

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 20th March and Monday 1st June 2015. Please ensure all representations are with us by 5pm on Monday 1st June.

Name	Mr <input checked="" type="radio"/> Mrs <input type="radio"/> Miss <input type="radio"/> Ms <input type="radio"/> Christopher Ross
Organisation	Barratt North Scotland
On behalf of (if relevant)	
Address	Blairton House, Old Aberdeen Road, Balmedie
Postcode	AB23 8SH
Telephone	01358 741373
E-mail	christopher.ross@barratthomes.co.uk

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

What document are you commenting on?	Proposed Plan	<input checked="" type="checkbox"/>	
	Proposed Supplementary Guidance	<input type="checkbox"/>	
	Proposed Action Programme	<input type="checkbox"/>	
	Strategic Environmental Assessment Environmental Report	<input type="checkbox"/>	
Policy/Site/Issue	(B0306) Newton East	Paragraph(s)	

What would you like to say about the issue?

Set out below are Barratt and David Wilson's outstanding issues and objections to the Proposed Aberdeen Local Development Plan 2015 and specifically objection to the non-inclusion of land at Newton East, Old Skene Road, Kingswells as a Greenfield Housing allocation and associated amendment to the Green Belt boundary.

Newton East - Site Specific Comments

The site is deemed to be immediately effective and following grant of planning permission could be completed within 18 months, thereby providing 20 units within Phase 1 of the LDP period.

Development on this site will not create an unacceptable impact on the surrounding landscape. Effective design and technical solutions will ensure the development fits within the site and surrounding context. Barratt North Scotland delivered the adjacent Willowburn development and a similar approach could be adopted at Newton East to ensure an equally successful development.

The site is well defined by clearly identifiable visual and robust boundaries, Old Skene Road to the north, tree belt to the east, A944 main road to the south and existing residential properties to the west. The site is small in scale (0.9 ha) and its release from the greenbelt for housing would not undermine the spatial strategy of the City-region.

The site should be deemed effective and the development can contribute to sustainable development.

The Spatial Strategy

The strategy is over-reliant on a few large greenfield releases. To ensure that a 5 year effective land supply can be maintained at all times throughout the LDP period, the spatial strategy should allocate further small to medium sized development sites of c.20-150 units.

Policy LR1

This policy does not meet the SPP's intention of providing an effective 5 years land supply at all times.

Directions For Growth

The Directions for Growth are over-reliant on large sites within Masterplan Zones, which is likely to cause failure on the ability to maintain a 5 years effective land supply at all times. For example, 5 Greenfield sites (OP9, 21, 22, 38, 59) are relied upon to provide 73% of the Greenfield housing allowance to 2035. This is a very high dependency on a very small number of sites and locations. The consequence of such dependency is a limited range of sites that is not in keeping with the intentions of SPP. The only way to deliver the housing requirements in the short to medium term is to allocate additional housing land; particularly allocating more small to medium (20-150 unit) sites that are both sustainable and effective.

Policy H5 Affordable Housing

This Policy does not comply with the intentions of SPP paragraph 129.

Please see attached accompanying this form, a full representation made by Barratt North Scotland - Land at Newton East, Old Skene Road, Kingswells (MIR Ref: B0306).

What change would you like to see made?

Policy LR1

The Aberdeen City LDP should provide for a minimum of 5 years effective land supply at all times and reference to this commitment should be made within policy LR1. The Policy should contain the following wording:

'The council will monitor and update the effective housing land supply figures annually via the Housing Land Audit process to make sure that a minimum five year supply is maintained at all times. If the Housing Land Audit process identifies a shortfall in the effective land supply, the Council will consider supporting sustainable development proposals that are effective. In doing so, account will be taken of other local development plan policies and any adverse impacts that would significantly and demonstrably outweigh the benefits of the proposal.'

Furthermore, to ensure that unintended constraints to windfall sites are not created, the words "Development on an allocated site or in close proximity to an allocation that jeopardises the full provision of the allocation will be refused" for both Parts A and B should be deleted. Instead, the following wording should be added: 'sites in close proximity to allocations should be considered by the Council if there is a shortfall in the 5 year land supply and any additional infrastructure required as a result of the development is either committed or to be funded by the developer.'

Directions for Growth

Object to Table 5: Development at Kingswells and Greenferns

Change - Add Newton East as a greenfield development opportunity site for housing, comprising 20 no. homes in Phase 1.

Policy H5 Affordable Housing

The wording "Housing developments of five units or more are required to contribute no less than 25% of the total number of units as affordable housing" does not comply with the intentions of SPP paragraph 129 which states "The level of affordable housing required as a contribution within a market site should generally be no more than 25% of the total number of houses". Policy H5 should be re-written as follows: 'For market housing developments of five units or more, no more than 25% of the total number of units should be for affordable housing.'

Object to Appendix 2 - Opportunity Sites

Add Newton East - 0.9ha of land - Land Release Policy - Opportunity for development of 20 homes

Object to the Proposals Map

Remove Newton East from the Greenbelt and include as LR1.

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

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 1st June.**

Thank you. For more information, please visit 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.



Ref:CR/JMcD/0002

1st June 2015

Local Development Plan Team
Aberdeen City Council
Business Hub 4
GroundFloor North
Marischal College
Broad Street
Aberdeen
AB10 1AB

Dear Sir/Madam

**Proposed Aberdeen Local Development Plan 2015
Barratt North Scotland Representation**

Land at Newton East, Old Skene Road, Kingswells (MIR Ref: B0306)

