 4.2 The Structure Plan advocates sustainable mixed communities with new housing and developments for employment and commercial use well related to each other to improve people's quality of life and opportunity. One of the targets to meet the sustainable mixed communities objective is for all housing development over 1 hectare in the Strategic Growth Areas to be in line with approved supplementary guidance and generally have no less than 30 dwellings per hectare.
- 4.3 With regard to economic growth, the plans objective is to provide opportunities which encourage economic development and create new employment in a range of areas that are both appropriate and attractive to the nature of different industries. The Plan seeks to ensure that at least 60 hectares of land available to businesses at all times in a range of locations within the City. New employment land allocations in the City between 2007 and 2023 require to total 105 hectares, with 70 hectares identified as strategic reserve land to come forward in the period between 2024 and 2030.

#### Proposed Aberdeen City and Shire Strategic Development Plan

- 4.4 The proposed SDP for the Aberdeen city region was published in February 2013 for consultation. It is expected that a finalised Plan will be sent to Scottish Ministers in the coming weeks for approval. The Plan sustains many of the fundamental principles contained in the Structure Plan. As in the preceding Structure Plan, Aberdeen City is identified as a Strategic Growth Area with around half of all new development in the SDP area to be located here.
- 4.5 The Plan acknowledges the scale of growth expected in the City region, and anticipates that a significant proportion of development will be located on greenfield sites. The housing and employment allowances for Aberdeen are set out in the table below.

Figure 4: SDP Land Allowances

	Housing Allowances		
	Existing LDP allocations to 2016	2017 – 2026	2027 – 2035
Brownfield	4,500	3,000	3,000
Greenfield	12,000	5,000	4,000
	Employment land allowances (hectares)		
	105		70

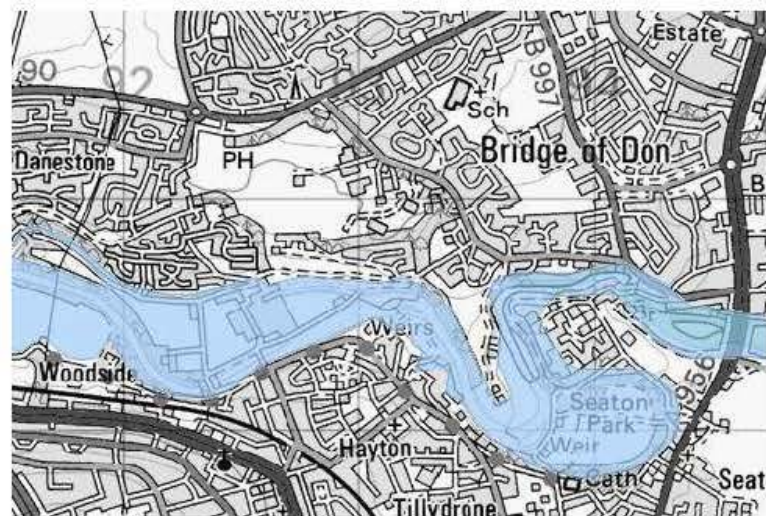


- 4.6 Economic Growth is a key objective for the SDP. The Plan looks to provide opportunities which encourage economic development and create new employment in a range of areas that are both appropriate for and attractive to the needs of different industries. It acknowledges the success of the area's economy during the recent global downturn and looks to capitalise on this by continuing to diversify the economy into other key sectors such as life sciences, food and drink and tourism.
- 4.7 On sustainable development and climate change, this objective looks at the energy resource use in new developments and stipulates the need for employing energy saving technologies in all new development. The target for this policy is for all new buildings to be carbon neutral by 2020. Transportation use, as it impacts on climate change, is another focus of this policy and new developments are encouraged to consider a proposal's impact on the environment from increased unsustainable forms of transport.
- 4.8 With regard to population growth, the region's population has risen in recent years and the plan is based on the assumption that this will continue to grow up to 500,000 people by 2035. However, as many stakeholders have argued during the recent consultation on the proposed plan, these projections significantly underestimate the anticipated population growth published by the National Records of Scotland (NRS). They project the population of the Aberdeen City and Shire Strategic Development Plan Area to rise to 567,800 by 2035. This is reinforced by the projections for household growth published by the NRS which is set to increase by 35% over the period from 2010 – 2035. Overall, whilst the SDP sets an annual average housing requirement of 2,159 units for the period 2011 – 2035, according to realistic projections, this figure is more likely to be 2,815 units a year, creating an annual shortfall of 656 units across the plan period. Over the plan period, this points to a requirement for an additional 16,400 houses for which the Local Development Plan Review should be seeking to identify sites for.
- 4.9 Another key objective of the plan is the creation of sustainable mixed communities, where housing, jobs, services and recreation facilities are available to as wide a range of people within existing settlements as possible. The Plan states that within the SGAs, services and facilities for the community must be part of a development. Employment and commercial use must be well integrated with new housing to maximise the benefits for the environment and the quality of life of local residents.

## 5.0 SERVICES

- 5.1 Mains drainage and gas are available in the surrounding area. An extension would be required to service the development of the site.
- 5.2 SEPA's Flood Risk Map is shown below in figure 5. The extent of the flood risk associated with the site ends at the boundary of the site. Given the difference in levels along the southern boundary there is no flood risk associated with the site.

