

<b>Issue 1</b>	<b>VISION AND GENERAL SPATIAL STRATEGY</b>	
<b>Development plan reference:</b>	Page 3-7	<b>Reporter:</b> Stephen Hall
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
<p>Ken Hutcheson (9)                  Old Aberdeen Community Council (100)                  Cults, Bieldside &amp; Milltimber Community Council (102)                  Nigg Community Council (111)                  Scottish Enterprise (120)                  MacTaggart and Mickel Homes (123)                  NHS Grampian (148)                  Persimmon Homes (157)</p>		
<b>Provision of the Development Plan to which the issue relates:</b>	The first two chapters of the Proposed Plan set out the Vision and Spatial Strategy for development over the lifetime of the Plan.	
<b>Planning authority's summary of the representation(s):</b>		
<p><u>Phasing and Infrastructure</u></p> <p>9: Detailed phasing of developments is required to ensure the infrastructure is developed to match the development of housing</p> <p>111: Whilst accepting in principle, and supporting the objectives of the Proposed Plan, respondent is of the opinion that many of the suggested proposals intimated as being required to encourage the economic and financial growth of Aberdeen City and North East should be suspended until existing infrastructure problems are resolved.</p> <p>148: Generally supportive of the Spatial Strategy but want to emphasise the importance that adequate provision is made for healthcare facilities to serve new development. Existing facilities are already pressurised and incapable of catering for new development.                  New Employment Land</p> <p>120: In order to achieve the full potential of the area around the new harbour expansion, new employment land allocations require consideration.</p> <p><u>General Comments</u></p> <p>100: The aims of the Plan are ideal however the means of delivery are not clear and succinct. We would wish to see all of the Aims in Section 1 delivered within the timescale of the Plan.</p> <p>Define what is meant by "Housing allowances" in Section 1.9. Are these houses, flats, beds etc?</p>		

Section 2.1 promotes the city centre as the commercial, economic, social, civic and cultural heart of Aberdeen but all of the major commercial and economic developments are peripheral to the city centre and essentials such as transport transfer hubs and traffic circulation are not being fully addressed.

Section 2.5 states that "New developments will have to be of the best standard". This is highly desirable and it has sadly been neglected in current developments. All public developments should be subject to a design competition to ensure that they are of a high standard and show leadership which will encourage the commercial market to follow suit. Section 2.9 People will not choose residential location simply on it's proximity to their place of work. Effective alternatives to car travel must therefore be delivered in the form of public road transport, rail links and dedicated cycle routes.

102: Agree with the position of no further large scale development along Deeside.

Table 8 is missing OP41 Friarsfield which is still under development.

A local landowner has submitted a proposal to include land at Brookfield/Murtle Den. As long as the approval was conditional for the land to be only used for housing for over 50's we would have no objections.

120: The Proposed Plan reflects well the current NPF3 and SPP status and requirements particularly with regard to the ambition of the plan in relation to place. There is no Spatial Strategy Plan. A clear visual representation of the overall intentions would be welcomed.

The Plan could also show areas which have a regional significance for development, and an overlap between the City and Shire boundaries - for example Energetica and other growth areas and settlements which are bisected by the Council's boundary lines.

157: Introduction does not fully take account of the national planning policies and guidance. Specifically there are no comments made in relation to Scottish Planning Policy, which should be considered as one of the key documents to Scottish Planning. The key point from SPP is to "introduce a presumption in favour of development that contributes to sustainable development".

123: Noted from the Action Programme that there remains significant work to be carried out in order to deliver some of the masterplan zones. The Council are urged to realistically consider how achievable these aspirations may be and what procedures and sites are in place should a shortfall in housing numbers occur.

**Modifications sought by those submitting representations:**

Phasing and Infrastructure

148: Healthcare sites should be identified and set aside for healthcare facilities and should be capable of accommodating 50% expansion in the future. This should include the new sites allocated at Peterculter.

Employment Land

120: Devise the Action Programme to give priority to the development of associated employment land. Expand paragraphs 3.71 and 3.72 to make cross reference to other appropriate policies within the plan.

General Comments

102: Inclusion of OP41 Friarsfield in Table 8.

129: Include a Spatial Strategy Plan within the Introductory or Spatial Strategy sections of the Plan.

123: Requested that the council review the ability of the masterplan zones to create strong landscapes within which smaller developments in local communities can take place. The Proposed Plan does not provide a level of information to set out how these zones are to integrate with adjacent existing settlements and what their development mean for the context and setting of smaller sites.

Have a review of the green belt and green space network to assist in linking these zones without detrimentally affecting the small area of Bucksburn which has been omitted from either zone.

Include reference to how shortfalls from the masterplan zone developments are to be dealt with as the plan progresses.

157: Question the need for every major site to require a Masterplan created with community involvement, and would request a definition for major development to be included within the plan. Respondent believes this should only apply for sites of a certain size and would suggest 200 units or larger, rather than small sites. This is necessary to ensure the required 5 year land supply is met - small sites can assist where larger sites have not started or are not being developed as expected.

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

**Summary of response (including reasons) by planning authority:**

Phasing and Infrastructure

9: We agree that it is important to assess infrastructure requirements associated with new development and publish these in a Local Development Plan (LDP). Such good practice aims to provide clarity to the development industry and other stakeholders. The broad infrastructure requirements are set out in Appendix 3 of the Proposed Plan. Masterplan Zones are identified to distribute infrastructure requirements and to assist the coordination of planning and delivering such infrastructure. Further detail on the phasing and timing of development and associated infrastructure is set out in the Proposed Action Programme

(CD47).

111: Planning obligations can only relate to the development that is being proposed - developers cannot be obliged to 'make up' for pre-existing infrastructure deficiencies. From the outset of the Local Development Plan preparation, the Council has taken a proactive approach by identifying infrastructure required to support new development. This process has involved working with a range of organisations through the Future Infrastructure Requirements and Services (FIRS) Group to assess the capacity of existing infrastructure and its ability to cope with new development in each area of the City, and to then assess additional infrastructure required. Where it is considered necessary, conditions have been placed upon planning consents which limits the amount of development that can take place until a specified project is complete. An example is where the Council have restricted the number of houses that can be built in some developments prior to the completion of the Aberdeen Western Peripheral Route (AWPR).

148: The healthcare requirements arising from new developments were provided by NHS Grampian (who are part of FIRS) and are identified in Appendix 3 of the Proposed Plan and in the Proposed Action Programme. The Proposed Plan therefore sets out what is needed in each development but does not identify sites. The detailed siting of healthcare facilities within a new development is an issue that should be addressed in individual masterplans for sites. Setting aside further land for future expansion is considered unnecessary given that the Proposed Plan has a 20 year time horizon to 2035.

The Council considers that this approach represents a positive step forward for the planning and delivery of infrastructure by providing details of infrastructure requirements clearly and early in the Development Plan preparation process, based on the latest information available. Infrastructure provision and planning obligations will continue to be negotiated at the planning application stage. However, the approach provides clarity to all parties on what is generally expected to be provided as part of new development.

#### New Employment Land

120: The employment land allocations required by the Aberdeen City and Shire Strategic Development Plan (SDP) 2014 (CD12) are set out in Figure 6 of the SDP. This requires the Aberdeen City Local Development Plan to allocate 105 hectares of employment land to 2026 and a further 70 hectares of Strategic Reserve Land for the period 2027-35. Table 2 of the Proposed Plan (on page 9) shows that we have allocated 143 hectares to 2026 (it reads 130 hectares which is an error addressed by the Council as a Non-Notifiable Modification (CD26)) and a further 66 hectares to 2035. The SDP also requires a minimum of 60 hectares of marketable employment land to be available at all times in Aberdeen City (Figure 6). The latest Employment Land Audit 2014 (CD35) shows that Aberdeen has 140 hectares available as of 2014 (Figure 4). We therefore consider that the employment land requirements of the SDP have been fully met.

Whilst it is reasonable to assume that the development of a new harbour at Nigg Bay will stimulate demand for employment land and sites in the vicinity, this is an issue which will be addressed in the next iteration of the Local Development Plan, and from the time the new harbour becomes operational. This has been recognised by the Harbour Board itself in the [Draft Nigg Bay Development Framework](#) which is currently under preparation. In the programme for delivery highlighted in the Development Framework (pages 36 and 41), consideration of additional land through a subsequent Local Development Plan review is scheduled for development in 2019 and in year 8 – i.e. the Main Issues Reports for the Local

Development Plan 2021 and the Local Development Plan 2026 respectively.

General Comments

100: Whilst we would also like to see the aims of the Proposed Plan fully delivered, it needs to be borne in mind that the Vision (which is based on the vision of the SDP) is a longer term one that goes beyond the lifetime of the LDP to 2035. There will therefore be a number of reviews of the LDP before this time and, even assuming that the Vision remains consistent over this period, LDP's are likely to change in order to address changing circumstances and requirements. It should be noted however, that progress will be monitored through the Action Programme and reported in more detail in the next version of the Monitoring Statement.

The housing allowance is the number of dwellings that the SDP requires the Proposed Plan to allocate. This could be houses or flats.

In line with paragraph 60 of Scottish Planning Policy (SPP) (CD5), the Proposed Plan supports a Town Centre First approach to retail, commercial and leisure development. Office developments are encouraged into or close to the city centre and a specific West End Office Area has been identified (via Proposed Plan Policy B3) along with an area of proposed Specialist Employment Land to the south of Union Square around Poynerook. However, demand for city centre locations is high and space is limited and in order to accommodate anticipated business growth, the SDP requires significant employment land allocations to be identified as mentioned above. These are mainly concentrated in Bridge of Don, Dyce and the Airport, Kingswells and Altens. Although these are peripheral to the urban area of Aberdeen, they serve a much wider catchment that extends well into Aberdeenshire.

Considerable public investment into the transport system is currently underway with the construction of the AWPR, Third Don Crossing, Balmedie to Tipperty duelling, A96 Park and Choose and the Dyce Drive link road. Other schemes are planned and land reserved in Proposed Plan Policy T1 - Land for Transport. In addition, the adoption in June 2015 of the Strategic Transport Fund as Supplementary Guidance to the SDP (CD19) will secure funding to deliver transport infrastructure required as a result of new developments in and around Aberdeen. Projects arising from this are listed in paragraph 3.44 of the Proposed Plan. Taken together with policies encouraging sustainable and active travel (Proposed Plan Policy T3), the means and investment is taking place to ensure that the city region's growth can be served by a fit for purpose transport system and supported by a robust policy framework.

102: Friarsfield is not included in Table 8 of the Proposed Plan because it was a site first identified in the Aberdeen Local Plan 2008 (CD43). It therefore pre-dates the allocations that have arisen out of the SDP and the Aberdeen City and Shire Structure Plan 2009 (CD20), and so does not count towards them. It is still identified as an Opportunity (OP) Site because parts of it are undeveloped and still have to obtain planning consent. The site at Brookfield/Murtle Den is considered in Issue 12 Alternative Sites in Deeside.

120: It is considered that the Proposals Map which accompanies the Proposed Plan provides an adequate representation of the Spatial Strategy in that it shows the allocations, Opportunity Sites and zonings for the whole city area. There are no settlements bisected by the city boundary, although two Opportunity Sites within the Proposed Plan, at OP53 Aberdeen Gateway and OP34 East Arnhall, comprise developments that extend into Aberdeenshire. The boundary and extent of the Energetica Corridor is shown in the Proposed Supplementary Guidance on Energetica (CD25).

157: Scottish Planning Policy contains advice which is applicable to all Planning Authorities in Scotland and seeks to ensure a broadly consistent approach amongst them. Appropriate referencing is made to it throughout the Proposed Plan and it is cited in paragraph 1.11 as one of the key documents that has informed the Plan preparation. The SDP and National Planning Framework 3 (NPF3) (CD04) contain parts which relate directly to Aberdeen. For instance the Proposed Plan and the SDP share the same Vision and NPF3 contains National Developments in Aberdeen. This is why both these documents have greater prominence in the Proposed Plan Introduction.

There is no evidence that increasing the size threshold of sites requiring a Masterplan will have an effect on the 5 year housing land supply. Issue 2 shows that the supply is in a very healthy position under current arrangements.

The table of brownfield sites appears in Appendix 1 of the Proposed Plan rather than the Introduction for two reasons. Firstly, it's size means that it is more appropriately placed in the Appendices. More importantly, the tables are a snapshot of potential sites and consents at the time (in this instance taken from Brownfield Potential Study of 2014 (CD36)). This changes over time as existing sites are developed and new sites emerge. This is a more fluid situation than that applied to the greenfield allocations which are identified in the Proposed Plan and which are effectively 'fixed' over the Plan period.

123: Paragraph 3.36 of the Proposed Plan explains that Masterplan Zones are identified within which developers will be expected to work together to prepare Masterplans for each zone, and coordinate the planning and delivery of associated infrastructure requirements. The Aberdeen Masterplanning Process - A Guide for Developers (CD46) explains what is expected from Masterplans and Development Frameworks including, in Section 3, their content. This should include a site description, including the surrounding area on issues such as open spaces, the landscape, Green Space Network and so on, and the context, identity and connections between them. We consider that it is for the Masterplans and Development Frameworks to consider the detail of integration with existing communities and smaller sites, rather than the Local Development Plan. Further, because of the very limited scope of additional greenfield land release (over and above that already identified in the extant Aberdeen Local Development Plan 2012 (CD42)), we do not consider that a review of the Green Belt and Green Space Network is necessary at this time. The potential for shortfalls in the housing land supply are discussed under Issue 2 - Housing and Employment Land Supply.

**Reporter's conclusions:**

Phasing and Infrastructure

1. Regarding phasing and links between development and infrastructure provision, the proposed plan does, in chapter 2, identify broad phases (2017 – 2026 and 2027 – 2035) within which development is expected to take place. Some references to infrastructure requirements associated with new development are also set out here. It is specifically stated that the Oldfold development includes an opportunity to redevelop the Milltimber Primary School.
2. Much more detail is provided in the proposed action programme. For instance, regarding education at Oldfold Farm, the action programme identifies the existence of capacity constraints and the ongoing liaison with the Education Department regarding the

delivery of a new primary school and fitting this with the programming of the development.

3. While I agree that it is imperative for the planning authority to think carefully about the links between new development and the infrastructure needs it will give rise to, I consider there is a limit to the level of detail that can helpfully be contained in a local development plan. This is especially the case given the action programme exists as a statutory accompanying document that is better suited (indeed designed) to include such detail. Paragraph 131 of Circular 6/2013: Development Planning identifies the delivery of key infrastructure among the actions that may be expected to be included in action programmes. Because the action programme must be reviewed every two years, it can also respond more flexibly to changes in circumstance relating to infrastructure and phasing. I am therefore generally content that the proposed plan contains adequate information on phasing and the links between particular developments and the infrastructure requirements they give rise to.

4. The role of local development plans in resolving existing infrastructure constraints tends to be limited to proposals that have land use implications, for instance the reservation of land for new road schemes. In this regard, Policy T1 of the proposed plan safeguards land for a number of transport schemes including the third Don crossing and improvements to Haudagain Roundabout. The regional and local transport strategies have a stronger role in identifying and delivering such schemes.

5. It is the case that new development should not place unacceptable burdens on existing infrastructure. To this end, Appendix 3 of the proposed plan identifies 41 items of new or upgraded infrastructure that are required to support development in the various masterplan zones. Policy I1, along with the relevant supplementary guidance and masterplans, provides the policy framework for securing the delivery of this infrastructure, which may be required before or alongside the construction of the associated development. Given these provisions, I am satisfied that, in general terms, the proposed plan deals adequately with the provision of infrastructure to support new development. This matter is dealt with in more detail under Issue 22.