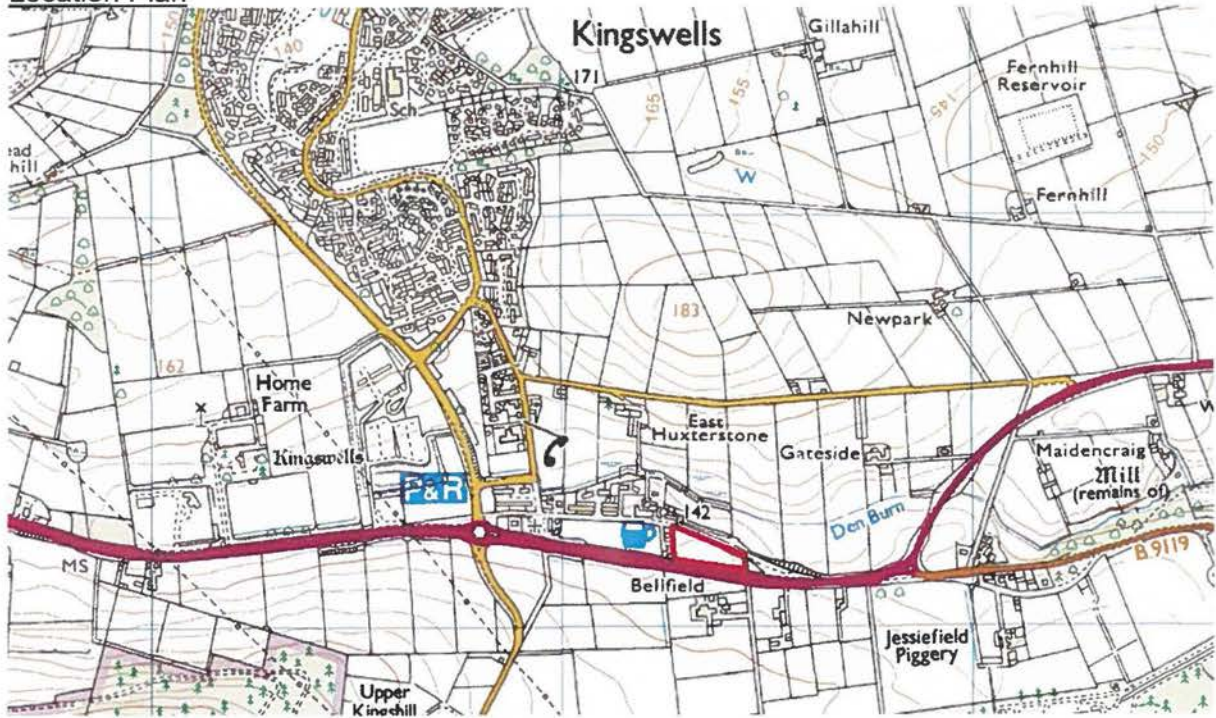
Set out below are Barratt North Scotland's outstanding issues and objections to the Proposed Aberdeen Local Development Plan 2015 and specifically objection to the non-inclusion of land at Newton East, Old Skene Road, Kingswells as a Greenfield Housing allocation and associated amendment to the Green Belt boundary.

Proposed Housing Site

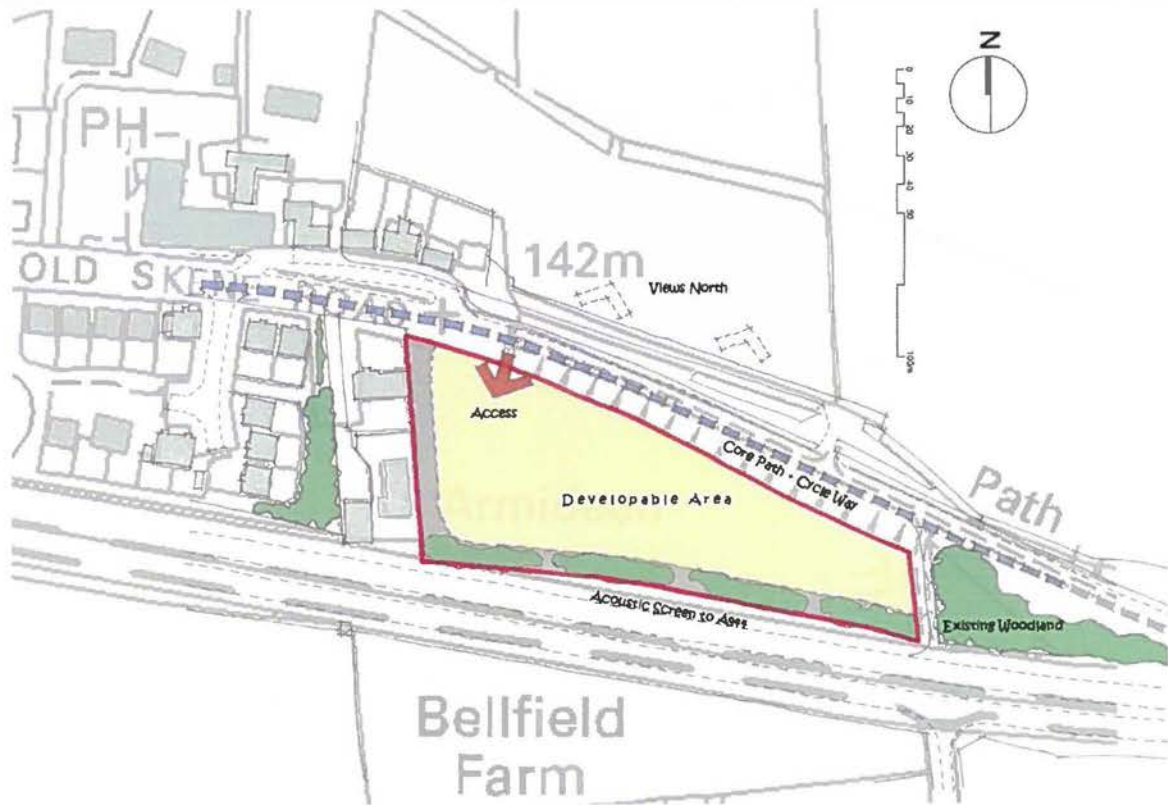
The site is located to the south of Old Skene Road on the southern edge of Kingswells. Representations in support of housing were submitted by Halliday Fraser Munro on Behalf of Barratt North Scotland in March 2014.

The site itself extends to approximately 2.8 acres (0.9 hectares) and is currently non-prime (Grade 3.2) agricultural land incorporating one field bound by the field margin and post and wire fence on the north, trees east and south, and existing properties west.

