

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	Mrs	Miss	Ms	
Organisation					
On behalf of (if relevant)					
Address					
Postcode					
Telephone					
E-mail					

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

What document are you commenting on?	Proposed Plan Proposed Supplementary Guidance Proposed Action Programme Strategic Environmental Assessment Environmental Report		
Policy/Site/Issue		Paragraph(s)	

What would you like to say about the issue?

What change would you like to see made?

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.

Representation to the Proposed Aberdeen City Council Local Development Plan 2016, on Behalf of Stewart Milne Homes in response to “The Network of Centres” contained within Section 3 -Delivering Sustainable Communities and associated Policy NC8 Retail Development Serving New Development Areas.

Modification Sought

Stewart Milne Homes would request that the full 7000m2 retail provision identified Zone 29 West Aberdeen / Countesswells within the Aberdeen City and Aberdeenshire Retail Study (2013), be allocated to the Countesswells settlement within the new Local Development Plan. Accordingly, The OP38 Countesswells designation contained within Appendix 2 - Opportunity Sites of the PLDP should be amended to include the 7000m2 of retail provision and this should be carried forward into the new LDP.

Introduction and Background

The Proposed Local Development Plan 2016 (PLDP) identifies the City’s network of retail centres as falling into a hierarchy, with the role of each centre set out within associated Supplementary Guidance “Hierarchy of Centres”, which requires a sequential approach be taken in accordance with the hierarchy as stipulated within current SPP. Paragraph 3.28 of the PLDP has also sought to address evident retail deficiencies across the city, as identified within the Aberdeen City and Aberdeenshire Retail Study 2013 through the allocation of additional retail opportunities over and above those allocated within the extant LDP. This approach is welcomed by Stewart Milne Homes (SMH), particularly in the case of Countesswells as it will help strengthen the mixed community and promote a more sustainable travel pattern.

Retail deficiencies within Aberdeen City as identified within the above mentioned Retail Study were set out explicitly within Table 6 of the Main Issues Report. This identified Zone 29- West Aberdeen / Countesswells as an area which could accommodate a total of 7,000 m2 floorspace, with 5,500 m2 reserved for convenience and 1,500 m2 for local shops and retail services. The MIR echoed the Retail Study, stating that *“Floorspace can be in more than one location”*. Accordingly, SMH submitted representation to the MIR (Appendix 1), specifically requesting that the full allocation of 7,000m2 be allocated within the new Countesswells settlement. The representation argued that the proposed population size and associated retail expenditure presents a great opportunity for the Countesswells development to provide for a wide range of retail occupiers to service the local community, directed towards a mixed-use core, acting as a sustainable neighbourhood centre as

advocated by SPP and echoed within the Aberdeen City and Shire Strategic Development Plan's vision to create "*sustainable mixed communities*".

Paragraph 61 of SPP stipulates that "*Emerging or new centres designated within key new developments or land releases should also be shown within the network of centres*". It is therefore disappointing that the PLDP has failed to stipulate where in Zone 29 the retail provision should be located. This demonstrates ambiguity and a lack of forward-planning which will ultimately lead to community and developer uncertainty, thus contradicting the spirit of SPP. This uncertainty will be felt in particular for SMH as their development of a new community at Countesswells is delivered. The entire ethos behind the new settlement at Countesswells echoes SPP's Policy Principles on successful "placemaking", therefore ACC should seek to "*direct the right development to the right place*" as advocated within SPP by allocating the full retail allocation identified in the Retail Study to Countesswells. This would help facilitate a strong and vibrant retail function right at the heart of the new Countesswells community, thus directing development "*where investment in growth or improvement would have the most benefit for the amenity of local people and the vitality of the local economy*" as set out in Paragraph 40 of SPP.

Within the associated background papers to the PLDP, "Schedule 4 Forms (Responses to Representations)" indicates ACC's response to representations submitted to the MIR. In respect of SMH's representation submitted to Main Issue 6 – Retail Centres outwith the City Centre, ACC's recommendation for the PLDP states "*Retail floorspace of 5,500 sq. m for convenience and 1,500 sq. m. for comparison will be identified in Zone 29N but no site has been favoured*". This approach has therefore been carried forward into the PLDP. SMH wish to object to this and would request that the full allocation of 7,000sq.m of retail space as identified previously within the MIR for Zone 29 (in accordance with the Aberdeen City and Aberdeenshire retail Study 2013), be allocated to Countesswells. Accordingly, the OP38 Countesswells land allocation as identified within PLDP Appendix 2 – Opportunity Sites, should be amended to include the full retail allocation as set out above.

Retail provision at Countesswells

As set out previously in the representation to the MIR (Appendix 1), a mid-range supermarket (3,500sq.m.) will anchor the retail provision on site, supported by a range of smaller shops and independent retail units. This will offer a varied retail core, with an additional occupation mix served by various other uses, including Class 2 and 4. Accordingly, the full 7,000 sq.m of retail space, as identified within the Retail Study for Zone 29, should be allocated to Countesswells to provide a vibrant and viable retail core, integrated and highly accessible to the surrounding residential area, which is essential to

achieving a sustainable mixed community. This would help define the new village core at **Countesswells within Aberdeen's network of centres hierarchy**, thereby according with paragraph 61 of SPP which states that *"emerging or new centres designated within key new developments or land releases should also be shown within the network of centres"*.

Allocation of retail space to alternative locations within Zone 29, outwith the Countesswells development would be a much less sustainable option. For example, a large allocation of retail space at the future Maidencraig development would result in a high concentration of retail space within a very close proximity. The site is adjacent to a large Dobbies garden centre and the 5,576 sq.m. Tesco superstore at Rousay Drive is less than 2km to the east. As can be seen, the Maidencraig site already has a diverse range of retail provision within close proximity, therefore Countesswells offers a much more logical and sustainable location to allocate the 7,000sq.m. of retail space detailed within the Retail Study as referred to in paragraph 3.28 of the PLDP.

Furthermore, allocation of a large swathe of retail provision at Prime Four would also be a less sustainable option than allocation to the Countesswells community. This site is currently being developed for employment use, associated primarily with large scale office accommodation for oil and gas sector companies. Retail provision at this site would result in significantly more trip generation from surrounding residential areas, particularly if a supermarket was favoured at this location. The basis of representations to the MIR on behalf of Drum Property for the retail provision to be located at Prime four, rely heavily on drawing on the population of the adjacent Kingswells settlement, which already has an established retail core and has not been specifically mentioned within the Retail Study. A large scale provision of retail space at Prime Four would seriously prejudice the sustainability of the new Countesswells settlement, resulting in gross shortage of appropriate retail space within the new community, thus jeopardising the functionality and vitality of the new village core. This will result in the new community having to commute outwith the site in order access supermarket retail facilities.

Countesswells offers a prime location for the full 7,000sq.m. of retail floor space proposed within the MIR. The area has an extant allocation for 3,000 new homes, with an adopted Development Framework and Phase 1 Masterplan serving as Supplementary Guidance to the extant LDP. An application for Planning Permission in Principle for the entire Countesswells LDP allocation was approved at Full Council on 8th October 2014, with consent expected to be released imminently as the S75 is currently being finalised. Assuming an approximate average of 2.27 persons per household, this would provide a population of some 6,810 people at Countesswells, with build out rates detailed at 200-250 homes per annum. Based on a 2016 site start, this would equate to some 800 new

homes by 2020 increasing to 1,800 by 2025 thus establishing a large population, which **would coincide with the Retail Strategy's timescale expectations for the additional** retail provision within Zone 29N to be trading.

Conclusion and Recommendations

It is therefore evidently clear that Countesswells would be a self-sustaining community, more than capable of supporting the retail allocation in full. The approved Development Framework and Phase 1 Masterplan Supplementary Guidance identifies early delivery of the mixed-use community core which would encompass local shops anchored by a mid-range supermarket. The intention for high quality development throughout Countesswells will serve as a suitable attraction for potential larger scale operators, with interest already received for the site to date. The mid-range supermarket store as discussed above is flexible for a number of formats, particularly higher quality operators that may be attracted to the new self-sustaining community at Countesswells, boasting a high profile location on the western periphery of Aberdeen.

In view of the forgoing, it is hereby requested that the full 7000m² retail provision identified for Zone 29 – West Aberdeen / Countesswells within the Aberdeen City and Aberdeenshire Retail Study (2013) be allocated to the Countesswells settlement within the new LDP. This will be fundamental in providing a high quality, vibrant retail core in line with the Approved Countesswells Development Framework and Phase 1 Masterplan and is essential to serve and maintain a sustainable mixed-use community. Accordingly, Appendix 2 Opportunity Sites of the PLDP should be amended for OP38 Countesswells designation to detail the 7000m² of retail provision and this should be carried forward into the new LDP.

Representation to the Aberdeen City Council Main Issues Report on Behalf of The Countesswells Consortium in response to Issue 6, Retail Centres Outwith the City Centre.

In light of the retail deficiencies highlighted within the recent Aberdeen City and Aberdeenshire Retail Study 2013, the MIR has sought to address this through the allocation of additional retail opportunities over and above those allocated through the extant LDP and those with planning permission in place. This approach is welcomed, particularly in the case of Countesswells as it will help strengthen the mixed community and promote a more sustainable travel pattern.

Table 6 contained within the MIR identifies Zone 29- West Aberdeen / Countesswells as an area which could accommodate a total of 7,000 m² floorspace, with 5,500 m² reserved for convenience and 1,500 m² for local shops and retail services. The MIR clarifies that ***"Floorspace can be in more than one location"***, however it is hereby requested that the full allocation of 7,000m² be allocated within the Countesswells settlement. The proposed population size and associated retail expenditure presents a great opportunity for the Countesswells development to provide for a wide range of retail occupiers to service the local community, directed towards a mixed-use core, acting as a sustainable neighbourhood centre.