6. Regarding healthcare facilities, I note the extensive range of new provision that is identified in Appendix 3 of the proposed plan as being required in association with the eight masterplan zones and certain other development proposals. The section on planning obligations on page 33 of the plan specifically refers to developer contributions to healthcare. I am therefore satisfied that this matter is comprehensively covered in the proposed plan.

7. I agree with the council that it would not be practical to identify specific sites for healthcare facilities within larger developments, as these will emerge through the masterplanning process. It would not appear reasonable to require developers to provide 50% future expansion space if this is not required by the current development. The matter of healthcare contributions is considered further under Issue 22.

#### New Employment Land

8. Regarding the suggested need to develop more employment land around the Nigg Bay Harbour Expansion area, I note the council's comments about having fulfilled the strategic development plan's requirements in terms of the quantum of new employment land. However the point being made by Scottish Enterprise relates to the location rather than the extent of this land. The council agrees that the harbour expansion is likely to stimulate demand for employment land in the vicinity, but identifies this as an issue to be addressed in

the next review of the local development plan.

9. The draft Nigg Bay Development Framework indicates that the new harbour will become operational in 2019, whereas the next local development plan may not be adopted until 2021 (based on a 5 year cycle). I consider it would therefore have been preferable for the matter of new employment land in this vicinity to have been considered in the current iteration of the local development plan. However insufficient information is available to me to identify the best location or extent of such land, and such allocations have not been subject to public consultation. On this basis I am content for this matter to be considered as part of the next review of the local development plan.

10. Other representations relating to the Nigg Bay Harbour Expansion area are considered under Issue 13.

### General Comments

11. A number of disparate points have been raised in representations relating to the vision and spatial strategy of the proposed plan.

12. The aims expressed in Chapter 1 of the proposed plan are largely drawn from the higher tier strategies of the national planning framework and strategic development plan. To some extent these visions express important yet intangible concepts such as being recognised for a high quality of life and to create sustainable communities. I would expect such aims to be ongoing rather than being fully achieved within a single local development plan period.

13. I am content that the reference to housing allowances in Table 1 of the proposed plan can reasonably be taken to encompass both houses and flats. Given that these figures derive, in this form, from the strategic development plan, it is not necessary for the local development plan to break them down into targets for particular house types.

14. In a local development plan whose natural focus is on land use change, and when opportunities to accommodate growth in the city centre are limited by the existing urban fabric, it is not unexpected to find that much of the plan is concerned with peripheral, often greenfield, land releases. However the plan does also identify a large number of urban redevelopment opportunities, as is evident from the proposals map and Appendices 1 and 2. Support for maintaining the role of the city centre as the preferred location for major retail developments, and for the West End office area as a focus for office development, is clearly stated in the relevant sections of the plan.

15. The proposed plan addresses traffic and transport at paragraphs 3.37 to 3.48. However the main focus of a local development plan is likely to be on the transport implications of new development and on safeguarding land for new transport infrastructure. Other documents, in particular the local and regional transport strategies, are better placed to take a lead on developing initiatives for new transport schemes and addressing traffic management.

16. The suggestion that new public buildings should be subject to design competition may have merit, but the planning system is ultimately concerned with the quality of the design output, rather than the process of commissioning or procurement. I do not therefore consider that it would be reasonable to require there to be a process of design competition.

17. It is the case that alternatives to car travel should be facilitated and promoted. To this end I note the references in the plan to various public transport projects at paragraph 3.44 and to integrating walking, cycling and public transport into new communities at Policy T2. Again, it is primarily the role of the regional and local transport strategies to initiate measures to encourage non-car modes. Overall I am satisfied that the reference at paragraph 2.9 of the proposed plan to reducing the need for car-based travel is appropriate.

18. It is correct that site OP41 Friarsfield is not included in Table 8 of the proposed plan. This is because it is a historic site that does not contribute towards the housing allowances arising out of the strategic development plan. The site at Murtle Den is considered under Issue 12.

19. Regarding the need for a spatial strategy plan, to include areas of regional or cross-boundary significance, such as Energetica, I consider that these matters are largely for the strategic development plan to illustrate, albeit in a non-site-specific manner. While it would have been possible, or even useful, for the local development plan to have included such a map, it is not essential. The relevant legislation only requires the inclusion of a proposals map, plus any other maps the planning authority thinks appropriate. In any event, at Figure 1 the proposed plan does include a city-wide map showing the location of most major development proposals and the eight masterplan zones.

20. Paragraph 30 of Scottish Planning Policy states that development plans should “be consistent with the policies set out in this SPP, including the presumption in favour of development that contributes to sustainable development”. The presumption in favour of development that contributes to sustainable development should therefore be reflected in the contents of the local development plan. It is, however, unnecessary to repeat the precise terms of Scottish Planning Policy in the plan. Paragraph 1.11 of the proposed plan notes that key national planning policies and guidance, including Scottish Planning Policy, have been taken into account.

21. Policy D1 of the proposed plan indicates that the council only intends to require masterplans for larger sites. Policy H4 implies that masterplans will be required for housing developments of over 50 units. I consider this to be a proportionate use of this approach, particularly given the clear support at paragraph 39 of Scottish Planning Policy for the use of masterplans “at site and individual building level”. Regarding community involvement, paragraph 7 of Scottish Planning Policy states that “planning authorities and developers should ensure that appropriate and proportionate steps are taken to engage with communities ... when development proposals are being formed”. On this basis I am content with the plan’s reference to drawing up masterplans with local community involvement.

22. Regarding the integration of masterplan zones with the wider landscape and existing settlements, these are matters that can be explored in depth in the masterplans themselves. The main function of the local development plan in these areas is to establish the principle of these development locations. While more could usefully have been said in the plan itself about the placemaking aspects of these proposals, I am content that the council’s approach of incorporating this material in masterplans is sufficient.

23. Paragraph 50 of Scottish Planning Policy indicates that development plans need only review the boundaries of green belts ‘where necessary’. Given the relatively small scale of change between the proposed plan and the currently adopted local development plan, I agree with the council that a comprehensive review of the green belt and green space network is unnecessary at this time. Any local adjustments that may be required are

considered under the relevant site specific issue of this report.

24. The approach to be taken should development shortfalls arise is discussed under Issue 2.

**Reporter's recommendations:**

No modifications

<b>Issue 2</b>	<b>HOUSING LAND SUPPLY AND POLICY LR1 &amp; LR2</b>			
<b>Development plan reference:</b>	Pages 7-10	<b>Reporter:</b> Stephen Hall		
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>				
<table border="1"> <tr> <td data-bbox="130 454 796 1057"> <p>Avant Homes (31) Eve Glegg (50) Mr McDonald (56) Stewart Milne Homes and John Lawrie (Aberdeen) Ltd (64) Stewart Milne Homes (85) Sandy Hutchison (113) Stewart Milne Homes (117) MacTaggart and Mickel Homes (123) Barratt North Scotland (125) Stewart Milne Homes (128) Gladman Developments (129) CALA Homes (North) Ltd (131) Aberdeen Civic Society (136)</p> </td> <td data-bbox="796 454 1460 1057"> <p>The Reid Family (138) Cults Property Development Limited (142) Homes for Scotland (149) Drum Property Group (150) Scotia Homes (152) British Airways (153) Rubislaw Estates (154) John McIntosh (156) Persimmon Homes (157) AA Webster and Sons (162) MacTaggart and Mickel Homes and Fabrizio Necchi (163) Bancon Developments(183)</p> </td> </tr> </table>			<p>Avant Homes (31) Eve Glegg (50) Mr McDonald (56) Stewart Milne Homes and John Lawrie (Aberdeen) Ltd (64) Stewart Milne Homes (85) Sandy Hutchison (113) Stewart Milne Homes (117) MacTaggart and Mickel Homes (123) Barratt North Scotland (125) Stewart Milne Homes (128) Gladman Developments (129) CALA Homes (North) Ltd (131) Aberdeen Civic Society (136)</p>	<p>The Reid Family (138) Cults Property Development Limited (142) Homes for Scotland (149) Drum Property Group (150) Scotia Homes (152) British Airways (153) Rubislaw Estates (154) John McIntosh (156) Persimmon Homes (157) AA Webster and Sons (162) MacTaggart and Mickel Homes and Fabrizio Necchi (163) Bancon Developments(183)</p>
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<b>Provision of the Development Plan to which the issue relates:</b>	Policies LR1 and LR2 (on page 10 of the Proposed Plan) make provision for phased housing and employment land release, and for the provision of mixed use communities where they have been identified.			
<b>Planning authority's summary of the representation(s):</b>				
<p><u>Additional Housing Land Required</u></p> <p>31, 56, 128, 129, 131, 150: Additional housing land should be identified to meet local need and comply with the requirements of the Strategic Development Plan. The policy does not meet with SPP's intentions of providing an effective 5 year land supply at all times</p> <p>64, 117: The city's population, from the census figures is greater than the forecast figures, this discrepancy along with the low rate of housebuilding will likely result in housing shortages in the long term due to insufficient housing land allocations.</p> <p>85, 138, 150, 152, 154: There has been a failure on the part of the LDP to deliver housing requirements, and this shortfall has been compounded by sites not being built out in the timescales expected (for example at OP38 Countesswells). There is a shortfall of 578 homes in the period 2016-2035.</p> <p>150, 156: Carrying forward allocations as they are does not deal with historical housing need shortfalls, reduces supply relative to demand and increases the difficulty in those needing to access housing being able to do so. Liverpool and Sedgfield carry forward some or the entire historical shortfall into future housing land allocations over and above the need projected for that period. These allow housing delivery to catch up with housing need. Aberdeen's LDP ignores the historic shortfall.</p>				

152: The LDP should clearly set out the housing land requirement and housing land supply for the 5 year and 10 year period of the LDP, not just the SDP allowances. A Table that clearly sets out the 5 and 10 year housing land requirement would provide clarity and assist in the monitoring of the delivery of housing land. The Table should also illustrate an increase in the housing land requirement by 10-20%

142, 162, 163: The review of the LDP requires to critically assess the greenbelt boundaries currently identified in in the adopted Plan in order to find suitable land for development to meet SDP requirements for growth.

#### Large and Small Housing Sites

31, 56, 117, 123, 125, 128, 129, 131, 149, 152, 154, 156, 157, 162, 163: The allocations in the Proposed Plan are for large scale allocation; as evidenced in the Housing Land Audit no homes have been completed on these sites. Several of these sites are delayed due to various constraints. The reliance of existing allocated sites being carried out from the 2012 adopted LDP is flawed because there are situations where some/part of these historic allocations are large-scale and there remains a significant level of detailed work and consents to be put in place before deliverability on the ground will occur. There has been no test of their effectiveness as required by the SPP.

Small scale and readily deliverable sites are required to make up the shortfall of effective land supply. The ability of small-scale greenfield sites to be released and built-out in a timeous manner should be acknowledged in the emerging Plan. The Plan does not currently support small-scale residential land releases which are responding to local needs

The Council have not suggested to include a draw-down mechanism to meet any shortfall which may occur in Phase 1 or 2 of the land release schedule. Provisions should be made within Policy LR1 regarding the role smaller-scale sites have to play in meeting overall housing targets. There should be an allocation of a wider range of sites in terms of scale and location to ensure greater flexibility. Policy LR1 would therefore benefit from an additional Part C setting out the Council's response in the event that a 5-year effective land supply is not maintained.

#### Policy LR1 and LR2

183: Part B is redundant as Phase 2 sites are reliant on Phase 1 sites being built out. Two of the sites identified on the Proposed LDP to delivering houses beyond 2026 are constrained in the HLA 2015, and could not be drawn down early.

183: LR2: Delivery of Mixed Use Communities - It is not clear to which site this policy applies.

136: Whilst paragraph 2.18 refers to encouraging mixed use, this is not reinforced by Policy LR1, which should contain wording which reinforces the desire for all large-scale developments to be mixed use.

153: NPF3 identifies improvements to Aberdeen Airport as one of the developments considered essential to the delivery of the Aberdeen Spatial Strategy. In order to safeguard and build upon the future role of the Airport, consistent with this NPF3 objective, it is important that any land use allocations and any proposed development that comes forward within these allocations should have appropriate and proper regard to airport operations.

Less Housing Land Required

50, 113: Questions whether additional houses are needed due to the downturn in oil. The reality is that most housing developments cannot be completed in Aberdeen.

Brownfield Housing

64: SPP encourages the prioritisation of brownfield land. The SDPA aims to provide 40% of all new residential development on brownfield land. This is not reflected in the current housing allocations.

152: Whilst the LDP (para 2.13) states that future Local Plans will continue to identify brownfield sites to meet housing allowances beyond the next 7-10 years, this LDP does not provide certainty that the brownfield housing land supply will be achieved through allocations in this LDP in the period up to 2026, as required by Figure 1 of the SDP. A shortfall in the supply of deliverable brownfield sites provides justification for releasing additional greenfield land to accommodate the shortfall.

**Modifications sought by those submitting representations:**

Additional Housing Land Required

31: Remove land adjacent to the Mill of Mundurno from the Green Belt and Green Space Network and identify it as greenfield housing allocation post 2017.

117: Allocate effective sites such as Derbeth, Gillahill and Huxterstone.

152: Introduce additional sites to augment the supply. These include land at Foggieton, Countesswells, land at Kingswells East and land at Shielhill Farm.

162: Allocate land at Derbeth Farm

56, 85, 128, 142, 150, 183: In order to comply with the SDP targets there must be additional greenfield housing land allocations made in the forthcoming LDP which are immediately available and are without any constraints to their delivery. Change Section 2 and the Proposals Map as appropriate.

123, 163, 183: Allocate additional small sites.

152: Introduce a new table clearly identifying the housing land requirement and housing land supply over the 5 and 10 year period of the LDP, together with a 10-20% increase on the housing land requirement.

Policy LR1 and drawing down additional sites to augment supply

128, 149, 152: The wording of LR1 should be changed to ensure that a minimum five year supply is maintained at all times. If there is a shortfall in the effective land supply, the Council should consider further proposals that are effective.

129: Include a policy for assessing housing proposals on unallocated land when faced with a shortfall in the housing land supply.

153: The preamble text to Policy LR1 should provide explicit guidance to developers at the outset in relation the constraints that airport operations impose upon development.

Policy LR2

183: Define a large site, therefore where this policy should be applied.

**Summary of response (including reasons) by planning authority:**

General Overview

Aberdeen City sits within the Aberdeen Housing Market Area, along with those parts of Aberdeenshire closest to the city. As a consequence, there is a shared responsibility for meeting the housing requirement in this area. This is facilitated by the Aberdeen City and Shire Strategic Development Plan 2014 (SDP) (CD12) which clearly sets out the responsibilities of each council in terms of the provision of housing land.

The Aberdeen City and Shire Strategic Development Plan was approved by Scottish Ministers in March 2014, before Scottish Planning Policy (SPP) (CD5) was published in June 2014. Some of the terminology in the SDP differs slightly from SPP, although they are broadly consistent.

The Housing Requirement (set out in SDP Figure 10) equates to the Housing Supply Target under SPP – setting out a target for new homes over the period to 2035. In order to facilitate this, Housing Allocations (in SDP Schedule 1) are set out which need to be allocated in the respective local development plans, equating to the housing land requirement. As demonstrated in the Housing Land Audit (CD17), the adequacy of the supply of housing land is measured with reference to the Housing Requirement.

New information in the form of the census or new population or household projections are an issue for the next Housing Need and Demand Assessment (HNDA) to inform the next Strategic Development Plan, as confirmed by the SDP Examination. The task of the Local Development Plan is to implement the SDP.

The Aberdeen Housing Market Area has a very generous supply of effective housing land – both at the current time but also well into the future.