Figure 5: Flood Risk



- 5.3 Seaton Primary School has a capacity of 198 pupils. In 2012, it was operating at 85% of capacity. This was forecast to increase to 115% of capacity by 2015. Developer contributions could therefore be provided to alleviate this. Secondary schooling would be provided by St Machar Academy is operating at a capacity of 86%, rising to 92% by 2017. Therefore, there would be enough spare secondary school capacity to support mainstream residential development on the site.

## 6.0 DEVELOPMENT JUSTIFICATION

- 6.1 The development of green belt land is necessary to allow the future growth of the City and this is acknowledged in the Strategic Development Plan<sup>2</sup>. There is a strong argument that available land within the built up area should be developed in advance of sites on the periphery. This is an example of such a site and, in the first

<sup>2</sup> Proposed SDP, paragraph 3.16

instance, there is a strong justification for the removal of this site from its current Green Belt/ Green Space Network designation.

- 6.2 This site contributes little to the objectives of the Green Belt, which are, as highlighted in SPP: to direct growth to the most appropriate locations; to protect and enhance the character, landscape setting and identity of towns and cities; and give access to open spaces within and around towns and cities<sup>3</sup>. However, the majority of the site is developed with two large outdoor hockey/ football pitches; changing and parking facilities; a tennis court in poor condition; a derelict cottage; and an area of hardstanding, which is used as a car park as highlighted in Figure 6.

Figure 6: Photograph of hard standing to the south



- 6.3 The removal of the site from the green belt would not impact on the ability to give access to open space around the city. Footpaths to the wider area would be retained and enhanced and any development would respect the most important mature landscaping on the site. The University of Aberdeen have conducted an extensive engagement process with local interest groups regarding improved path networks through the site to this effect. The character, landscape setting and identity of this area has already been affected by this built development, but this has been accepted in the area. The removal of the site from the green belt would not therefore affect the identity of the area and should be identified as a mixed use opportunity.

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<sup>3</sup> SPP paragraph 159

- 6.4 Further to this, the Green Belt designation on this site is not required to manage growth or prevent unplanned growth. The site has already been developed and growth has already taken place. The Green Belt at this location would not prevent the coalescence of settlements in this instance as the River Don provides a permanent physical barrier between Aberdeen and Bridge of Don. The wooded valley in which the River sits provides a natural visual barrier that separates the two built up areas. There is no particular advantage to this area by the designation of this land as green belt. Scottish Planning Policy promotes Green Belts that contribute towards the long-term growth of a settlement, and warns that boundaries should not be drawn too tightly round settlements. Not all Greenfield land will be designated Green Belt, according to SPP<sup>4</sup>
- 6.5 In terms of the Green Space Network designation, current policy aims to protect and enhance the wildlife, recreational, landscape and access value of these areas. The importance of the mature trees on this site to these policy aims is acknowledged and the proposals will not affect them. Any built development will be located on areas of waste land and playing fields with no wildlife, recreational, landscape and access value. The areas of trees and network of paths which contribute to these aims will not be affected. There is therefore no reason why this site needs to be classified as Green Space Network. It should therefore be removed from this status in the Aberdeen City Local Development Plan and identified as a mixed use site.
- 6.6 Development will not affect the conservation area status. Most of the site has already been developed and is therefore considered acceptable. The University of Aberdeen has done much to preserve the historic core of the area and would not want to see it affected by development. It is committed to preserving the character of the area and any development would be sympathetic to this. It is argued that any development will enhance the conservation area status as development would be concentrated on areas of underused land and wasteland and would improve the environment in this case. The immediate area is already characterised by modern development in the form of the halls of residence, and further development would be small scale and complimentary to this and existing development to the south.
- 6.7 The University are dedicated to sustaining sporting excellence and this was demonstrated through the purchase of Keith Park in 2004 and the investment made in the Aberdeen Sports Village at Linkfield. This facility has rendered the Hillhead Centre redundant as the University's Hockey Club have established themselves there. The current under-use and poor condition of the facilities will only continue if

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<sup>4</sup> SPP, paragraph 160

redevelopment of the site is not allowed to come forward. Aberdeen Sports Village provides this replacement with a significantly enhanced facility that is available to all members of the community, not just University students and staff.

- 6.8 The bid site is considered suitable for student accommodation development/ mainstream residential development due to its location adjacent to one of the main routes through the City. The Proposed Strategic Development Plan encourages the development of locations along these corridors and any development will contribute to a sustainable mixed use community due to easy access to various modes of public and active transport. SPP also encourages the coordination of housing land provision with improvements in transport infrastructure, as a means of promoting sustainable economic growth. Bus stops along King Street and Don Street are within the 400m walking distance thresholds stated in PAN75: Planning for Transport.
- 6.9 The site is also well-connected and close to a wide range of services within walking distance. It is well connected to King Street to the east, which provides good access to the surrounding area. The site is an infill site surrounded on all sides by development. The site is also immediately adjacent to Hillhead Halls of Residence which is undergoing an extensive refurbishment programme aimed at increasing the University's provision of accommodation to students. This site is nearing capacity and, therefore, further sites will be required to accommodate this expansion. The bid site is considered ideal given the co-location to existing student accommodation and the other amenities present in the area.
- 6.10 King Street lies approximately 370 metres from the site, which is a major road network leading to the Aberdeen to Peterhead corridor strategic growth area. The further development of the bid site would meet the Proposed Strategic Development plan requirement to concentrate new proposals in this area. Community facilities, such as Seaton Park, are located within 100 metres of the site. St. Machar Cathedral is approximately 650 metres away. Local shops are approximately 170 metres and sports facilities located at Aberdeen Sports Village, 1.6km away. These are all within the 1.6 km requirement of PAN75.
- 6.11 The site is also very well connected to existing employment sites. Bridge of Don industrial estate, approximately 1.7 kilometres from the site, is outwith the distances required by PAN75. However, the University of Aberdeen, one of the largest employers in the North East and is located within 850 metres of the bid site. Employment opportunities can also be found along King Street to the east and Ellon Road to the north.