A mid-range food store (3,500sq.m.) will anchor the retail provision on site, supported by a range of smaller shops and independent retail units. This will offer a varied retail core, with an additional occupation mix served by various other uses, including Class 2 and 4. Accordingly, the full 7,000 sq.m of retail space set out within the MIR for Zone 29, should be allocated to Countesswells to provide a vibrant and viable retail core, essential to a sustainable mixed community.

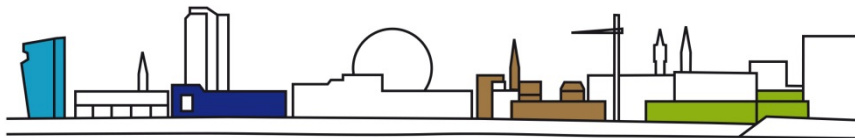
Allocation of retail space to alternative locations within Zone 29, outwith the Countesswells development would be a much less sustainable option. For example, a large allocation of retail space at the future Maidencraig site would result in a high concentration of retail space within a very close proximity. The site is adjacent to a large Dobbies garden centre

and the recently opened 5,576 sq.m. Tesco superstore at Rousay Drive is less than 2km to the east. Morrisons also have an extant permission to construct a 6,505 sq.m superstore on the former Summerhill Academy, some 350m east of the existing Tesco Store. As can be seen, the Maidencraig site already has a diverse range of retail provision within close proximity, therefore Countesswells offers a more logical and sustainable location to allocate the 7,000sq.m. retail space detailed within the MIR.

Furthermore, allocation of a large swathe of retail at Prime Four would also be a less sustainable option than allocation to the Countesswells community. This site is currently being developed for employment use, associated primarily with large scale office accommodation for oil and gas sector companies. Retail provision at this site would result in more trip generation from surrounding residential areas, particularly if a supermarket was favoured at this location. This would be to the detriment of Countesswells and result in an unsustainable shortage of appropriate retail space within the new community.

Countesswells offers a prime location for the full 7,000sq.m. of retail floorspace proposed within the MIR. The area has an extant allocation for 3,000 new homes, and assuming an approximate average of 2.27 persons per household, would provide a population of some 6,810 people. This clearly demonstrates that there would be a self-sustaining community, more than capable of supporting the retail allocation in full. The Countesswells **Consortium's intension for high quality** development throughout the entire development will serve as a suitable attraction for potential larger scale operators. The mid-range supermarket store as discussed above is flexible for a number of formats, particularly higher quality operators that may be attracted to the new self-sustaining community at Countesswells, which will boast a high profile location on the western periphery of Aberdeen.

Accordingly, it is hereby requested that the full 7000m2 retail provision identified in Table 6 of the MIR be allocated to the Countesswells settlement to provide a high quality, vibrant retail core, which is essential to serve and maintain a sustainable mixed-use community.



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Representation to Aberdeen City Council on Behalf of Stewart Milne Homes in response to the Proposed Spatial Strategy and Associated Employment Land Allocation at Countesswells Contained within the Proposed Aberdeen City Local Development Plan March 2015.

Modification Sought

The Countesswells Consortium wish to object to the proposed Spatial Strategy and more specifically the decision to roll forward the existing Aberdeen Local Development Plan's (ALDP) employment land allowance for Countesswells, into the Proposed Local Development Plan (PLDP) published in March 2015. The PLDP identifies 10ha of employment land within the existing allowances up to 2026 despite previous representation and appropriate justification being submitted to the Aberdeen City Council's Main Issues Report (MIR) in March 2014 (Appendix 1) requesting a reduction in employment land. The Countesswells Consortium would therefore request that this figure is reduced within the new LDP (2016) and Table 6 of the PLDP which identifies Directions for Growth at Countesswells, should be amended accordingly to reflect a lower figure than the 10ha currently stipulated.

Introduction and Background

Since the sites allocation within the extant LDP, The Countesswells Consortium have undertaken extensive market research associated with employment opportunities within the new settlement. The Aberdeen City and Shire Employment Land Audit (2014) demonstrates a plentiful supply of employment land, augmented by the adoption of the extant LDP in 2012. The total supply for Aberdeen City as of April 2014 was 246 hectares 140ha of which is considered marketable. The Proposed Aberdeen City and Shire Strategic Development Plan targets a 60 hectare employment land supply for the Aberdeen City area that is immediately available to business at all times. The 2014 Employment Land audit details that the City has 66 hectares of employment land immediately available, primarily located in established employment areas such as that located in and around the Airport (Dyce Drive) and Prime Four.

As highlighted previously within the Consortium's representation to the MIR, Countesswells will be a high quality, sustainable residential-led mixed use development and this is likely to be reflected in the employment uses attracted to the new community. Aberdeen City Council's stance detailed in their Schedule 4 "Responses to Representations" document stipulate that they "do not propose to change the employment land allocation which was

established in the 2012 LDP", is somewhat short-sighted and does not take account of the recent changes to the economic climate within the city and resultant impact this has had on market conditions. Commercial sector forecasts demonstrate that large swathes of employment land at Countesswells could be met with a lack of demand, therefore the focus for the new settlement should draw on smaller scale business space and create jobs at higher densities than more traditional large scale employment, associated primarily with class 5 & 6 uses. Smaller scale business space provided in higher density offers a more diverse and compatible opportunity with a wide range of other uses and has a better potential to form part of an active neighbourhood centre, allowing for the creation of significantly more jobs than a comparative large scale industrial warehouse or distribution centre. Such an approach would satisfy an identified demand, help support economic growth, and create a sustainable balanced community at Countesswells in line with the principles of SPP and the adopted Countesswells Development Framework and Phase 1 Masterplan Supplementary Guidance.

Market research carried out during the preparation of the Countesswells development Framework demonstrated a lack of supply of smaller employment units of less than 200m² within the Aberdeen Market, which was unusual given demand for small start-up business requiring industrial floor space. This presents an opportunity for Countesswells, as some of the employment land allocation on the site could accommodate small industrial units, workshops or offices that would provide a degree of flexibility for a range of occupiers, most likely within the oil and gas sector or business service companies that need to be located within close proximity to existing large scale employment centres such as Westhill and the new Prime Four development. Such small scale accommodation would tie in with the overarching design and placemaking parameters contained within the adopted Countesswells Development Framework, which seeks to create a high density, vibrant mixed-use neighbourhood core, which would be intrinsically linked to network of streets and housing within the surrounding new residential community.

Within the current LDP, the allocation seeks 10 hectares of employment land to be **provided within the site, however this was not identified as a "stand alone" land use, rather** that it should form an integral part of the overall development, interconnected and supported by the surrounding housing and infrastructure in accordance with SPP "Placemaking" principles. As such, the creation of a settlement/neighbourhood centre, as highlighted above has been carefully thought out as part of an approved Development Framework/Masterplan process and will feature at the heart of the development, providing a range of employment and services to the surrounding community, rather than 10ha of an intensive class 5/6 use located in isolation and disconnected from the rest of the development.

Countesswells is aimed primarily at supplementing the supply of housing land within the area. This increase in population will provide opportunity for businesses to benefit from a close relationship with residents of this new community on the western fringes of Aberdeen. Market evidence demonstrates that the settlement would likely attract the following employment land uses:

- Small scale office accommodation
- Small scale business space
- Local retail and convenience
- Community facilities
- Hotel accommodation

The above-mentioned land uses would be ideally located within the new settlement core, offering the opportunity to promote higher density development rather than the more traditional approach of allocating employment land based on a supply-led basis. The 10 hectares allocated for Countesswells appears to have been formulated on that basis and in order to achieve such an allocation, this could result in the provision of lower density alternative land uses to those set out above, which in the current economic climate could struggle against low demand for uptake. This would be undesirable for the new residential community, which seeks to exploit a relatively rural location with high amenity value. Provision of such facilities would ultimately be at odds with a residential-led settlement, increasing vehicle movements and impacting upon surrounding amenity. Accordingly the new LDP should apply a reduction to the 10 hectare employment allocation detailed within the PLDP, in order to promote a higher density, town centre approach which will be of much greater benefit to the Countesswells community as a whole.

Conclusion and Recommendation

Extensive work has been undertaken by the Countesswells Consortium to deliver the associated land allocations set out within the extant LDP. This has included gaining approval and subsequent adoption of a Development Framework and Phase 1 Masterplan to coordinate the planning and delivery of development as well as progressing an application for Planning Permission in Principle for the entire Countesswells land allocation, which was granted approval by Full Council in October 2014 subject to conclusion of a S75 Legal Agreement. The overriding aim for Countesswells is to create a sustainable community in the widest sense, by creating areas of mixed land use, which would incorporate a number of employment opportunities through different sectors. As highlighted above, The Development Framework and Masterplanning process aims to respond to SPP by providing employment land as a component of this mixed use,

strategically located around a primary community core, central to the site and also a secondary neighbourhood centre to the northern aspect of the site. These areas will incorporate a high density, vertical mix of uses as well as opportunities solely for employment, designed to be flexible and responsive to change in market conditions.

In view of the foregoing, it is requested that the 10 ha employment allocation which has been carried forward from the extant LDP into the Proposed LDP is suitably reduced. Accordingly, a lower employment allocation should be applied within the new LDP, in favour of a higher density, flexible mixed use community core and neighbourhood centre, as advocated within the Countesswells Development Framework and Phase 1 Masterplan which forms adopted Supplementary Guidance to the extant LDP.

PAPER APART

Representation to Aberdeen City Council on Behalf of The Countesswells Consortium in Response to the Failure of the Proposed Development Plan to Identify Additional Land at Countesswells (Development Option B0918 - Countesswells Community Expansion) as a Preferred Site for Mixed Use Development.

