

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"/> Steve Crawford
Organisation	Halliday Fraser Munro
On behalf of (if relevant)	Drum Property Group
Address	Carden Church, 6 Carden Place, Aberdeen
Postcode	AB10 1UR
Telephone	[REDACTED]
E-mail	[REDACTED]

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	Causewayend, Bridge of Don (bid site B0210)	Paragraph(s)	

What would you like to say about the issue?

see attached report

What change would you like to see made?

See attached report

Please return the completed form by:

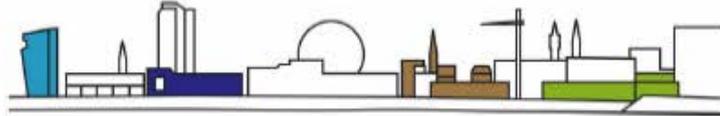
- post to the Local Development Plan Team, Aberdeen City Council, Business Hub 4, Ground Floor North, Marischal College, Broad Street, Aberdeen AB10 1AB; or
- email to ldp@aberdeencity.gov.uk

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.



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	Proposed Supplementary Guidance <input type="checkbox"/>
	Proposed Action Programme <input type="checkbox"/>
	Strategic Environmental Assessment Environmental Report <input type="checkbox"/>
Policy/Site/Issue	Housing Land Delivery (General) Paragraph(s)

What would you like to say about the issue?

see attached report

What change would you like to see made?

See attached report

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Causewayend, Local Development Plan Bid Ref: 0210

For Drum Property Group

ISSUE 1 – CAUSEWAYEND BID REF B0210

This site has been promoted as a development site for housing in the current Local Development Plan Review. At the MIR stage Aberdeen City Council did not support the inclusion of this site as the Planning Authority felt that they had allocated enough housing sites to meet requirements as set out in the Strategic Development Plan.

We do not believe that is the case. We also believe that many of the reasons suggested as negative in respect of this site are incorrect and that this site makes a sensible extension of Bridge of Don. Our reasoning is explained below:

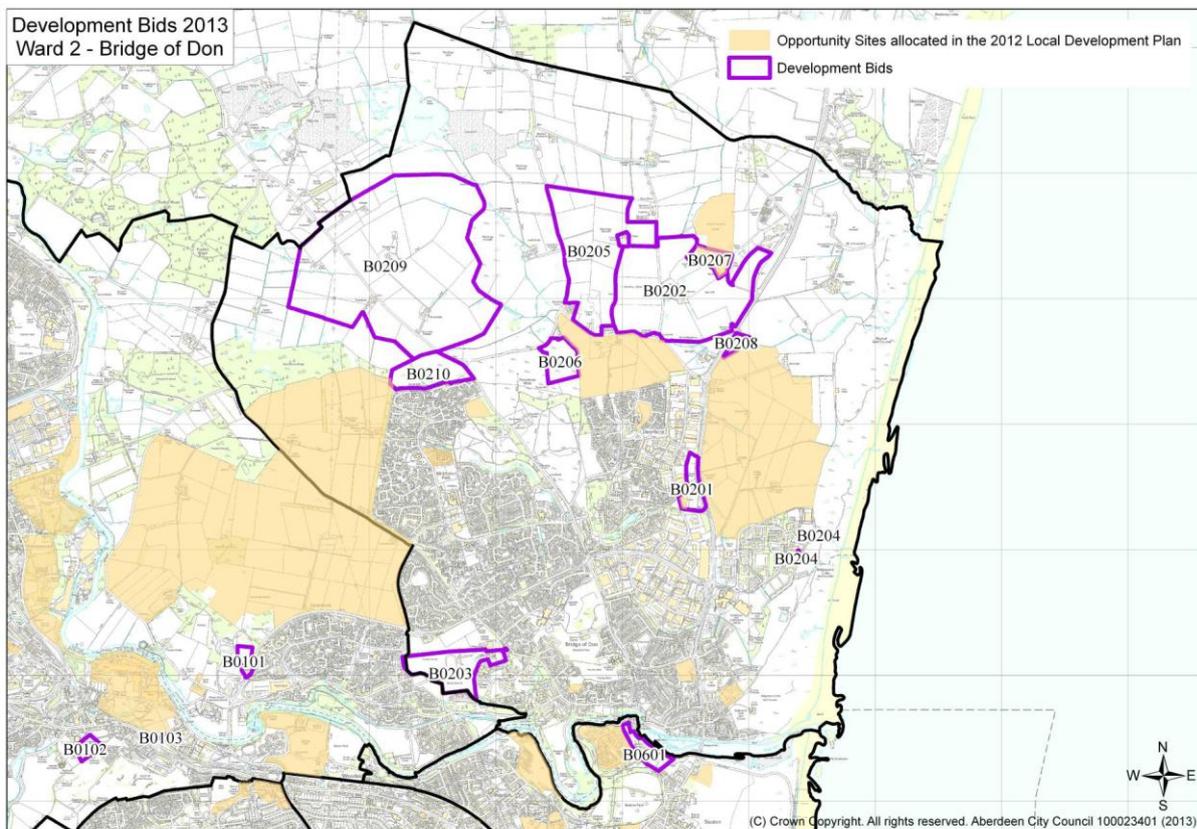


Figure 1 – Extract from Development Options Study, Aberdeen City Council 2013

The Site

Causewayend is located immediately adjacent to the northern section of Bridge of Don’s urban area. It comprises two large fields with partially wooded boundaries and covers approximately 34 acres of unused agricultural land. Its southern boundary is essentially the housing along Woodcroft Avenue to the north of Middleton Park. An aerial photograph is included below for reference.



Figure 2 – Aerial Photo ((copyright) Getmapping plc 2015)

The ground is broadly flat and has no physical constraints to development. Historically the site has been affected (blighted) by proposals for previous iterations of the AWPR that ran through these fields. The neighbouring residential community was developed in the 1980s and includes two way-leave/access gaps along the northern boundary of the housing development (southern boundary of Causewayend). These wayleaves create clear linkages to the existing development and facilities to the south and there are service tails built in to enable easy extension.

The site is not zoned in the Local Development Plan for development. It has, however, been the subject of development bids. It's presently zoned as Green Space Network (GSN) and Green Belt (GB) but many of the sites now zoned in the LDP for housing development, including Grandhome to the South were previously zoned in a similar fashion. Aberdeen has a tight Green Belt boundary and little brownfield opportunities. Any development around the City will require rezoning to fit the new proposed use. The key question in areas such as Causewayend is whether the current zoning is appropriate and whether the qualities of the site are sensitive enough to merit retaining it in that zoning. We don't believe that this site is particularly sensitive and it is more appropriate as a development site for new housing. In respect of GSN in particular the zonings seem to have little rationale and cover a range of sites, including sites such as this, which are simply unused agricultural fields.

The limited natural elements within these fields, rather than being constraints, are exactly the type of elements that add character and amenity to housing developments as they could easily be incorporated into the design of the new development. The Council's GB review does not rule out development on this site.

Issues Raised at MIR Stage

Quite often during extensive consultation processes the facts of the case for development are lost amongst generalities. Those of us who are supporting the inclusion of sites spend more time and effort in researching issues, considering the facts and looking far more closely at the proposed site than the Planning Authority do. This is not unusual or unexpected as the Planning Authority is considering a great many sites during these processes and time can be tight. However, this approach sometimes leads to a generic answer missing the point or indeed simply getting it wrong. In this instance there are elements of the MIR site review of Causewayend carried out by the Planning Authority that are erroneous and others that overstate the issue – failing to recognise the opportunity and suitability of the site for development. These elements are outlined below:

Landscape Impact – this is subjective. Regardless of where a site is situated it will be seen within the landscape and the context within which it's seen, from where and the impact that has on the landscape setting as a whole are the important factors. In this instance the site sits immediately adjacent to the existing settlement. In fact, for approximately 1/3 of its southern boundary there are no significant landscape features between this site and the neighbouring houses. These houses are clearly visible from the B997 from both north and south of the site. In fact these houses also hide the majority of the site from view from the south as they are located immediately adjacent to the B997. From the north these same houses can be seen against the backdrop of the wider housing development. Additional housing at this location would benefit from the same setting i.e. a backdrop of the existing housing development. This does not pose a significant landscape setting issue and with the benefit of sensitive design will provide a more suitable transition to the countryside than at present.