Additional Housing Land Required

31, 56, 64, 85, 117, 128, 129, 131, 138, 142, 150, 152, 154, 156, 162, 163: The Aberdeen City and Shire Strategic Development Plan 2014 sets a clear strategy for development in Aberdeen, which includes housing allowances to be delivered through Local Development Plans. Paragraph 4.18 of the SDP explains that expectations of housing need and demand over the period to 2035 have been assessed in a Housing Need and Demand Assessment 2011 (CD14). The housing requirement is set out in Figure 10 of the SDP and shows a total requirement of 53,972 homes over the Strategic Development Plan area to 2035 – 38,488 of which is in the Aberdeen Housing Market Area. Schedule 1 of the SDP (on page 42) shows the housing allowances required to be identified in the Local Development Plan. The SDP explains in paragraph 4.24 that these allowances provide a generous supply of land for new housing on top of the housing requirement in line with Scottish Planning Policy. For the SDP area the allowance is for 67,500 homes (plus an effective supply in 2011 of 9,815) compared

to the requirement of 53,972 homes (representing 43% generosity). In the Aberdeen Housing Market Area, the generosity level is 49% (land for 57,418 homes against a requirement of 38,488).

As a consequence, a very generous SDP allowance has already been provided by the Proposed Plan over and above the actual requirements, exceeding the levels required by the new SPP. There is therefore no need to add to this as has been requested. In addition there is no remit for the Proposed Plan to allocate significant amounts of additional land which would cause it to be inconsistent with the SDP. Circular 06/2013 Development Planning (CD10) states in paragraph 56 that LDP's need to be consistent with the SDP. Paragraph 4.25 of the SDP clearly states that LDP's have to make land available for homes in line with the Spatial Strategy and Schedule 1 of the Plan. Table 2 of the Proposed Plan (page 9) shows how these allowances have been met. This Table shows that, for the periods up to 2026, the Proposed Plan allocates 16,982 greenfield homes which is just 18 homes short of the 17,000 SDP allowance over the same period. This 0.1% 'shortfall' is not considered to be of any material significance in the context of a very generous allowance.

The Housing Land Audit indicates that the area is on-track to deliver housing completions in line with the housing requirement over the period 2011-2016. In any event, because of the SDP compliance issue, it is not possible to carry forward historical shortfalls, even if they do exist. Nevertheless, sites which have been allocated in previous Local Plans and the extant Local Development Plan 2012 continue to be identified where appropriate. For instance, proposed sites OP41 Friarsfield and OP58 Stationfields in the Proposed Plan continue to be identified from the Aberdeen Local Plan 2008 (CD43). These do not count towards the SDP allowances.

It is not appropriate to rely on recent census or population / household forecast figures to argue for a higher requirement and allocations from those contained in the SDP for the same reason. In any event, the generosity of the SDP allowances is such that it should be possible to accommodate any potential demands arising from fluctuations in forecasts. This was confirmed at the SDP Examination (Issue 5), while the most recent 2012-based projections are lower than those put forward to justify an increase at that time. The Housing Need and Demand Assessment is the vehicle for addressing these issues, not the local development plan. Development Plans need to provide certainty for developers, agencies, infrastructure providers and the public. Constantly reacting to variations in census data (either up or down) would not achieve this.

Monitoring the delivery of housing land is carried out in the annual Housing Land Audits that are prepared jointly between Aberdeen City and Aberdeenshire Councils. There is no need to repeat this in the Local Development Plan. As mentioned under Issue 1, because of the very limited scope of additional greenfield land release (over and above that already identified in the extant Aberdeen Local Development Plan 2012 (CD42)), we do not consider that a review of the Green Belt is necessary at this time.

#### Specific Sites

31, 152: The sites at Mundurno and Shielhill are dealt with under Issue 4 Alternative Sites in Bridge of Don.

117, 162: The sites at Derbeth, Gillahill and Huxterstone are dealt with under Issue 8 Alternative Sites in Kingswells and Greenferns.

152: The sites at Foggieton and Countesswells are dealt with under Issue 10 Alternative Sites in Countesswells.

Large and Small Housing Sites

31, 56, 117, 123, 125, 128, 129, 131, 149, 152, 154, 156, 157, 162, 163: There is no shortfall in the 5 year effective land supply. The 2015 Housing Land Audit (HLA) shows the latest position in its Section 5. Section 5.4 shows a continuing upward trend of supply in the Aberdeen Housing Market Area. Paragraph 5.4.2 states that, for the fourth year in a row, the 5-year effective supply in the Aberdeen Housing Market Area has increased and it now stands at 12,091 homes - its highest level since Local Government reorganisation in 1996.

Figure 13 of the Housing Land Audit 2015 shows an effective supply in the Aberdeen Housing Market Area of 12,091 homes compared to an SDP requirement of 7,827 homes, which amounts to 7.7 years supply – well in excess of the 5-year requirement set out in SPP. Appendix 3 of the HLA shows the actual and anticipated housing completions over the SDP area. The anticipated completion rate in 2016 is 2875 homes which compared favourably with the SDP target of building at least 2500 homes a year by 2016 (on page 32 of the SDP). Figures then rise to over 3000 homes per year for 2017-19 which is ahead of the SDP target of moving towards building 3000 homes a year by 2020. Anticipated figures then begin to drop again beyond year 5, but this is to be expected in any such Audit. However, the effective supply beyond 2019 is higher than it is within the period 2015-2019. It would be reasonable to expect further windfall, brownfield and currently constrained sites to be added to the supply to boost these figures over that period.

Of the 25 greenfield housing sites identified in Tables 3 to 8 of the Proposed Plan, 16 sites are of 500 homes or less, with 11 being less than 100 homes. In addition there are 43 brownfield sites identified in Proposed Plan Appendix 2 - Opportunity Sites which are suitable for residential uses or a mixture of uses, including residential. Brownfield sites with the potential for residential use are identified in the two tables at the end of the Brownfield Potential Study 2014 (CD36). There is therefore a very wide range of sites both large and small, brownfield and greenfield which are collectively contributing to a very positive picture for future house completions.

The identification of a number of large sites is necessary in the context of the generous SDP housing allowances that are required. Large sites support a range of facilities and services within the new development, enable the delivery of significant infrastructure improvements, and avoid the problems that disjointed incremental growth has. Through the Site Assessment process (CD28 to CD31) we have sought to identify sites which can make the most efficient use of existing infrastructure. It is acknowledged that large sites take longer to come to fruition. The Housing Land Audit 2015 shows a snapshot position as of 1 January 2015. Although some of the allocated sites are regarded as constrained at that point, Scottish Planning Policy (paragraph 19) requires city regions to allocate “a range of sites which are effective or expected to become effective in the plan period to meet the housing land requirement of the strategic development plan up to year 10 from the expected year of adoption.” All of the large sites identified in the Proposed Plan have either a Masterplan or Development Framework in place which has been adopted as Supplementary Guidance to the extant Local Development Plan 2012. The 2015 Housing Land Audit shows that several of these will start delivering completions within the next 5 years. These will help to ensure the maintenance of a continuing 5 year supply housing supply over the lifetime of the Proposed Plan, and beyond.

In summary, we have a generous housing allowance resulting in a wide range of greenfield and brownfield sites being identified in the Proposed Plan. These are likely to be augmented by further windfall and brownfield sites and sites identified through future Brownfield Potential Studies. There is a very healthy land supply and this is likely to be maintained as the larger sites progress. In this context there is no need for a draw down mechanism to augment the supply. In any case, such a mechanism is not identified in SPP.

The suggestion that larger sites which will not deliver their full Phase 1 allowance in the current Phase should have this shortfall re-allocated to new sites is noted. It is recognised that this suggestion is not that this shortfall should be removed from these sites, but rather re-scheduled to a later Phase. In effect the shortfall would then become an additional allocation to make up for the initial delay. However, to redistribute allowances based on an initial 'delay' to the start of a site would remove the certainty which the Plan aims to provide and could impact on the deliverability of larger sites. It also represents a misunderstanding of the housing allowances, which were never designed to be built out within the period for which they were allocated (SDP para 4.24). If that had been the intention, completions would have had to exceed 6,000pa over the last few years (9815+27,300 built over 6 years) – more than double the highest individual year's completions over the last 35 years. This would be contrary to the SDP which is clear in its allocations for all Phases up to 2035.

The SDP recognises that front loading the allowances in the way it does means it is unlikely that all of them will be delivered in the timescales. Paragraph 4.24 of the SDP explains that, due to this generosity, "we cannot expect all the new homes to be built within the relevant plan period. This makes sure the plan can cope with higher levels of demand than we currently expect."

#### Policies LR1 and LR2

128, 129, 149, 152, 183: As detailed in the paragraphs above, it is not considered necessary to have a draw down mechanism to augment the land supply.

183: Proposed Plan Policy LR2 applies to those large sites which contain both a residential and employment allocation and these are identified in the Directions for Growth (Tables 3 to 8 in the Proposed Plan). It is accepted that this is not immediately obvious. For the avoidance of doubt Proposed Plan Policy LR2 covers OP9 Grandhome, OP33 Greenferns, OP36 Countesswells, OP59 Loirston and OP48 Oldfold.

136: Proposed Plan Policy LR1 is about controlling the phased release of allocated greenfield housing and employment sites. We would agree that all large scale developments should be mixed use. This is embedded in much of the Proposed Plan but it particularly expressed in Proposed Policy D1 - Quality Placemaking and Design. Masterplans or Development Frameworks have been adopted as Supplementary Guidance to the extant Local Development Plan 2012 for all the large greenfield releases, and these studies set out in detail the mix of uses expected in each site. It would be our intention to readopt these Masterplans and Development Frameworks upon adoption of the Proposed Plan.

153: The operations of Aberdeen Airport are dealt with in Proposed Plan Policy B4 – Aberdeen Airport. This covers the Airport Safeguarding Area and highlights Circular 08/2002 – Control of Development in Airport Public Safety Zones. Noise issues are dealt with in Proposed Plan Policy T5 - Noise. Further detail on public safety zones, noise contours, safeguarding maps and operations area are covered in a Technical Advice Note on Land Use Planning and Aberdeen Airport 2015 (RD42). It is not considered necessary to repeat

these issues in Proposed Plan Policy LR1.

Less Housing Land Required

50, 113: The above paragraphs explain why it is not possible to depart with any degree of significance from the requirements of the SDP. Paragraph 4.27 of the SDP recognises that meeting housing and population targets also depends on factors that are not related to the Development Plan, including the state of the economy and, particularly in Aberdeen, the price of oil. However, the SDP’s Spatial Strategy has been agreed and the Proposed Plan identifies Aberdeen’s contribution towards that. This ensures that the Proposed Plan can cope with higher levels of demand than we currently expect.

The SDP review process over the next few years will factor in emerging evidence of economic and housing market performance through a new Housing Need and Demand Assessment. This will subsequently feed into the next LDP.

Brownfield Housing

64, 152: Schedule 1 of the SDP sets out the brownfield housing allowances for Aberdeen City. For the two periods from 2011 to 2026, the allowance is for 7,500 homes, which equates to 500 homes per annum. Our approach to meeting this is set out from paragraph 2.8 of the Proposed Plan. This explains that we have identified sites with planning consents from 2011 (in Proposed Plan Appendix 1 Table 2) amounting to 2808 homes (up until 31 August 2014), and that these have not been double counted against those sites found in the effective land supply of 2011 which was used by the SDP. Added to this are the sites in Proposed Plan Appendix 1 Table 1 which were identified through the Brownfield Potential Study of 2014. This uses a number of different calculations to estimate the potential yield of identified sites – in this case between 2590 homes to 4479 homes. When added to the consented sites, this amounts to between 5398 and 7287 homes (or between almost 11 years to 14.5 years when set against the SDP allowances of 500 homes per annum). Section 4.1 of the Brownfield Potential Study 2014 suggests that this is a conservative estimate.

It is not practical to identify brownfield sites too far into the future. It is also inevitable that more, as yet unidentified, brownfield sites will continue to emerge over the lifetime of the Proposed Plan. Much of this will be driven by the buoyant housing market here. Section 2.2 of the Brownfield Potential Study shows that brownfield housing completions have averaged 688 homes a year for the period 1993 to 2013. Only for the 3 years following the financial crash (2008-10) have there been fewer than 500 brownfield homes completed in each year (which is what the SDP requires).

In this context it is not considered appropriate to augment any potential shortfall of brownfield sites with further greenfield releases. This would be contrary to the SDP target for 40% of all new houses in Aberdeen City to be on brownfield sites (page 37 of the SDP). We will however, continue to monitor ongoing consents, completions and brownfield potential through regular updates of the Brownfield Potential Study.

**Reporter's conclusions:**National and strategic policy requirements

1. Scottish Planning Policy requires local development plans to allocate a range of sites which are effective or expected to become effective in the plan period to meet the housing land requirement up to year 10 from the expected year of adoption. In the case of Aberdeen this would be to 2026. The plan should provide for a minimum of 5 years effective land supply at all times. Allocations should be capable of being brought forward for development within the plan period and enable the housing supply target to be met. The housing land requirement and the housing supply target are to have been already established in the strategic development plan.
2. Scottish Planning Policy was published in June 2014. Due to the timing of plan preparation in North-East Scotland, the terminology and approach used in the Aberdeen City and Shire Strategic Development Plan and subsequent local development plans does not exactly match that envisaged by Scottish Planning Policy. However, Figure 10 of the strategic development plan identifies a housing requirement for the Aberdeen housing market area (which includes the whole of Aberdeen City Council's administrative area but also significant adjoining areas of Aberdeenshire) of 24,982 homes for the 2011 to 2026 period. I accept that this requirement is equivalent to the housing supply target envisaged in Scottish Planning Policy.
3. In Schedule 1, the strategic development plan goes on to set out housing allowances for Aberdeen City, split into brownfield and greenfield sites over various time periods. I accept that these allowances are equivalent to the housing land requirements envisaged by Scottish Planning Policy. These allowances incorporate a significant 'generosity allowance'. For instance the allowance for the Aberdeen housing market area between 2011 and 2026 is 36,250 (not including the effective and constrained land supply). This represents a 45% generosity allowance over and above the supply target. The allowances for Aberdeen City for the 2011 to 2026 period are for 7,500 brownfield homes and 17,000 greenfield homes.
4. The requirements that Scottish Planning Policy and the strategic development plan place on the local development plan are therefore to allocate sites, which are effective, or expected to become effective by 2026, for 7,500 brownfield homes and 17,000 greenfield homes. Paragraph 117 of Scottish Planning Policy notes that meeting the housing land requirement can also be contributed to by the established supply (so long as this is effective or expected to become effective by 2026) and a proportion of windfall development. Schedule 1 of the strategic development plan takes account of the effective land supply in 2011 as well as the allowances in the existing adopted local development plans for the period up to 2016 in calculating the remaining allowance for 2017 to 2026.
5. A number of representations argue that the housing requirements in the strategic development plan should be revisited because they were based on projections that underestimated population growth that has since occurred, or is now forecast. However, the respective roles of the strategic and local development plans are clearly set out in Scottish Planning Policy. It would not serve either the certainty that the development planning system is intended to create, or the efficiency of that system, to revisit at the local development plan stage decisions that had already been reached in the strategic development plan.

6. If it is the case that the underlying demographics of the region are changing in a way that was not previously expected, this can be addressed in the next review of the strategic development plan. In the meantime, as paragraph 4.24 of the strategic development plan notes, the generosity of the housing allowances provides some flexibility to cope with any higher than expected levels of demand (provided of course that sufficient of the allocated sites are effective or expected to become so).

Housing Land Supply

7. Table 2 of the proposed plan indicates that the plan allocates greenfield land to accommodate 16,982 houses to 2026. Assuming, for the time being, that all this land is effective or expected to become so by 2026, this represents a shortfall of 18 units (around 0.1%) from the housing allowance set out in the strategic development plan. While I consider a shortfall this small to be of limited significance, there is nevertheless some scope to identify additional greenfield development land, should any suitable sites emerge through the examination process.

