

Proposed Aberdeen Local Development Plan 2015 Representation Form

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Name	Mr <input checked="" type="radio"/> Mrs <input type="radio"/> Miss <input type="radio"/> Ms <input type="radio"/> Oliver Munden
Organisation	Persimmon Homes East Scotland
On behalf of (if relevant)	
Address	Unit 1, Wester Inch Business Park Old Well Court Bathgate
Postcode	EH482TQ
Telephone	01506638368
E-mail	oliver.munden@persimmonhomes.com

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	Policy B1	Paragraph(s)	3.60

What would you like to say about the issue?

Policy B1 should have similar wording for new allocations as the plan already identifies for existing business use land. We believe that any site which has evidence provided that it has been marketed with no developer interest should be allowed to be developed for an alternative use. This principle has already been considered for existing allocations. Furthermore, there should actually be more pressure to re-use existing allocations for business first, rather than delivering on new allocations, which are potentially Greenfield release anyway.

Persimmon therefore requests that Policy B1 is modified to take account of this requested change

What change would you like to see made?

Policy B1 should have similar wording for new allocations as the plan already identifies for existing business use land. We believe that any site which has evidence provided that it has been marketed with no developer interest should be allowed to be developed for an alternative use. This principle has already been considered for existing allocations. Furthermore, there should actually be more pressure to re-use existing allocations for business first, rather than delivering on new allocations, which are potentially Greenfield release anyway.

Persimmon therefore requests that Policy B1 is modified to take account of this requested change

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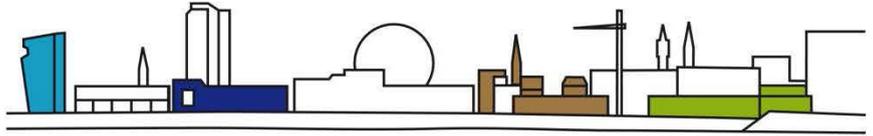
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	Strategic Environmental Assessment Environmental Report	<input type="checkbox"/>	
Policy/Site/Issue	Community Facilities	Paragraph(s)	3.89-3.93

What would you like to say about the issue?

Persimmon agrees with the comments made by Homes for Scotland (HFS) on community facilities. These can be read in full within their representations, but in summary Healthcare is a statutory requirement, funded through UK general taxation, and the services are not typically delivered by Councils. There is no immediate and automatic relationship between new development and the provision of new local facilities, with decisions for new services made by the NHS or individual GP's/dentists.

It is therefore believed that a planning authority would not be able to demonstrate the requirement to collect contributions towards health care meets with the 5 tests set out within Circular 1/2013, and therefore not suitable to collect contributions for. We believe that the Council would not be able to demonstrate need or detriment, or planning purpose for any condition which deals with a healthcare contribution.

Developer contributions to infrastructure are typically provided through planning conditions or agreements. They are paid to the Council and held in clearly-differentiated accounts with the provision for repayment if unused within their anticipated timescales. No such arrangements are in place with the NHS, notwithstanding Homes for Scotland's view that it is inappropriate for developers to be replacing/supplementing UK taxation expenditure. Accountability and control of funds would be a significant issue.

What change would you like to see made?

Persimmon therefore agree with the comments made by HFS and request that the entire policy wording set out under community facilities should be removed in total from the plan, and any references made elsewhere also removed

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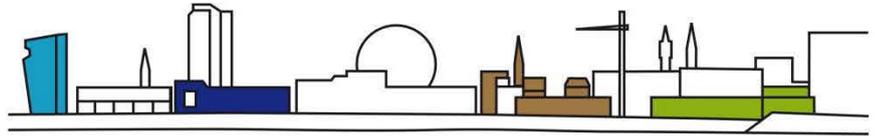
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Policy/Site/Issue	Introduction	Paragraph(s) 1.1-1.15

What would you like to say about the issue?

The introduction does not fully take account of the national planning policies and guidance which have been prepared and should be followed by all Local Authorities, developers and other stakeholders. Specifically there are no comments made in relation to Scottish Planning Policy, which should be considered as one of the key documents to Scottish Planning. The key point from SPP is to "introduces a presumption in favor of development that contributes to sustainable development".

What change would you like to see made?

We would also question the need for every major site to require a Masterplan created with community involvement, and would request a definition for major development to be included within the plan. Persimmon believe this should only apply for sites of a certain size, and would suggest 200 units or larger, rather than smaller sites. We feel this is necessary to ensure that the smaller sites which help provide deliveries where large sites have not started, or where deliveries on large sites are not taking place, in order that the required effective 5 year land supply and required deliveries are met.