The northern boundary of the site is also delineated by an original dry stone dyke creating a clear differential between it and the larger agricultural fields beyond. Again, this is an established traditional landscape feature that defines the site. It could also be strengthened if required by appropriate landscape design and strategic landscape features. These types of traditional features on the site will be integrated into proposed designs and layouts.

As the B997 passes the site most of the boundary consists of mature trees and dry stone dyke. These, together with the B997 itself, create a strong eastern boundary to the site, stronger than any features on the current GB boundary. They also help integrate any proposed development into the landscape and can be strengthened to provide an even stronger eastern boundary to the site.

Approximately 1/3 of the site is well screened by existing tree belts. These, however, are not extensive and can help to frame development and create amenity should the site be developed. In developing the site the majority of the trees would be retained.

The site sits in a bowl in the landscape. The B997 slopes down from the south towards the site and upwards to the north away from the site. This allows the site to sit within the landscape and reduce any potential impact to local impacts only, perceived while travelling south on the B997.

Overall, the landscape impact will be limited. It will be local and seen as a logical extension to the existing built up area. Established strong landscape features at the north, west and east will help to contain the development within the landscape. The clear visual and physical connectivity between the site and the housing to the south will provide a continuity of development. This site, therefore, has a plenty going for it in landscape terms.

Ancient Woodland – this would not be affected in any major way by the proposed development of this site. Ancient woodland is simply an informal designation that suggests that trees have been on a site for some time and not necessarily that the trees on site are very old. In this case (see aerial photo) only a small proportion of the site is wooded. In fact they are just tree belts. The woodland provides amenity for the site and can be incorporated into any future landscape strategy. It also provides local character and shelter. There's no reason why the site should be discounted because it includes tree belts. The neighbouring allocated Grandhome Urban Village wasn't discounted because it included far more woodland. A consistent approach suggests that this site should be treated in a similar manner with the woodland being considered a constituent part of any proposed development.

Nature Conservation – although neighbouring sites are designated for nature conservation this site has no nature conservation designations. Contrary to the MIR evaluation there can therefore be no significant loss or disruption to natural conservation.

Access – Please refer to the aerial photo in Figure 2 and the extracts from that below. Essentially access is achievable at a number of locations. The eastern boundary of the development can facilitate a new and improved access (and the adjacent junctions) for the whole site. The housing area to the south already has an established road access to the south east of the site and there's also an area of open space that could facilitate footpath access to the west of the site. These are consented and deliberate to facilitate future development. These are service tails. The development to the south has clearly been designed to provide access to Causewayend. The houses either side of the retained road link turn the corner and face onto that link providing the start of a new street connection.



Figure 3 – Potential existing access points (vehicular and pedestrian) ((c) Getmapping plc 2015)

The Council have recognised that the site is within 500m of a major bus link and the scope for a strong cycle and footpath link between the existing housing and the proposed development site.

Proximity to Facilities – The primary school is within 800m (recognised by ACC). ASDA Middleton Park is a 3 minute drive via Ashwood Road/Jesmond Drive or a 10 minute bus journey. Walking would take just under 20 minutes. Oldmachar Academy is even closer. Local facilities are therefore close and certainly no worse than any other part of the Bridge of Don.

Grandhome, AWPR and Energetica

Three other major projects affect this proposed site, creating a better case for its development. Grandhome Village (7,000 new homes plus retail, community, commercial and leisure uses) has been allocated immediately adjacent to the Causewayend site. See the Grandhome Masterplan over.

