

## 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"/> | Steve Crawford |
| <b>Organisation</b>               | Halliday Fraser Munro   |                |
| <b>On behalf of (if relevant)</b> | Mr W Donald   |                |
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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"/><br>Proposed Supplementary Guidance <input type="checkbox"/><br>Proposed Action Programme <input type="checkbox"/><br>Strategic Environmental Assessment Environmental Report <input type="checkbox"/>   |                                 |   |                       |                |   |  |
| <b>Policy/Site/Issue</b>                              | <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 60%;">Policy NE1: Green Space Network</td> <td style="width: 40%;"><b>Paragraph(s)</b> 3.95—3.98 / page 52</td> </tr> <tr> <td>Policy NE2: Greenbelt</td> <td>3.99 / page 53</td> </tr> <tr> <td><b>Site Specific Response (Additional Allocation)</b></td> <td></td> </tr> </table> | Policy NE1: Green Space Network | <b>Paragraph(s)</b> 3.95—3.98 / page 52 | Policy NE2: Greenbelt | 3.99 / page 53 | <b>Site Specific Response (Additional Allocation)</b> |  |
| Policy NE1: Green Space Network                       | <b>Paragraph(s)</b> 3.95—3.98 / page 52   |                                 |   |                       |                |   |  |
| Policy NE2: Greenbelt                                 | 3.99 / page 53  |                                 |   |                       |                |   |  |
| <b>Site Specific Response (Additional Allocation)</b> |   |                                 |   |                       |                |   |  |

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

Please see attached document for detailed response

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

Please see attached document for detailed response

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.

HALLIDAY FRASER MUNRO  
PLANNING

P1543.001/SC

01 June 2015

Local Development Plan Team  
Planning & Infrastructure  
Aberdeen City Council  
Business Hub 4, Ground Floor  
Marischal College  
Broad Street  
ABERDEEN  
AB10 1AB

**For the attention of the Local Development Plan Team**

Dear Sir/Madam,

**ABERDEEN PROPOSED LOCAL DEVELOPMENT PLAN 2016  
SUBMISSION OF PLDP REPRESENTATION –  
POLICY NE1: GREEN SPACE NETWORK & POLICY NE2: GREENBELT,  
DELIVERY OF HOUSING SITES  
SITE SPECIFIC RESPONSE: BINGHILL FARM (ADDITIONAL ALLOCATION)  
ON BEHALF OF MR W DONALD**

I write with reference to the above consultation on the Proposed Aberdeen Local Development Plan (PLDP).

Our response to the PLDP further highlights previous representation made on behalf of Mr W Donald at the Development Bid and Main Issues Report stages of the forthcoming 2016 Aberdeen Local Development Plan for land at Binghill Farm, Milltimber. I direct you to our Main Issues Report (MIR) response appended to this letter.

This representation is structured to provide an overview into the history of representation to date, and will discuss each of the above aspects of the PLDP in turn, concluding with our recommendation.

**OVERVIEW: REPRESENTATION TO DATE**

During the Bid process for the forthcoming LDP for Aberdeen, a submission was made on behalf of Mr W Donald, landowner of Binghill Farm.

It has been our view that this site would act as a logical extension to the Oldfold housing site (LDP Site OP62/ PLDP Site OP48). In response to the decision to not include Binghill Farm we again provide two reasons for supporting a change in the zoning of the land here and favouring inclusion of Binghill Farm for development, as per our MIR response in 2014.

The first reason relates to the principle of development relating to Oldfold, with regards to the proposed Greenbelt (Policy NE2) and Green Space Network (Policy NE1) policies. The second is a more general discussion based upon the housing completion rates in Aberdeen approaching the end of the current (2012) LDP.

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Binghill Farm scored 46 out of 100 on the 2016 LDP Development Assessment Sustainability Checklist (2013), with Oldfold (Knight Frank) and Oldfold (CALA Homes) scoring 48 each in the 2012 LDP Checklist. Although the Reporter in the last LDP Inquiry discussed concerns over **sustainable travel** and the principle of **development in the Greenbelt/ Green Space Network**, Oldfold was still allocated. The same principles apply to Binghill.



## **Transport**

As reiterated in the MIR Response, transport alone does not provide an excuse for not zoning this land. Indeed, all that is set out in the submitted Transport Assessment for the Oldfold Site would equally apply to Binghill Farm. As a result, we see no real transport-related issues that would prejudice the allocation at Binghill.