Modifications Sought

Table 6 contained within the Proposed Aberdeen Local Development Plan (PLDP) details the associated Greenfield Land allocations at Countesswells as identified within the extant Aberdeen Local Development Plan (LDP), setting out existing allocations to 2016 and Phase 1 allocations (2017 – 2026) which would be released under the new LDP and Phase 2 (2027 – 2035) by a future LDP. This table should be modified to incorporate an additional land allocation of 1,500 homes, which would increase the total housing allocation at Countesswells to 4,500. This could be spread over the Development Plan period, with 1,000 homes allocated to the Phase 1 Plan Period and the remaining 500 could be identified within Phase 2 to be brought forward in 2027-2035 under a future LDP. Appendix 2 of the PLDP should also be amended to detail the additional allocation of housing for OP28 Countesswells new settlement.

Additionally, the OP38 Land Release allocation identified within the Proposed Plan City Wide Map should be modified to include the additional parcels of land identified under Development Option- B0918.

Introduction and Background

The Countesswells Consortium wish to object to the failure of Aberdeen City Council to recognise 6 additional pockets of land at Countesswells Development Option - B0918 as an additional Greenfield Development Allocation within the Proposed Local Development Plan (PLDP), published March 2015. This Representation should be considered in conjunction with the Development Bid (Appendix 1) submitted in June 2013, as well as further Representation to the Main Issues Report, submitted in March 2014 (Appendix 2), both of which are discussed in further detail below.

A Development Bid was submitted to the local authority in June 2013 in response to the **Council's** call for Development Option sites and represented an expansion to the existing OP58 allocation within the extant Aberdeen Local Development Plan (ALDP) 2012. The land at Countesswells, submitted under the aforementioned Bid, was subsequently deemed undesirable through the technical response issued within the Development

Options Assessment Report, published as a supplementary document to the Main Issues Report (MIR). The technical response cited reasons pertaining to loss of Woodland and perceived disturbance to designated species and their habitats. Furthermore, visual intrusion and a detrimental landscape impact were also included as reasoning for not including Development Option B0918 as an opportunity site within the MIR. A copy of the Development Bid is attached as Appendix 1.

Further representation was submitted on behalf of the Countesswells Consortium to the content of the MIR in March 2014, providing further justification and logical argument for inclusion of the additional land under Development Option B0918 within the Proposed LDP. A copy of the representation submitted to the MIR is attached as Appendix 2. It is therefore disappointing that the PLDP has failed to incorporate additional land as requested through the Development Bid and subsequent Representation to the MIR, despite the previous justification provided. Loss of woodland and **habitat again featured within the Council's** response to MIR representations, provided within their Schedule 4 Forms as supplementary documentation to the PLDP. Furthermore, build-out rates have also been cited as reason to preclude additional allocations, as they would not be perceived to increase house building in the next Plan Period.

Development Principle

The principle of development at Countesswells has been firmly established under the adoption of the extant Local Development Plan and the expressed willingness of the Council to grant Planning Permission in principle for the site. Opportunity Site OP58 covers an area of 165 hectares, to accommodate 3,000 homes and 10 hectares of employment land in the period to 2023. The social, environmental and economic benefits of this development were echoed by Aberdeen City Council and also the Scottish Government Reporter during the formation of the extant LDP.

The Countesswells Consortium are committed to the delivery of an exemplar new community at Countesswells and **since the 2012 LDP's allocation, significant work has** been undertaken to drive this forward. This has included the preparation and submission of a Development Framework and Phase 1 Masterplan which coordinates the planning and delivery of the development and associated infrastructure requirements. This was **approved by the Council's Enterprise, Planning & Infrastructure** Committee on 13 March 2014 and subsequently adopted as formal Supplementary Guidance to the LDP. In addition, an application for Planning Permission in Principle for the entire LDP Countesswells allocation was approved by Members at Full Council on 8th October 2014 subject to an appropriate s75 legal agreement, which is now approaching conclusion to allow formal consent to be released. **The Consortium's** continued aspirations to create a

sustainable mixed use community remain at the forefront of development delivery at Countesswells and the Development Bid submitted to the LDP Review Process has sought a logical expansion to the existing site boundaries, in order to establish and safeguard direction for a natural expansion of the settlement, which will in turn facilitate and secure future growth and investment.

The sheer scale of infrastructure required for the Countesswells development is significant, incorporating an intricate network of roads, streets and pedestrian/cycleways as well as providing essential utilities throughout the site. Two new connections to the A944 will be delivered to ensure efficient transport connections for all users, between the existing various development blocks and the surrounding road network, thus ensuring continued delivery of development and the long term sustainability of the settlement. Paragraph 23 of SPP states that, *"by aligning development more closely with transport and digital infrastructure, planning can improve sustainability and connectivity"*, therefore it is entirely logical to include the additional land, sought under (Development Option B0918) in order to maximise the significant level of infrastructure associated with Countesswells and secure the long term-planning of the community, allowing it to expand organically in the future.

Furthermore, the Green Belt/ Greenspace Network designation on these sites is not required to manage growth or prevent growth which is unplanned. Paragraph 50 of SPP stipulates that planning authorities should *"identify the most sustainable locations for longer-term development and, where necessary, review the boundaries of any green belt"*. Green belts, should therefore not artificially restrict growth, but should ensure that growth is directed to the best locations, such as *"within or adjacent to existing settlements"* as advocated within paragraph 40 of SPP. As such, the case for the removal of Green Space Network and Green Belt designation from the additional parcels of land as identified within Development Option B0918 is strongly reiterated, as is the justification for inclusion within the New LDP. This is also confirmed through the site's associated score of 44 out of a possible 60 within the Council's Site Assessment Checklist criteria carried out in conjunction with preparation of the MIR, demonstrating clearly that the site has significant potential as an expansion to the existing ALDP OP58 Countesswells designation.

Effective Land Supply

As indicated above, the Countesswells community has been established through its allocation in the current LDP as a prime location to accommodate a substantial level of **Aberdeen's growth over the period 2012-2023**. The PLDP is in line with Schedule 1 of the adopted Strategic Development Plan, which simply rolls forward housing allocations formulated by the previous Structure Plan and extends the time horizon of the plan to

2035. Within the local authority response to the Development Option Bid for the additional land, it is stated that there *'is no numerical justification to allocate further housing sites'*. This statement is strongly refuted in this instance. A separate Paper Apart has been prepared on behalf of Stewart Milne Homes, relative to the associated Greenfield Housing and Employment Allocations. Please refer to this, as it provides a robust argument for increasing housing allocations within the new Local Development Plan, which is intrinsically linked to Countesswells.

SPP advocates that the planning systems should seek to, ***"direct the right development to the right place"***. This is directly applicable to Countesswells, which has been allocated through the extant LDP as a new community to the west of Aberdeen. As highlighted above, a substantial level of new infrastructure, including upgrades to the existing road network are required in order to deliver the Countesswells development. Once in place this will provide an intricate network of streets, effective to all modes of transport, allowing access to both the internal facilities within the development and to the wider strategic network, with connections to Kirk Brae, Countesswells Road and the A944. Significant upgrades to the surrounding drainage and utilities network is also required to serve the new community. It is therefore evident that the development will have sufficient infrastructure capacity and linkages to the surrounding network to allow for future organic growth of the Countesswells community. A modest expansion will help bolster and sustain the associated health, education, recreation and service facilities to be delivered in line with the extant LDP allocation. The development bid represents a highly appropriate area to augment some of the abovementioned greenfield housing allowance and demonstrates conformity to SPP place-making principles, which encourage *"locating development where investment in growth or improvement would have the most benefit for the amenity of local people and the vitality of the local economy"*.

Loss of Woodland and Habitats

Issue is taken with the Schedule 4 "Responses to Representations" received to the MIR, which have been utilised by Aberdeen City Council to inform the content of the PLDP. Suggestion has again been made that the additional land applied for within Development Bid (B0918), would lead to a loss of woodland and associated habitats. This statement appears to refer to all 6 development parcels which is factually inaccurate. It can only be attributed to **"Development Site 1" in the Bid, as none of the other five related Bid sites** would result in the loss of any woodland, as they are primarily made up of agricultural land immediately adjacent to the OP38 Countesswells boundary within the PLDP.

The concerning area of woodland is currently attributed to a commercial woodland plantation adjoining Hazlehead Park. The woodland has been poorly managed and is considered to be of a relatively low quality. This formed the fundamental basis of its choice as the location for the primary access road to link Countesswells with the A944 to the north, which has been approved through the Development Framework, Phase 1 Masterplan and PPIP application, with the latter informed by a robust Environmental Impact Assessment. It therefore makes logical sense to provide a sustainable growth corridor to the north and east, with development built off this road, integrating new mixed density neighbourhoods with the surrounding areas to the south. The majority of the woodland would be retained, forming a natural backdrop and links would be retained through to the recreational uses associated with Hazlehead Woods, whilst providing a key arrival sequence into Countesswells from the north.

Furthermore, any development on the Bid sites would continue with the principles set out within the approved Development Framework, respecting the most important mature landscape features and incorporating the use of strategic landscaping which would help re-establish fragmented ecologies, encourage wildlife and biodiversity and facilitate unrestricted access to open space for the new community. The area of land sought for expansion to the north east would also retain and link appropriately with the existing Core Path 57, connecting Countesswells Woodland and recreational facilities at Hazlehead. Therefore any suggestion that development of the additional pockets of land would have a detrimental impact on woodlands and ecology is unsubstantiated and strongly refuted.