8. The shortfall in allocated sites to 2035 is larger at 578 units (around 2.8%). However Scottish Planning Policy is clear that the role of the local development plan is to look only ten years ahead from the expected date of adoption. Any additional land that may be required to meet demand beyond 2026 can be identified in the next iteration of the local development plan.

9. Not all the sites that contribute to the 2026 housing allowance are currently effective or expected to be built out in that period. Several representations and responses to further information requests have included analyses of recent housing land audits that demonstrate that the programmed delivery from these sites will fall well short of the 17,000 house greenfield housing allowance for Aberdeen City. For instance the analysis submitted by Bancon Developments (representation 183), which appears to be soundly based, indicates that only 11,078 units are programmed for delivery on allocated greenfield sites within Aberdeen City up to 2026. However the policy requirement in Scottish Planning Policy is to allocate sufficient sites that are expected to become effective by 2026 to meet the housing land requirement (in this case 17,000 on greenfield sites). The expectation is not that all these sites will be built out in this period. As paragraph 4.24 of the strategic development plan notes, due to the generosity of the supply “we cannot expect all the new homes to be built within the relevant plan period”.

10. The policy requirement relating to the actual delivery of housing (as opposed to the allocation of land) is for the housing supply target to be met (paragraph 119 of Scottish Planning Policy). Unfortunately, the strategic development plan does not specify a separate housing supply target for Aberdeen City, and in their response to a further information request the council stated that it was not currently possible to derive such a target. Instead, Figure 10 of the strategic development plan sets a housing requirement/ housing supply target of 24,982 for the wider Aberdeen housing market area to 2026.

11. At paragraphs 22 to 26 below, I conclude that it is likely that at least 7,500 houses will be delivered on brownfield sites in the 2011 to 2026 period. If the 11,078 greenfield completion figure suggested by Bancon Homes were accurate, this would equate to a total of 18,578 being built in Aberdeen in this period, or 74% of the total target for the Aberdeen housing market area.

12. This would leave a balance of 6,404 homes as the minimum that would need to be

delivered in the Aberdeenshire portion of the Aberdeen housing market area in order to achieve the housing supply target. Figures submitted by the council in response to a further information request indicate that land for 11,711 units is proposed to be allocated by Aberdeenshire Council in their portion of the Aberdeen housing market area. It may be that not all of this land will be developed by 2026, but it is likely to be supplemented by a level of windfall development. Overall I therefore conclude that the evidence indicates both that Aberdeen City is making a reasonable contribution to ensuring that the housing supply target for the Aberdeen housing market area is met, and that there is a reasonable likelihood of the housing supply target in the housing market area being achieved.

13. Some representations point to past under-delivery of houses on sites allocated in the previous local development plan and argue that these historic shortfalls should be rolled forward and added to the requirements pertaining to the proposed plan. I agree that low levels of housebuilding in the past may exacerbate needs and demands now and in the future. Any shortfalls that occurred before 2011 have already been considered afresh through the 2014 strategic development plan, which was informed by a housing needs and demand assessment that considered this issue in the round, including the existence of any backlog up to that time (pages 146 to 151 of the housing needs and demand assessment). Any shortfalls that have arisen since 2011, while not affecting the overall housing requirement and allowances set out in the strategic development plan, will influence the rate of development required in order to achieve the requirement in the remaining part of the strategic development plan period. I discuss the consequences of this further at paragraphs 27 to 29 below.

14. Other representations argue a need to build in a 'generosity allowance' in the land allocations over and above the allowances set out in the strategic development plan. However, as noted at paragraph 3 above, the strategic development plan has already built in a level of generosity well in excess of the 10 to 20% margin required by Scottish Planning Policy. There is therefore no case to add a further generosity allowance in the local development plan.

15. It has emerged through responses to further information requests that the second columns of Tables 3 to 8, setting out the development allocations in the various masterplan zones, have been wrongly labelled in the proposed plan. To be consistent with the city-wide position set out in Table 2, these columns in Tables 3 to 8 should refer to 'Existing to 2016'. I recommend a modification below to correct this error.

#### Deliverability and balance between large and small sites

16. Many representations argue that the housing land supply in the proposed plan is excessively composed of large sites requiring much in the way of new strategic infrastructure, land assembly and other preparatory works and so not deliverable in the short term. It is suggested that a range of smaller sites that are in the control of single developers and can readily plug in to existing infrastructure and so be developed more quickly should be included in order to better balance the land supply.

17. Representations also point to the poor delivery from allocated sites over the previous plan period. For instance, analysis of the 2012 and 2015 housing land audits by Drum Property Group (representation 150) indicates that, as of May 2015, only a total of 182 houses had been built on twelve of the major housing proposals of the 2012 local development plan out of an allocation (to 2016) of 11,150. Looking across all the greenfield allocations the analysis from Stewart Milne Homes (representation 128), based on the 2015

housing land audit, indicates that only 1,418 completions are anticipated by 2016 out of an allocation for this period of 11,834.

18. I agree that the evidence points to disappointing levels of completions having been achieved up to this point on the major land releases contained in the 2012 plan. It is the case that the scale of many of these sites, for instance OP9 Grandhome (7,000 homes) and OP38 Countesswells (3,000 homes), is likely to have increased the complexity of their delivery and up-front infrastructure costs. These factors and others may have caused delays. But progress is being made. The council has now adopted masterplans or development frameworks for all the large sites, and the housing land audit indicates increasing numbers of completions on these sites in the coming years. I consider that it is not surprising that the big strategic releases from the last local development plan have taken some time to start producing units given their size and complexity in terms of gaining the necessary consents and securing infrastructure. However there are signs of progress. It is too early to conclude that these sites have fundamental delivery problems.

19. However, paragraph 119 of Scottish Planning Policy does refer to a range of sites being allocated, and I agree that delivery rates may be more assured if plans allocate a variety of types of site that may appeal to different market segments or development models. The council correctly points out that 16 of its 25 greenfield allocations are for less than 500 homes, including 11 for less than 100 homes. However this still represents over 90% of greenfield units being planned for sites with a final capacity (to 2035) of over 500.

20. In terms of the opportunities available, greenfield sites in Aberdeen City Council's administrative area should not be considered in isolation. Brownfield sites, windfall sites and sites in the Aberdeenshire portion of the housing market area will also provide range and choice and meet many of the same needs and demands as greenfield sites close to the city. In response to a further information request, the council supplied tables incorporating sites in the Aberdeenshire portion of the housing market area and the output of brownfield sites (where known). This showed 79% of units being planned for sites of over 500 units, though the output from windfall sites and further brownfield sites may be expected to lower this figure in reality.

21. I conclude that a relatively high proportion of housing completions are planned for large sites in the Aberdeen area. To some extent it is not surprising that individual land releases around a city such as Aberdeen should tend to be larger than in more dispersed or rural authorities. Need and demand may be expected to be more concentrated and opportunities more limited. I also accept that the high levels of growth that are planned for are likely to necessitate major investments in transport and community infrastructure regardless of the split between large and small sites. It would however be harder to integrate that infrastructure with development or secure funding for it in the context of a plethora of small sites as opposed to larger strategic releases. A range of types of site is beneficial, but I conclude that in the context of Scotland's third largest city the balance between larger and smaller sites in the proposed plan is appropriate.

#### Brownfield

22. As stated above, the strategic development plan identifies a housing allowance (housing land requirement) of 7,500 homes for brownfield sites in Aberdeen over the 2011 to 2026 period (excluding sites already in the effective supply in 2011). Table 2 of Appendix 1 of the proposed plan lists brownfield sites that have gained planning consent since 2011 and are largely already built, under construction or considered effective. However in response to

a further information request, the council acknowledged that the sites at the Balgownie Centre (OP5) and Pittodrie Stadium (OP87) are not currently considered effective. It is possible that these sites will become effective before 2026, but excepting the capacity of these two sites, the sites listed in this table contribute 2,287 units towards the brownfield target.

23. There is less certainty about the effectiveness or capacity of the sites listed in Table 1 of Appendix 1. This uncertainty is to some extent reflected in paragraph 2.12 of the proposed plan where the potential of these sites is given as a range of between 2,590 and 4,479 units. Bancon Developments throws considerable doubt on the early effectiveness of some of these sites. However even if all were to become effective by 2026, Appendix 1 only demonstrates a brownfield supply amounting to 4,877 to 6,766 homes.

24. Paragraph 117 of Scottish Planning Policy allows a contribution from a proportion of windfall development to the housing land requirement. Windfall sites are unexpected opportunities not identified individually in the plan, so contributions from such sites would be over and above the contributions of the sites listed in Appendix 1. The assessment of the windfall contribution is to be based on clear evidence of past completions and sound assumptions about future trends, and (in urban areas) be informed by an urban capacity study.

25. I have not been furnished with any analysis of past windfall completions. However the council have prepared a brownfield potential study, which shows that an average of 688 homes per annum were delivered on brownfield sites between 1993 and 2013, and that brownfield completions have been on an upward trend since 2009. Brownfield completions only fell below 500 homes per year in 3 years out of 21. Not all of these completions will have been on windfall sites, but these figures do provide a strong level of comfort that the brownfield housing allowance of 7,500 homes, which equates to 500 homes per year, is likely to be achieved. For this reason I conclude that the council have succeeded in demonstrating that, through a combination of the sites identified in Appendix 1, and an allowance for windfall development, the housing allowance for brownfield development in the city will be met.

26. This would also mean that it is safe to assume that brownfield sites will contribute at least 7,500 units towards meeting the housing supply target for the Aberdeen housing market area, as referred to at paragraph 11 above.

#### 5 year land supply

27. Paragraph 119 of Scottish Planning Policy requires local development plans to provide for a minimum of 5 years effective land supply at all times. As noted above, no housing supply target has been set for Aberdeen City in isolation, so the relevant figures against which to measure the adequacy of the housing land supply are the housing requirements for the Aberdeen housing market area contained in figure 10 of the strategic development plan. In response to a further information request, the council stated that the annualised target for the 2011 to 2016 period is 1,661 per year, and the annualised target for the 2017 to 2026 period is 1,502 per year. Because the most recent housing land audit is that for 2015, at that time the supply target for 2015 to 2019 (inclusive) was therefore 7,827. However, as noted at paragraph 13 above, I consider that some undersupply in the Years 2011-2014 may have resulted in a larger residue having to be achieved in the remaining years of the plan period.

28. Appendix 3 of the housing land audit 2015 states that 5,424 units were completed in the Aberdeen housing market area in the 2011 to 2014 period. This would leave a residue of 19,558 units out of the 2011 to 2026 housing requirement/ housing supply target remaining to be met. This equates to around 1,630 units per year between 2015 and 2026, or a five-year supply of 8,149 units. Figure 7 of the housing land audit reports that the effective 5 year supply in 2015 was 12,091 (not accounting for small sites which could be added to this figure). Figure 9 shows effective land for a further 6,414 units coming on stream between 2020 and 2022 (inclusive), and effective land for a further 12,325 becoming available thereafter. I note that the assessment of the effective supply contained in the 2015 audit was largely agreed between the planning authorities and the housebuilding industry with the exception of one site in Aberdeenshire amounting to only 120 units over the initial 5 year period and 805 units thereafter.

29. I conclude that the most recent housing land audit clearly demonstrates the current adequacy of the 5 year housing land supply and strongly indicates the likelihood of a 5 year supply being maintained throughout the plan period.

#### Policy LR1

30. Policy LR1 of the proposed plan is concerned with land release. A number of representations argue that it should include a clause regarding the maintenance of a 5 year effective housing land supply and the drawing down of additional land in the event of a shortfall in the land supply. The inclusion of such policies in other local development plans is highlighted, sometimes emerging from the recommendations of examination reports.

31. There is no requirement in Scottish Planning Policy that such policies need be included in local development plans. Indeed the clear expectation in paragraph 119 is that the housing land requirement is met through allocations in the plan rather than through policy mechanisms. As established above, Aberdeen has a particularly healthy effective land supply, and the likelihood of any shortfall emerging in this supply is low. For this reason there is no need, in this case, to include a policy mechanism addressing the scenario of a potential shortfall.

32. Regarding the need for part B of the policy relating to Phase 2 development (2027 – 2035), I do not consider this to be redundant given the council's desire to hold the development of these sites back until at least the next review of the local development plan. These are not all sites that are incapable of development until Phase 1 has been completed, but may be sites the council wishes to be phased for other reasons such as the avoidance of piecemeal development.

33. Another suggestion was to remove the references in this policy to refusing development that jeopardised the full provision of an allocation. However, I consider that the proposed plan's approach is justified both in order to safeguard the allocated sites from other incompatible uses, and to ensure that the sites contribute as they need to towards meeting the housing supply target.

34. There is a suggestion that this policy should refer to the desirability of all large sites allocated for housing or employment use by this policy being developed for a mix of uses. This point is already made in paragraph 2.18 of the proposed plan, and the council has stated their agreement that all large scale developments should be mixed use. However, the purpose of Policy LR1 is more about ensuring land is released at the appropriate times to ensure that the land requirements identified in the strategic development plan are met.

Therefore I do not consider that Policy LR1 is the appropriate place to include requirements about mixed use development. Rather, such a reference would be better included in Policy LR2, which specifically refers to mixed use communities. The wording of Policy LR2 is discussed further below.

35. British Airways suggest that the preamble to Policy LR1 should refer to the constraints imposed by airport operations. As the council points out, this matter is already extensively covered at pages 43 and 44 of the proposed plan and in Policy B4. The plan is to be read as a whole, and it is not necessary to repeat material under different policy headings. Various potential constraints may apply to development land, and it would not be appropriate to single out airport-related constraints at Policy LR1.

Policy LR2

36. The council accepts that Policy LR2 is not clear about which sites it is intended to apply to, and clarifies above that the intention is that the policy applies to sites OP9, OP33, OP36, OP48 and OP59, all of which contain both housing and employment allocations. I agree that the proposed policy is not clear in this regard, and therefore recommend a modification to clarify its intention.

37. As noted at paragraph 34 above, the council agrees that all large scale developments should be mixed use. This position is supported by paragraph 40 of Scottish Planning Policy which indicates that land within or adjacent to settlements should be used for a mix of uses. However it is not clear from this part of the plan (or from Policy D1 which the council refers to) that complementary uses will be permitted within development sites. I agree with Aberdeen Civic Society (representation 136) that a reference to this matter in the plan would be desirable, and recommend a suitable modification below.

**Reporter's recommendations:**

It is recommended that:

1. the heading of the second columns to Tables 3 to 8 be changed to read “Existing to 2016”.
2. The following paragraph is added at the start of Policy LR2: “Other small scale complementary uses will be supported within allocated sites provided there is no conflict with the spatial strategy of the plan or the achievement of the specified housing and employment provision.”
3. The words “Mixed use developments will be required to service” are deleted from proposed Policy LR2, and replaced with “Developments including provision for both housing and employment land will be required to service the ...”.