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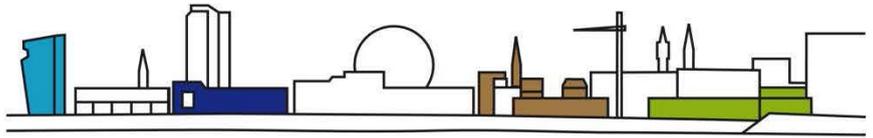
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Policy/Site/Issue	Loriston and Cove Appendix 2 - Opportunity Sites	Paragraph(s) 2.24

What would you like to say about the issue?

Please see attached document entitled 'Rigifa Farm, Cove - Residential Development Opportunity' for full details.

What change would you like to see made?

Please see attached document entitled 'Rigifa Farm, Cove - Residential Development Opportunity' for full details.

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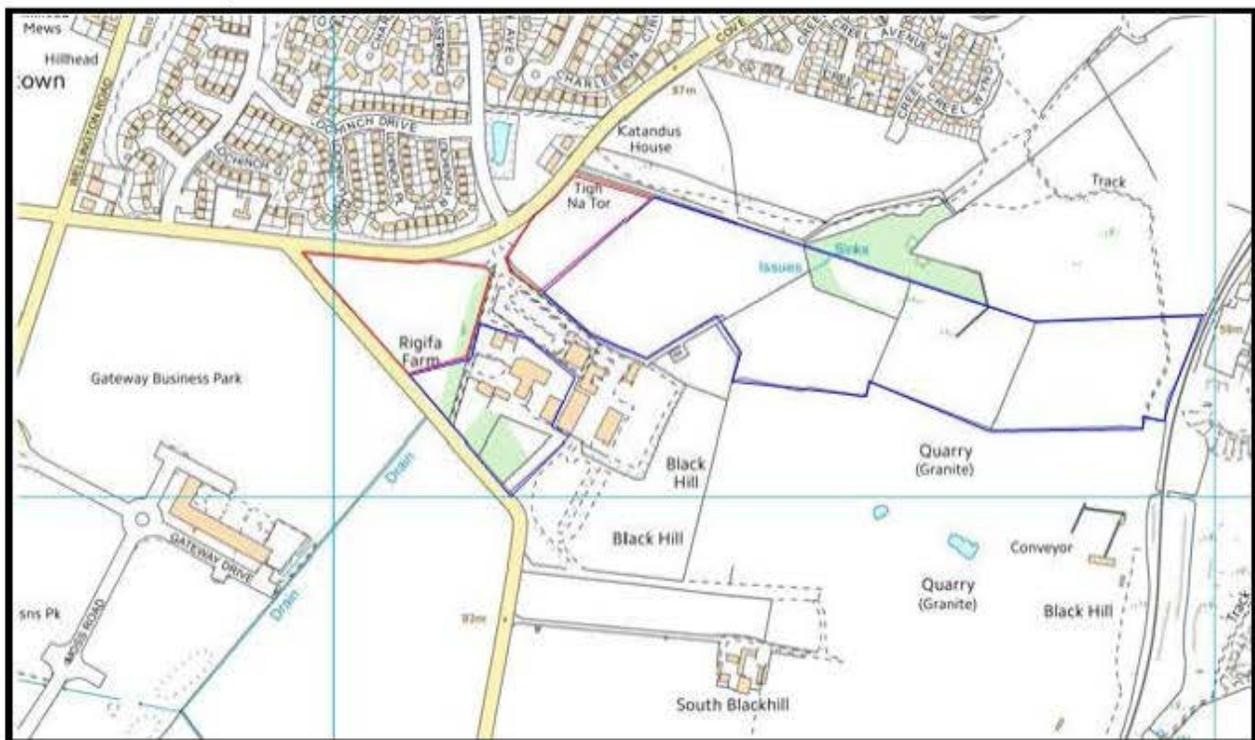
Rigifa Farm, Cove – Residential Development Opportunity

Site Context

The Rigifa Farm site lies directly to the south of Cove Road and immediately to the north east of OP53: *Aberdeen Gateway* and an unnamed road leading to Findon. The site itself is currently in agricultural use but also includes the buildings associated with the existing farming unit. In total this extends to approximately 6 acres in two separate land parcels which are bisected by the existing entrance to the farm and the offices of Leiths Scotland Ltd. The area which lies immediately to the east is currently utilised as farmland and a core path runs along the eastern boundary providing access from Cove Road towards the coast. The proposed Charlestown junction associated with the new Aberdeen Western Peripheral Route is located approximately 850m to the north west of the site and will significantly improve accessibility in the local area.