- 6.12 There are a number of footpath networks adjacent the site. Part of the Aberdeen City core path network is located along the northern boundary of the site. Therefore, the site offers good connections to the wider area. The University have been active in engagement with local interest groups into the provision of enhanced footpaths through the site.
- 6.13 With regard to the natural environment, development would not be intrusive into the surrounding landscape. Much of the site is already developed and already integrated and accepted in the landscape. Additional development would improve the area and be seen in the context of existing development, well contained by mature landscape features. Development of the site would also present opportunities to enhance local biodiversity through reconnecting habitats and feeding grounds. Sensitive landscaping around new development can re-establish wildlife networks and fragmented ecologies, adding to the environmental gains associated with landscape change. The area at present contributes little to landscape quality of the area, whereas redevelopment can enable this improvement.
- 6.14 As the site has previously been developed, it is classified as brownfield land. The proposed Strategic Development Plan makes it clear that the re-use of brownfield land is strongly encouraged at all levels of policy. The SDP recognises that not all land requirements can be met by previously developed sites and acknowledges the constraints associated with land that has a history of prior development. These can include site contamination works, demolition and clearance. These upfront works are costly and often render proposals financially unviable. With the University's site at Hillhead, the University has the finance in place to overcome these costs, remove these constraints and deliver the regeneration of brownfield land.
- 6.15 This policy is supported by Scottish Planning Policy due to the range of environmental, social and economic benefits of re-using brownfield land. Vacant and derelict land can act as a barrier to investment and reduce the environmental quality of an area. Therefore, planning authorities should bring forward proposals to bring vacant or derelict land back into productive use, adopting a "proactive approach"<sup>5</sup>.
- 6.16 Redevelopment of the site for student accommodation can also be justified in economic development terms. Recent changes in the funding of higher and further education sector have increased the competition between institutions to attract

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<sup>5</sup> SPP, paragraph 48

students, particularly non-Scottish students facing increased tuition fees and levels of debt. This has resulted in a 7.7% fall in applicants to University places in June 2012<sup>6</sup>.

- 6.17 The impact on institutions of these changes is that they must provide an attractive package to prospective students in order to secure their enrolment. Within this mix, the provision of modern, attractive accommodation in suitable and convenient locations is often high on student's selection criteria. Recent research by property company Savills suggests that many top institutions in Scotland continue to struggle with their supply of purpose built student accommodation and this could impact negatively on their abilities to attract students, particularly from higher fee paying students from south of the Border<sup>7</sup> and further afield.
- 6.18 Indeed, higher education institutions are increasingly competing for students on an international scale. In order to effectively compete, the University must be able to present an attractive package to prospective students. Accommodation plays an extremely important role in this mix. It is no longer acceptable to provide mass accommodation blocks made of cheap materials, draughty halls and outdated dorms. Student accommodation is evolving and experimenting with different formats such as 'study hotels', 'education hubs' and 'international study villages' which provide a much more comfortable and tailored set of accommodation options for different students, whether they are undergraduates, postgraduates or research fellows. The demographics of modern students are fragmenting dramatically because of the limitations imposed by high tuition fees. Students are enrolling later in life, at different stages of their career and are no longer just 17-18 year olds fresh out of secondary school. This fragmented student body needs to have a range of accommodation options to suit a variety of needs and it is this range of options available that can be the deciding factor for a prospective student.
- 6.19 The University is committed to ensuring that enrolment in available course remains as high as possible. The direct and indirect benefits associated with a large student population are well known and widely acknowledged. Being able to attract students on an international stage will broaden the expenditure on local services in Aberdeen to beyond UK borders, increasing the student body's support for local businesses. Indirect benefits include student's families visiting the area and supporting local hotels, restaurants and tourist facilities.

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<sup>6</sup> "Student Housing Market Overview", GVA 2012

<sup>7</sup> "Spotlight on Student Housing: Scotland, Wales and Northern Ireland, Savills Research Winter 2011/2012

- 6.20 As an alternative to student accommodation, the University present this bid site as a possible location for residential development. The University is keen to explore a mix of options on this site and would envisage the residential development contributing towards its aims to create affordable/ key worker housing to accommodate its staff. As a major employer in the area, the University is keenly aware of the difficulties in recruitment currently felt by other employers across the various economic sectors in Aberdeen. A major barrier to attracting talented teaching staff, research assistants and other support workers is the lack of affordable housing in the city. The site at Hillhead could be developed to provide a mix of affordable housing that is located close to the main University campus that would help overcome some of the barriers that exist in attracting employees to Aberdeen.
- 6.21 Given the importance of the University to the economic, social and cultural life of the city (see section 1.2 above), it is important to reflect the growth and development needs of the University in the review of the Local Development Plan. The provision of modern and attractive student housing is an important element of the University's offer to prospective students. Attracting these students is essential in order to ensure the University is able to contribute towards the success of the City and the wider region, through its contribution towards the local economy, providing local employment and attracting investment by providing the skills required to fuel economic growth in the region.