Location Plan



Proposed Development Framework

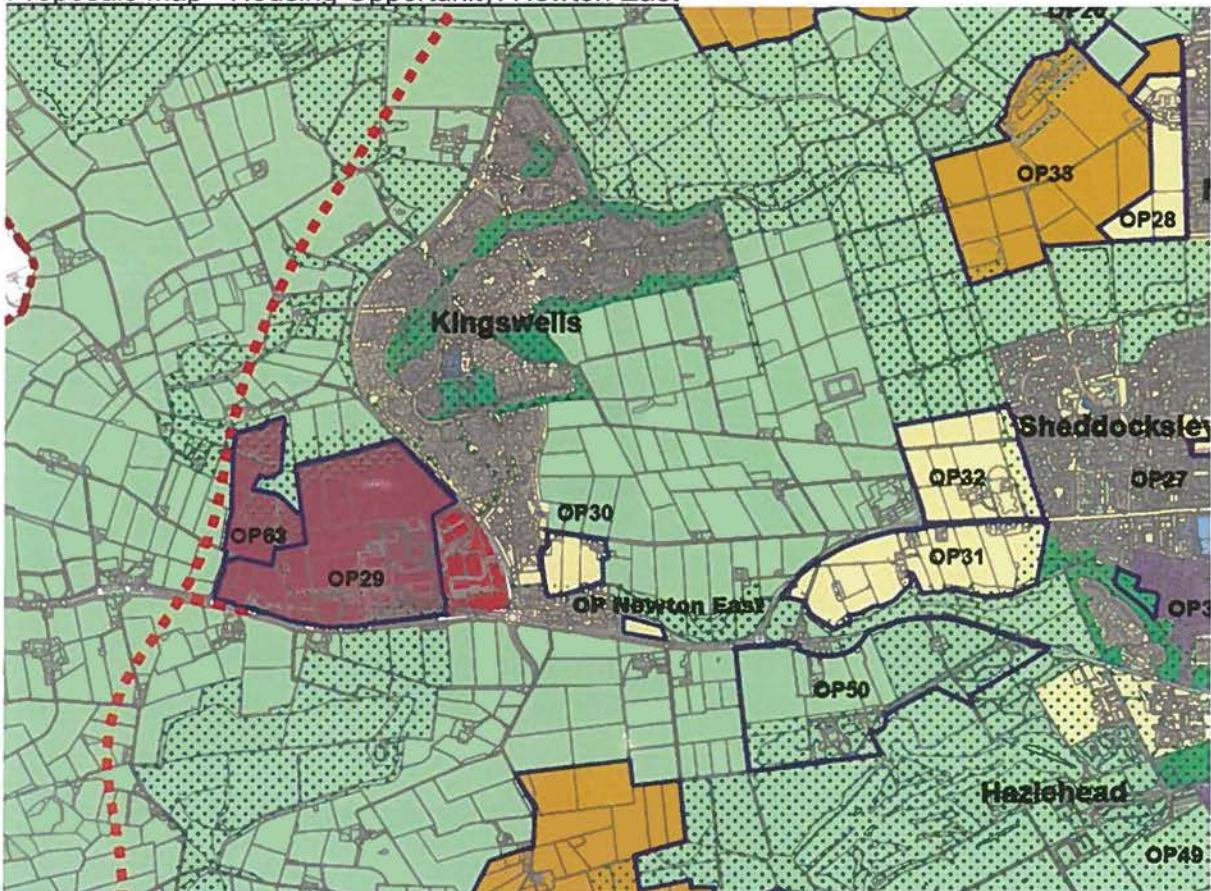


The housing proposal would provide for circa 20 homes, creating a suitable density to accord with surrounding areas and would provide a range of market housing including 25 % affordable provision. The requirement for additional deliverable small to medium scale housing sites is addressed further within this representation.

Green Belt

The Proposals Map shows the defined Greenbelt around Aberdeen City. Barratt North Scotland object to the current Green Belt boundary at Old Skene Road, Kingswells. The field to the south of Old Skene Road should be removed from the Greenbelt and instead included as a housing opportunity site, Policy LR1. The resultant change to the Proposals Map is indicatively shown below.

Proposals Map - Housing Opportunity: Newton East



Scottish Planning Policy (June 2014) Paragraph 51 states:

“The spatial form of the green belt should be appropriate to the location. It may encircle a settlement or take the shape of a buffer, corridor, strip or wedge. Local development plans should establish the detailed boundary of any greenbelt, giving consideration to...establishing clearly identifiable visual boundary markers based on landscape features such as rivers, tree belts, railways or main roads.”

The site is well defined by clearly identifiable visual and robust boundaries, Old Skene Road to the north, tree belt to the east, A944 main road to the south and existing residential properties to the west. The site is small in scale (0.9 ha) and its release from the greenbelt for housing would not undermine the spatial strategy of the City-region. Instead it would support it by releasing an effective housing site that could augment the housing land supply that is over reliant on a few very large releases.

Development on this site will not create an unacceptable impact on the surrounding landscape. Effective design and technical solutions will ensure the development fits within the site and surrounding context. Barratt North Scotland delivered the adjacent Willowburn development and a similar approach could be adopted at Newton East to ensure an equally successful development.

Site Delivery Programme

The site is deemed to be immediately effective and following grant of planning permission could be completed within 18 months, thereby providing 20 units within Phase 1 of the LDP period.

Effectiveness Assessment

Ownership	The site is controlled and promoted by Barratt North Scotland who are committed to the delivery of the proposed development and the owner is willing to release it for development at the earliest opportunity.	Effective
Physical	The site is expected to be free from constraints as it is greenfield and relatively level. There are no technical impediments to the proposed residential development allowing completion within the proposed site delivery programme above.	Effective
Contamination	The site is greenfield and no contamination is expected allowing development for marketable housing.	Effective
Deficit Funding	The development shall be privately funded. Whilst delivery of the 25% affordable housing may require public subsidy via Registered Social Landlord housing delivery, Barratt North Scotland are also able to provide non-subsidised discounted sale units as part of this contribution to maximise deliverability.	Effective
Marketability	Kingswells is a marketable area and the full development can be expected to be delivered within the proposed site delivery programme above.	Effective
Infrastructure	The site is not expected to be affected by any infrastructure constraints. Any upgrades required as a direct consequence of the development can be funded by the developer.	Effective
Land Use	The proposed residential land use is compatible with surrounding uses (residential / agricultural).	Effective