Landscape

Suggestion within the Schedule 4 **"Responses to Representations"** supplementary documentation to the PLDP that the B0918 Development Option for additional land at Countesswells would be *"visually intrusive and would have a detrimental impact on the surrounding landscape"* is strongly contested and completely irrational in light of the 165ha of greenfield land associated with existing OP58 allocation within the extant LDP. The land sought under B0918 should be assessed in relation to the forthcoming new urban community at Countesswells, which will alter the landscape as it exists in its current form. As discussed, this has been accepted not only through the current LDP and adopted Countesswells Development Framework and Phase 1 Masterplan Supplementary Guidance, as well as approval of an application for PPIP on the site. This process has been landscape led, with substantial consultation undertaken with the local community providing valuable input into the perceived design and layout of the development.

The additional sites for expansion are located immediately adjacent to the existing OP58 boundary and have been identified as the most suitable to allow for future organic growth. They offer excellent connectivity, allowing for a natural integration to existing core paths and the planned network of streets and open space and should therefore be viewed as a logical expansion to the existing Countesswells boundary.

Recommendations

In light of the reasoning set out above, it is respectfully requested that the boundaries attributed to the PLDP (OP38) Countesswells allocation are increased to encompass additional land sought under Development Option B0918, as a suitable location for development to be delivered post 2023, within the Proposed Local development Plan. Additionally, Table 6: Development at Countesswells contained within the PLDP should be amended to include an additional 1000 homes in Phase 1 and further 500 homes in the Phase 2 Plan Period.

PAPER APART

Representation to Aberdeen City Council on Behalf of Stewart Milne Homes in Response to the Failure of the Main Issues Report to Identify Development Option B0918 - Countesswells Community Expansion as a Preferred Site for Mixed Use Development.

Introduction

The Countesswells Consortium wish to object to the failure of Aberdeen City Council to recognise 6 additional pockets of land at Countesswells (Development Option B0918) as opportunity sites for mixed use development within the Main Issues Report published in January 2014.

A development bid was submitted to the local authority in June 2013 in response to the **Council's** call for Development Option sites and represented an expansion to the existing OP58 allocation within the extant Aberdeen Local Development Plan (ALDP) 2012. The land at Countesswells, submitted under the aforementioned Bid, has subsequently been deemed undesirable through the technical response issued within the Development Options Assessment Report, which is published as a supplementary document to the Main Issues Report (MIR).

The sites encompassed within the Countesswells Expansion Bid have been excluded by the MIR for reasons pertaining to loss of Woodland and resultant disturbance to designated species and their habitats. Furthermore, visual intrusion and a detrimental landscape impact have also been included as reasoning for not including Development Option B0918 as an opportunity site.

The principle of development at Countesswells has previously been established under the adoption of the extant Local Development Plan. Opportunity Site OP58 covers an area of 165 hectares, to accommodate 3,000 homes and 10 hectares of employment land in the period to 2023. The social, environmental and economic benefits of this development were echoed by Aberdeen City Council and also the Scottish Government Reporter. The Countesswells Consortium have recently concluded and submitted a Development Framework and Phase 1 Masterplan for the site, which coordinates the planning and delivery of the development and associated infrastructure requirements. This was

approved by the Council's Enterprise, Planning & Infrastructure Committee on 13 March 2014. The Consortium's aspirations to create a sustainable mixed use community are at the forefront of the Development Framework and the Development Bid has sought a logical expansion to the existing site boundaries, in order to establish and safeguard direction for a natural expansion of the settlement, which will in turn facilitate and secure future growth and investment.

The scale of infrastructure required for the Countesswells development is significant, incorporating an intricate network of roads, streets and pedestrian/cycleways throughout the site. Two new connections to the A944 will be delivered to ensure efficient transport connections for all users, between the existing various development blocks and the surrounding road network, in order to ensure the long term viability and continued delivery of development. Paragraph 166 of SPP states that "*the relationship between transport and land use has a strong influence on sustainable economic growth*", therefore it is logical to include the additional land, sought under (Development Option B0918) in order to maximise the significant level of infrastructure associated with Countesswells and secure the long term-planning of the community, allowing in to expand organically in the future.

Furthermore, the Green Belt designation on these sites is not required to manage growth or prevent growth which is unplanned. Paragraph 160 of SPP promotes Green Belts that contribute towards the long-term growth of a settlement, and warns that boundaries should not be drawn too tightly round settlements. Green belts, should therefore not artificially restrict growth, but should ensure that growth is directed to the best locations. As such, the case for the removal of Green Space Network and Green Belt designation from the additional parcels of land (site reference B0918) within the MIR is strongly reiterated, as is the justification for inclusion within the Proposed LDP. This is also confirmed through the site's associated score of 44 **out of a possible 60 within the Council's** Site Assessment Checklist criteria, demonstrating clearly that the site has significant potential as an expansion to the existing ALDP OP58 designation.

Effective Land Supply

The development of Countesswells community has been established through its allocation **in the current LDP as a prime location to accommodate a substantial level of Aberdeen's** growth over the period 2012-2023. However as evidenced above, should the SDP be adopted in its recommended form, there will be significant shortfalls in housing supply. As

such, in order to help mitigate this shortfall, additional land identified in the MIR under B0918 should be included within the proposed LDP. It is a statutory requirement to ensure a generous housing land supply that maintains a five year supply of effective housing land at all times, including at the end of the Plan period. Accordingly, further sites should be allocated through the proposed Local Development Plan.

Within the aforementioned local authority response to the Development Option bid on site, it is stated that there *'is no numerical justification to allocate further housing sites'*. This statement is strongly refuted in this instance. A separate Paper Apart has been prepared on behalf of Stewart Milne Homes, relative to MIR Issue 1 – Greenfield Housing and Employment Allocations. Please refer to this, as it provides a robust argument for increasing housing allocations within the proposed Local Development Plan, which is linked directly to Countesswells.

Paragraph 80 of SPP states that *'planning authorities should promote the efficient use of land and buildings, directing development towards sites within existing settlements where possible to make effective use of existing infrastructure and service capacity'*. This is directly applicable to Countesswells. A substantial level of new infrastructure, including upgrades to the existing road network are required in order to deliver the Countesswells development. Once in place this will provide an intricate network of streets, effective to all modes of transport, allowing access to both the internal facilities within the development and to the wider strategic network, with connections to Kirk Brae, Countesswells Road and the A944. Significant upgrades to the surrounding drainage and utilities network is also required to serve the new community. It is therefore evident that the development will have sufficient infrastructure capacity and linkages to the surrounding network to allow for future organic growth of the Countesswells community. A modest expansion will help sustain the associated health, education, recreation and service facilities to be delivered in line with the extant LDP allocation. The development bid represents a highly appropriate area to augment some of the abovementioned greenfield housing allowance in accordance with SPP.

Loss of Woodland and Habitats

Issue is taken with the MIR's assumptions that the Development Bid (B0918) would result in a detrimental loss of woodland and associated habitats. It is assumed that this statement relates to the site referred to as "Development Site 1" in the Bid, as none of

the other five related Bid sites would result in the loss of any woodland, as they are primarily made up of agricultural land immediately adjacent to the OP58 boundary.

The concerning area of woodland is currently attributed to a commercial woodland plantation adjoining Hazlehead Park. The woodland has been poorly managed and is considered to be of a relatively low quality. This formed the fundamental basis of its choice as the location for the primary access road to link Countesswells with the A944 to the north, which has been approved through the Development Framework and Phase 1 Masterplan. It therefore makes logical sense to provide a sustainable growth corridor to the north and east, with development built off this road, integrating new mixed density neighbourhoods with the surrounding areas to the south. The majority of the woodland would be retained, forming a natural backdrop and links would be retained through to the recreational uses associated with Hazlehead Woods, whilst providing a key arrival sequence into Countesswells from the north.

Furthermore, any development on the Bid sites would respect the most important mature landscape features and the use of strategic landscaping would help re-establish fragmented ecologies, encourage wildlife and biodiversity and facilitate unrestricted access to open space for the new community. The area of land sought for expansion to the north east would also retain and link appropriately with the existing Core Path 57, connecting Countesswells Woodland and recreational facilities at Hazlehead.

Landscape

Suggestion within the MIR and associated supplementary documentation that the Bid sites would be "*visually intrusive and would have a detrimental impact on the surrounding landscape*" is strongly contested and absurd in light of the existing OP58 allocation. The land sought under B0918 should be assessed in relation to the forthcoming planned new urban community at Countesswells, which will alter the landscape as it exists in its current form. As discussed, this has been accepted through the current LDP, recent approval of the Development Framework and Phase 1 Masterplan and the Consortium are in final stages of progressing subsequent planning applications for the site. This process has been landscape led, with substantial consultation undertaken with the local community providing valuable input into the perceived design and layout of the development.

The additional sites for expansion are located immediately adjacent to the OP58 boundary and have been identified as the most suitable to allow for future organic growth. They offer good connectivity, allowing for a natural integration to the existing network of streets and open space and would therefore be viewed as a logical expansion to the existing Countesswells boundary.

Recommendation

In light of the reasoning set out above, it is respectfully requested that the existing boundaries attributed to the OP58 Countesswells allocation are increased to encompass additional land sought under Development Option B0918, as a suitable location for development to be delivered post 2023, within the Proposed Local development Plan.

Representation to Aberdeen City Council Main Issues Report on Behalf of The Countesswells Consortium in response to the Proposed Settlement Strategy and Associated Employment Land Allocation at Countesswells.

The Countesswells Consortium wish to take issue with the proposed Settlement Strategy and more specifically the proposals to carry forward the existing Aberdeen Local Development Plan's (ALDP) employment land allowance for Countesswells, within the Main Issues Report (MIR) published in January 2014. The existing allowance up to 2026 equates to 10 hectares and it is hereby sought that this figure is reduced within the Proposed ALDP.