It is proposed that the Rigifa site has potential for a smaller scale residential development of approximately 70 residential units including the provision of 25% of these units as affordable homes.

Site Location – Rigifa Farm



The two sites bounded red in the above plan are those indicated as having potential for residential development whilst the area bounded blue shows the existing farm buildings which offer potential for redevelopment and the wider extent of the landowners control.

The site was previously promoted by Ryden on behalf of Mr Ian Stephen, however, it is now under the control of a national housebuilder. This representation should therefore be read in connection with the previous submissions made by the aforementioned parties.

Policy Context

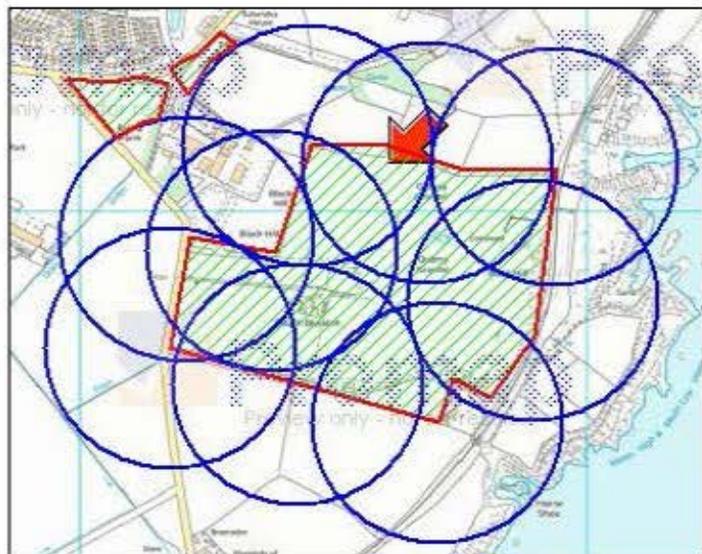
The Rigifa site is located within the Aberdeen City Strategic Growth Area and due to its close proximity to both the existing urban area of Cove and the newly constructed Aberdeen Gateway Business Park it is believed to have strong prospects for residential use which could come forward at an early date.

The site is presently designated as Green Space Network under Policy NE1 and is further allocated as Green Belt under Policy NE2. The preamble to the Green Belt policy states that its aim is to maintain the distinct character of Aberdeen and the communities around the city by clearly defining their physical boundaries, preventing coalescence, maintaining Aberdeen's landscape setting and providing access to open space.

It is contended that the site no longer contributes to the aims of the Green Belt Policy, in that, the recent construction of the Aberdeen Gateway Business Park which lies immediately to the south west of the site has arguably degraded and eroded the purpose and context of the Green Belt in this particular location. Furthermore, the landscape setting of the Rigifa Site has changed dramatically in recent years and it is now surrounded by existing built development on its northern, western and southern boundaries. Development of the site would therefore not significantly impact upon the character or amenity of the surrounding area. Additionally, the site currently provides no significant benefits in terms of the Green Space Network as no access is currently available to either portion of the site and habitat diversity is limited due to utilisation of the site for arable farming. The stone walls bounding the development sites may have some ecological value and it is proposed that they would be retained and incorporated within the development proposal.

Development of the most northern parts of the two sites would include the provision of strategic landscaping, open space and increased public access to the south of Rigifa Farm which would also provide increased public access and new pedestrian/habitat linkages with the existing footpath network and the leisure facilities proposed to the north of Aberdeen Gateway. It is envisaged that this would be incorporated within any masterplan required by Policy NE1 and take account emphasised elsewhere within the Proposed Local Development Plan

The developers have now amended the developable area of the Rigifa site to only include that which lies outwith the 250m exclusion zone associated with the requirement for blasting at Blackhills Quarry which was previously identified as a potential constraint to development associated with the original development proposal. The plan opposite indicates the extent of the 250m exclusion zone associated with the proposed extension to the quarry i.e worst case scenario and not that which relates to the current consent.



Significant structure planting would be proposed to supplement the existing planning along the southern portion of both the western and eastern sites in order to further mitigate any adverse impact (visual, amenity and environmental) from all ongoing quarrying operations.

Site Deliverability

The site was previously identified as having potential for employment and local retail uses under reference of Development Option B1304. The assessment of the site was fairly positive in its nature and it should be highlighted that it met the majority of the tests with the exception of the exclusion zone associated with the quarry.