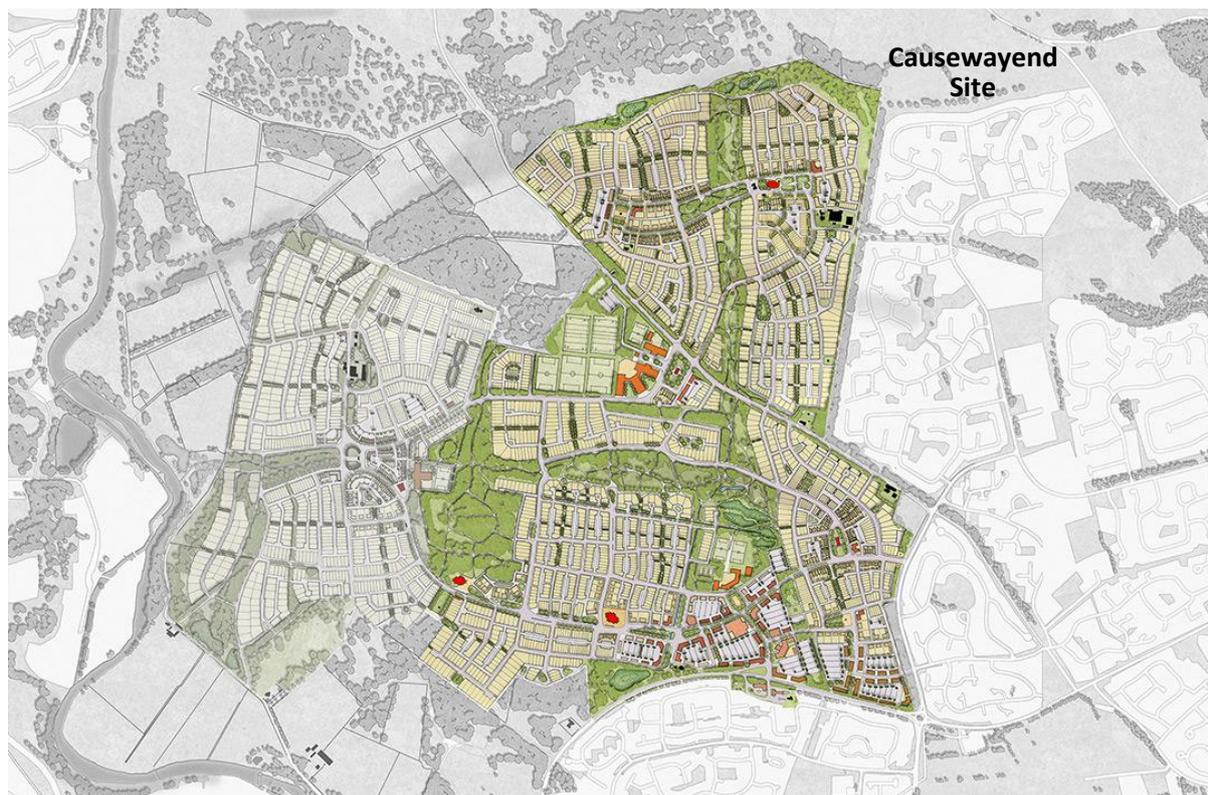


Figure 4 – Grandhome Masterplan

This means that the access to facilities, to employment and to opportunities will, over time, significantly improve in this part of the City.

The second project is the AWPR. The route now runs north of this site but one of the key routes to the City will be via the Goyal Junction and along the B997 Scotstown Road. As a result the 2014 Regional Transport Strategy refresh includes road improvements to mitigate traffic impacts of the AWPR. The Strategic Transport Fund justification (that sits behind the RTS refresh) indicates an upgrade B997 Scotstown Road & through Parkhill into North end of Dyce Drive using appropriate design standards to accommodate forecasted traffic volumes. The associated cost for these upgrades is stated as £3 million.

Scotstown Road, therefore, will be upgraded. This proposed development site could tie in with those upgrades and will now sit on a major identified route into the City from the AWPR.

Energetica – is a strategic policy to support energy related development and a higher quality of life in a corridor between the Bridge of Don and Peterhead. It's about providing homes as much as jobs and economic development, especially homes with access to the outdoors, to recreation and with good links. This site falls within the southern section of the Energetica Corridor and could help deliver much needed housing to support economic development.



Figure 5 – Energetica Plan (Bridge of Don extract)

ISSUE 2 - Housing Land Delivery

The housing land allocations in the PLDP are predicated on the housing requirements set out in the 2012 Strategic Development Plan (SDP). They are required to sustain a 5 year housing land supply at all times during the lifetime of the LDP.