The Countesswells Consortium have undertaken extensive market research associated with employment opportunities within the new settlement. The Aberdeen City and Shire Employment Land Audit demonstrates a generous supply of employment land augmented by recent allocations within the extant LDP. The total supply for Aberdeen City is 298 hectares, representing an approximate 82 year supply. The Audit details that of this total, 125 hectares are marketable in Aberdeen, representing 42% of the total supply. The Proposed Aberdeen City and Shire Strategic Development Plan targets a 60 hectare employment land supply for the Aberdeen City area that is immediately available to business at all times. At present Aberdeen has 58.1 hectares immediately available, located in established employment areas such as that located in and around the Airport (Dyce Drive).

At present there are in excess of 100 industrial properties being marketed in Aberdeen, in a variety of sizes ranging from 200 m² to 2,000m². However there appears to be a lack of supply of smaller units of less than 200m², which is unusual given demand for small start-up business requiring industrial floor space. This presents an opportunity for Countesswells, as some of the employment land allocation on the site could accommodate small industrial units, workshops or offices that would provide a degree of flexibility for a range of occupiers, most likely within the oil and gas sector or business service companies that need to be located within close proximity to existing large scale employment centres such as Westhill and the new Prime Four development. Such small scale accommodation and uses would integrate well with the surrounding residential community.

Aberdeen's swift recovery from the economic downturn experienced in 2009's economic recession is a trend that has not been replicated anywhere else in Scotland. Office take up **figures for September 2012 had risen beyond those experienced in 2008's peak.** As a result, supply of office accommodation has been on the decline in recent years and market analysis suggests that there is currently no Grade A stock office accommodation available in the city centre for the next year. New development continues to take place in peripheral locations on the edge of the city, such as Dyce, Westhill and Kingswells. Office take up data from October 2009 – October 2013 demonstrates that the majority of transactions took place at the smaller end of the market (<500m²), which represents an active market and an opportunity for Countesswells to cater for this scale of office provision to compliment larger offices located close by at Westhill and Prime Four.

Countesswells provides the opportunity for a high quality residential led mix use development and this is likely to be reflected in the employment uses attracted to the new community. There is also the prospect for the new settlement to draw on the apparent supply shortage in small scale business space and create jobs at higher densities than more traditional class 5 & 6 uses. Class 4 use offers a more diverse and compatible opportunity with a wide range of other uses and has a better potential to form part of an active neighbourhood centre. Small scale office space provided in high density, would allow for the creation of many more jobs than a comparative larger scale industrial warehouse or distribution centre. Such an approach would satisfy an identified demand, help support economic growth and create a sustainable balanced community at Countesswells.

Within the current LDP, the allocation seeks 10 hectares of employment land to be provided within the site, however this was not identified **as a "stand alone" land use, rather** that it should form an integral part of the overall development, interconnected and supported by the surrounding housing and infrastructure in accordance with SPP principles. As such, the creation of a settlement/neighbourhood centre, as highlighted above, will feature at the heart of the development, providing a range of employment and services to the surrounding community.

Countesswells is aimed primarily at supplementing the supply of housing land within the area. This increase in population will provide opportunity for businesses to benefit from a close relationship with residents of this new community on the western fringes of

Aberdeen. Market evidence demonstrates that the settlement would likely attract the following employment land uses:

- Small scale office accommodation
- Small scale business space
- Local retail and convenience
- Community facilities
- Hotel accommodation

The above-mentioned land uses would be ideally located within the settlement core, offering the opportunity to promote higher density development rather than the more traditional approach of allocating employment land based on a supply-led basis. The 10 hectares allocated for Countesswells appears to have been formulated on that basis and could result in the provision of lower density alternative land uses to those set out above such as Classes 5 & 6, in order to achieve such an allocation. This would be undesirable for the new residential community, which seeks to exploit a relatively rural location with high amenity value. Provision of such facilities would ultimately be at odds with a residential-led settlement, increasing vehicle movements and impacting upon surrounding amenity. Accordingly a reduction in the 10 hectare employment allocation is sought, in order to promote a higher density, town centre approach which will be of much greater benefit to the community as a whole.

Extensive work has been undertaken by the Countesswells Consortium to produce a Development Framework and Phase 1 Masterplan to coordinate the planning and delivery of development associated with the ALDP OP58 allocation. This was recently approved by **Aberdeen City Council's Enterprise, Planning & Infrastructure Committee** on 13 March 2014. The Overriding aim for Countesswells is to create a sustainable community in the widest sense, by creating areas of mixed land use, which would incorporate employment opportunities. As highlighted above, The Development framework aims to provide employment land as a component of this mixed use, strategically located around a primary community core, central to the site and also a secondary neighbourhood centre to the northern aspect of the site. These areas will be incorporate a vertical mix of uses as well as opportunities solely for employment, designed to be flexible and responsive to change in market conditions.

Accordingly, it is requested that the existing 10 ha employment allocation within the extant LDP is suitably reduced within the Proposed LDP, in favour of a higher density, flexible mixed use community core and neighbourhood centre, as advocated within the approved Development Framework and Phase 1 Masterplan for Countesswells.

Stewart Milne Homes and IDJ Properties

Development Bid for land at Countesswells



June 2013

Ryden LLP

25 Albyn Place

Aberdeen

AB10 1YL

Tel; 01224 588866

Fax; 01224 589669

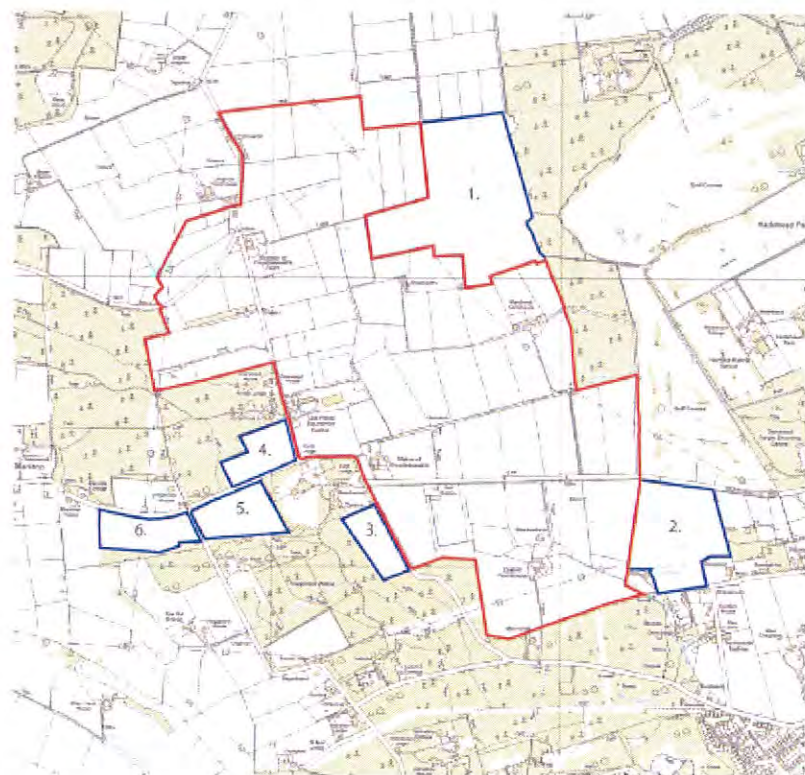
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1.0 INTRODUCTION

- 1.1 This development bid is submitted on behalf of the Stewart Milne Homes and IDJ Properties who own land at Countesswells, to the west of Aberdeen, as highlighted in Figure 1 below.

Figure 1: Site Location Plan



- 1.2 Development at Countesswells is due to start in the near future and will be an exciting sustainable new community, a place to live, work and play with 3,000 homes, employment land and associated uses such as schools, shops and a GP surgery.
- 1.3 Progress with the development has involved the preparation of a development framework for the whole site which will guide the direction of growth for Countesswells. A masterplan and planning permission in principle application are to be submitted to Aberdeen City Council in early course. These proposals have been informed by an extensive period of consultation with the local community and relevant stakeholders. It is anticipated that work will commence on the site in Spring/Summer 2014.

- 1.4 Given the opportunities surrounding this new community, and the social, environmental and economic benefits resulting from it, the applicants wish to expand the boundaries to include those parcels of land edged blue on Figure 1 and numbered 1 to 6. This expansion of the development site will make the maximum use of the planned investment in infrastructure for Countesswells and enhance the sustainability of the community by allowing for future growth to be accommodated in a comprehensive masterplanned manner.
- 1.5 This development bid wishes to remove areas of ground edged blue on Figure 1 from their current Green Space Network and Green Belt designations and include them within the site boundaries of Countesswells, allocated in the extant Local Development Plan as Opportunity site OP58. Further justification is provided in section 6.0.

2.0 SITE DESCRIPTION

- 2.1 The bid site comprises those six parcels of land edged blue in Figure 1 and numbered 1 to 6. All six parcels of land are currently designated in the adopted Local Development Plan as Green Space Network and Green Belt Land, with the exception of Development Site 2 (see Figure 2) where the majority of the site lying to the north sits outside of the Green Space Network boundary. This bid proposes that these designations are removed and the land incorporated into the Countesswells allocation making the best use of proposed infrastructure. The development proposals and justification are described in section 6. Descriptions of each site in turn are given below.

Development Site 1



- 2.2 This is 21.16ha in size and sits on the boundary of OP58 to the north and east. It is currently commercial woodland plantation adjoining Hazlehead Park, which provides convenient access via a core path to outdoor recreational pursuits such as walking, cycling, jogging and dog walking. The current plantation has a life span of no more than 15 years, is all even aged and is not of the same quality as other surrounding woodlands. These woodlands have not been managed effectively in recent years and their integrity will be further compromised by the primary infrastructure (new road connection) that is required to run through this area connecting Countesswells to the A944, and as a result sits on a prominent future access to Countesswells. An overhead power line runs through the site.