<b>Issue 3</b>	<b>ALLOCATED SITES &amp; GENERAL AREA STRATEGY : BRIDGE OF DON/GRANDHOME</b>	
<b>Development plan reference:</b>	Pages 11-12 and 79-80; Proposals Map: Map 1, Table 3, Appendix 2, Policy RT4	<b>Reporter:</b> Stephen Hall
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
<p>Zara Lee (26)  sportsotland (41)  Pamela Shand (52)  European Development Holdings Limited (58)  Carlton Rock Limited (75)  John McDonald (79)  Moorfield Group Limited (94)  Shirley Copland (97)  The Grandhome Trust (101)  Royal Aberdeen Golf Club (104, 105)  North East Scotland College (109)  Scottish Enterprise (120)  Scotia Homes (152)  Buccmoor LP (160)  Bancon Developments (183)</p>		
<b>Provision of the Development Plan to which the issue relates:</b>	Overview of Direction for Growth in this area and specific Opportunity Sites	
<b>Planning authority's summary of the representation(s):</b>		
<p><u>Area Spatial Strategy General and Scope of Development</u></p> <p>152: Respondent is concerned over the deliverability of large strategic housing sites and reliance on single sites to provide for the required housing land supply. In Bridge of Don and Grandhome area, the housing land supply is dominated by the allocation of Grandhome (OP9) for 4,400 houses. Two other sites are currently being developed in the area and are both due for completion in 2017. After 2017 the housing supply is largely dependent on Grandhome coming forward and being developed at rate anticipated. An additional site is proposed to provide flexibility and choice in housing land supply - see Issue 4 Alternative Sites: Bridge of Don/Grandhome.</p> <p>183: In the Bridge of Don/Grandhome area the allocations post 2017 are only to Grandhome. There is no choice available to developers. Failure to deliver the SDP requirement is most acute on the Grandhome site.</p> <p><u>OP3 Findlay Farm</u></p> <p>94, 120, 160: Policy zoning for OP3 and existing developed part of the Energy Park should be changed from Policy B2 Specialist Employment Areas to Policy B1 Business and</p>		

Industrial Land.

94: Flexibility is required regarding types of permitted uses to allow the Energy Park to grow. Current zoning (under Policy B2) does not give flexibility and conflicts with recently granted consent for extension of the energy park which allows Class 4,5 and 6 with no restriction on Class 5. It would be more appropriate to change the zoning to Policy B1 - Business and Industrial Land. Respondent provides an example of an OP site at Dyce Drive which is proposed to be rezoned from Specialist Employment Areas (BI2) in the extant Aberdeen Local Development Plan 2012 (OP32) to Business and Industry (B1) in the Proposed Plan (OP23).

160: Existing allocation is outdated and there is significant market interest to occupy space at the Park. Allocation should reflect planning consent.

OP4 Dubford Community Facilities

26: Objects to development on the site. Concern raised about loss of green space for leisure/fauna, loss of views and safety. Local people strongly against.

OP6 Balgownie Primary School

79: Reference to condition 2 on decision notice for the development (dated 29 January 2015). Planning reference 131860. Condition states no development shall commence on site until a detailed landscaping scheme has been submitted and approved by the authority. Concerns that established trees should be retained wherever possible.

OP7 Aberdeen College Gordon Street

109: Support for continuing allocation of site. Request for additional land to be zoned as part of OP7.

52: Request for retention of wood adjacent to the site, should it be developed, to protect the site from the sea winds. Concern raised over loss of trees in light of a shortage in Aberdeen and the Proposed Local Development Plan Policies and Supplementary Guidance which indicates a preference for retention.

105: Site lies adjacent to Royal Aberdeen Golf Club. As an important tourist destination and significant contributor to the local economy. The amenity and setting of the golf club should be protected if the site is to be developed. Support for Appendix 2 "Other Factors" statement to retain woodland on site along the sites boundaries.

OP9 Grandhome

101: Respondent welcomes approach to greenfield release for housing and employment allocations. In particular respondent supports the allocation of site OP9 for a mixed use development of 7000 homes and 5 hectares of employment land.

97: Transport - Respondent concerned about the extensive development and consequential impact on residential amenity and traffic congestion which is already a problem. Respondent not convinced that there is a sufficiently robust plan for dealing with the increase in vehicular road traffic that the development would bring. The Third Don Crossing may aid, but respondent doubts it can cope with rise in traffic as a result of the development. Serious

consideration of alterations to transport network is required. Dualling of Parkway and Persley Bridge would be necessary in addition to Third Don Crossing. Developers would need to make large contribution to improve road network.

Pollution - Concerned about increase in noise and air pollution as a result of increased traffic and congestion. Concern regarding impact on residents and close proximity of the development site to schools and a health centre. Insufficient reassurance has been given that there has been sufficient consideration given to current residents.

Tree Band - Concern that the development would impact on and weaken the existing peripheral tree band if the development was built in too close proximity to it. Housing should only be allowed at a sensible distance from the established tree band for protection of the trees and rural amenity. Due consideration needs to be given to preserving the green space amenity of the area. The loss of farming land just for commercial gain will have a negative impact on the semi rural appeal of the Bridge of Don area.

#### OP13 Aberdeen Exhibition and Conference Centre (AECC), Bridge of Don

94: Propose recycling facility should be located more centrally to serve the whole community and reduce the need to travel. Suggests Grandhome as a suitable location (close to eastern edge). If considered acceptable at OP13 then high standards of landscaping and amenity (which apply to the Energy Park) must be applied regardless of where it is located.

104: Does not support the formation of a recycling centre in this location. Concern raised regarding the proposed location of the recycling centre being adjacent to the 14th hole of Royal Aberdeen Golf Course. Setting and amenity of golf course should be protected. Support retention of existing woodland buffer along southern half of the eastern boundary - request more substantial strategic landscape belt. Concern regarding loss of public parking as a result of developing the site and the impact this may have on attracting high profile golf tournaments.

160: Strong reservations in respect of inclusion of a household waste recycling centre within the site. Limited reference to potential amenity impacts of the inclusion of the facility.

Proposed Plan does not qualify the nature of the waste recycling centre, its scale, or any environmental effect potentially prejudicing and undermining significant investment on nearby high amenity business and industrial development sites.

While statements will likely be made within any planning application submission regarding regulatory guidance and pollution control, it is not considered appropriate to allocate a site for this use if there has been no assessment.

#### OP75 Denmore Road

41: Policy NE3 should apply to the allocation as it currently contains two full size pitches and changing accommodation.

58: Support for allocation of the site and its identification as a Commercial Centre. Concern that the site can only be developed in the event that the North Demore Road site is developed - thus only maintaining not enhancing the retail offer in Bridge of Don and leaving a deficiency in retail provision in the area. The North Denmore Road site may not be developed. Given the size of the community and planned expansion to 2030 the Plan should

be seeking to increase the retail offer in the area.

Expenditure leakage indicated in the retail capacity assessment for Bridge of Don area. Provision of additional food and non-food retail facilities would not have an adverse impact on existing facilities (Boulevard Retail Park, Kittybrewster or Berryden) and could claw back some expenditure leakage.

Development would consolidate existing non-food retail provision, encourage relocation of units dispersed through Bridge of Don and encourage single trip shopping. No technical impediments - site can be accessed from A90 and is accessible to cyclist and pedestrians. Proposals are in place to relocate existing playing fields. Site would satisfy a local need and would not conflict with adjoining land uses. There would be no significant loss to landscape, character and amenity of site or adjoining areas. No significant wildlife value and remainder of site is bounded by business, industry and residential uses.

Land at Jesmond Drive

75: Respondent states the Proposed Plan incorrectly identifies land at Jesmond Drive as Urban Green Space rather than part of the existing built up area. Planning permission A4/0409 approved and consent implemented. Consent shows mixed use development on the site. The Council accepted the Reporter’s findings to the Aberdeen Local Plan 2008 regarding removing the Urban Green Space designation from the site, but failed to carry out the amendments.

Respondent states that the error was repeated in the extant Aberdeen Local Development Plan 2012, with the boundary being further reduced. The Reporter did not consider the site boundaries in any detail as it was noted the planning permission had already been granted and development was underway. Current Local Development Plan 2012 zoning and Proposed Plan zoning contravenes the Council’s and Scottish Government’s finding on the site. Land is covered by an implemented planning permission and required to be included on the built up area. Current planning application pending for erection of 21 affordable homes on the land in question. Indicative layout attached to representation shows all open space will be actively maintained and existing footpaths preserved.

**Modifications sought by those submitting representations:**

Area Spatial Strategy General and Scope of Development

152: Allocate land at Shielhill Farm for a new mixed use neighbourhood.

183: Additional housing sites need to be allocated.

OP3 Findlay Farm

94, 120, 160: Policy zoning of existing Energy Park and proposed extension and OP3 Findlay Farm be changed from Policy B2 (Specialist Employment) to Policy B1 (Business and Industrial Land). Consequential changes to Appendix 2.

OP4 Dubford Community Facilities

26: No development on site.

OP6 Balgownie Primary School

79: See and comment on submitted detailed plan of landscaping before any works start.

OP7 Aberdeen College Gordon Street

52: Retention of the wood should the site be developed.

105: Support for wording under Appendix 2 - OP7 - Other Factors. "The woodland on site, particularly along the site's boundaries, should be retained." Strongly supported to ensure amenity of the golf club is protected.

OP9 Grandhome

97: Reduce the extent of the development of OP9.

OP13 Aberdeen Exhibition and Conference Centre (AECC), Bridge of Don

94: Consequential changes to Policy R4 and Appendix 2: Opportunity Sites due to requested removal of reference to a household recycling centre being located at OP13 (AECC site) and replace with OP9 Grandhome.

104: Deletion of household waste recycling centre from the allocation. If this is not favoured then under the "Other Factors" section in Appendix 2 include text: "The Household Waste Recycling Centre shall be sited to ensure that no adverse impact on the amenity of the neighbouring golf course arises" and "A strategic landscaping belt at least 20 metres in width shall be planted along the eastern boundary of the development."

160: Remove reference to OP13 being appropriate for waste recycling centre (to replace facility at Scotstown Road) and make more explicit reference to the nature and appropriateness of any such uses across the site being determined/guided by the Development Framework. This process may determine that other sites are more appropriate for such development.

OP75 Denmore Road

41: Previous Reporter's findings was that NE3 would apply to allocated development sites. If this remains the intention then policy protection in Scottish Planning Policy applies. If not, request reference made in the Plan to the need to compensate for the loss of facilities.

58: The Plan should accommodate both the consented convenience floor space at North Denmore Road and the existing bulky goods uses. It would be logical for both sites to be allocated through the Local Development Plan to accommodate a mix of convenience and bulky goods retailing. Descriptive text should be amended to allow the development of the site as an addition, and complementary to, the existing commercial centre at North Denmore Road.

Land at Jesmond Drive

75: Area outlined in plan attached to representation should be removed from Urban Green Space and included within the existing built up area.

**Summary of response (including reasons) by planning authority:**

Area Spatial Strategy General and Scope of Development

152, 183: The Aberdeen City and Shire Strategic Development Plan (SDP) 2014 (CD12) proposed not to allocate additional land, but to 'roll forward' the allocations from the Aberdeen City and Shire Structure Plan 2009 (CD20) into the SDP, and this was accepted by the Reporter during the SDP's Examination (Issue 5 pages 54 - 74) (CD13). The Reporter's conclusion stated "Drawing all of these matters together, I conclude that the scale and distribution of growth provided for in the housing allowances is appropriate and sufficient, in accordance with the requirement of paragraph 117 of Circular 6/2013." Aberdeen City Council agrees with these conclusions.

The Vision and Objectives for the Proposed Plan are the same as the Aberdeen City and Shire Strategic Development Plan 2014. The role of the Strategic Development Plan is to "set clear parameters for subsequent Local Development Plans and inform decisions about strategic infrastructure investment." (Circular 06/2013 paragraph 41, CD10). The Strategic Development Plan sets a clear strategy for development in Aberdeen, which includes housing allowances to be delivered through Local Development Plans.

Large, strategic-scale housing sites form an important part of the Proposed Plan's ambition to create sustainable, mixed communities. The merits and current position of Proposed Plan site OP9 Grandhome are discussed below.

Under Issue 2 we conclude that the Strategic Development Plan greenfield requirements have been fully met and we are confident that a continuous 5 year housing land supply can be met throughout the lifetime of this Proposed Plan. Accordingly, we do not consider it necessary to allocate any further greenfield sites beyond those already identified in the Proposed Plan.

The proposal for additional land is considered under Issue 4 - Alternative Sites: Bridge of Don/Grandhome.

OP3 Findlay Farm

94, 120: The existing Energy Park is a long established centre for research and product development for the oil, gas and renewable energy sectors with a history spanning nearly 30 years and with strong connections to research, design and development, knowledge driven industries and related education and training. Planning permissions granted to date have been restricted to the aforementioned uses. It is important to note that Proposed Plan site OP3 and the existing Energy Park are located at a key position in the Energetica Corridor. Planning Permission in Principle ([P131483](#)) was granted on 7 November 2014 for Classes 4 and 5, with Class 6 use restricted to being ancillary to the Class 4 and 5 uses and limited to 20%. The restriction reflects the extant Local Development Plan's (CD42) Specialist Employment Area designation.

The zoning in the Proposed Plan (unchanged from the extant Local Development Plan 2012) is considered relevant and appropriate. There is no need to rezone the existing Energy Park or OP3.

94: The respondent mentioned the proposal in the Proposed Plan to amend zoning at

Proposed Plan site OP23 Dyce Drive. OP23 is proposed to be rezoned (from Specialist Employment Areas (BI2) in the extant Local Development Plan 2012 to Business and Industry (B1) in the Proposed Plan) to reflect an existing planning consent (P041165 (RD46)) which was granted (19 November 2012) Planning Permission in Principle for Class 4 use and ancillary Class 5 and 6 uses. The use granted and under construction at OP23 is akin to Business and Industry (B1) zoning. As discussed above the use granted at OP3 reflects the extant Specialist Employment Area designation. In this regard, the two sites are not comparable – OP3 is not under construction, the uses granted are different and there has been no submission of further applications for Matters Specified in Conditions at OP3.

#### OP4 Dubford Community Facilities

26: The site was allocated in the Aberdeen Local Plan 2008 (CD43) and is allocated in the extant Local Development Plan 2012 as Opportunity Site OP6 reserved for community centre, primary school, local shops etc. The principle of this allocation was tested at the Examination into the Local Development Plan 2012 (CD44) under Issue 7. It remains appropriate to identify the site as a development opportunity for community facilities within the wider residential zoning as there has been no significant change in circumstances which would justify an amendment to this designation.

#### OP6 Balgownie Primary School

79: Detail of the site, including landscaping, design and amenity issues, is an issue for consideration at planning application stage and is not an issue for consideration at the Local Development Plan level. An application for Detailed Planning Permission ([P131860](#)) was given Conditional consent on 29 January 2015 in line with extant Local Development Plan policies on design, trees and woodland, landscape, open space and Urban Green Space. Appendix 2 – Opportunity Sites within both the extant Local Development Plan and the Proposed Plan specifically states "The amenity space to the west of the site should be retained." A landscape design scheme was submitted to the Council as per Condition 2 specified in the decision notice. The [landscape design scheme](#) is available to view online.

#### OP7 Aberdeen College Gordon Street

105: Support for Proposed Plan Appendix 2 - OP7- Other Factors text relating to retention of woodland, particularly along the site's boundaries, is noted.

109: Support for continued allocation is noted and welcomed. Request for additional land to be zoned as part of OP7 is considered under Issue 4 – Alternative Sites: Bridge of Don and Grandhome.

52: Concern over loss of trees is noted. We consider it appropriate to retain woodland within the site to ensure satisfactory residential amenity. The entry for Proposed Plan site OP7 in Proposed Plan Appendix 2: Opportunity Sites specifically states "The woodland on site, particularly along the site's boundaries, should be retained." The planning application process will consider the design and layout of the site including the presence of existing trees on site. It is not considered an issue which is insurmountable to the development of the site.