SPP Principles: Sustainable Development Assessment

<p>Giving due weight to net economic benefit</p>	<p>The proposed development would create the following headline economic benefits:</p> <ul style="list-style-type: none"> • c. £3m of construction investment • Create 15 direct construction jobs per annum • Support 23 indirect and induced jobs per annum • Over £4m of gross value added over construction period • £375k per annum disposable income generated for the local economy • Additional Council tax receipts from 20 new homes
<p>Responding to economic issues, challenges and opportunities, as outlined in local economic strategies</p>	<p>The construction of new homes will create both employment opportunities and increased investment to the local economy as outlined above. Barratt North Scotland employs local contractors and tradesmen to construct new homes.</p>
<p>Supporting good design and the six qualities of successful places</p>	<p>The proposed development of the site would support the 6 qualities of successful places and Barratt North Scotland would work in partnership with the local authority to deliver this.</p>
<p>Making efficient use of existing capacities of land, buildings and infrastructure including supporting town centre and regeneration priorities</p>	<p>The proposed development would make use of an efficient design to ensure the best use of a greenfield site in an accessible location. No buildings exist on the site. Existing infrastructure would be capable of supporting the proposed development.</p>
<p>Supporting delivery of accessible housing</p>	<p>The proposed development is adjacent to an existing residential area with a foot and cycle path on the northern boundary. The site is easily accessible by bus and car via the A944.</p>
<p>Supporting delivery of infrastructure, for example transport, education, energy, digital and water</p>	<p>Given the relatively small scale of the proposed development, it is expected that there is sufficient infrastructure capacity and no constraints exist. The development will provide much needed new build housing to help meet the housing allocation for Aberdeen City in Phase 1 of the plan period.</p>
<p>Supporting climate change mitigation and adaptation including taking account of flood risk</p>	<p>The proposed development will be built to meet building standards that ensure a lowered carbon footprint. The site is not at risk of flooding from rivers. The site is accessible by foot, cycle and bus. Core Path 91 and a cycle route run at the northern edge of the site and links into Aberdeen. There are also connections to Core Path 31. The cycle path links into two other cycle routes through core path 91. This range of transport options to and from the site will reduce the reliance on the private car and thereby vehicle emissions.</p>
<p>Improving health and well-being by offering opportunities for</p>	<p>There are no known contamination issues associated with the site that could impact on human health. The site will link with Core Path 91 and cycle route on the northern boundary.</p>

social interaction and physical activity, including sport and recreation	
Having regard to the principles for sustainable land use set out in the Land Use Strategy	The development of the site would present an efficient use of land for residential dwellings at an appropriate density. Development of the site would not impact on prime agricultural land.
Protecting, enhancing and promoting access to cultural heritage, including the historic environment	The proposed development would not impact upon cultural heritage features including the historic environment. The Council's MIR options assessment of the site (B0306) states: "There are 3 site and monument records, off the site, to the north. Harthill Farm, Kingswells Free Church School, Milestone 4. Development is unlikely to have any significant affect on these features."
Protecting, enhancing and promoting access to natural heritage, including green infrastructure, landscape and the wider environment	The proposed development would enhance the natural heritage of the site through tree planting to the southern boundary. The site is well placed to take advantage of existing core paths with links to the countryside. The Council's MIR options assessment of the site (B0306) states: The North Burn of Rubislaw (Den Burn) LNCS is 98m to the north of the site. The site lies within the River Dee Catchment Area. There are records of bats within the vicinity of the site (Chiroptera, Common Pipistrelle and Pipistrellus pipistrellus) and the designated species Wych Elm. Further tree and bat studies can be undertaken if required as part of any planning application. The introduction of private gardens and public open space will result in a more diverse habitat than the existing agricultural use.
Reducing waste, facilitating its management and promoting resource recovery	Barratt North Scotland complies with all necessary standards for reducing waste during construction and promotes the use of recycling whenever possible.
Avoiding over-development, protecting the amenity of new and existing development and considering the implications of development for water, air and soil quality	The development proposal creates an efficient use of land while avoiding over development to protect the amenity of existing residential development in the vicinity of the site. A sustainable urban drainage system will ensure no impact on water quality. Any open space and garden ground within the site will comply with necessary human health standards for soil quality.

The Spatial Strategy

Paragraph 119 of Scottish Planning Policy (SPP 2014) states that:

"Local development plans in city regions should allocate a range of sites which are effective or expected to become effective in the plan period...In allocating sites, planning authorities should be confident that land can be brought forward for

development within the plan period and that the range of sites allocated will enable the housing supply target to be met”.

It is accepted that allocations in the form of Masterplan Zones will be required to help meet the overall housing land allowance for the Local Development Plan (LDP) period and beyond, however most of these have experienced significant delays in implementation for a variety of reasons, including land ownership, masterplan development, complex S. 75 negotiations and problems with infrastructure. Therefore, uncertainty remains over the delivery of units and programme slippage from Phase 1 to Phase 2 is expected and should be accounted for. To ensure that a 5 year effective land supply can be maintained at all times throughout the LDP period, the spatial strategy should allocate further small to medium sized development sites of c.20-150 units. These small to medium sized sites should be effective and can be delivered more quickly in comparison to the Masterplan Zones. Such sites would supplement the effective land supply when lower than programmed completions from larger sites occur, thus ensuring that a 5 years effective land supply can be maintained at all times.

Policy LR1

The Aberdeen City LDP should provide for a minimum of 5 years effective land supply at all times and reference to this commitment should be made within policy LR1. The Policy should contain the following wording:

‘The council will monitor and update the effective housing land supply figures annually via the Housing Land Audit process to make sure that a minimum five year supply is maintained at all times. If the Housing Land Audit process identifies a shortfall in the effective land supply, the Council will consider supporting sustainable development proposals that are effective. In doing so, account will be taken of other local development plan policies and any adverse impacts that would significantly and demonstrably outweigh the benefits of the proposal.’

Furthermore, to ensure that unintended constraints to windfall sites are not created, the words “Development on an allocated site or in close proximity to an allocation that jeopardises the full provision of the allocation will be refused” for both Parts A and B should be deleted. Instead, the following wording should be added: ‘sites in close proximity to allocations should be considered by the Council if there is a shortfall in the 5 year land supply and any additional infrastructure required as a result of the development is either committed or to be funded by the developer.’

Directions for Growth

Barratt North Scotland object to Table 5: Development at Kingswells and Greenferns. The site to which the representation relates, Newton East should be added as a greenfield development opportunity site for housing, comprising 20 no. homes in Phase 1. As such we object to Appendix 2 - Opportunity Sites, which should add Newton East - 0.9ha of land - Land Release Policy - Opportunity for development of 20 homes.