Development Site 2



- 2.3 This is 9.87ha in size and sits on the boundary of Countesswells to the south and east. It is currently agricultural land, generally flat, with a gradual gradient to the south, providing good southerly aspect for future development, good positive drainage in to common low lying areas leading to the Burn of Cults. It has well defined stone walled field boundaries and an access track to a collection of farm buildings. It is bound to the north by Countesswells Road and in turn Hazelhead Golf Course and as a result sits on a prominent access to Countesswells. An overhead power line runs through the site.

Development Site 3



- 2.4 This is 2.92ha in size and sits on the boundary of Countesswells to the south and west. It is currently agricultural land, generally flat, with a gradual gradient to the

south providing positive drainage to common low lying areas. It is well defined on each side. To the west and south by Foggieton Wood, the east by Kirk Brae and to the north by a field boundary. The site sits on a prominent access to Countesswells.

Development Site 4



- 2.5 This is 3.31ha in size and sits on the boundary of Countesswells to the west. It is currently agricultural land, sloping gently from north to south toward Blacktop Road and is well defined on the north and west by Countesswells Wood and to the east by Kirk Brae. The site has a good southerly aspect and sits on a prominent entrance to Countesswells. An overhead power line runs through the site.

Development Site 5



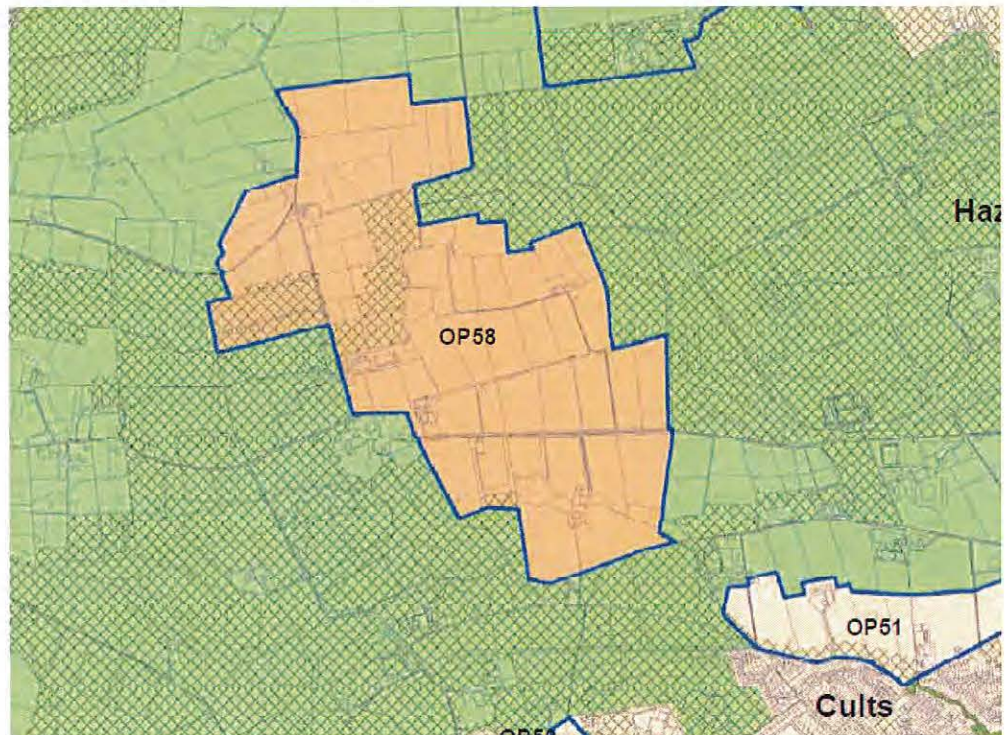
- 2.6 This is 4.34ha in size, is currently agricultural, and sits to the south of Blacktop Road at a key gateway to Countesswells. It is well defined by Blacktop Road to the north and in turn, Development Site 4, Baillieswells Road to the west and Foggieton Ancient woodland to the south. It had good southerly aspect and views eastward to the Dee Valley. There are a number of stone walled field boundaries typical of the local area, and a number of overhead power lines run through the site.

Development Site 6



- 2.7 This is 3.90ha in size, it is currently agricultural, and sits to the south of Blacktop Road, west of Bailliewells Road and is well defined to the south by Foggieton Wood. It slopes from north to south, providing good southerly aspect and some expansive views out over the Dee Valley. There are a number of internal stone walled field boundaries typical of the local area and a number of overhead power lines run through the site.
- 2.8 Current Green Belt and Green Space Network policies state that no development will be permitted in the green belt for purposes other than those essential for agriculture, forestry, recreation, mineral extraction or restoration or land renewal. Green Space Network land consists of areas of land that are considered to have particular value in terms of public access, wildlife or landscape together with links between such areas.

Figure 2: Aberdeen City Local Development Plan 2012



2.9 The proposals for these sites include their removal from the Green Belt and Green Space Network and their inclusion within the current allocation at Countesswells site OP58, for the appropriate number of additional homes, in the extant Local Development Plan. The inclusion of these sites will support the viability of this mixed use development and the services contained therein. Any development will incorporate excellent sustainability principles in its design in order to minimise any landscape impact and loss or disturbance to the natural environment. These designs will look to incorporate residential units to support the viability of the new settlements, add significant ecological value to the surrounding environment and enhance the social and economic benefits of the development as a whole for the local community.

3.0 SCOTTISH PLANNING POLICY

3.1 The 2010 consolidated document on Scottish Planning Policy (SPP) places sustainable economic growth at the heart of town planning policy in Scotland. It is designed to encourage the right development in the right place, which enables social, environmental and economic benefits to result from land use change. This “triple-bottom line” approach to spatial planning is recognised as the best way to

promote sustainability which will help this generation meet its needs without compromising future generations' ability to meet theirs.

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

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

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

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

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

- 3.6 High-quality design of new residential development is a key policy objective of the Scottish Government and should guide the whole process of delivering new housing. The aim for this policy is to create places that are distinctive, with a good mix of integrated land uses including homes of varied types and tenures. Fundamental to this policy is the integration with new residential development of active travel solutions, including walking and cycling as well as public transport. This will reduce reliance on the private car and encourage easy access to local services and promote healthy lifestyles.

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

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

4.0 STRATEGIC PLANNING

Aberdeen City and Shire Structure Plan 2009

- 4.1 The Aberdeen City and Shire Structure Plan approved by Scottish Ministers in 2009 sets growth targets for the city region and promotes a spatial strategy designed to accommodate this growth in the most sustainable locations. It identifies a requirement for 72,000 houses within the Structure Plan area over the period to 2030. Aberdeen City is identified as one of three Strategic Growth Areas (SGAs) which will be the main focus for development in that period. Around half of all new development is likely to be located in Aberdeen City. Of those 36,000 houses required within the City it is envisaged that 21,000 will be provided on greenfield sites with a further 15,000 split between brownfield sites and identified regeneration areas within the City. In terms of phasing of greenfield housing, 12,000 are anticipated to be required between 2007 and 2016; 5,000 between 2017 and 2023 and 4,000 between 2024 and 2030.
- 4.2 The Structure Plan advocates sustainable mixed communities with new housing and developments for employment and commercial use well related to each other to improve people's quality of life and opportunity. One of the targets to meet the sustainable mixed communities objective is for all housing development over 1 hectare in the Strategic Growth Areas to be in line with approved supplementary guidance and generally have no less than 30 dwellings per hectare.

- 4.3 With regard to economic growth, the plans objective is to provide opportunities which encourage economic development and create new employment in a range of areas that are both appropriate and attractive to the nature of different industries. The Plan seeks to ensure that at least 60 hectares of land available to businesses at all times in a range of locations within the City. New employment land allocations in the City between 2007 and 2023 require to total 105 hectares, with 70 hectares identified as strategic reserve land to come forward in the period between 2024 and 2030.

Proposed Aberdeen City and Shire Strategic Development Plan

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

Figure 3: SDP Land Allowances

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

- 4.6 Economic Growth is a key objective for the SDP. The Plan looks to provide opportunities which encourage economic development and create new employment in a range of areas that are both appropriate for and attractive to the needs of different industries. It acknowledges the success of the area's economy during the recent global downturn and looks to capitalise on this by continuing to diversify the economy into other key sectors such as life sciences, food and drink and tourism.

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

5.0 SERVICES

- 5.1 Significant infrastructure works are planned for the creation of the relevant phases of development at Countesswells. The additional sites comprising this development bid would be supported by this infrastructure.

- 5.2 SEPA's Flood Risk Map is shown below in figure 4. With no significant watercourse through or nearby the site, there is no risk of flooding on any of the additional parcels of land sought for inclusion in the Countesswells site.

Figure 4: Flood Risk



- 5.3 Countesswells will be a sustainable mixed community that looks to provide as many services and facilities as possible within the settlement boundary. This is primarily to create an attractive, balanced community that people will want to live and work in, but also to reduce the amount of travel to other locations outside the settlement, as much as possible. This includes primary and secondary schooling which form part of the proposals on site OP58. A primary school will be developed in the first phase of the development and a new secondary school and a further primary school provided in latter phases to support the increase in housing. These additional sites in this bid would be supported by the new provision of education facilities, as well as the leisure, community, retail, employment and open space provision as described in the development framework.

6.0 DEVELOPMENT PROPOSALS AND JUSTIFICATION

- 6.1 This section will provide a justification for each individual site separately before exploring arguments in favour of the expansion of the Countesswells Community boundaries as a whole.