#### OP9 Grandhome

The Strategic Development Plan sets the requirements for greenfield housing/employment

allowances and these are set out in Figure 1 of the SDP on page 12 and in Schedule 1 on page 42. The majority of greenfield sites identified in the Proposed Plan have been carried over from the extant Aberdeen Local Development Plan 2012, and most are at an advanced stage in terms of planning consents and Masterplans as detailed in the Proposed Action Programme (CD21). This site is a desirable option because there are relatively few planning and topographical constraints within the site itself and its scale means that those that do exist (such as woodland and shelter belts and historic features) can be maintained and even enhanced. The scale of development would mean that it can support its own public transport infrastructure as well as services and facilities such as a new town centre, schools and employment land. Its single ownership will assist its deliverability. Large, strategic-scale housing sites form an important part of the Proposed Plan's ambition to create sustainable, mixed communities.

This site is subject to an approved [Development Framework](#) for the whole allocation (all phases of the LDP to 2035) which was adopted as Supplementary Guidance to the extant Local Development Plan 2012 in October 2013. The site is also subject to an approved Planning Permission in Principle ([P131535](#)) for a mixed-use development comprising: up to 4,700 homes, town and neighbourhood centres (including commercial, retail, leisure and hotel uses), employment land (circa. 5 hectares), community facilities, energy centre, open space/landscaping, and supporting infrastructure, including access in line with the first two Phases of the extant Local Development Plan 2012. This Planning Permission in Principle was granted in February 2015 with legal agreement to ensure the necessary developer obligations are secured.

101: Support for the allocation is noted. The allocation at Grandhome is a key part of the spatial strategy for the north of Aberdeen City.

97: In response to the respondents concerns, taking each in turn:

Transport - Traffic modelling has been undertaken and a range of works agreed to the local roads network as part of the assessment process of the aforementioned Planning Permission in Principle (P131535). This has taken into consideration the proposed phasing and occupation of homes. Contributions have been sought for both local and strategic road network improvements via a legal agreement. Strategic improvements to the road network will be provided by the Aberdeen Western Peripheral Route (AWPR), improvements to the Haudagain roundabout and Third Don Crossing. The Council and its partner the North East of Scotland Transport Partnership (Nestrans) are committed to these schemes, and the Third Don Crossing is due for completion early 2016. Other infrastructure improvements are listed in Appendix 3 of the Proposed Plan, the Proposed Action Programme and the 'Delivering Infrastructure, Transport and Accessibility' section of the Proposed Plan.

Pollution - The scale of development allocated will enable a range of facilities to be provided on-site, will reduce the need to travel, and will result in a more sustainable development. Sustainable and walkable neighbourhoods are one of six Core Principles in the Grandhome Development Framework. A Noise Impact Assessment was undertaken as part of the aforementioned planning application process, and Conditions have been attached to the Planning Permission in Principle consent in the interests of mitigation and residential amenity.

Tree Band - As detailed in the Committee Report accompanying the Planning Permission in Principle and supporting documents (Planning and Design Statement, Landscape Statement and Development Framework) there are sections along the site boundary that are

designated ‘Ancient Woodland Inventory – Long Established Woodland (of plantation origin)’ and areas of the site zoned under extant Policy NE1 (and this zoning continued via the Proposed Plan). As evidenced within the Development Framework, the areas of Green Space Network are being largely retained, and enhanced with additional green links across the site. The detailed layout of green spaces would be the subject of any subsequent Matters Specified in Conditions applications.

OP13 Aberdeen Exhibition and Conference Centre (AECC), Bridge of Don

94, 104, 160: A recycling facility is required within the Bridge of Don area to replace the current facility on Scotstown Road which is not considered fit for purpose. Its replacement is a key priority within the Aberdeen City Waste Strategy 2014 – 2025 (RD31 (pages 21 – 23)). Delivery of the facility at Proposed Plan site OP13 is within the control of the Council as landowner. The Council wish to ensure that these facilities are fit for purpose with an improved range of recyclables. The facility at Grove Nursery in Hazlehead Park is an example of a modern high quality facility which will be replicated at OP13. At the time of writing (August 2015), a public consultation process had recently been undertaken with regards to a draft Development Framework for OP13 and is due to go before the [Communities, Housing and Infrastructure Committee](#) for approval on 27 October 2015. This masterplanning process provided a further opportunity for engagement with the community in relation to the detail of the site, which should address concerns in relation to the location, design, landscaping and mitigation of impact on the amenity of adjacent areas. The draft Development Framework provides two options for the location of the recycling facility within OP13. The final location for the recycling facility has not, therefore, been determined. Further surveys and tests will be required to determine the most appropriate location within the site as well as any necessary mitigation and licensing arrangements. The exact site and nature of the Household Waste Recycling Centre will be guided by the Council’s Waste and Recycling Team. However, it is essential for the Development Framework to include options for it to ensure conformity with the Proposed Plan allocation as detailed in Proposed Plan Appendix 2: Opportunity Sites. Once the Development Framework has been approved it will be Interim Planning Advice. Once the Proposed Local Development Plan is adopted it will be put forward for adoption as statutory Supplementary Guidance which will again allow for further consultation. Subsequent planning applications will enable further public consultation on the specific details on the site.

94: There is no requirement in the adopted Local Development Plan for a recycling facility within Grandhome which has had its Development Framework adopted as Supplementary Guidance and gained Planning Permission in Principle since the adoption of the extant Local Development Plan in 2012. It would not be appropriate to apply additional requirements to existing, ‘rolled forward’ development sites which already have consent.

104: As detailed above, the masterplanning process and any subsequent planning applications will consider detailed issues such as strategic landscaping and amenity of adjacent land uses. It is not considered appropriate to pre-empt the final decision regarding the location of the recycling centre by inclusion of text in the Proposed Plan relating to the golf course or proposed strategic landscaping.

160: It is not considered appropriate to pre-empt the final decision regarding the location of the recycling centre by inclusion of text in the Proposed Plan relating to the Development Framework guiding / determining the appropriateness of the use on the site. The Proposed Plan is the appropriate vehicle to determine the principle of land use – the Development Framework adheres to the requirements for the site as laid out in the Proposed Plan.

OP75 Denmore Road

41: Proposed Plan Policy NE3 would apply to the allocation. Paragraph 3.101 states "this policy applies to all areas of urban green space including those not zoned on the Proposals Map". Furthermore the entry for OP75 in Proposed Plan Appendix 2: Opportunity Sites specifically states, in the event of the site being developed for bulky goods, "Pitches lost should be replaced in Bridge of Don by new or upgraded pitches which are of comparable or greater benefit".

58: The Aberdeen City and Aberdeenshire Retail Study 2013 (CD16 (pages 14 and 57 -59)) does not identify any quantitative deficiency of convenience retailing in the north of the city other than in some of the larger expansion areas identified around Aberdeen at Grandhome, West Aberdeen/Countesswells and Newhills. Development for bulky goods at OP75 is intended to maintain diversity (not fill a deficiency) of offer in Bridge of Don should the North Denmore site be developed. Irrespective of the suitability of OP75, there is sufficient overall retail offer in the Bridge of Don/Denmore/Dubford area. There is no requirement for additional retail offer over and above what is already consented/allocated at North Denmore site, Dubford and Grandholme. Furthermore additional retail offer may adversely impact other retail locations such as Beach Boulevard (CD16 (pages 98 -102)).

Land at Jesmond Drive

75: An application for planning permission in principle ([P150369](#)) for 19 affordable housing units with associated car parking and landscaping went before the Planning Development Management Committee on 16 July 2015 and was approved by Members, subject to conditions and a legal agreement under Section 75 of the Town and Country Planning (Scotland) Act 1997, as amended ('Section 75 agreement'). The Committee Report details both the complicated development management and development plan history covering the points raised by the respondent.

As a brief summary, planning applications A0/0624 and A4/0409 (RD48 and RD49) were granted conditional Outline Planning Permission with associated Section 75 agreements, but ensuring that 11,200 square metres was to be maintained as public open space in perpetuity (included the area subject to this representation).

A subsequent Reserved Matters application (05/1169) (RD50) was granted conditional consent for the formation and landscaping of the area of open space –this permission was partially implemented to provide pedestrian links, but no formal landscaping.

The Finalised Aberdeen Local Plan – Green Spaces – New Places 2004 (RD47 – see City Wide Proposals Map) identified the whole of the Jesmond Drive site as Urban Green Space and Green Space Network. In response to representations, the Council produced a series of Proposed Changes to the Finalised Plan and this included the identification of Jesmond Drive as an opportunity site for community facilities and the removal of Green Space Network from part of the site (RD70 Proposed Change G6, site Number 4 – see map) The issue was considered at Public Local Inquiry in 2006 (CD45 – Volume 1, Chapter 2, Issue 35 pages 2-67 to 2-71). Following receipt of the Reporter's Report, the Council Modified the Finalised Local Plan to show the land at Jesmond Drive as Opportunity Site 104 (Suitable for mixed uses including local shops, nursing home, amenity open space and paths complementary to adjacent amenity open space, and housing (approximate 40 units, of which about one third are expected to be provided by a housing association).

This was published in the Finalised Aberdeen Local Plan Proposed Modifications on 18

January 2008 (RD71 page 34 of 225, and see map 6). This showed Opportunity Site 104 as Mixed Use with both Green Space Network (in line with Reporter's Recommendation) and as Urban Green Space (contrary to Reporter's Recommendation). The Modifications made by the Council were publicised and all Objectors (including the Respondent) were notified. No objections were received. The Aberdeen Local Plan 2008 was adopted on this basis. No Objection was submitted to the allocation boundaries during the extant Aberdeen Local Development Plan 2012 cycle or the Examination. Representations were however received relating to concerns about the principle of OP11 (as it was named at that time) but no changes were made following the Examination. It is however worth noting that a closer review of the Proposals Map which accompanied the Local Development Plan 2012 reveals that the area of open space was not allocated as Green Space Network

The allocation and boundaries included within the Proposed Plan currently under Examination are the same as those within the extant Local Development Plan 2012, with the site to the south of the objection area identified for Mixed Use and the objection area itself designated as Urban Green Space. The OP11 label on the land to the south has been removed as the site is developed.

Fundamentally, at the time of the publication of the Proposed Plan, the Urban Green Space zoning was appropriate and wholly sufficient.

A further planning application ([P151068](#)) for the modification or discharge of the planning obligation regarding planning application A4/0409 in relation to Clause 2 (Open Space) is currently pending consideration by the Authority. We would however, expect the next iteration of the Local Development Plan to reflect this planning permission, assuming that a consent will have been issued by this point.

### **Reporter's conclusions:**

#### Area Spatial Strategy General and Scope of Development

1. The suggestion that the housing land supply in Aberdeen is overly dominated by large sites is discussed under Issue 2. There I concluded that, across Aberdeen, the balance between larger and smaller sites in the proposed plan was appropriate.
2. It is the case that greenfield land release in Bridge of Don/ Grandhome is dominated by Site OP9 Grandhome. However the greenfield releases are supplemented by a number of brownfield sites identified on the proposals map, and doubtless also by a certain amount of windfall development.
3. The Bridge of Don/ Grandhome area forms one part of the larger Aberdeen housing market area. The principle described in paragraph 111 of Scottish Planning Policy is that demand for housing is relatively self-contained across a housing market area. Although Scottish Planning Policy goes on to acknowledge the possible existence of sub-market areas, it is not suggested in these representations that such a recognisable sub-market exists in Bridge of Don. Therefore I do not believe it is appropriate to look at one part of the city in isolation when considering the balance between different types of site.
4. Economic development in the Energetica corridor may justify directing a good proportion of housing growth to this area. In this context I note that in addition to the 5,310 greenfield homes and a number of brownfield sites identified for Bridge of Don/ Grandhome to 2026 in the proposed plan, can be added the housing provision made in the Aberdeenshire portion

of the Energetica area.

5. Overall I conclude, for these reasons, that there is no general requirement to diversify the types of site allocated in the Bridge of Don/ Grandhome area.

OP3 Findlay Farm

6. The reference to Scottish Enterprise in paragraph 3.62 of the proposed plan, and the suggested widening of the range of uses that will be considered in the wider Aberdeen Energy Park are discussed under Issue 25.

7. As regards site OP3 Findlay Farm, the council has accepted, in response to a further information request, that it would be reasonable to amend the zoning for this site from Specialist Employment Area (B2) to Business and Industrial Land (B1). Given the recent approval by the council of a planning application to remove restrictions over the types of business and industrial use that may be developed on this land, I agree that this change in the local development plan zoning is sensible.

OP4 Dubford Community Facilities

8. This is an attractive area of open space contained within a modern housing development. While its current use will doubtless be valued by residents, equally the proposed community uses, for which this site appears to have been reserved for some time, would also benefit the local population.

9. I note that the principle of this development was considered at the time of the examination into the current local development plan, when it was concluded that, with the addition of the urban greenspace designation on the southern part of the site, the proposal should remain in the plan. It is not helpful to the certainty that the planning system is intended to create for the principle of development in development plans to be revisited unless circumstances have clearly changed. In this case I am not aware of any relevant and significant changes in circumstance since the adoption of the current plan.

10. It is somewhat unusual for an area of designated urban greenspace to be contained within a development opportunity site. However in this case this may provide some necessary flexibility to accommodate the design requirements of new development while still recognising a need to protect an element of open space use on the site.

11. For these reasons I conclude that no change is required to the plan.

OP6 Balgownie Primary School

12. Development was underway on this site at the time of my site inspection. The matter of compliance with conditions applied to planning permissions is one for the council's development management and enforcement services, and not for the local development plan. No change to the plan is required.

OP7 Aberdeen College Gordon Street

13. Representations express concern that the existing trees along the site boundary should be retained. I agree that this narrow strip of woodland is of value, including to provide shelter to the development and neighbouring properties, and as part of the setting of the

Royal Aberdeen Golf Club. The need to retain these trees is stated among the factors applying to this site in Appendix 2 of the proposed plan. On this basis no further change is required.

14. The suggested extension to this site is covered under Issue 4.

OP9 Grandhome

15. This major land release has been rolled forward from the existing adopted local development plan. It was considered as part of the examination into that plan, when it was concluded that the scale and location of the site were justified. It is not helpful to the certainty that the planning system is intended to create for the principle of development in development plans to be revisited unless circumstances have clearly changed. In this case, significant changes in circumstance have been the approval by the council of a development framework for the site as statutory supplementary guidance, and the approval of planning permission in principle for a major mixed use development on the site, as detailed by the council above. These factors only serve to reinforce the suitability of the site for development. I therefore conclude that the opportunity site should remain as designated in the proposed plan.

16. Turning to the specific concerns raised, this scale of development will inevitably have an impact on the wider transport network. Across the city, a range of transport interventions have been identified (at paragraph 3.44 of the proposed plan) aimed at mitigating the impact of development. These include junction and capacity improvements at Parkway and Perseley Bridge, which are locations of concern mentioned in the representation. Above, the council confirms that traffic modelling and noise impact assessment has been undertaken in association with the recent planning permission, and a range of improvements to the local road network agreed. On this basis I am satisfied that the traffic, and associated pollution, impacts of the development have been properly accounted for.

17. As regards the protection of trees, I do not interpret the site allocation on the proposals map to mean that the entirety of this land will necessarily be subject to built development. The most significant areas of tree cover are shown as part of the greenspace network and so afforded a strong degree of protection under Policy NE3 of the proposed plan. Development would also be subject to Policy NE5 which serves to protect trees and woodlands, including root protection areas. Above, the council explains how it has taken account of designated ancient and long-established woodland on the site and largely retained areas of greenspace network through the ongoing planning of this site. I am therefore content that this matter is adequately covered in the proposed plan.

OP13 Aberdeen Exhibition and Conference Centre (AECC), Bridge of Don

18. The principal concerns raised with regard to this site relate to the proposed household waste recycling centre. The need for this facility in this part of Aberdeen is set out in the Aberdeen City Waste Strategy, and is not disputed. I consider that the concerns expressed regarding the amenity impact of a recycling centre are understandable, particularly given the high amenity business and industrial uses that it is hoped to attract to Site OP13. However it is also the case that amenity concerns would be likely to be raised at alternative locations, particularly those in primarily residential areas, such as Grandhome. Furthermore, I accept the council's point that a modern facility could be designed in such a way as to give rise to fewer of the adverse impacts than may have been associated with such facilities in the past.