The Directions for Growth are over-reliant on large sites within Masterplan Zones, which is likely to cause failure on the ability to maintain a 5 years effective land supply at all times. For example, 5 Greenfield sites (OP9, 21, 22, 38, 59) are relied upon to provide 73% of the Greenfield housing allowance to 2035. This is a very high dependency on a very small number of sites and locations. The consequence of such dependency is a limited range of sites that is not in keeping with the intentions of SPP. The only way to deliver the housing requirements in the short to medium term is to allocate additional housing land; particularly allocating more small to medium (20-150 unit) sites that are both sustainable and effective. In comparison to the large masterplanned sites, these small to medium sites can be delivered much quicker and more efficiently, without the requirement for an agreed masterplan prior to the submission of an application. The over-reliance on large sites to deliver housing could have damaging effects on the Aberdeen economy. Families will not be able to find new homes and businesses will not be able to attract the staff they require. Aberdeen has a strong economic policy to retain and attract new businesses, however a housing supply problem will negate this.

Policy H5 Affordable Housing

The wording "*Housing developments of five units or more are required to contribute no less than 25% of the total number of units as affordable housing*" does not comply with the intentions of SPP paragraph 129 which states "The level of affordable housing required as a contribution within a market site should generally be no more than 25% of the total number of houses". Policy H5 should be re-written as follows: '*For market housing developments of five units or more, no more than 25% of the total number of units should be for affordable housing.*'

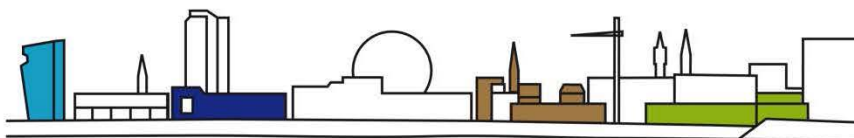
Yours faithfully

For Barratt North Scotland



Chris Ross

Senior Land Manager



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.

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Name	Mr <input checked="" type="radio"/> Mrs <input type="radio"/> Miss <input type="radio"/> Ms <input type="radio"/> Christopher Ross
Organisation	Barratt North Scotland
On behalf of (if relevant)	
Address	Blairton House, Old Aberdeen Road, Balmedie
Postcode	AB23 8SH
Telephone	01358 741373
E-mail	christopher.ross@barratthomes.co.uk

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What document are you commenting on?	Proposed Plan	<input checked="" type="checkbox"/>
	Proposed Supplementary Guidance	<input type="checkbox"/>
	Proposed Action Programme	<input type="checkbox"/>
	Strategic Environmental Assessment Environmental Report	<input type="checkbox"/>
Policy/Site/Issue	(BO924) Thornhill, Craigton	Paragraph(s)

What would you like to say about the issue?

Set out below are Barratt and David Wilson's outstanding issues and objections to the Proposed Aberdeen Local Development Plan 2015 and specifically objection to the non-inclusion of land at Thornhill, Craigton as a Greenfield Housing allocation and associated amendment to the Green Belt boundary.

Thornhill Craigton - Site Specific Comments

The site is deemed to be immediately effective and following grant of planning permission could be completed within 4 years, thereby providing 150 units within Phase 1 of the LDP period.

The site is well defined by clearly identifiable visual and robust boundaries, Countesswells Road to the north and tree belts to the east and south. Further woodland planting to the northern and western boundaries can ensure that the development fits into the surrounding landscape character and would not be visible from main approaches or from the countryside to the west.

The site is medium in scale (7.8 ha) and its release from the greenbelt for housing would not undermine the spatial strategy of the City-region. Instead it would support it by releasing an effective housing site that could augment the housing land supply that is over reliant on a few very large housing releases.

Development on this site will not create an unacceptable impact on the surrounding landscape. Effective design and technical solutions will ensure the development fits within the site and surrounding context.

The site should be deemed effective and the development can contribute to sustainable development.

The Spatial Strategy

The strategy is over-reliant on a few large greenfield releases. To ensure that a 5 year effective land supply can be maintained at all times throughout the LDP period, the spatial strategy should allocate further small to medium sized development sites of c.20-150 units.

Policy LR1

This policy does not meet the SPP's intention of providing an effective 5 years land supply at all times.

Directions For Growth

The Directions for Growth are over-reliant on large sites within Masterplan Zones, which is likely to cause failure on the ability to maintain a 5 years effective land supply at all times. For example, 5 Greenfield sites (OP9, 21, 22, 38, 59) are relied upon to provide 73% of the Greenfield housing allowance to 2035. This is a very high dependency on a very small number of sites and locations. The consequence of such dependency is a limited range of sites that is not in keeping with the intentions of SPP. The only way to deliver the housing requirements in the short to medium term is to allocate additional housing land; particularly allocating more small to medium (20-150 unit) sites that are both sustainable and effective.

Policy H5 Affordable Housing

This Policy does not comply with the intentions of SPP paragraph 129.

Please see attached accompanying this form, a full representation made by Barratt North Scotland - Land at Thornhill, Craigton (MIR Ref: B0924).

What change would you like to see made?

Policy LR1

The Aberdeen City LDP should provide for a minimum of 5 years effective land supply at all times and reference to this commitment should be made within policy LR1. The Policy should contain the following wording:

'The council will monitor and update the effective housing land supply figures annually via the Housing Land Audit process to make sure that a minimum five year supply is maintained at all times. If the Housing Land Audit process identifies a shortfall in the effective land supply, the Council will consider supporting sustainable development proposals that are effective. In doing so, account will be taken of other local development plan policies and any adverse impacts that would significantly and demonstrably outweigh the benefits of the proposal.'

Furthermore, to ensure that unintended constraints to windfall sites are not created, the words "Development on an allocated site or in close proximity to an allocation that jeopardises the full provision of the allocation will be refused" for both Parts A and B should be deleted. Instead, the following wording should be added: 'sites in close proximity to allocations should be considered by the Council if there is a shortfall in the 5 year land supply and any additional infrastructure required as a result of the development is either committed or to be funded by the developer.'

Directions for Growth

Object to Table 6: Development at Countesswells

Change - Add Thornhill as a greenfield development opportunity site for housing, comprising 150 no. homes in Phase 1.

Policy H5 Affordable Housing

The wording "Housing developments of five units or more are required to contribute no less than 25% of the total number of units as affordable housing" does not comply with the intentions of SPP paragraph 129 which states "The level of affordable housing required as a contribution within a market site should generally be no more than 25% of the total number of houses". Policy H5 should be re-written as follows: 'For market housing developments of five units or more, no more than 25% of the total number of units should be for affordable housing.'