## **7.0 CONCLUSIONS AND RECOMMENDATIONS**

- 7.1 This development bid looks to remove the bid site from its current Green Belt and Green Space Network designation. The land contributes little in terms of environmental quality, does not protect the landscape or identity of the city nor prevents coalescence with surrounding settlements. Access to open space would be retained within any future proposals on the site.
- 7.2 The policy objectives of NE1 – Green Space Network and NE2 – Green Belt can be achieved through a design-led approach to redevelopment of the site. Mature landscaping will be retained and incorporated into the proposals, whilst wildlife and biodiversity will be enhanced through strategic landscaping. Footpath connections will provide links through the site to surrounding areas and create excellent residential amenity for new occupants. The wooded area coloured green on Figure 1 would not be developed and remain as valued amenity ground.



- 7.3 The remainder of the site has previously been developed and should be classified as brownfield land. The recently opened Aberdeen Sports Village provides alternative and significantly enhanced sports facilities for staff, students and the people of Aberdeen, making the bid site redundant. Planning policy at all levels strongly supports proposals to re-use brownfield land to bring it back into productive use. The University believe that student accommodation, or mainstream housing would constitute a more productive use of the land than currently exists. Student housing would allow the University to successfully compete for new students, whilst affordable residential use would assist in the University's growth plans by improving the quality of teaching and support staff.
- 7.4 The Strategic Development Plan sets ambitious growth targets for the City region up to 2035. Significant development pressure will be exerted on outlying areas of the City to help meet these targets. However, whilst many of these sites will be able to contribute towards this growth, the bid site is able to contribute towards the supply of brownfield sites, thus helping to achieve sustainable growth targets.
- 7.5 On the basis of the above, this land at the Hillhead Centre should be considered favourably as a location for development within the review of the Aberdeen City Local Development Plan to meet the requirements for the Aberdeen City area as identified in the Strategic Development Plan.

## **PAPER APART 3**

### **Representation to Aberdeen City Council on behalf of the University of Aberdeen in Response to the failure of the Main Issues Report to identify Development Option B0601 Hillhead Centre, Old Aberdeen as a Preferred Site for Residential Development**

#### **Introduction**

The University of Aberdeen object to the failure of the Mains Issues Report (MIR) to identify site B0601 of Hillhead as a preferred option within the document published in January 2014. It is maintained that the site should be identified by the Proposed Local Development Plan for residential use with ancillary open space provision. The University of Aberdeen consider this site as being surplus to their requirements in its current format and its disposal shall directly contribute to the consolidation and improvement of their estate infrastructure across Aberdeen, providing an improved university life for its students.

The original Development Option bid of June 2013 was recommended within the local authority's response as 'undesirable' stating the constraints of the setting of the River Don and the Old Aberdeen Conservation Area as well as the loss of open space and tree cover as reasons for the site's exclusion. However, the site gained a Checklist Score of 50 out of a possible 60 within the Development Option response formulated by the Council and therefore represents a valid and justifiable bid for inclusion within the Proposed Local Development Plan (LDP), the reasons for which are reiterated within this objection.

#### **Open Space & Recreation Provision**

The site is currently under recreational use, comprising of a single football field, hockey pitch, two tennis courts of poor condition and ancillary changing facilities within a central pavilion. A non-descript area of hard standing occupies the southern segment of the site immediately adjacent to the hockey pitch and is primarily utilised for informal car parking.

As per the 2012 Aberdeen LDP, the proposed bid site is currently designated as Green Belt (NE2) land and falls within the Green Space Network (NE1). Green belt designation prevents any development on site other than in exceptional circumstances or where, as in this case, the development has been ascertained as being essential for recreational uses. It is now contended that recreational use of this land is no longer deemed 'essential' and therefore fails to meet LDP criteria pertaining to green belt designation.

The facility at Balgownie has now been superseded by the development of Aberdeen Sports Village (ASV) at Linkfield, now in its Third Phase, which has been constructed through a joint venture with Aberdeen City Council and Sport Scotland who have invested substantially in the project. This complex offers state of the art provisions both indoor and outdoor, providing a central base for University sports

clubs. Hence, the facility at Hillhead Centre is deemed redundant by varsity sporting clubs. It is therefore reasoned that the provisions of ASV shall sufficiently mitigate the loss of recreational facilities at Hillhead.

A substantial area of woodland falls within the northern segment of the site and accommodates part of the local Core Path network, with linear woodland defining the northeast/eastern site boundary flanking the River Don. As per the Development Bid of June 2013, all woodland features within the parameters of the site shall be maintained, therefore mitigating loss of tree cover and open space, specified as a concern within the Council's response. Its retention shall ensure the biodiversity of the site and its integration within the existing Green Space Network and surrounding urban green spaces such as Seaton Park and the Local Nature Reserve at the Mouth of the Don through existing path networks.

It is believed that by the retention of the northern segment of the site in its current use as open space, the proposal bid reflects the objectives of the emerging National Planning Framework (NPF3) and the Proposed Aberdeen City & Shire Strategic Development Plan (SDP) pertaining to the protection of valued assets and resources through sustainable development.