## **Green Space Network**

*'The green space network is intended to provide opportunities to connect inner urban areas with their surrounding rural environments...'*

The land at Binghill Farm is presently zoned as Greenbelt and Green Space Network, as is intended for the PLDP.

The principle of development, however, is established in this area of Greenbelt/ Green Space Network with the allocation of a major housing site adjacent to Binghill Farm since 2010 (550 units).

Another major housing development in the nearby Greenbelt area is Countesswells. Small and medium scale sites are present throughout the Deeside corridor in the Greenbelt, both new allocations and existing.

It is evident in the indicative zoning plan of development for the Binghill site (Appendix 2) that a relatively small portion of the site will be developed for housing, for 45 to 65 lower-density homes, with a large area of open space to the north. The medium to low-density nature proposed would not be overbearing to the character of the landscape. The proposed area to be developed does not extend north beyond the Oldfold allocation.

Existing path access from the Milltimber settlement to the northern Green Space Network would be maintained and enhanced through sensitive design.

## **LAND ZONING 'POLICY NE1: GREENSPACE NETWORK'**

Three aspects of Policy NE1 will be discussed in relation to Binghill;

1) *"Aberdeen's Green Space Network is a strategic network that connects natural green spaces and habitats to each other and the communities around them"* (PLDP Para 3.95)

Whilst we support the overall Green Space Network policy objective, we believe that Milltimber is not an inner urban area, but a suburb, and building on the edge of this settlement while retaining existing links to the Network is not applicable to this policy's position.

In relation to the site at Binghill Farm, little value would be retained through preventing development in favour of the Green Space Network. There is an existing path linking the Milltimber settlement to land to the north, which is

retained in Oldfold development proposals, and would be retained – potentially enhanced – in Binghill development proposals. The links to the wider Green Space Network would not be impacted.

2) *“Aberdeen’s Green Space Network is made up of multiple components and is mainly comprised of:*

- *Formally designated natural heritage sites;*
- *A diversity of habitats and their connectivity;*
- *Water bodies of all types including lochs, ponds, wetlands and watercourses;*
- *Woodland, hedgerows and individual trees, especially veteran trees;*
- *Open Spaces defined in Aberdeen’s Open Space Audit 2010;*
- *Spaces for physical activity and access to the outdoors; and*
- *Paths and links for pedestrians and cycling.”*

(PLDP Para 3.97)

Development of Binghill Farm would not compromise the above key characteristics of the Green Space Network. A small portion of the proposed site would be developed, retaining a large area of land for Open Space, paths and access, and landscape feature retention.

3) *“Proposals for development that are likely to destroy or erode the character and/or function of the Green Space Network will not be permitted”* (PLDP Policy NE1)

We do not agree that proposals for 45-65 units of low-density housing as an extension to an existing housing site would destroy the function of the Green Space Network. As mentioned, we intend to enhance links to the Green Space Network and retain a large area of Open Space on the site (Appendix 2).

## **LAND ZONING ‘POLICY NE2: GREENBELT’**

Three aspects of Policy NE2 merit discussion in relation to our supported site.

1) *“The aim of the Green Belt is to maintain the distinct identity of Aberdeen and the communities within and around the city, by defining their physical boundaries clearly.”* (PLDP Para 3.99)

We agree with the principles of the Aberdeen Green Belt policy and respect the intent through the design approach we would advocate and employ. A constraint of Binghill Farm is the current Green Belt and Green Space Network zoning. Its integration with the existing settlement of Milltimber would support a clear, defined physical boundary to the settlement. We are not in agreement that the boundaries at present are as sustainable and defensible as they could be.

2) *“Safeguarding the Green Belt helps to avoid coalescence of settlements and sprawling development on the edge of the city, maintaining Aberdeen’s landscape setting and providing access to open space.”* (PLDP Para 3.99)

We are of the view that the site is a logical extension to Milltimber and the expected Oldfold development. The site has strong boundaries to the east, south and west allowing for a clear, defined boundary. This, in turn with the scale of the proposed development would not contribute to undesirable coalescence or sprawl.



3) *“The Green Belt directs planned growth to the most appropriate locations and supports regeneration.” (Para 3.99)*

For the reasons listed throughout our representation narrative, we believe that this is an appropriate location for planned development in Milltimber. Thus we contend the reasons for rejecting Binghill are not in any way robust.

In terms of Green Belt, we suggest including Binghill will provide a strong, settled edge to the developed area, which is not offered by Oldfold.

As per the Aberdeen Green Belt Review; ***“Green belt designation should be used to direct development to suitable locations, not to prevent development from happening”*** (pg 1, 2010).