In this respect, it should be reiterated that the site offers no significant constraints to development. The topography is generally flat in nature with a very minimal north facing slope (1:37). Other comments arising from the sites previous assessments which have not been specifically addressed above are considered as follows:

Flood Risk - The site is well drained and not identified as being at risk of flooding according to the SEPA flood map.

Built / Cultural Elements – There are no listed buildings or cultural designations within the site boundary. The Rigifa Boundary stone is located off site to the south of the unnamed road to Findon and would be within the site developed for Gateway Business Park.

Nature Conservation – All existing planting in and around the site would be retained and enhanced through the development proposals. All designated species and a bat survey in and around the existing farm buildings would be undertaken in advance of any development commencing.

Landscape Features - The site is characterised as open farmland, however, it is contended that this is no longer the case and the features have been significantly degraded through the intensification of the business uses at both Aberdeen Gateway and the offices of Leiths Scotland which are located within the boundaries of the former Rigifa Farm.

It is, however, recognised that the stone walls which are a common form of enclosure provide an element of character to the local area lying to the south of Cove Road and we confirm that any development of the site would seek to retain and re-use these features and the habitats these provide wherever possible.

Landscape Fit and relationship to existing settlement - The site is located immediately to the south of existing residential development which runs along the northern boundary of Cove Road. The recent developments mentioned above have significantly altered the landscape in this area of Cove and incorporation of the Rigifa Farm sites would allow a more long term and defensible Green belt boundary to be created along the south of the Gateway Business Park, south of the to the more open country.

Accessibility / Cycle / Pedestrian Connections – The site is in close proximity to the new AWPR junction at Charleston and 10 bus stops are located within easy walking distance of the site. This includes 2 new bus stops associated with the adjacent Aberdeen Gateway development.

The most eastern of the 2 residential development site lies directly adjacent to a footpath which provides access from Cove Road eastwards towards Cove Crescent towards the coast. The development of the 2 sites at Rigifa would also create the opportunity to create improved pedestrian links to and from the Gateway Business Park from the existing path running across the open space from the extreme eastern end of Cove Road.

Contamination - The site was previously considered as being in reasonable proximity to Blackhills Quarry and concerns were raised that the associated restoration and infilling of the quarry may offer the potential for contamination at Rigifa. This is considered highly unlikely as the land at Rigifa has been consistently utilised for agricultural use and is located some 500-600m from the area of the quarry which has been restored. Further investigations will be undertaken in the form of a Geotechnical and Geo-environmental Report however no contaminants of an adverse nature are anticipated.

Physical Infrastructural Capacity – It is understood that all existing services and infrastructure required to serve the site are readily available in close proximity to the site at reasonable cost. Educational capacity will require to be further discussed with City of Aberdeen Council, however, it is anticipated that financial contributions underpinned by a Section 75 Agreement would suffice in this instance.

Conclusions

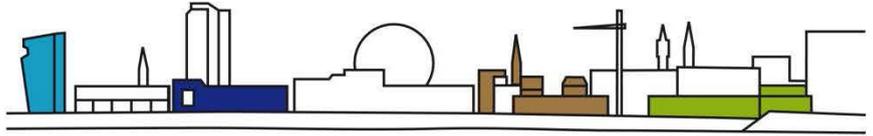
It is proposed that the site at Rigifa Farm provides an opportunity to provide a smaller scale residential development of approximately 70 units.

- A significant number of the residential development sites making up the housing allocations within the Proposed Plan are large greenfield releases from the adopted 2012 Plan. To date a number of these extremely large scale greenfield releases have experienced significant delay in implementation associated with land ownership, complex Section 75 agreements and infrastructure development. This trend is considered very likely to continue and uncertainty remains over a number of the allocations delivering units within the required timescales. It is therefore recommended that a number of smaller residential development sites which are less likely to be subject to such uncertainty be allocated which could come forward in early course and supplement any shortfall in housing completions.
- The provision of residential units on the site will increase the range and choice of housing within the local area and provide 25% affordable housing in accord with current affordable housing requirements.
- Development of the site will include an element of brownfield development associated with redevelopment of the existing farm buildings at Rigifa Farm.
- Development of the site will assist in providing a more appropriate and defensible long-term boundary to the Green Belt in this location of Cove. This will include a comprehensive strategy for future proofing the Green Belt boundary in this location which creates a strong long term defensible boundary which addresses the adjacent Aberdeen Gateway Business Park.