It is contended that green belt such as this, in an urban context should be promoted for land release prior to that at the periphery of the city within the wider countryside which is likely to be of greater amenity value. The nature of the site in its current use undermines its green belt designation as it fails to contribute to the landscape setting or character of the urban identity and should therefore be removed due to its non-compliance with current Scottish Planning Policy (SPP).

### **Housing Provision**

Within the aforementioned local authority response to the Development Bid site, it is stated that *'adequate housing and employment has been provided to meet the allowances set in the emerging SDP'* and that there *'is no numerical justification to allocate further housing sites'*. This comment is refuted in this instance.

The Proposed SDP recognises the responsibility of Aberdeen City in providing 36,000 new dwellings by 2030, with 21,000 located on greenfield land. Furthermore, the MIR refers to pressures upon the private rented property within Aberdeen and encourages the development of private rented accommodation to facilitate young professionals and key workers. This approach is advocated by the University of Aberdeen especially within areas within close proximity to the institution, such as Hillhead, in order to attract and maintain high quality staff and students. The case for the provision of additional allocation of sites for homes is laid out within Paper Apart 1, accompanying this document.

The bid site lies directly east of the Hillhead Halls of Residence, owned and operated by the University of Aberdeen. This area has been designated as a brownfield Opportunity Site (OP105) within the extant LDP. Potential future uses have been identified by the Planning Brief of January 2013, published by the Council, with *'residential, office or business, recreational or a mix of these uses'* deemed acceptable in

principal. As the bid site is in close proximity to this opportunity site, identification as land suitable for mixed use including recreational and residential development pertaining to either student or private accommodation is believed to be appropriate as an extension to this area, as it relates well to the surrounding urban context.

The Hillhead Centre remains as greenfield land as it continues to be designated as Open Space and has not been recognised within the Aberdeen Brownfield Urban Capacity Study (BUCS) as updated in 2013. It is contested that due to its current developed nature, the site should no longer be classified as greenfield land and should be designated brownfield as it represents a more favourable option to greenfield development and can contribute to the 3,000 housing units required during Phase 1 of the Plan.

This change in categorisation will add to the 2013 established supply of 22% of brownfield land within the City, as detailed by the Housing Land Audit of 2013 and promote brownfield regeneration in favour of greenfield development where available.

The Hillhead Centre offers a more viable alternative to a number of 'preferred sites' for greenfield housing development as specified within the MIR due to its superior Checklist Score when assessed against the criteria set out by the Council within its Development Option response.

The bid site promotes an area which can contribute effectively to the housing supply objectives of the Proposed SDP through high quality development which has the potential to contribute positively to the character of its surroundings, whilst maintaining the present open space and biodiversity of the site. The promotion of student or key worker accommodation on site via the private rented sector is encouraged by the University of Aberdeen in this instance in order to maintain a viable supply of housing within close proximity of the institute, as well as providing an on-site option for affordable housing needs. This is further discussed within Paper Apart 4, pertaining to Issue 8 of the MIR: Affordable Housing.

This assessment galvanises the argument for the inclusion of the site within the Proposed LDP under a designation for mixed use due to the potential it possesses in meeting the greenfield housing needs set out within the Proposed SDP within a sustainable environment.

### **Accessibility & Local Context**

Due to the location of the site in close proximity to King Street, the main trunk road running north from the city centre and adjoining the A90 at the Bridge of Don, the site is highly accessible. The First Bus number 20 bus service links the area to the city centre, with routes 1, 2 & X40 within a 5-10 minute walk from the site found on King Street. The location of housing at this location would comply with the aims of associating residential development in close proximity to transport corridors, as specified within the Proposed SDP. A range of retail services are located close by, the site is approximately 850m from the main University campus on King Street with ASV located 1.6km from the bid site, therefore complying with the standards recommended by PAN75: Planning for Transport pertaining to local services. Ease

of pedestrian access to the university campus through Seaton Park enhances the accessibility of the institution for prospective students and staff members, improving the viability of the site for accommodation of current and prospective students and key workers.

The Hillhead Centre falls within the Conservation Area of Old Aberdeen in close proximity to the River Don. With the exception of Rose Cottage, which lies in a ruinous state in the northern area of the Hillhead site, there are no buildings of any architectural value to the nature of the Conservation Area which would be affected by a residential development on site. Through high quality design and build, the bid site offers an opportunity for the enhancement of the conservation area and its contribution to the wider urban fabric.

### **Summary**

As detailed by the reasons above, the proposer objects to the failure of the MIR to identify Hillhead Centre, Old Aberdeen as a preferred site for residential development.

The site concurs with the Proposed Strategic Development Plan's objectives pertaining to the promotion of sustainable mixed use communities through the retention of open space provision in the northern segment of the site. It is believed that an appropriate balance of residential and recreational open space shall contribute to the objectives of creating a sense of place as promoted by PAN66: Planning & Open Space. Efficient and attractive land use as promoted in this instance enhances the quality of life of residents on site and within the vicinity of Brig o'Balgownie and King Street.

Superior recreational facilities at ASV are more than sufficient to effectively mitigate the loss of green space which would be replaced by a more efficient and viable mixed use alternative that will ultimately benefit the needs of the local community and comply with the objectives of the Proposed SDP.