19. Site OP13 has the advantage, from the council's perspective, of being within its control as landowner. I accept that it would be likely to be harder to deliver this facility on land outwith the council's control, in part due to the perceived negative impacts on amenity. Site OP13 also has the advantage of direct access to the principal road network. For these reasons I conclude that it is reasonable to include the proposal for a household waste recycling centre within site OP13 at Policy R4 and in Appendix 2.

20. The detailed location of the proposed facility within the opportunity site is not shown on the proposals map. It is clear that the council wishes to retain a degree of flexibility over the exact location, while further surveys and tests are carried out. I consider this to be a reasonable position. If a final location had been known, this could usefully have been shown in the proposed plan, but it is equally appropriate for this level of detail to be covered in the masterplan/development framework.

21. Regarding the potential impact of the recycling centre and the wider development on the Royal Aberdeen Golf Club, it is not normally necessary to specify a need to preserve the amenity of individual neighbours to development sites. In particular the need for a landscape framework that enhances the visual impact of development is already covered in general terms by Policy D2. However, in this particular case I am satisfied that the courses of the Royal Aberdeen Golf Club do represent an asset of particular value to the city's economy and as a tourism draw. I therefore consider that, on balance, it would be advantageous to highlight the particular need for development within the OP13 site to respect the landscape setting and amenity of these golf courses. It is beneficial to state this in the plan itself to ensure that potential developers are aware of the importance of this factor from the outset.

#### OP75 Denmore Road

22. This site consists of an area of hardstanding on the frontage to Denmore Road, and two sports pitches and other green land to the east. Regarding the application of Policy NE3, and in particular the protection of sports pitches, the entry for this site in Appendix 2 of the proposed plan states that any pitches lost should be replaced in Bridge of Don by new or upgraded pitches which are of comparable or greater benefit. I therefore identify no contradiction in the plan, as Policy NE3 allows for the loss of pitches in circumstances such as those described in Appendix 2.

23. Appendix 2 stipulates that Site OP75 may only be developed for bulky goods retailing, and this only if the existing bulky goods retailers are displaced from the North Denmore Road commercial centre. The council therefore sees this allocation as a means of maintaining broadly existing levels of bulky goods retailing in this area. Conversely the representation sees this as an opportunity for additional retail space, and greater flexibility for the development of either convenience or bulky goods stores.

24. The representation identifies a level of expenditure leakage from the Bridge of Don area, that further retail development could help to reverse. However I find the most authoritative evidence on this matter to be the Aberdeen City and Aberdeenshire Retail Study, which does not point to a deficiency in convenience or comparison goods retailing in Bridge of Don (part of 'Area 23').

25. Paragraph 63 of Scottish Planning Policy refers to the possible need to restrict retail activity in commercial centres to the sale of bulky goods where necessary to protect the role of town centres. Paragraph 68 calls on development plans to adopt a sequential town

centre first approach when planning for retail. Given the apparent absence of any deficiency in convenience or comparison goods retailing in Bridge of Don, I consider that the identification of additional or more flexible retail opportunities in locations away from town centres is unnecessary, and would be contrary to this sequential approach. On this basis I conclude that no change to the plan is required.

Land at Jesmond Drive

26. This land forms a narrow strip north of a recently developed area of housing, shops and a care home. The eastern part of this strip is particularly narrow and contains a recently-constructed footpath and associated amenity land. Though this area may originally have been included within the site area for the wider development, it now has a clear recreational function. Due to its narrowness it would in any event be unsuitable for further built development. For these reasons I consider that the urban greenspace designation for this eastern area is wholly appropriate.

27. The western part of this strip of land, fronting onto Jesmond Drive, is somewhat wider. Without commenting on the particular indicative layout that accompanied the representation, I accept that it is likely that some form of development could be physically accommodated on this land. However, although this area is currently somewhat unkempt, I consider that it does perform a useful open space function by preserving a continuous green link between Jesmond Drive and the larger area of open space to the east. I am not therefore supportive of development on this land.

28. I note the planning history of the site. However I do not find it unusual for land that was secured as open space provision within what was historically a larger planning application site to be subsequently identified as protected green space in the development plan. Such a measure assists in securing the ongoing retention of that land as open space. No change to the plan is required.

**Reporter's recommendations:**

I recommend that:

1. The zoning for Site OP3 Findlay Farm, Murcar on the proposals map be changed from Specialist Employment Area (B2) to Business and Industry (B1).
2. The policy reference for Site OP3 Findlay Farm, Murcar in Appendix 2 be changed from Specialist Employment Area to Business and Industry.
3. The following words are added to the 'Other Factors' for Site OP13 in Appendix 2:  
 "Development should respect the landscape setting and amenity of the course of the Royal Aberdeen Golf Club".

<b>Issue 4</b>	<b>ALTERNATIVE SITES: BRIDGE OF DON/GRANDHOME</b>	
<b>Development plan reference:</b>	No reference in the Plan	<b>Reporter:</b> Stephen Hall
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
<p>Avant Homes (31)                  University of Aberdeen (63)                  A &amp; G Cowie (71)                  Stewart Milne Homes (85)                  North East Scotland College (109)                  Langer Investments (118)                  Drum Property Group (150)                  Scotia Homes (152)                  John McIntosh (156)</p>		
<b>Provision of the Development Plan to which the issue relates:</b>	Alternative sites in Bridge of Don/Grandhome	
<b>Planning authority's summary of the representation(s):</b>		
<p><u>Mill of Mundurno</u></p> <p>31: Remove land adjacent to Mill of Mundurno from Green Belt and allocate for housing. Site is logical and compact expansion of Dubford close to employment sources and accessible to public transport routes. Within close proximity of Aberdeen Western Peripheral Route northern terminus and Aberdeen Exhibition and Conference Centre. Located within Energetica Corridor. Site would be well contained within landscape, would not lead to coalescence. 25% of units would be affordable. Schools in area have declining school roll or are operating at less than capacity. Issues relating to integration with existing developments, linear crop marks and drainage can be addressed at planning application stage.</p> <p><u>Land at Balgownie (B0203)</u></p> <p>63: Object to failure to identify land at Balgownie as a mixed use development incorporating residential, employment and recreational land. Land is surplus to requirement and its redevelopment will contribute to the consolidation/improvement of the Universities' estate infrastructure across Aberdeen. Aberdeen Sports Village (ASV) now provides a base for the sporting facilities and as such land at Balgownie is now surplus.</p> <p>Residential land use in the vicinity is acceptable to the council with two development sites identified in the Proposed Plan at OP11 and OP12. One is under construction and the other has an application pending.</p> <p>Proposal will result in 50% recreational/open space with the remainder as employment/residential use. Redevelopment of the land would deliver a sustainable</p>		

development in the right location in line with Scottish Planning Policy (para 40).

Site would positively impact on the Energetica Corridor and enable expansion of the Aberdeen Science and Technology Park. Site is located within the Aberdeen City Strategic Growth Area. Site will be very accessible after the Third Don Crossing is complete. Core Path network paths are within close proximity. There is a shortfall in housing numbers and this site will help meet the shortfall. Site is effective and capable of delivery. The allocated sites are large and constrained.

Persley Croft (B0101)

71: Include land at Persley Croft in the Local Development Plan. Located in popular area of the city within close proximity to Aberdeen airport/industrial sites in Bridge of Don and Dyce and has good connections to Aberdeen City Centre. Ideal location for variety of uses (housing, hotel, retail, commerce or industry).

Issues of access are not insurmountable. There are options to create adequate access. There is scope to access land from the west of the site which would be of mutual benefit to the Grandhome development. A potential third access (south of the site) has not been fully investigated by the Council - adequate room to create and improve upon existing access point.

All surrounding land has been included in the Local Development Plan. Site was originally part of the Grandhome estate which has been included in the Local Development Plan. Majority of Green Belt zoning has been lifted - not reasonable to consider the site at Persley to be different.

Development would prevent site becoming more derelict and increased negative impact visually and on adjacent housing developments. Site target for vandals.

Support for site by local councillors and MSP. Community Council in favour of tidying up the area.

Mundurmo (B0202)

85: Object to failure to identify site B0202 at Mundurmo for development of mixed use sustainable community (1000 houses, retail/business hub and community facilities - single stream primary school and playfield fields).

Commitment to delivery of AWPR and Third Don Crossing has material implications for the Bridge of Don Area and the proposed site.

Continued assertion that the site performs Green Belt functions (contributing to identify and landscape setting of city, preventing coalescence between Bridge of Don and Potterton) is refuted. Site is located 2 kilometres from Potterton and is not visually connected. Construction of AWPR to north of site negates any prospect of coalescence. The AWPR will entirely alter the character of the area.

Site lies within the city (Strategic Growth Area) and anchors the Energetica Corridor. Site is well served by public transport with good (and improving) access. Additional housing is required to be identified in the area to improve the integration of housing and employment uses and encourage sustainable walking and cycling linkages between the two.

Land at Shielhill (B0206)

118: Objection to non-allocation of site B0206. Site proposal has been refined and is now proposed as key worker housing for 250 houses (site previously promoted as a sand and gravel quarry and for affordable housing).

Site is brownfield, lies within Energetica Corridor and is of low ecological value. No evidence of supported species. There will be a good landscape fit, high quality amenity areas and enhanced pedestrian links. Site is accessible to AWPR, Bridge of Don and Dyce employment centres and existing established residential areas.

There is a clear need and demand for housing (especially medium income housing). The houses will be: 100% of these will be affordable - available to a range of people in need; 25% of these will be made available to those on the Council housing waiting list; 75% of these will be sold at a 30% discount from open market value, to be made available to key workers, public sector/NHS/Council employees; A discount of at least 20% will be applied in perpetuity in relation to subsequent sales; 10 Homes for Heroes are proposed, with associated 30 square metres workshops.

Causewayend (B0210)

150: Site promoted as bid site but was not supported as the Planning Authority believed they had allocated enough housing sites in line with the Strategic Development Plan. The MIR site review failed to recognise the opportunity and suitability of the site for development. It is contended that this is not the case. The negative reasons suggested in respect of the site are incorrect. Currently zoned as Green Space Network and Green Belt but it would be more appropriate for housing.

The site makes a sensible extension to Bridge of Don. The site falls within the southern section of the Energetica Corridor and could help deliver housing to support economic development.

Site is immediately adjacent to northern section of Bridge of Don's urban area covering approximately 34 acres of unused agricultural land. Ground is flat with no physical constraints. Landscape impact will be limited due to it sitting in a bowl and it will be a logical extension to existing built up area. Dry stone dyke located on sections of the boundary can be used to create a strong boundary which would be stronger than any features on the current green belt boundary. These will help integrate the proposed development into the landscape. Site sits in a bowl in the landscape reducing any local impacts. Small proportion of site is wooded – other sites in close proximity (Grandhome) were not discounted as they contained woodland. The site has no nature conservation designations. Contrary to the Main Issues Report evaluation there can be no significant loss or disruption to natural conservation.

New access can be taken from eastern boundary. Development to the south has been designed to provide access to the site. The Council have recognised that the site is within 500 metres of a bus link and there is scope for a cycle and footpath link between the existing housing and the proposed site. The primary school is within 800 metres. Local facilities are close and no worse than any other part of the Bridge of Don.

The Grandhome development will improve facilities and employment opportunities within this part of the city. Other local roads will be upgraded due to the AWPR.

Shielhill Farm (B0205)

152: Shielhill Farm should be allocated for residential and mixed-use development in order to bring forward land in an appropriate location capable of delivering effective housing land in the first period of the Local Development Plan. Land at Shielhill Farm can contribute to the long-term growth requirements of the area.

Land can accommodate approximately 1,000 homes commencing 2020 at a rate of 100 per annum. A mixed use development is proposed for the site. It will be influenced by the masterplanning process. Allocation at Shielhill Farm will complement existing mixed use site at OP10 Dubford.

Site is well related to existing and emerging development context of the Bridge of Don area. Also well placed in terms of connectivity (south side of AWPR, west of A90 and Energetica Corridor).

Land at Perwinnes/North of Don Masterplan (B0209)

156: Object to non-allocation of B0209 - North of the Don Masterplan for a mixed community of 2000-3000 homes. Any constraints to the North of the Don Masterplan are principally policy based rather than technical. The few technical issues which exist are common to any larger scale development. They are all capable of resolution.

There are minimal facilities in Bridge of Don - suburban town of 36,000 population. There has been no consideration of a substantial District Centre of strategic significance which could provide much of the local services and facilities and jobs that a settlement of this scale would normally justify. Once Grandhome is built an additional 15,000 - 18,000 population will be located in Bridge of Don. Congestion in the City Centre is at levels that the possibility of a local centre to serve a wider set of Town Centre needs could make sense for Bridge of Don, benefiting the City Region as a whole.

A masterplanned Town Centre for Bridge of Don is required. There is no rationale which would justify housing land constraint in the face of sensible masterplanning of places, infrastructure and facilities. Arguments made in the past by the North East of Scotland Transport Partnership (Nestrans) that a route through Bridge of Don could undermine the AWPR Northern Leg no longer apply as the AWPR is now underway. A public transport loop (set out in North of the Don Masterplan) which links across the Third Don Crossing to University and Science Parks makes sense in planning terms with potential for dedicated hydrogen bus loop. The masterplan complements Energetica.

OP7 Aberdeen College Gordon Street

109: Support for continuing allocation of site. However not all of the former campus has been included within the OP7 designation. The Gordon Centre has not been used by North East Scotland College (NESCOL) for teaching facilities since 2011, is no longer required for teaching purposes and its redevelopment of the larger site will form part of NESCOL's strategic plan going forward.

**Modifications sought by those submitting representations:**

Mill of Mundurno

31: Remove land adjacent to Mill of Mundurno from Green Belt and Green Space Network and identify as a greenfield allocation post 2017.

Land at Balgownie (B0203)

63: Rezone to Mixed Use development encompassing expansion of Aberdeen Science & Technology Park, student and key worker accommodation and recreational/open space.

Persley Croft (B0101)

71: Site at Persley Croft to be included in the LDP.

Mundurno (B0202)

85: Site should be allocated to accommodate 500 houses in each phase of the Plan (1,000 in total) with associated ancillary uses and community facilities. Consequential changes to Proposals Map, Bridge of Don/Grandhome growth area, Tables 2 and 3 of the Proposed Plan and additional consequential amendments to text.

Land at Shielhill (B0206)

118: Land at Shielhill is removed from the Green Belt/Green Space Network zoning and allocated as an 'Opportunity Site' suitable for up to 250 key worker houses. Allocation to be subject to Masterplan to be agreed with the Planning Authority.

Causewayend (B0210)

150: Identify site to help delivery housing land now or into the future as a draw-down site should the failure to deliver the current allocations continue.

Shielhill Farm (B0205)

152: Remove the Green Belt designation and allocate phased residential development for approximately 1,000 houses and other Mixed Use development with anticipated commencement in 2020.

Land at Perwinnes/North of Don Masterplan (B0209)

156: Allocate the site or identify it as strategic reserve.

OP7 Aberdeen College Gordon Street

109: Request that boundary be extended (as per plan attached to representation) and site be identified as an Opportunity for mixed use.

**Summary of response (including reasons) by planning authority:**

General Strategy

In preparing the Proposed Plan a Development Options Assessment (CD28, CD30 and CD31), Strategic Environmental Assessment (CD27), and Main Issues Report (CD29) were used to identify the most suitable locations to deliver the required growth. The majority of greenfield sites identified in the Proposed Plan have been carried over from the Aberdeen Local Development Plan 2012 (CD42) which went through a similar process at that time. Most of these sites are at an advanced stage in terms of planning consents and Masterplans as detailed in the latest version of the Action Programme (CD47).