- Development of the site offers the opportunity to provide a more robust strategy with regards to the Green Space Network in this location through additional public access and creation of pedestrian and cycle networks and further consolidation of additional habitat corridors.
- Revision of the boundaries of the site to take account of the 250m blast zone associated with Blackhills Quarry will provide suitable residential amenity within the site whilst providing the opportunity for additional strategic planting which will assist in screening any temporary visual impacts associated with the quarry uses to the south of the site.
- The Rigifa Farm site is considered fully effective and within the control of a housebuilder. It is not restricted by any significant infrastructure or servicing costs and could deliver units within the period 2017-2026.

Proposed Amendments to the Plan

The site at Rigifa Farm should be included within Table 7: *Development at Loirston and Cove* and within Appendix 2: *Opportunity Sites* as a residential opportunity for approximately 70 residential units falling within Phase 1: 2017-2026.



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Policy/Site/Issue	H1	Paragraph(s) 3.74

What would you like to say about the issue?

Whilst we are broadly supportive that development should be in scale and in keeping with its surroundings, the policy wording within H1 do not provide specific criteria, especially in relation to point 1 'does not constitute to over development'. Whilst it is understood this would be on a base by case basis, this is not helpful in the identification of new sites. We believe this needs to be defined where possible, or an indication given as to what would be allowed and what would not be as this helps to provide a bit more certainty to applicants prior to submission.

What change would you like to see made?

Persimmon therefore request a definition of over development is included within Policy H1

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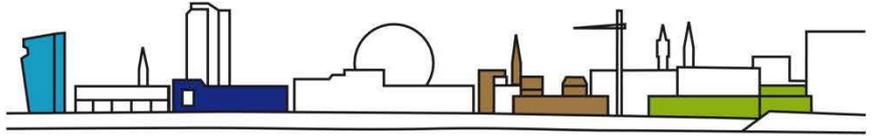
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Policy/Site/Issue	H4	Paragraph(s) 3.79

What would you like to say about the issue?

Paragraph 3.78 reflects SPP in discussing the need for mixed and inclusive communities, an aspect of which is a range and choice of house types and sizes. Persimmon believes that this is necessary to consider housing across the entirety of a settlement, rather than on a specific site. Furthermore the definition of communities is very woolly and does not provide any definition as to what a community is.

The policy P4 applies the requirement for mix and diversity to any major housing development i.e. of 50 houses or more. We believe this is at too small a scale to consider mix and diversity. Sites of this size are far too small a scale at which to consider mix and diversity. Any development, especially those of 50 units or smaller will be aimed at a certain sector of the market and will be influenced by local demand, surrounding area and land uses and the current market status, to which the developer will respond in order to deliver properties which can be sold easily and speed up the number of deliveries which Aberdeen require.

It is not appropriate for any planning authority to try to direct or predict demand for different property sizes in the market. Customers will determine how many bedrooms they are seeking and house builders will respond to the market demand.

What change would you like to see made?

We therefore request additional comments are made to include details of what is meant by community in order than the Policies on Housing can be implemented properly.

We therefore request that Policy H4 Housing Mix is removed from the plan in its entirety, as we believe it is not appropriate to include rigid demands for something which cannot be predicted by the Local Authority, nor will have to be delivered by them.

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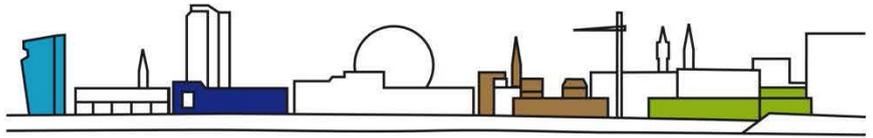
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Name	Mr <input checked="" type="radio"/> Mrs <input type="radio"/> Miss <input type="radio"/> Ms <input type="radio"/> Oliver Munden
Organisation	Persimmon Homes East Scotland
On behalf of (if relevant)	
Address	Unit 1, Wester Inch Business Park Old Well Court Bathgate
Postcode	EH482TQ
Telephone	01506638368
E-mail	oliver.munden@persimmonhomes.com

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	H5	Paragraph(s) 3.86

What would you like to say about the issue?

Persimmon understand that the affordable housing policy does not confirm with Scottish Planning Policy 2014, as SPP does no longer include any reference to "benchmark" (paragraph 3.82) affordable housing requirement. Furthermore SPP only states that "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".