The introduction of the site for residential development has the opportunity to mitigate the shortfall in greenfield housing allowances up to 2030 as portrayed within Table 2 of the MIR. This residential area shall be closely integrated with the existing Opportunity Site (OP105) at the Hillhead Halls of Residence and is perceived to benefit the context of the area through providing a more sustainable alternative to that of the use currently on site. Further to this, the site represents an opportunity for the promotion of on-site student and key worker accommodation due to its accessibility to the university and would complement the nature of the neighbouring OP105 site.

The accessibility of the site within its urban context is excellent, with the University of Aberdeen campus easily within walking distance, offering academic and employment opportunities for potential residents. Several bus links are located within a 5-10 minute walk of the bid site which is appropriately served by a network of local paths linking to open space areas such as at Seaton Park. The sports facility at ASV is located approximately 1.6km from the Hillhead Centre and is easily accessed by bus or on foot.

The setting of the River Don and the Old Aberdeen Conservation Area shall be respected through the retention of woodland upon the site and through the utilisation of sensitive design in order to preserve and enhance the amenity of the area. This reflects the Promoted SDP of assigning priority to mixed use developments which respect the character of the landscape and local identity.

Ultimately, the site represents a more prudent alternative to greenfield housing when compared with the 'preferred' sites designated by the MIR. These sites have also scored lower within the assessment Checklist than the proposed residential use site at Hillhead, which scored 50 of a possible 60, representing a viable alternative. The inclusion of the bid site represents the opportunity to demonstrate a flexible approach to planning for housing as promoted by NPF3 and contribute to the Strategic Growth Area of Aberdeen City.

### **Recommendation**

With regards to the above, it is respectfully requested that current Aberdeen Local Development Plan (2012) site allocations of Green Space Network (NE1) and Green Belt (NE2) are removed from the Proposed Aberdeen Local Development Plan (LDP) and the area promoted as an opportunity site with residential development encompassing student and key worker accommodation as a preferred use.

## **PAPER APART**

**Objection is made on behalf of the University of Aberdeen to the failure of the Proposed Aberdeen Local Development Plan (ADLP) to identify student and key worker accommodation within the definition of affordable housing.**

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

### Background

The University of Aberdeen object to the failure of the Proposed Aberdeen Local Development Plan to include student and key worker accommodation within the definition of affordable housing in Policy H5 Affordable Housing and Supplementary Guidance relative to Specialist Housing.

There exists a substantial identified need for student and key worker accommodation in Aberdeen due to an expanding student and staff population at both universities. Furthermore, 2014 saw house prices rise by as much as 20% in Aberdeen and rentals have increased by in excess of 15% over the last 5 years. This ultimately results in housing being unaffordable for the majority of students and key workers. It is essential that good quality accommodation is made available to attract prospective students and staff to study, work and live in Aberdeen. This can be achieved by allowing affordable housing contributions arising from surplus land sold by the University of Aberdeen to be retained either for the provision of on-site or off-site new or refurbished student and key worker accommodation.

Representation (Appendix 1) was made in March 2014 in response to the Main Issues Report which failed to include student or key workers under the definition of affordable housing. Option 2 of Issue 8 in the MIR has been carried forward within the Proposed ALDP, with paragraph 3.83 stating that to '*maximise the provision of affordable housing it is the aim of the Council to take a flexible approach to its delivery*'. This approach is welcomed, however, the University of Aberdeen wish to see such flexibility extended to recognise student and key worker accommodation. Objection is now made to this.

### University Influence on Aberdeen

The Universities of Aberdeen and Robert Gordon's University provide academic facilities for approximately 30,000 students, representing around of 15% of the city's population. This population continues to rise annually and both universities look to constantly expand in order to attract students and staff, many of whom are in their early 20s. A substantial number of slightly older postgraduate and key workers either attending or employed by these institutions

currently exists. These groups add to the diversity and skills pool available within the city's economy and make an important contribution in counteracting the 'top-heavy' demographic trend prominent within Aberdeen.

Student and key worker accommodation should therefore be considered as affordable housing. Students make a significant contribution to the city and therefore student housing is an important part of the requirement and should be regarded as an exceptional case in this regard.

The University of Aberdeen, as illustrated through its 'Estate Strategy 2013-2023', confirm significant investment in the development and modernisation of infrastructure in recent times and through their actioned 'Growth Strategy', anticipate an *'expanding student and increasingly diverse population'*. This demonstrates the University's commitment to the continual improvement and consolidation of provisions for students and staff. Inclusive of this, the institution wishes to enhance the quality and affordability of its accommodation and aims to create a portfolio of accommodation to meet expectations throughout the life time of the Aberdeen Local Development Plan 2016.

This objective has been highlighted within the University's 'Student Accommodation & Staff Housing' strategy (2018-22). This states the intention to bring forward recommendations to address the need for affordable accommodation for staff and students through a committed approach to a high quality student experience; and to facilitate ambitions for income growth through increases in post graduate population and research growth. To help deliver this it is essential that any affordable housing requirements arising from the sale of surplus land by the University are retained for the provision of student or key worker accommodation.

#### Principle of Key Worker Accommodation as Affordable Housing

Aberdeen City Council have recently shown a willingness to accept the retention of 9 affordable housing units by the University for provision as key worker accommodation at the Cala Homes development consented at Balgownie Home Farm. This would be subject to a number of conditions detailed within a Section 75 agreement. Appendix 2 attached outlines the Council's position in this regard and confirm that low cost housing provided at 80% of the local housing allowance would be considered appropriate. The University of Aberdeen have since confirmed that they are prepared to meet the criteria set out by the Council which will allow key workers to be accommodated within the development at Balgownie Home Farm. Cala Homes are also in agreement with this strategy.