### DELIVERY OF HOUSING SITES

The allocation of this site at Milltimber would aid the realistic delivery of housing in the Deeside corridor, where development has again been earmarked as ‘limited’ in the forthcoming 2016 LDP, as it was in the 2012 LDP (Directions for Growth: Deeside).

New allocations are scarce in the Deeside corridor (Table 1), and data sourced from the Draft Housing Land Audit 2015 shows that a low number of completions (12%) have taken place over the course of the current LDP, resulting in a number of sites being carried forward into the forthcoming 2016 Plan (Table 2). We believe that the allocation of small and medium scale sites is the key to the reaching housing delivery targets.

**Table 1: NEW ALLOCATIONS IN DEESIDE**

| PLDP Site Ref, Name | Allocated Units | Expected / Further Completions |
|---------------------|-----------------|--------------------------------|
| OP108, Mid Anguston | 6               | Phase 1 LDP                    |
| OP109 Woodend       | 19              | Phase 1 LDP                    |
| <b>TOTAL</b>        | <b>25</b>       |                                |

**Table 2: HOUSING COMPLETIONS IN DEESIDE**

| 2016 LDP Site Ref, Name | Allocated Units | Units Delivered (2015) | Expected / Further Completions |
|-------------------------|-----------------|------------------------|--------------------------------|
| OP45 Peterculter East   | 31              | 0                      | 2015 (15 units)                |
| OP 46 Culter House Road | 5               | 3                      | 2016 (2 units)                 |
| OP47 Edgehill House     | 5               | 0                      | 2015 (5 units)                 |
| OP48 Oldfold            | 550             | 0                      | 2016 (20 units)                |
| Craigton Road           | 20              | Completed              | -                              |
| North Garthdee Farm     | 60              | Completed              | -                              |
| OP51 Peterculter Burn   | 19              | 0                      | Post 2023 (19 units)           |
| <b>TOTALS</b>           | <b>690</b>      | <b>83</b>              |                                |



## CONCLUSION

We strongly support the views and evidence supplied in previous representations throughout the preparation of the forthcoming 2016 LDP.

Our response to the Proposed Aberdeen Local Development Plan, published in March 2015, is directed at the Green Belt and Green Space Network and Housing Delivery in relation to our preferred development option, Binghill Farm.

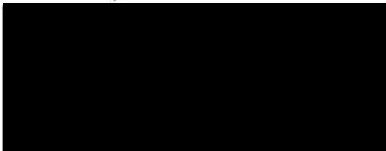
Despite the suggestion in the Main Issues Report Housing Land Strategy (2013) not to allocate any further Greenfield land, the newly allocated sites for Deeside are two sites outside of a built-up area within the Green Belt (OP109/109), including the majority of the existing sites carried forward.

There are no serious technical constraints to the development of this site.

The failure of the delivery of a large number of the allocated units of the current LDP and its impacts on the property market is further justification for more deliverable small and medium scale sites to be allocated in the forthcoming LDP.

It is, therefore, our contention that the land at Binghill Farm should be zoned for residential development, instead of Green Belt, to allow a suitable, sustainable site to be delivered in the forthcoming LDP period as a logical extension to an existing residential allocation at Oldfold.