Development Site 1

- 6.2 The current quality of the woodland area that makes up Development Site 1 is considered to be of poor quality. This is one of the main reasons that it was deemed logical in the first instance to align a new primary access road to the A944 through it. It therefore makes sustainable development sense to combine this primary infrastructure with well linked development. However over time and with positive management and intervention, most notably diversification of species, at least part of the woodland could still provide cover, screening and shelter, especially to the northern boundary where it will link in with current proposed woodland treatment for the northern edge of Countesswells. With heightened ecological and recreational value, it will provide significant high quality and desirable development potential and a positive addition to the Countesswells Community.
- 6.3 This links not only to the primary infrastructure, as in the access road to the A944, but also the recreational benefits of Hazlehead Park, core path network, will provide a positive sustainable neighbourhood within Countesswells. Additional benefits include the site's proximity to the proposed Countesswells northern mixed use local centre and primary school as well as the main settlement centre, and with the southerly aspect of the site, all combine to enhance the quality of the proposed community and the attractiveness of the area. The alignment of the new primary access to Countesswells provides a corridor for growth to the north and east. Development would logically be built off this road integrating new mixed density neighbourhoods with the surrounding residential areas, the woodland backdrop and the recreational use of Hazlehead Woods, while responding to the key arrival sequence into Countesswells from the north. It provides a very logical and well integrated extension to the proposed settlement.

Development Site 2

- 6.4 The benefits of this development site include the southerly aspect for future residential development, presenting opportunities for passive solar gain and high quality residential amenity. The site is also ideally placed to link into the proposed SUDS system for Countesswells, enhancing the drainage system and combining infrastructure requirements, thereby utilising the residential development potential of this particular site in a sustainable way. With a boundary to the main site it also allows for good connections between neighbourhoods on this development site and those already proposed within Countesswells both in terms of streets and open space.

- 6.5 Situated along Countesswells Road, the site also has the potential to provide good access for future public transport. This would strengthen the sustainability of development in this location and reduce the need for residents to rely on the private car. Due to the proximity to the town centre and arrival sequence to Countesswells proposals for the site would include a broad range of residential densities and areas of open space including SUDS well integrated within the existing development pattern.

Development Site 3

- 6.6 The boundaries of the site adjoin both Kirk Brae and the Countesswells site which presents the opportunity to enhance connections through the whole development. With the woodland cover of Foggieton to the west and south, there are also potential connections into this outdoor recreational resource and in turn further connections to new neighbourhood developments in sites 4, 5 and 6. Due to its proximity to the settlement centre, its key location on entering Countesswells from the south, the site offers the potential for a broad range of residential densities with attractive open space. Opportunities also exist to enhance the core path network that links the residents of Countesswells to the outdoor recreation opportunities in the surrounding rural areas. This connection to the woodland, which includes Ancient Woodland remnants and extensive path networks, provides a positive connection for the rest of Countesswells, which was not readily available before. Combine this with the lower lying nature of the southern portion of the site, the creation of an enhanced open space network starts to emerge.

Development Site 4

- 6.7 This site is bound on the north by Countesswells Wood which includes Ancient Woodland remnants and extensive path networks. This presents excellent opportunities for residential development integrated with existing outdoor recreational pursuits. This network of paths connects well into the Countesswells neighbourhoods that bound the northern edge of Countesswells Woodland and, in turn, facilitates a better connected place and resource.
- 6.8 Its southerly aspect provides views out over the wider Dee Valley, and with its location on the junction of Blacktop Road and Kirk Brae, provides a key gateway site to the Countesswells Community. The key location of the site in close proximity to the centre of Countesswells, on a key arrival sequence from the west and on gently sloping land presents the opportunity to allow an increasing density of

residential development towards the settlement core, while allowing excellent access to the existing recreational opportunities in Countesswells Woods.

Development Site 5

- 6.9 The proximity of this site to Foggieton Wood allows for new residential development to be connected to the extensive path network that exists and the wider outdoor recreational pursuits. It also offers the connection to the potential new residential neighbourhoods in development site 3 and on to the Countesswells Community. It benefits from a southerly aspect and glimpsed views out over the Dee Valley. The key location of the site in close proximity to the centre of Countesswells, on a key arrival sequence from the west and on gently sloping land presents the opportunity to allow an increasing density of residential development toward the settlement core, while allowing excellent access to the existing recreational opportunities in Foggieton Woods. Together with development site 4 there is an opportunity to create a meaningful and attractive settlement entrance sequence.

Development Site 6

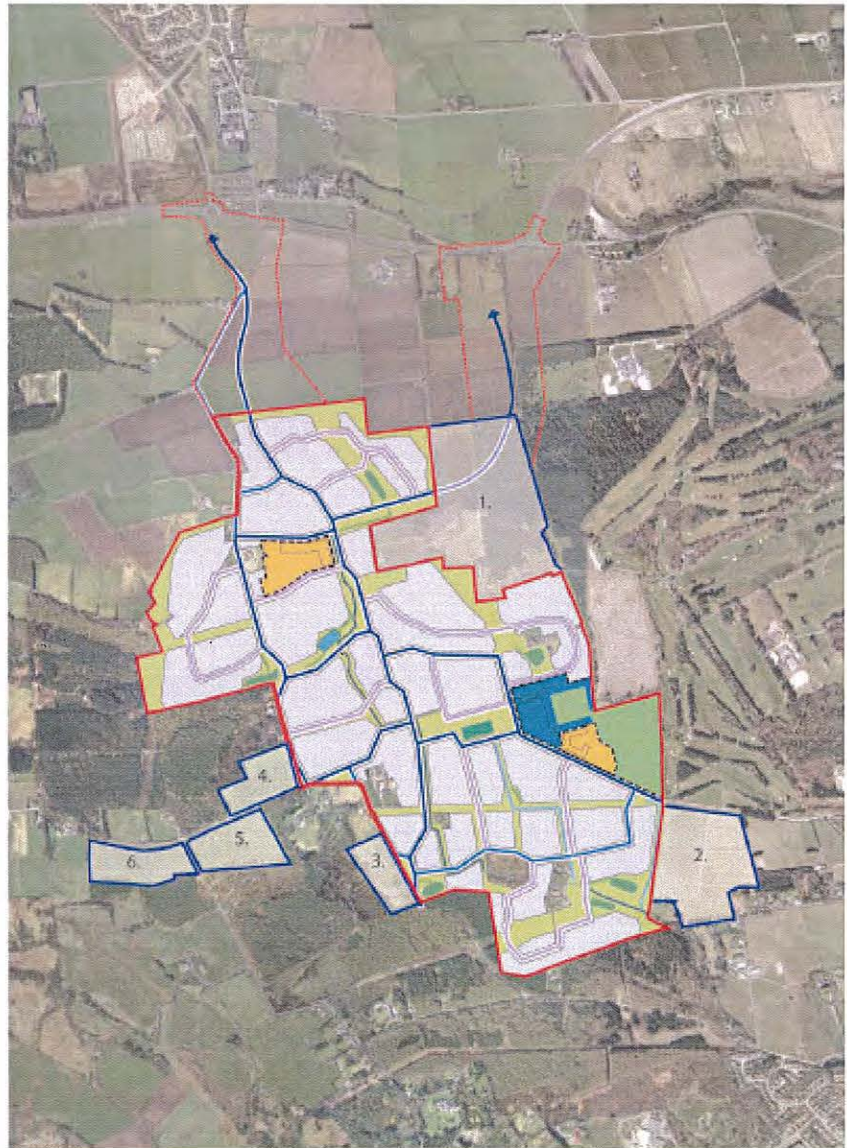
- 6.10 This site shares many of the benefits of the above development site 5, with the addition of expansive views out over the Dee Valley. Its connection to Foggieton Wood allows for the potential for a new residential neighbourhood link in to the wider network of footpaths and outdoor pursuits that this offers, as well as good connections to the other development sites and the Countesswells Community. The key location of the site on the arrival sequence into the settlement of Countesswells presents the opportunity to allow lower to medium density residential development, while allowing excellent access to the existing recreational opportunities in Foggieton Woods. With development sites 4 and 5 there is a tremendous opportunity to create a gradually increasing density of development when arriving from the west, typical of many traditional Scottish places which evolve over time and create attractive rural to urban arrival sequences providing memorable gateways to distinctive places. Path connections would be created to link the area with the development sites 4 & 5 as well as the other areas of Countesswells beyond.

Countesswells Community Expansion

- 6.11 In addition to the site-specific benefits each site represents, there are more universal benefits which are presented by considering the expansion of the Countesswells Community as a whole. Figure 5 below shows the Countesswells

Development Framework with the addition of the six development sites described above.

Figure 5: Development Framework and Proposed Development Sites



- 6.12 The development of green belt land is necessary to allow the future growth of the City and this is acknowledged in the Strategic Development Plan¹. There is a strong justification for the removal of these sites from their current Green Belt/Green Space Network designations to support the development of the Countesswells Community.