However, in analysing the allocations versus delivery it's clear that the current allocations are not delivering the scale of housing required by the SDP. Table 1 below summarises the current position on the delivery of housing land in the 2007 – 2016 first phase of the 2012 Local Development Plan across Aberdeen. On the larger allocated sites (in excess of 100 houses), with only a year to go in the first phase of the LDP, these are only delivering less than 2% of their associated allocation.

Comparison of Major Housing Proposals in 2012 LDPs with outturn					
city	site	ref	2007-2016	actual at May 2015	shortfall
	Grandhome	OP12	2600	0	2600
	Dubford	OP25	550	64	486
	Stoneywood	OP24	500	88	412
	Craibstone South	OP28	750	0	750
	Rowett South	OP30	1000	0	1000
	Greenferns Landward	OP31	750	0	750
	Maidencraig SE	OP43	450	10	440
	Maidencraig NE	OP44	300	0	300
	Greenferns	OP45	600	0	600
	Countesswells	OP58	2150	20	2130
	Oldfold	OP62	400	0	400
	Loriston	OP77	1100	0	1100
	TOTALS		11150	182	10968
			percentage delivered	1.63	

Table 1 – Housing Delivery in Key Aberdeen Locations at May 2015 (sources: Aberdeen Local Development Plan 2012, Aberdeen Housing Land Audit 2012 and Aberdeen Housing Land Audit 2015) June 2015

This raises a number of fundamental questions ...

a) What has happened to the need and demand for these now undelivered housing over this plan period?

The SDP set out the housing need with flexibility over and above that to theoretically provide “generous” housing allocations across Aberdeen and Aberdeenshire. The theory, however, has not matched the practice and Aberdeenshire now has a serious historical shortfall in housing land.

This is an issue recognised widely in England and Wales but less so across Scotland. In a recent Parliamentary Briefing paper (Planning for housing SN/SC/3741, 18 March 2015) on housing land supply the models were explained:

“In particular it highlights Liverpool and Sedgefield as being “good examples” for calculating historic undersupply of housing in a “clear and transparent manner”.

The Sedgefield method of calculating land supply involves adding any shortfall of housing in the local plan from previous years over the next five years of the plan period, whereas the Liverpool method spreads the shortfall over the whole remaining plan period.”

Although Scottish Planning legislation is independent from the rest of the UK the principle of the issue remains the same i.e. simply carrying forward allocations as they are does not deal with historical housing need shortfalls, reduces supply relative to demand and increases the difficulty in those needing to access housing being able to do so. Both the Liverpool and Sedgefield methods expect some or the entire historical shortfall to be carried forward into future housing land allocations over and above the need projected for that period on its own. In effect these are methods that allow housing delivery to catch up with housing need. Aberdeen’s LDP ignores the historic shortfall.

b) Will carrying the current allocations forward in the Proposed Local Development Plan improve the chances of the housing need for the next plan period being delivered/met?

Quite clearly the scale and pace of delivery for the major housing sites in the City have not met expectations (see the 2014 and draft 2015 HLAs). The successive Housing Land Audits have exposed a story of lack of delivery and long lead-in times to get sites on the go. And a draw-down mechanism that relies on a limited number of larger sites is flawed. If these sites have difficulty in delivering their first housing then it’s highly unlikely that future phases can be expedited plus the ability to market significantly more houses on a single site just doesn’t fit how the housing market works. The housing market needs choice and it needs more sites of all sizes across a wide range of locations and developers or landowners.

Does the Council actually have a deliverable 5 year housing land supply?

Given the historical evidence we don’t believe that the Council have a 5-year housing land supply. Extending the historical delivery rates, even with an increase as a result of infrastructure coming on stream, we believe that delivery will continue to be quite different that the expectations set out in the Housing Land Audits.

Changes requested to the Proposed Local Development Plan

- We believe that additional housing sites are required to help match historical housing shortfalls (using either the Liverpool or Sedgefield methods) and to deliver the baseline housing need across the PLDP timeframe.
- Causewayend should be identified as a site that can help deliver housing land now or into the future as a draw-down site should the failure to deliver the current allocations continue.