It is therefore contended that the Council now accept the principle of the University retaining the affordable housing requirement upon sites deemed surplus to their needs when sold for



residential development on the open market. This is a clear indication of the willingness of the Council's Communities, Housing & Infrastructure service to permit provision as such in order to ensure quality accommodation for staff and students. This will undoubtedly enhance the attractiveness of the University for prospective employees and students and this stance adopted by the Council is welcomed by the University. It should also be reflected through Local Development Plan Policy and associated Supplementary Guidance.

Further to this, the University of Aberdeen supported the previous approach adopted by the 2008 Aberdeen Local Plan, which stated that *'where Universities or comparable institutions are providing new or up-dated accommodation for student or groups with similar characteristics, such provision may therefore be an acceptable alternative destination for affordable housing contributions from mainstream housing built on land owned by the institutions'*. This illustrates that the Council has previously accepted the principle of affordable housing provision through alternative methods such as student or key worker accommodation. A similar wording should now be incorporated within the 2016 ALDP to ensure a flexible approach is adopted through the provision of affordable housing.

As mentioned above, paragraph 3.83 of the Proposed ALDP alludes to the Council taking a *'flexible approach'* to the delivery of affordable housing and *'maximising opportunities to achieve the highest level possible'*. Paragraph 129 of SPP reiterates this, advising that development plans should give consideration *'to the nature of affordable housing required and the extent to which this can be met by proposals capable of development with little or no public subsidy'*. This would be the case regarding provision of key worker accommodation by the University, effectively acting as a social landlord.

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

It is contended that students and key workers should be eligible for affordable housing. Where surplus land becomes available and is sold on the open market, the University should be extended the option of retaining the affordable housing requirement arising from that land for the provision of student or key worker accommodation. This could involve on-site provision or the retention of commuted sums for off-site provision on other lands controlled by the University. This could include new or refurbished accommodation. As discussed above, this is a method previously accepted by the Council within the 2008 Local Plan as well as more recently detailed within Appendix 3.

In light of this, the emerging Aberdeen ALDP 2016 should recognise student and key workers within the definition of affordable housing within Policy H5 Affordable Housing and under paragraph 6.2.4 of Supplementary Guidance relative to Specialist Housing. The Strategic Development Plan (SDP) specifies affordable as being *'housing made available at a cost*

*below full market value to meet an identified need'*. It is clear that students and key workers represent a proportion of said need and should therefore be represented within this definition.

## **PAPER APART 4**

### **Representation to Aberdeen City Council on behalf of the University of Aberdeen in Response to Issue 8 of the Main Issues Report pertaining to Housing Needs and Affordable Housing**

#### **Introduction**

The challenges in delivering affordable housing within the City of Aberdeen are outlined within the Main Issues Report (MIR) of January 2014. It is acknowledged that housing is unaffordable to a large proportion of the population and that additional affordable housing is vital to support an increasing population.

In terms of Issue 8, the University of Aberdeen support 'Option 2' which promotes flexibility in the approach to affordable housing, allowing options that can help to deliver greater numbers of affordable homes, in order to promote sustainable mixed communities.

It is recommended by the University of Aberdeen that students and key workers should be eligible for affordable housing. It is contended that where the University land becomes surplus to requirements and is sold on the open market, the affordable housing requirement arising from that land be retained by the University for the provision of student or key worker accommodation. This could involve on-site provision or the retention of the commuted sums for off-site provision on other lands controlled by the University. This could include new or refurbished accommodation.

#### **Justification**

The Universities of Aberdeen and Robert Gordon's University provide academic facilities for approximately 30,000 students, which represents just under of 15% of the city's population. The Universities attract people to Aberdeen, many of whom are in their early 20s. Additionally, a substantial number of slightly older postgraduate and key workers either attending or employed by these institutions currently exists. These groups add to the diversity and skills pool available within the city's economy and make an important contribution in counteracting the 'top-heavy' demographic trend prominent within Aberdeen.

However, the University of Aberdeen, a major employer within the city, finds it difficult to attract and retain staff and students due to the shortfall, and consequent high cost of housing. The provision of affordable housing for these groups is therefore an important consideration. House prices in Aberdeen remain consistently high, with rents rising 15.5% over the last 4 years, compounded by lack of housing land. Due to the high prices, a proportion of the population are excluded from the housing market, including students and key workers. The failure to provide affordable housing restricts their ability to obtain a decent standard of housing, forcing these groups to rent poor quality accommodation.

Student and key worker accommodation should therefore be considered as affordable housing. Students make a significant contribution to the city and therefore student housing is an important part of the requirement and should be regarded as an exceptional case in this regard.

The University is committed to improving the quality and affordability of its accommodation and will create a portfolio of accommodation to meet expectations throughout the life time of the Proposed Local Development Plan (LDP).

This objective has been highlighted within the University's 'Student Accommodation & Staff Housing' strategy (2018-22). This states the intention to bring forward recommendations to address the need for affordable accommodation for staff and students through a committed approach to a high quality student experience; and to facilitate ambitions for income growth through increases in post graduate population and research growth. To help deliver this it is essential that any affordable housing requirements arising from the sale of surplus land by the University are retained by the University for the provision of student or key worker accommodation.