Object to Appendix 2 - Opportunity Sites

Add Thornhill - 7.8ha of land - Land Release Policy - Opportunity for development of 150 homes

Object to the Proposals Map

Remove Thornhill from the Greenbelt and include as LR1.

Please return the completed form by:

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1st June 2015

Local Development Plan Team
Aberdeen City Council
Business Hub 4
GroundFloor North
Marischal College
Broad Street
Aberdeen
AB10 1AB

Dear Sir/Madam

**Proposed Aberdeen Local Development Plan 2015
Barratt North Scotland Representation**

Land at Thornhill, Countesswells Road Craigton (MIR Ref: B0924)

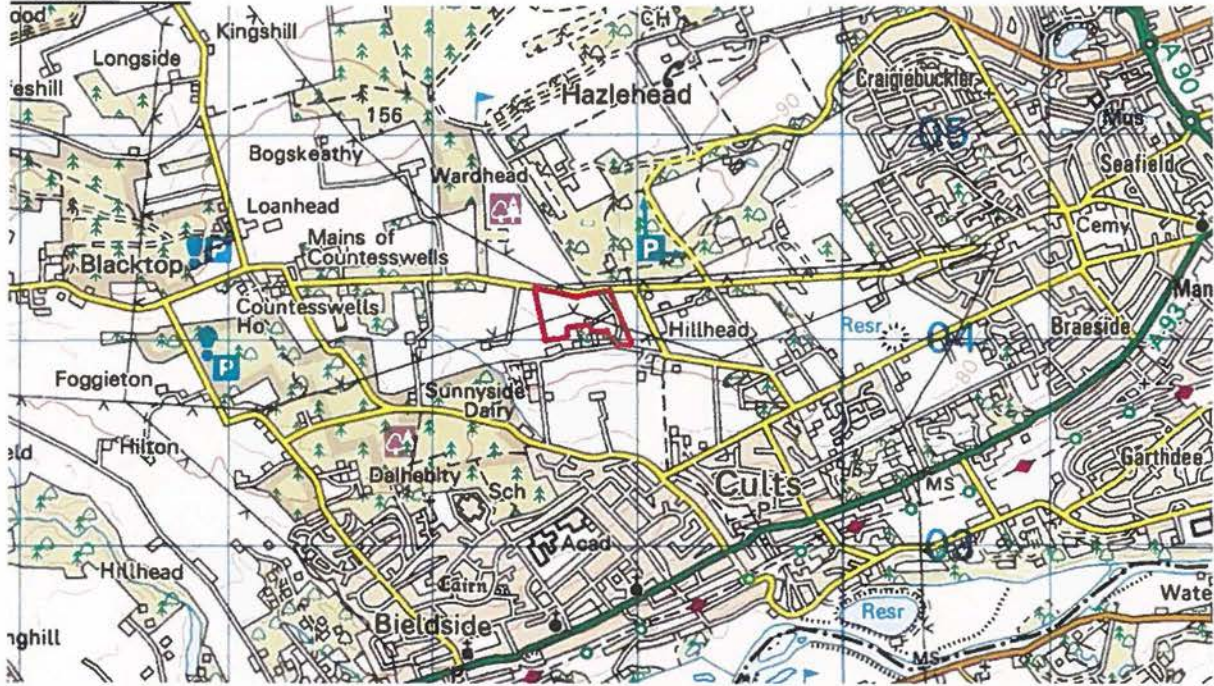
Set out below are Barratt North Scotland's outstanding issues and objections to the Proposed Aberdeen Local Development Plan 2015 and specifically objection to the non-inclusion of land at Thornhill, Craigton as a Greenfield Housing allocation and associated amendment to the Green Belt boundary.

Proposed Housing Site

The site is located to the south of Countesswells Road and to the west of Thornhill. Representations in support of housing were submitted by Halliday Fraser Munro on Behalf of Barratt North Scotland in March 2014.

The site itself extends to approximately 15 acres (7.8 hectares) and is non-prime (Grade 3.2) agricultural land incorporating fields bound by stone walls and sparse woodland. The northern boundary is made by Countesswells Road, while Thornhill Road and woodland create the eastern boundary. Existing properties and woodland belt form the southern boundary and sparse woodland creates the western boundary.