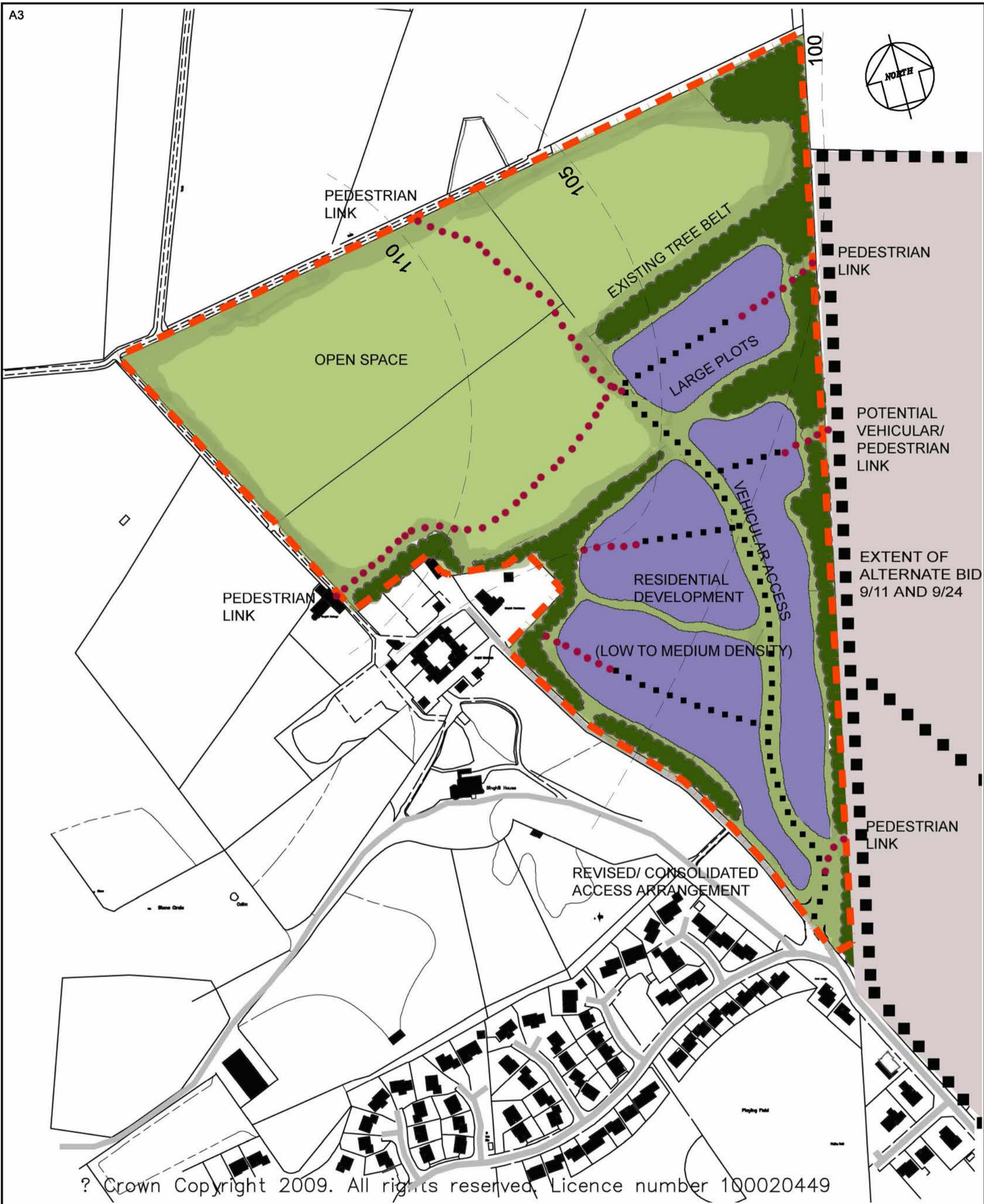
Yours faithfully,



**Steve Crawford**  
**Regional Director of Planning**  
**For Halliday Fraser Munro**

Encs: Appendix 1 – MIR Representation, March 2014  
Appendix 2 – HFM Zoning Plan, Dec 09





Project: **Indicative Development Framework  
Binghill Farm, Milltimber**

Title: **Zoning plan**

Scale: **1:2500@a3** Date: **dec 09** Drawn: **hm**

Drawing No:  
**sk01**

Rev:

Comp. Ref.

| REVISIONS |  |
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P1543/br

24 March 2014

Andrew Brownrigg  
Team Leader City Development Plan  
Planning & Infrastructure  
Aberdeen City Council  
Marischal College  
Broad Street  
ABERDEEN

Dear Mr Brownrigg,

**ABERDEEN LOCAL DEVELOPMENT PLAN 2016  
SUBMISSION OF MIR REPRESENTATION – BINGHILL FARM**

During the MIR Bid process for the forthcoming LDP for Aberdeen, a submission was made (see attached) on behalf of Mr W Donald who owns Binghill Farm. Along with all of the other housing land submissions to the LDP MIR Bid stage, the extension of the Oldfold Farm site to logically include Binghill Farm has been rejected at this stage. In response to that decision – there are two reasons for supporting a change in that decision and favouring inclusion of Binghill Farm. The first reason relates to the logic of the sites inclusion in relation to Oldfold Farm. The second is a more generic reason based upon the performance of the housing market in Aberdeen at this point 2 years into the LDP cycle.

**1. Logical addition to Oldfold.**

Binghill Farm is a logical extension to the allocation at Oldfold Farm. That proposition had previously been rejected by the Reporter during the 2012 LDP examination. The grounds for that rejection were largely based on the distance from bus routes, landscape and capacity at Cults Academy – all matters which have progressed or moved on since the LDP was adopted in 2012.