Currently, there is no reference within the MIR to the requirement for students or key worker accommodation, raising concerns that such provision has been entirely overlooked. However, the affordable housing definition within the Proposed SDP specifies affordable as being *'housing made available at a cost below full market value to meet an identified need'*. It is contended in this instance that students and key workers represent a proportion of said need and should therefore be represented within this definition.

The University contend that where any surplus land under the institution's ownership is sold on the open market for mainstream housing, the University should have the ability to retain affordable housing contributions for the provision of student or key worker accommodation. Thus could either be on-site, or through the 'ring fencing' of the commuted sums for the provisions of such accommodation on other land controlled by the University, possibly better located to accommodate such facilities. For example, the University's land at Rowett South (OP30) is remote from the University campus and rather than provide accommodation on-site, the commuted sums, in lieu of on-site provision, could be retained by the University for the construction of student and key worker accommodation at the former Dunbar Halls.

This approach, which promotes housing provision, responsive to the needs of student and key workers, is forwarded as an alternative to providing 25% of on-site units as affordable housing and advocates the MIR option to *'move away from a blanket approach to the delivery of on-site affordable housing... to allow for flexibility'*.

The University of Aberdeen supported the previous approach adopted by the 2008 Aberdeen Local Plan, which stated that *'where Universities or comparable institutions are providing new or up-dated accommodation for student or groups with similar characteristics, such provision may therefore be an acceptable alternative destination for affordable housing contributions from mainstream housing built on land owned by the institutions'*.

This illustrates the consideration of affordable housing through alternative methods such as student/key worker accommodation as being previously accepted in principle by the local authority.

### **Recommendation**

With regard to the above, it is respectfully requested that student and key worker accommodation are incorporated into the definition of affordable housing and promoted as policy within the Proposed LDP. It is further requested that any affordable housing contributions arising from surplus land sold by the University are retained by the University either for on-site or off-site provision of new or refurbished student and key worker accommodation.

Our Ref. GNS/HRS  
Your Ref.  
Contact Graeme Stuart  
Email [gstuart@aberdeencity.gov.uk](mailto:gstuart@aberdeencity.gov.uk)  
Direct Dial 01224 523043  
Direct Fax 01224 523764



**ABERDEEN**  
CITY COUNCIL

14<sup>th</sup> November 2014

*See fs. Any other way  
Exchange of letters*

Angus Donaldson  
Director of Estates  
University Office  
Kings College  
Aberdeen  
AB24 3FX

Communities, Housing and  
Infrastructure  
Aberdeen City Council  
**Business Hub 12**  
Second Floor West  
Marischal College  
Aberdeen  
AB10 1AB

Tel 08456 08 09 10  
Minicom 01224 522381  
DX 529451, Aberdeen 9  
[www.aberdeencity.gov.uk](http://www.aberdeencity.gov.uk)

Dear Angus

### **Proposed Key Worker Accommodation**

Further to your letter of 10<sup>th</sup> October 2014 I have now had the opportunity to consider it's content and I have had a discussion with planning colleagues Gale Beattie, David Dunne and Les McGonigle from my team.

I have set out the issues which I believe require further clarification and agreement to allow the proposal you made to progress.

Rent levels – agreement is required around the initial rental and subsequent annual increases.

In your letter you refer to rents at 80% of the local housing allowance which would be appropriate. The 2 bed LHA is currently £675.99 per month. We would also want to agree an annual rent review policy to ensure any increases maintain this affordability.

Period for rental – We would expect to see the properties used for a minimum of 30 years. If there was to be early disposal or the properties were not being utilised as affordable housing then we would expect to see a payment made in lieu of the future affordable use. If such a payment were made it would then be reinvested by the City Council in new affordable housing in the city. This payment could therefore be seen as equivalent to the current commuted payment which a developer makes in lieu of onsite provision with perhaps a reduction over time to reflect the length of time the affordable housing has been provided.

Key workers – Can you advise what the University would propose as the definition of key workers. It would be helpful to understand what posts this would cover,

PETE LEONARD  
DIRECTOR



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understanding that this may change over time. Presumably the main need is to help attract staff to the city so is this framed around new employees moving to Aberdeen. The aim of the Section 75 Agreement is to help assist households who can not meet their need in the market. We would not expect households able to meet their own housing needs in the market to be assisted even if one member is identified as a key worker. We would therefore expect to see a maximum household income used to help support the definition of key worker .

If at any point the University is unable to let a property but intends to keep the property in the long term then we would expect the property to be offered to a key worker from another employer, perhaps Robert Gordons University.  
A discussion has started with the Scottish Government around a key worker housing policy which could help inform this.

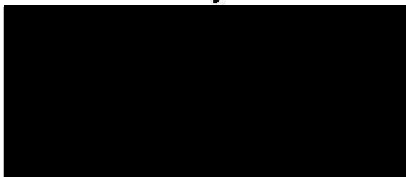
Tenancy – Can you advise what tenancy you would offer and what policy, if any, you would have restricting the lifetime of such a tenancy.

Landlord Accreditation Scotland – We would expect the university to become an accredited landlord if it is not already.

The proposal has still to be discussed with the Planning Case Officer who dealt with the original planning application. Once your detailed response is received this discussion will take place.

I look forward to your response.

Yours Sincerely



Graeme Stuart  
Housing Strategy & Performance Manager