Location Plan



Proposed Development Framework

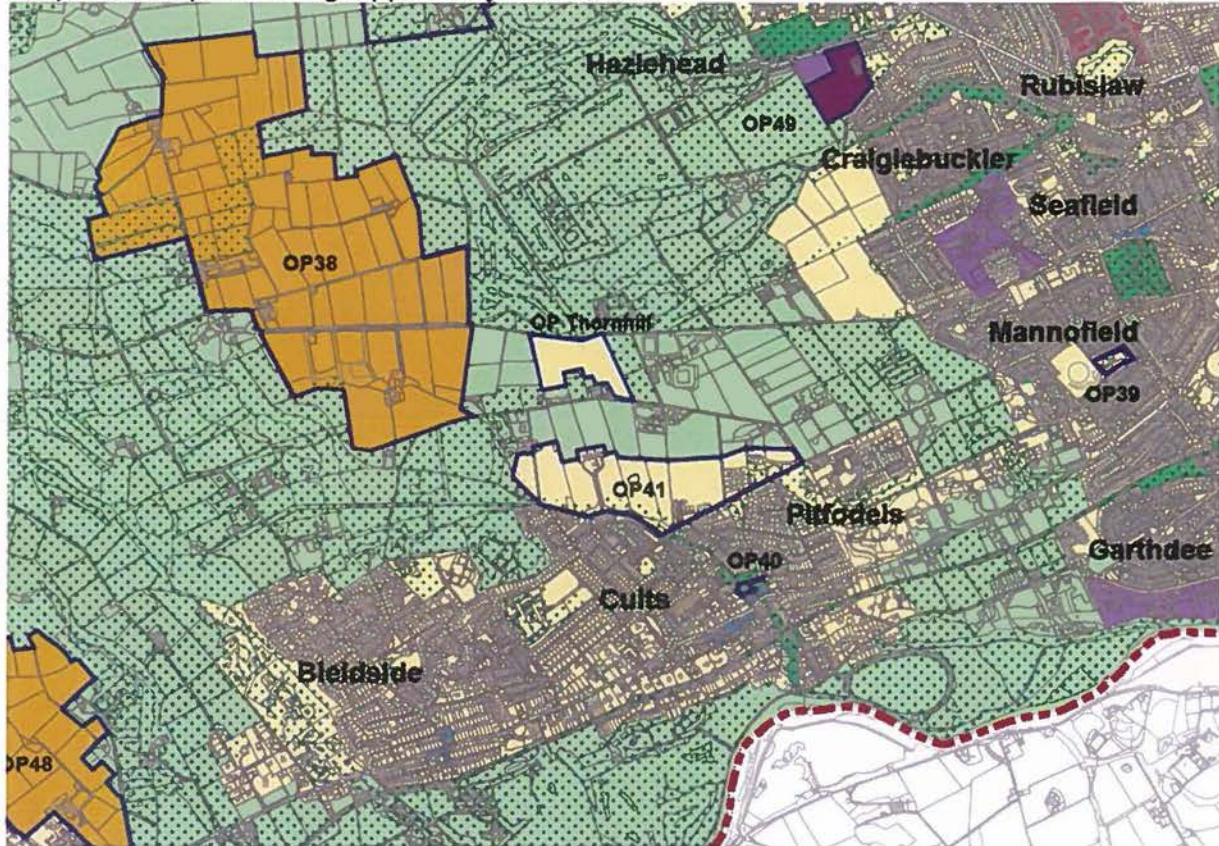


The housing proposal would provide for circa 150 homes, creating a suitable density to accord with proposed greenfield housing releases and would provide a range of market housing including 25 % affordable provision. The requirement for additional deliverable small to medium scale housing sites is addressed further within this representation

Green Belt

The Proposals Map shows the defined Greenbelt around Aberdeen City. Barratt North Scotland object to the current Green Belt boundary at Thornhill. The proposed development site to the south of Countesswells Road should be removed from the Greenbelt and instead included as a housing opportunity site, Policy LR1. The resultant change to the Proposals Map is indicatively shown below.

Proposals Map - Housing Opportunity: Thornhill



Scottish Planning Policy (June 2014) Paragraph 51 states:

“The spatial form of the green belt should be appropriate to the location. It may encircle a settlement or take the shape of a buffer, corridor, strip or wedge. Local development plans should establish the detailed boundary of any greenbelt, giving consideration to...establishing clearly identifiable visual boundary markers based on landscape features such as rivers, tree belts, railways or main roads.”

The site is well defined by clearly identifiable visual and robust boundaries, Countesswells Road to the north and tree belts to the east and south. Further woodland planting to the northern and western boundaries can ensure that the

development fits into the surrounding landscape character and would not be visible from main approaches or from the countryside to the west.

The site is medium in scale (7.8 ha) and its release from the greenbelt for housing would not undermine the spatial strategy of the City-region. Instead it would support it by releasing an effective housing site that could augment the housing land supply that is over reliant on a few very large housing releases.

Development on this site will not create an unacceptable impact on the surrounding landscape. Effective design and technical solutions will ensure the development fits within the site and surrounding context.

Site Delivery Programme

The site is deemed to be immediately effective and following grant of planning permission could be completed within 4 years, thereby providing 150 units within Phase 1 of the LDP period.

Effectiveness Assessment

Ownership	The site is controlled and promoted by Barratt North Scotland who are committed to the delivery of the proposed development and the owner is willing to release it for development at the earliest opportunity.	Effective
Physical	The site is expected to be free from constraints as it is greenfield and relatively level. There are no technical impediments to the proposed residential development allowing completion within the proposed site delivery programme above. Allowances have been made in the development framework for the electricity infrastructure present on the site.	Effective
Contamination	The site is greenfield and no contamination is expected allowing development for marketable housing.	Effective
Deficit Funding	The development shall be privately funded. Whilst delivery of the 25% affordable housing may require public subsidy via Registered Social Landlord housing delivery, Barratt North Scotland are also able to provide non-subsidised discounted sale units as part of this contribution to maximise deliverability.	Effective
Marketability	Thornhill is a marketable area and the full development can be expected to be delivered within the proposed site delivery programme above.	Effective
Infrastructure	The site is not expected to be affected by any infrastructure constraints. Any upgrades required as a direct consequence of the development can be funded by the developer.	Effective
Land Use	The proposed residential land use is compatible with surrounding uses (residential / agricultural).	Effective

SPP Principles: Sustainable Development Assessment

<p>Giving due weight to net economic benefit</p>	<p>The proposed development would create the following headline economic benefits:</p> <ul style="list-style-type: none"> • c. £18m of construction investment • Create 54 direct construction jobs per annum • Support 81 indirect and induced jobs per annum • Over £28.5m of gross value added over construction period • £2.75m per annum disposable income generated for the local economy • Additional Council tax receipts from 150 new homes
<p>Responding to economic issues, challenges and opportunities, as outlined in local economic strategies</p>	<p>The construction of new homes will create both employment opportunities and increased investment to the local economy as outlined above. Barratt North Scotland employs local contractors and tradesmen to construct new homes.</p>
<p>Supporting good design and the six qualities of successful places</p>	<p>The proposed development of the site would support the 6 qualities of successful places and Barratt North Scotland would work in partnership with the local authority to deliver this.</p>
<p>Making efficient use of existing capacities of land, buildings and infrastructure including supporting town centre and regeneration priorities</p>	<p>The proposed development would make use of an efficient design to ensure the best use of a greenfield site in an accessible location. No buildings exist on the site. The proposed development would support necessary infrastructure upgrades required as a direct consequence of the development.</p>
<p>Supporting delivery of accessible housing</p>	<p>For walking and cycling Core Paths 87 and 63 run to the south of the site. Path 63 connects to the Cults District Centre and the Deeside Line. On road cycle lanes are present on the North Deeside Road and the Deeside Line is a shared path. The site sits adjacent a proposed main public transport bus corridor and road access to Aberdeen City.</p>
<p>Supporting delivery of infrastructure, for example transport, education, energy, digital and water</p>	<p>The development will provide much needed new build housing to help meet the housing allocation for Aberdeen City in Phase 1 of the plan period. The early phasing of the development could help the sustainability of public transport proposals for the Countesswells (OP38) development.</p>
<p>Supporting climate change mitigation and adaptation including taking account of flood risk</p>	<p>The proposed development will be built to meet building standards that ensure a lowered carbon footprint. The site is not at risk of flooding from rivers.</p>
<p>Improving health and well-being by offering opportunities for social interaction and physical</p>	<p>There are no known contamination issues associated with the site that could impact on human health. The site will link with Core Paths 87 and 63 that run to the south of the site.</p>