The neighbouring site at Oldfold Farm was accepted and a scheme for 550 houses [ref [130378](#) ] has now been submitted for planning permission by CALA Homes. It is most significant that the application made on behalf of CALA has extended the Oldfold development proposals much further up the hill than was proposed in the original bid submitted on behalf of Mr Donald.

Indeed all of the supposed faults that were aimed at Binghill Farm – could equally have applied to Oldfold itself. We see that by the application of common sense planning and sensible urban design - answers in terms of transport, landscape and schooling have all been arrived at for a scheme which is a very substantial addition to Bieldside.

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In resubmitting this bid as a formal representation for inclusion in the final draft plan – it is suggested that the original dismissal of this proposition was short sighted and in many respects simply unfair. Moreover, the rationale for rejecting the original bid no longer applies now that Oldfold Farm has been included in the plan. It would be a simple matter for the planning authority to ensure that connectivity between the two sites is “planned-for”. Previous examples of two adjacent sites ignoring each other (in Cove) are repeatedly cited by the planning authority as examples of bad planning and bad design. Permeable connection between the two sites allows for sensible ‘rounding-off’ to take place at this locus. It seems an easy-to-achieve increment in the number of home available were sites like Oldfold Farm designed in such a way that they were permeable and allowed connectivity. The Binghill site has its own access and can be served from Binghill Road itself.



In terms of Landscape – the site would not be viewed as undeveloped land in the future because the CALA scheme would have been built. The open fields at Binghill would in fact become difficult to separate from the Oldfold Scheme, which included housing extending considerably further up the hill.

In terms of Transport – the centre of this site is 1.2km from North Deeside Rd. Pan 75 “Planning and Transport” sets up a maximum threshold for walking of 1600m – a distance which goes considerably beyond Binghill farm. Moreover, the additional routes, paths and cycleways within the Oldfold Masterplan will enhance the accessibility of this site. Transport does not provide a reason for not zoning this land. Indeed, all that is set out in the submitted Transport Assessment for the Oldfold Site, would equally apply to Binghill Farm.

In terms of schooling – it is recognised that significant and potentially strategic decisions need to be made about secondary education in the West of the City. However, the difference between the addition of 550 houses and 650 houses at this locus would be in the range of 20 secondary and 40 additional primary children. A figure, we would suggest is capable of being rationally dealt with and not, we would contend, a reason which would be credible as a reason for refusal. Moreover, we note that a Primary School is proposed as part of the Oldfold scheme. Indeed the site suggested is immediately adjacent to Binghill Farm site. It is suggested that the additional 100 homes would help with the justification and funding – and not hinder or compromise it in any way, shape or form.

## **2. The Housing Land Arguments**

Appended to this representation is an annexe setting out the current difficulties Aberdeen is facing in relation to Housing Land. House completions in particular are running at about 50% of the level that is required to deliver the target numbers set out in the SDP.

Set against this overall poor performance is a view expressed in the MIR that sufficient land has been zoned for housing. The problem with that stance is that nearly 60% of that housing allocation is in just four very large sites – none of which is remotely ‘shovel ready’. In such context a response which suggests these sites should be protected both misunderstands the housing market and simply stores up the problems of undersupply, land costs and unaffordability into the future rather than resolving them. The most obvious means by which this could be done is simply to increase the number of sites that have been zoned.



Moreover there is a clear underlying rationale for why Aberdeen needs more houses. The recent PwC Good Growth Report....

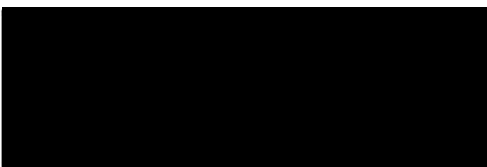
[ <http://www.pwc.co.uk/government-public-sector/good-growth/good-growth-for-cities-report.jhtml> ]

....shows that Aberdeen will have to attract 120,000 recruits over the next 10 years if it wants to realise its potential as a global energy capital. The present sites zoned in the local plan are a start, but cannot realise the level of delivery growth which is required. Economic Development analysts recognise that one of the biggest constraints on growth in the North East Economy will be the lack of availability of homes.

We suggest that a zoning which recognises the potential extension from Oldfold Farm would be sensible medium term planning – and would secure additional housing land which could provide circa 100 additional homes. It is also of note that this is an area of high market demand. Zoning this land would be going with the market rather than against it. It is highly likely that development can be delivered.

We look forward to engaging further with the Planning Authority and would welcome the opportunity to discuss how this site could be taken forward.

Yours faithfully



**Steve Crawford**  
**Regional Director of Planning**

Attachment: Annexe: Housing Land in Aberdeen