However paragraph 3.82 does note that the "provision of affordable housing should not jeopardise the delivery of housing, as this would be counter-productive, would increase affordability constraints and have other knock-on effects on the local economy." The following paragraph notes that the delivery of affordable housing is significantly reliant on funding from Scottish Government and privately sourced by RSL's, and that such funding is becoming more difficult to obtain. Whilst Aberdeen Council has a target for affordable housing provision, principally social-rented housing, in reality it cannot be delivered with likely available resources. Negotiations on existing planning applications are proving difficult in terms of resolving a realistic and deliverable level of affordable housing and there is no reason to suggest this will become any easier, especially considering the poor availability of funding. The current Policy ignores SPP, as it requires "no less than 25%" affordable housing.

What change would you like to see made?

Persimmon request that the wording of Policy H5 is changed to replace “contribute no less than 25%” with “approximately 25%”.

We also note the comments made by Homes for Scotland in terms of the recent Supplementary guidance. It notes :-
The Policy notes that Supplementary Guidance sets out further detail on the provision of affordable housing. The Council has recently revised this Guidance and, against all advice from the housing industry (including RSLs) is seeking levels of commuted sum payments which are unviable and which will, in the terms of paragraph 3.82 of the Plan, “jeopardise the delivery of housing”.

The Council should revert to the previous approach on commuted sums of a commuted sum based on transaction evidence in the market, as this represents the values which both developers and RSLs find practical and viable.

The outcome of the above would therefore allow any developer to deliver less than 25% affordable housing, where they can prove there is a viability argument. This is especially true for some of the more marginal locations, especially on brownfield sites which may have high remediation costs.

Please return the completed form by:

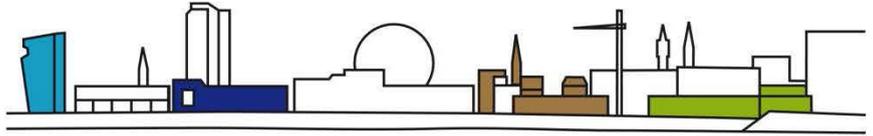
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Policy/Site/Issue	LR1 - Land Release Policy	Paragraph(s)	2.17

What would you like to say about the issue?

Whilst this policy should be addressing all land allocations, it does not consider how Aberdeen Council will address an ineffective housing land supply at any time during the plan. Similarly to the representations submitted by Homes for Scotland (HFS) to this consultation, Persimmon are supportive of those representations, and would like to reiterate there needs to be a mechanism within the plan to address an ineffective housing land supply should this issue arise over the plan period.

What change would you like to see made?

We would direct Aberdeen Council to include the comments made by the reporter of the Falkirk Local Development Plan, where the reporter added the below clause into the policy on Housing land supply, to ensure new sites could come forward where necessary. This wording should form part of Policy LR1.

“The council will monitor and update the effective housing land supply figures annually to make sure that a minimum five year supply is maintained at all times. If this Housing Land Audit process identifies a shortfall in the effective land supply, the council will consider supporting sustainable development proposals that are effective, in the following order of preference:

- Urban Capacity sites
- Additional brownfield sites
- Sustainable Greenfield sites

In doing so, account will be taken of other local development plan policies and of any adverse impacts that would significantly and demonstrably outweigh the benefits of the proposal.”

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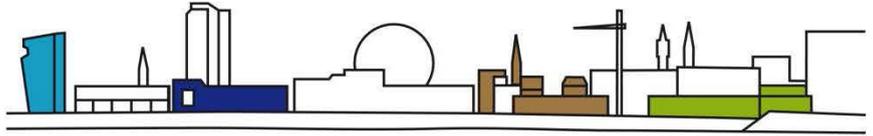
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	Strategic Environmental Assessment Environmental Report	<input type="checkbox"/>
Policy/Site/Issue	The Spatial Strategy	Paragraph(s) 2.13

What would you like to say about the issue?

In order to assist the readability of the plan we request a table is included around page 8 which includes a breakdown of the locations, number of units and anticipated delivery timescales for all those identified brownfield sites, as per Table 2: Greenfield Development Allowances and Allocations. We believe that this will assist with the usability and understanding of the plan, and provides a single location to determine the locations of development within Aberdeen

What change would you like to see made?

In order to assist the readability of the plan we request a table is included around page 8 which includes a breakdown of the locations, number of units and anticipated delivery timescales for all those identified brownfield sites, as per Table 2: Greenfield Development Allowances and Allocations. We believe that this will assist with the usability and understanding of the plan, and provides a single location to determine the locations of development within Aberdeen

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