¹ Proposed SDP, paragraph 3.16

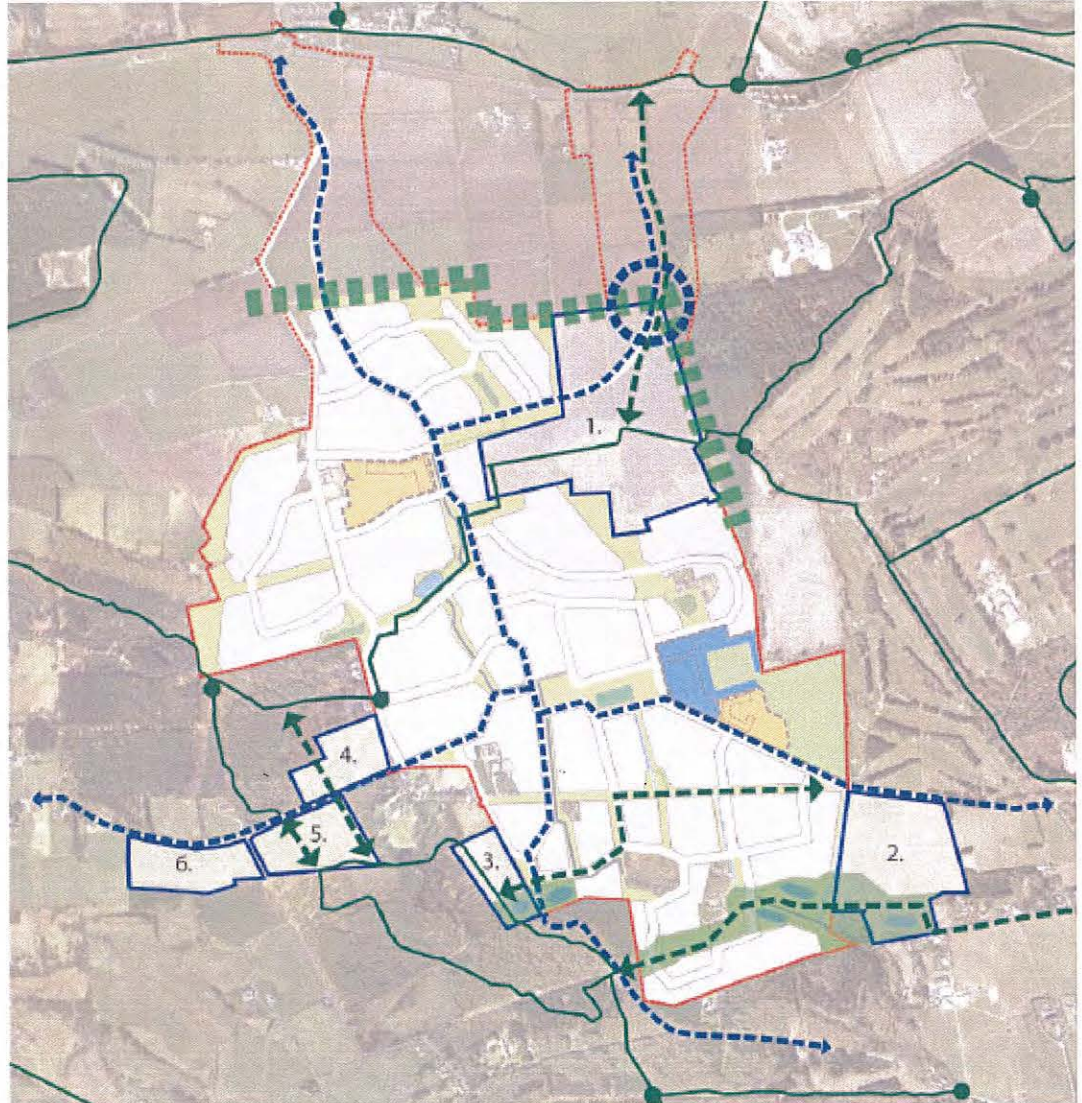
- 6.13 The sites at present form part of the rural setting of the City of Aberdeen and contribute towards the landscape which defines the urban area as it exists currently. However, this development bid should be assessed in relation to the planned creation of a new urban community at Countesswells which will alter the landscape fundamentally. This landscape change has been accepted in the adopted Local Development Plan. Since then, the Consortium have committed significant resources towards progression of the plans, including extensive consultation with local residents and other stakeholders.
- 6.14 The removal of these sites from the green belt would not impact on the ability to give access to open space around the city. Footpaths to the wider area would be created that link in with those already described in the development framework for the main Countesswells site. Any development on the additional sites would respect the most important mature landscape features that exist and use strategic landscape to re-establish fragmented ecologies, encourage wildlife and biodiversity and improve access to open space for the whole community. The development of land to the north east of Countesswells would retain the existing paths that form part of the Aberdeen City Core Path Network.
- 6.15 Further to this, the Green Belt designation on these sites is not required to manage growth or prevent unplanned growth. Scottish Planning Policy promotes Green Belts that contribute towards the long-term growth of a settlement, and warns that boundaries should not be drawn too tightly round settlements. Not all Greenfield land will be designated Green Belt, according to SPP². Green Belts, therefore, should not artificially restrict growth but should ensure that growth is directed towards the best locations. The development of Countesswells Community has been established by the adopted Local Development Plan as a good location to accommodate growth. As such, these six development sites would be more productive if they were added to the Countesswells Community boundary than they would be if they remained as Green Belt Land.
- 6.16 In terms of the Green Space Network designation, current policy aims to protect and enhance the wildlife, recreational, landscape and access value of these areas. Access through the expansion sites would link in with the current access strategy for Countesswells and provide opportunities for recreation, community access as well as contributing towards ecological improvements through the creation of wildlife corridors linking habitats with feeding grounds. These areas will provide a high level of amenity for existing and new residents and result in the creation of an attractive, sustainable and high quality place.

² SPP, paragraph 160

- 6.17 During the examination into the previous Local Development Plan, the Scottish Government Reporter recognised there was scope to extend the development area at Countesswells. At that time it was agreed that the boundary of OP58 was sufficient to accommodate the scale of development required by the Local Development Plan. However, given the scale of growth required to satisfy demands for housing and employment land in the review of the Local Development Plan, the expansion sites would be able to accommodate additional growth. This is a position supported by the Reporter.
- 6.18 The sustainability benefits of additional sites at Countesswells make these an ideal addition to the reviewed Local Development Plan. The sites are still within the minimum walking distance requirements of PAN75: Planning for Transport. The new settlement will feature primary and secondary schools, local shops, community facilities, leisure facilities and health services. All additional sites will be within walking distance of the planned "town centre" where the majority of these services will be located. Additional residential sites added to Countesswells would increase the viability of these services, increase the attractiveness of the location for employment land occupiers and ensure that the services that will eventually be taken-over by public sector providers would be more cost-effective.
- 6.19 Additional housing on these sites would also increase the viability of public transport provision within the settlement, enhancing the mass of population concentration that could support a range of services, improving the perception of convenience and, therefore, uptake of services. This modal shift away from private car transport is essential to secure the climate change objectives of the Local Development Plan's vision and spatial strategy. By increasing the allocation at Countesswells by adding the sites in this development bid, these objectives would be more easily obtainable.
- 6.20 With regard to the natural environment, development would not be intrusive into the surrounding landscape. The additional sites, much in the way that the original development site was, are well screened from major approaches into Aberdeen from the A93 and A944. The sites are also screened from the city itself and would have no impact on the landscape setting of Aberdeen, as is the case with OP58. Countesswells will have an urbanising effect on the landscape, thus minimising the impact on the additional sites sought for inclusion in this bid. Additional development would be well contained by mature landscape features.

- 6.21 The proposed Strategic Development Plan recognises that not all land requirements can be met by previously developed sites and acknowledges the constraints associated with land that has a history of prior development. These can include site contamination works, demolition and clearance. The challenge for the local authority is to accommodate growth whilst protecting environmentally-sensitive locations that contribute to the landscape setting of the City. There are limited opportunities within the existing built up area to accommodate growth, and fewer still that are viable in terms of upfront costs. The additional sites at Countesswells present an opportunity to satisfy growth demands in a location that has an established capacity to accommodate development without harming the natural environment.
- 6.22 The identification of these development sites in the review of the Local Development Plan will also provide clarity and certainty regarding the future direction of growth in the area. Identification of these sites in the emerging Local Development Plan will promote opportunities for growth that contribute towards the creation of sustainable, high quality places. A comprehensive masterplanned approach to the individual development sites, as part of the whole development, will ensure that supporting services, amenity areas and appropriate infrastructure are secured (see Figure 6). This certainty will reassure future residents of Countesswells that they are investing in a project that will have a positive lasting legacy and be a secure investment for the future. This certainty is vital to the success of Countesswells as a whole and these individual sites are able to help ensure that the emerging plans and proposals become a successful place to live, work and invest in.

Figure 6: Concept for Future Growth of Countesswells



7.0 CONCLUSIONS AND RECOMMENDATIONS

- 7.1 The principle of development at Countesswells was established during the production of the extant Local Development Plan. The social, environmental and economic benefits of this development were highlighted and endorsed by the City Council, relevant stakeholders and Scottish Government Reporter. The Consortium have undertaken a further period of consultation to refine the proposals and will present a development framework, masterplan and planning permission in principle to the City Council for examination. This establishes the viability of the development and confirms the desire to create a sustainable, high quality place for people to live and work in.
- 7.2 This development bid looks to extend the boundaries of Countesswells to include six parcels of land located to the south west, south east and north east of the original boundaries as described in the extant Local Development Plan as Opportunity Site OP58. This bid argues for the removal of the Green Space Network and Green Belt designation over these sites and puts forward the case for their inclusion in the review of the Local Development Plan as part of the Countesswells new settlement.
- 7.3 These additional sites will have a minimal impact on the surrounding landscape as, like the original site boundary, they are either already well contained and screened or can be managed to the considerable enhancement of the existing landscape given the topography and existing features of the site as a whole. The sites are free from constraints such as contamination and flood risk and would be ideal locations to accommodate mixed density residential organic growth of Countesswells.
- 7.4 Countesswells will accommodate a large range of services within its boundaries to provide day-to-day requirements of residents including employment, health, education, shopping and recreation. The expansion of the site's boundaries to include the additional parcels of land would ensure that these services remain viable, attractive and cost-effective.
- 7.5 On the basis of the above, these additional parcels of land should be considered favourably as a location for development within the review of the Aberdeen City Local Development Plan to meet the requirements for the Aberdeen City area as identified in the Strategic Development Plan.