activity, including sport and recreation	
Having regard to the principles for sustainable land use set out in the Land Use Strategy	The development of the site would present an efficient use of land for residential dwellings at an appropriate density. Development of the site would not impact on prime agricultural land.
Protecting, enhancing and promoting access to cultural heritage, including the historic environment	The proposed development would not impact upon cultural heritage features including the historic environment. The Council's MIR options assessment of the site (B0924) states: "Stone boundary walls surround the site. No other known built or cultural elements."
Protecting, enhancing and promoting access to natural heritage, including green infrastructure, landscape and the wider environment	The proposed development would enhance the natural heritage of the site through tree planting to the northern and western boundaries. The site is well placed to take advantage of existing core paths with links to the countryside. The Council's MIR options assessment of the site (B0924) states: "The site lies within the River Dee Catchment Area and contains two priority habitats, covering roughly one third of the site. A tree protection order (Number 101) covers trees immediately adjacent to the southern end of the site. The Den Wood Local Nature Conservation Site is adjacent to this site at the north-eastern corner boundary. Bats have been recorded in the area (Chiroptera Pipistrelle, Common Pipistrelle and Pipistrellus pipistrellus). Wych Elm and Common Bullfinch are also within the vicinity of this site, both of which are designated species. Ecology studies will ensure that any mitigation strategies required to protect and enhance the natural heritage within and surrounding the site will be undertaken during construction and accommodated with the planning application. The introduction of private gardens and public open space will result in a more diverse habitat than the existing agricultural use.
Reducing waste, facilitating its management and promoting resource recovery	Barratt North Scotland complies with all necessary standards for reducing waste during construction and promotes the use of recycling whenever possible.
Avoiding over-development, protecting the amenity of new and existing development and considering the implications of development for water, air and soil quality	The development proposal creates an efficient use of land while avoiding over development to protect the amenity of existing residential properties in the vicinity of the site. A sustainable urban drainage system will ensure no impact on water quality. Any open space and garden ground within the site will comply with necessary human health standards for soil quality.

The Spatial Strategy

Paragraph 119 of Scottish Planning Policy (SPP 2014) states that:

“Local development plans in city regions should allocate a range of sites which are effective or expected to become effective in the plan period...In allocating sites, planning authorities should be confident that land can be brought forward for development within the plan period and that the range of sites allocated will enable the housing supply target to be met”.

It is accepted that allocations in the form of Masterplan Zones will be required to help meet the overall housing land allowance for the Local Development Plan (LDP) period and beyond, however most of these have experienced significant delays in implementation for a variety of reasons, including land ownership, masterplan development, complex S. 75 negotiations and problems with infrastructure. Therefore, uncertainty remains over the delivery of units and programme slippage from Phase 1 to Phase 2 is expected and should be accounted for. To ensure that a 5 year effective land supply can be maintained at all times throughout the LDP period, the spatial strategy should allocate further small to medium sized development sites of c.20-150 units. These small to medium sized sites should be effective and can be delivered more quickly in comparison to the Masterplan Zones. Such sites would supplement the effective land supply when lower than programmed completions from larger sites occur, thus ensuring that a 5 years effective land supply can be maintained at all times.

Policy LR1

The Aberdeen City LDP should provide for a minimum of 5 years effective land supply at all times and reference to this commitment should be made within policy LR1. The Policy should contain the following wording:

‘The council will monitor and update the effective housing land supply figures annually via the Housing Land Audit process to make sure that a minimum five year supply is maintained at all times. If the Housing Land Audit process identifies a shortfall in the effective land supply, the Council will consider supporting sustainable development proposals that are effective. In doing so, account will be taken of other local development plan policies and any adverse impacts that would significantly and demonstrably outweigh the benefits of the proposal.’

Furthermore, to ensure that unintended constraints to windfall sites are not created, the words *“Development on an allocated site or in close proximity to an allocation that jeopardises the full provision of the allocation will be refused”* for both Parts A and B should be deleted.

Instead, the following wording should be added: *'sites in close proximity to allocations should be considered by the Council if there is a shortfall in the 5 year land supply and any additional infrastructure required as a result of the development is either committed or to be funded by the developer.'*

Directions for Growth

Barratt North Scotland object to Table 6: Development at Countesswells. The site to which the representation relates, Thornhill should be added as a greenfield development opportunity site for housing, comprising 150 no. homes in Phase 1. As such we object to Appendix 2 - Opportunity Sites, which should add Thornhill, Criagton – 7.8ha of land - Land Release Policy - Opportunity for development of 150 homes.

The Directions for Growth are over-reliant on large sites within Masterplan Zones, which is likely to cause failure on the ability to maintain a 5 years effective land supply at all times. For example, 5 Greenfield sites (OP9, 21, 22, 38, 59) are relied upon to provide 73% of the Greenfield housing allowance to 2035. This is a very high dependency on a very small number of sites and locations. The consequence of such dependency is a limited range of sites that is not in keeping with the intentions of SPP. The only way to deliver the housing requirements in the short to medium term is to allocate additional housing land; particularly allocating more small to medium (20-150 unit) sites that are both sustainable and effective. In comparison to the large masterplanned sites, these small to medium sites can be delivered much quicker and more efficiently, without the requirement for an agreed masterplan prior to the submission of an application. The over-reliance on large sites to deliver housing could have damaging effects on the Aberdeen economy. Families will not be able to find new homes and businesses will not be able to attract the staff they require. Aberdeen has a strong economic policy to retain and attract new businesses, however a housing supply problem will negate this.

Policy H5 Affordable Housing

The wording *"Housing developments of five units or more are required to contribute no less than 25% of the total number of units as affordable housing"* does not comply with the intentions of SPP paragraph 129 which states "The level of affordable housing required as a contribution within a market site should generally be no more than 25% of the total number of houses". Policy H5 should be re-written as follows: *'For market housing developments of five units or more, no more than 25% of the total number of units should be for affordable housing.'*

Yours faithfully

For Barratt North Scotland



Christopher Ross
Senior Land Manager