The Aberdeen City and Shire Strategic Development Plan (SDP) 2013 (CD12) sets the requirements for greenfield housing and employment land allowances and these are set out in Figure 1 of the SDP on page 12 and in Schedule 1 on page 42. Under Issue 2 we conclude that the SDP greenfield requirements have been fully met and we are confident that a continuous 5 year housing land supply can be met throughout the lifetime of this LDP. Accordingly, we do not consider it necessary to allocate any further greenfield sites beyond those already identified in the Proposed Plan.

Mill of Mundurno

31: We do not propose to allocate this site for development. The site was previously considered during the extant Local Development Plan 2012 Examination and rejected by the Reporter (CD44, Issue 11). Aberdeen City Council has reassessed this site, considered it undesirable, and rejected it on the grounds set out in the Proposed Plan Site Assessment Report (CD31). The B999 to the south of the site is a very busy road which helps to form a clear, robust and defensible Green Belt boundary. Developing north of the B999 (above and beyond the existing Premier Inn development) would extend the built up area into open countryside. Residential development on this site would intrude significantly into the surrounding landscape. The site is isolated from local facilities and there are few sustainable transport options, making any development in this location heavily car reliant. This land should therefore remain as Green Belt.

Land at Balgownie (B0203)

63: We do not propose to allocate this site for development. The site was previously considered during the extant Local Development Plan 2012 Examination and rejected by the Reporter (CD44, Issue 9). Aberdeen City Council has reassessed this site, considered it undesirable, and rejected it on the grounds set out in the Proposed Plan Site Assessment Report (CD31). The Green Space Network and Urban Green Space designations remain appropriate. The site is central to the Bridge of Don area and is easily accessible to local residents. The population will grow when the Proposed Plan allocations are implemented. This will generate an increased need for open space/playing fields. We acknowledge the improved facilities at Aberdeen Sports Village, however, these cannot compensate for the loss of local provision at Bridge of Don. While the University may no longer have a requirement for its own use, there is no evidence to suggest that there isn't a wider community requirement for this area of open space to be retained.

Scottish Planning Policy (SPP) (CD05, paragraph 226) allows for playing fields to be redeveloped where, among other reasons, a relevant strategy and consultation with

sportscotland show that there is a clear excess of provision to meet current and anticipated demand in the area. This has not been demonstrated. SPP, paragraph 224, states that "Local Development Plans should identify and protect open space identified in the open space audit." This site is identified in the Council's Open Space Audit 2010 (CD41 pg 100). The site is close to public transport and core paths, which reinforces its importance within the Green Space Network and the opportunity it presents for recreational use. Although the Third Don Crossing route runs close by there will be no direct vehicle access to the site.

#### Persley Croft (B0101)

71: We do not propose to allocate this site for development. Aberdeen City Council has assessed this site, considered it undesirable, and rejected it on the grounds set out in the Proposed Plan Site Assessment Report (CD31). The site is subject to significant constraints regarding access. The site is considered to be undesirable for development due to its location directly on the A90 Trunk Road (The Parkway), which is a major transport route. The Parkway severs the site from nearby residential development, services and facilities at Danestone, and would be very difficult and hazardous for pedestrians and cyclists to cross. The Parkway is a robust Green Belt boundary in this area. Considering the plans for development at Grandhome, it cannot be assumed that this road will become a significantly quieter local road post-Aberdeen Western Peripheral Route (AWPR). The responsibility of upkeep and maintenance of land lies with the landowner and is not a matter for the Development Plan process.

#### Mundurno (B0202)

85: We do not propose to allocate this site for development. The site was previously considered during the extant Local Development Plan 2012 Examination and rejected by the Reporter (CD44, Issue 11). Aberdeen City Council has reassessed this site, again considered it undesirable, and rejected it on the grounds set out in the Proposed Plan Site Assessment Report (CD31). The site is currently zoned as Green Belt and Green Space Network and performs its Green Belt functions by contributing to the identity and landscape setting of the city, and preventing coalescence between Bridge of Don and Potterton. It is isolated from the existing settlement of Denmore by the B999 and topographical changes. Local primary schools could not cater for the demand generated by a development of this size. It is unlikely this scale of development could support the necessary neighbourhood facilities and services to significantly reduce residents' need to travel. There is no requirement for this site in addition to the Dubford site and other Bridge of Don sites.

#### Land at Shielhill (B0206)

118: We do not propose to allocate this site for development. The site was previously considered during the Pre-Main Issues Report (Pre-MIR) stage and rejected as being unsuitable for development as a Quarry, as set out in the Pre-MIR Development Options Assessment Report (CD28). Aberdeen City Council has reassessed this site based on the updated proposal for residential use, considered it undesirable, and rejected it on the grounds set out in the Proposed Plan Site Assessment Report (CD31). This site lies to the west of the Dubford development. The Green Belt Review (CD38, pages 4-6 of 30) which supported the extant Aberdeen Local Development Plan 2012 found that the edge between Dubford and the proposed land at Shielhill site forms a clear boundary with a pronounced difference in vegetation between the gorse and heathland to the west and the improved grassland to the east. Residential development on this site would intrude significantly into the surrounding landscape. The site sits in an elevated position and is visible from a

considerable distance. The site is isolated from local facilities and there are few sustainable transport options, making any development in this location heavily car reliant. The site lies within the Scotstown Local Nature Conservation Site (LNCS). This land should remain as Green Belt.

Causewayend (B0210)

150: We do not propose to allocate this site for development. The site was previously considered during the extant Local Development Plan 2012 Examination and rejected (CD44, Issue 84). Aberdeen City Council has reassessed this site, considered it undesirable, and rejected it on the grounds set out in the Proposed Plan Site Assessment Report (CD31). Development on this site would have a severe impact on the surrounding landscape and weaken the defensible Green Belt boundary to the north of the city. The views from the B997 Scotstown Road would be prominent. The site is not well integrated with the existing settlement and it is thought that it would be difficult to link a new road between existing settlements to the south at Woodcroft to the proposed development. Consequently road access would need to be made on to the road to the north of the site and this may have safety implications. There would be some concern for pedestrians or cyclists aiming to avoid the use of the car. This could lead to increased car dependency which is against policies described in national, regional and local policy. Alternative sites in more appropriate and sustainable locations throughout the city have been identified. These allocations meet the requirements set out in the SDP. Sufficient allocations have already been made in the Bridge of Don area to support the Energetica Corridor.

Shielhill Farm (B0205)

152: We do not propose to allocate this site for development. Aberdeen City Council has assessed this site, considered it undesirable, and rejected it on the grounds set out in the Proposed Plan Site Assessment Report (CD31). The site is currently zoned as Green Belt and Green Space Network and performs its Green Belt functions by contributing to the identity and landscape setting of the city, and preventing coalescence between Bridge of Don and Potterton. It is relatively remote from existing facilities. Local primary schools could not cater for the demand generated by a development of this size. It is unlikely this scale of development could support the necessary neighbourhood facilities and services to significantly reduce residents' need to travel. There is no requirement for this site in addition to the Dubford site and other Bridge of Don sites.

Land at Perwinnes/North of Don Masterplan (B0209)

156: We do not propose to allocate this site for development. The site was previously considered during the extant Local Development Plan 2012 Examination and rejected (CD44, Issue 11). Aberdeen City Council has reassessed this site, considered it undesirable, and rejected it on the grounds set out in the Proposed Plan Site Assessment Report (CD31). The proposal would have an impact on the overall Spatial Strategy of the Proposed Plan and would require a major reassessment of the proposed sites across the entire city. Many of the aims of the North of Don Masterplan are equally achievable by masterplanning the sites which are already allocated in the Proposed Plan. Having such a high proportion of allocations in the Bridge of Don area would reduce the choice of sites available elsewhere in the city and may prove more difficult to deliver the required development within the timescales envisaged. The site is deemed undesirable as it is open farmland and is a highly visible exposed hill. The hill is a landmark that provides a backdrop to development at Bridge of Don and helps to contain it. The site is poor in access terms, although it may be large

enough to support its own services, facilities and public transport. However, development breaking out over the lower ground to the south before climbing up Perwinnes Hill would add a sense of urban sprawl and isolation unconnected to the existing urban area. Sufficient allocations have already been made in the Bridge of Don area to support the Energetica Corridor.

OP7 Aberdeen College Gordon Street

109: The extent of the boundary in the Proposed Plan is the same as in the extant Local Development Plan 2012 (CD42). No submission, bid for development, or indication of a desire to amend the zoning has been submitted until this point in the Development Plan preparation cycle.

Insufficient detail has been provided with regard to the type of mixed use which may be proposed on the site. Aberdeen City Council has assessed this site, considered it undesirable, and rejected it on the grounds set out in the Proposed Plan Site Assessment Report (CD31). In light of the adjacent primarily residential land uses it would not be appropriate to rezone the land as Mixed Use where there is uncertainty as to the type of uses proposed.

The boundary of Proposed Plan site OP7 Aberdeen College Gordon Centre should remain as proposed. The site is made up of redundant, unused land and buildings which Aberdeen College would like to see redeveloped in the future. The Opportunity Site is currently covered by residential designation (under Proposed Plan Policy H1 – Residential Areas). The remaining area owned by North East Scotland College (NESCOL) to the west of the site is also covered by a residential designation (Proposed Plan Policy H1). Proposed Plan Policy H1 states that new residential development will be approved in principle if it meets certain criteria relating to amenity. NESCOL would be able to redevelop the site to a complimentary use if the proposal was in accordance with the corresponding policies within the adopted Local Development Plan.

**Reporter's conclusions:**

General Remarks

1. I concluded at Issue 2 that the proposed plan contained a shortfall of only 18 units in meeting the greenfield housing land requirement, and that Aberdeen City is making a reasonable contribution to ensuring that the housing supply target for the Aberdeen housing market area is met. There is therefore very little requirement to identify additional housing land. However some limited scope does exist to allocate small new greenfield sites, should any suitable opportunities emerge through the examination process.
2. Several proposed sites have previously been considered at the time of the examination into the current adopted local development plan. Where this has been raised in evidence, I have read and agree with the conclusions reached at that time. It is generally not helpful to the certainty that the development planning system is intended to provide to revisit the principle of development on sites that have been considered through earlier equivalent processes unless circumstances have clearly and significantly changed.

Mill of Mundurno

3. The site comprises a single field on the northern fringes of Bridge of Don. It is currently slightly separated from the built-up area, but adjoins the Dubford development site to the west. To the east, the Premier Inn development establishes the principle of development north of the B999 to some extent, although this development is something of a one-off, being based around a historic building. The site benefits from close proximity to employment opportunities in Bridge of Don, but is isolated from most other local facilities. I found the B999 itself to be a particularly busy road at the time of my site inspection, and so housing development at Mill of Mundurno would not appear to be desirable in terms of the formation of a safe new access or the encouragement of non-motorised modes of transport.

4. A tree belt to the north shields the site somewhat from the open countryside beyond and would itself form a strong defensible boundary to any development. However there is a strong existing boundary to the green belt in this area in the form of the B999, which would be breached by any development on this site. The site retains a strong sense of openness and, despite the presence of the tree belt, of being a part of the broader countryside to the north of the city. It is visible to large numbers of people travelling on the B999. I therefore consider its current green belt status to be fully justified, and that development here would represent a clear extension into open countryside.

5. The merits of this site were considered at the time of the examination of the existing adopted plan, when it was concluded that the site's removal from the green belt and allocation for development was unjustified. I agree with the reasoning and conclusions reached at that time, and am not aware of any changes in circumstance of such significance as to lead me to reach a different conclusion now. For these reasons, and given the absence of a pressing need for further housing land release, I conclude that the site should remain in the green belt and not be allocated for housing development at this time.

Land at Balgownie

6. This area of existing sports pitches appeared to be still in use and of good quality at the time of my site inspection, although the athletics track is apparently disused. The site forms a series of terraces stepping down from north to south. It is reasonably well-screened by trees from nearby views (including from the A90 Parkway to the north). Although more open to the south, views from this direction are in the context of an urban backdrop. I do not therefore consider the site has an important strategic landscape role.

7. Although it appears no direct vehicular access to the site is planned from the Third Don Crossing link road, such an access would appear to be possible, as would access from the Science and Technology Park to the east. Development would relate reasonably well to employment opportunities, public transport and other local facilities. I therefore conclude that the site is capable of successful development. The main issue with its being allocated however would be the loss of sports pitches and open space.

8. Paragraph 224 of Scottish Planning Policy states that local development plans should protect open space identified in the open space audit and strategy as valued and functional or capable of being brought into use to meet local needs. The land at Balgownie is identified in the open space audit and given a quality score of 14-16, which is the middle categorisation (Appendix O). Paragraph 226 of Scottish Planning Policy states that outdoor sports facilities should be safeguarded from development except in certain circumstances. Two of these circumstances are of particular relevance. The first is where the facility would

be replaced by a new facility of comparable or greater benefit, or the upgrading of an existing facility to provide a facility of better quality. The second is where there is a clear excess of provision.

9. Regarding the first of these circumstances, the representation points to the new and upgraded facilities at the Aberdeen Sports Village. However it has not been demonstrated that all the uses made of the pitches at Balgownie can be met at the Sports Village. Nor is the Sports Village as convenient for local users as the land at Balgownie. Regarding the second circumstance, no evidence of a local excess of provision has been supplied. In this context I am also conscious of the significant increase in population which is expected to occur in north Aberdeen as a consequence of the new development areas proposed in the plan.

10. I would not rule out that a case could be made for the development of some land at Balgownie, particularly if associated with clearer evidence of how remaining sports provision on the site could be improved, and following consultation with sportscotland. However at this time I am not satisfied that development would not lead to an overall and unwarranted diminution in the availability of outdoor sports facilities in this part of the city.

11. The merits of this site were considered at the time of the examination of the existing adopted plan, when it was concluded that the loss of the open space designated as urban green space and green space network had not been justified. I agree with the reasoning and conclusions reached at that time, and am not aware of any changes in circumstance of such significance as to lead me to reach a different conclusion now. For these reasons, and given the absence of a pressing need for further housing or employment land release, I conclude that the site should retain its designation as green space network and urban green space and not be allocated for built development at this time.

#### Persley Croft

12. This site is occupied by a group of farm buildings and an associated field. The farm buildings have fallen into a derelict condition and form a prominent unsightly feature as viewed from the busy A90 Parkway at this point. Redevelopment, at least on the area currently occupied by buildings, could therefore offer an opportunity for a visual improvement.

13. The existing buildings and field maintain an agricultural character appropriate for the green belt. Although visually contained by surrounding woodland, the field area in particular contributes to the landscape setting of the city as an attractive area of open farmland highly visible from the peripheral Parkway road. This road at this point also forms a particularly strong green belt boundary.

14. While it is the case that the Grandhome development site takes the built area of the city across Parkway a little distance to the north of Persley Croft, there is no visual connection between the two areas. The scarp yard to the south of Persley Croft creates some precedent for urban activity to the west of Parkway, but it is well screened by mature trees.

15. In addition, access to the site would be problematic due to the volume of traffic using Parkway (which is currently a trunk road), the curvature of the road and the proximity of a roundabout to the south. A number of alternative access arrangements are suggested in the representation. Of these, the existing farm access to the south of Persley Croft would appear to have the most potential to serve a small number of houses, but I would still be

concerned about standing vehicles waiting to turn right into the site at this point.

16. In conclusion, while I acknowledge that the removal of the existing unsightly buildings would be a benefit, I do not consider that this is sufficient to justify removing the green belt designation from this land. The access concerns only add to my view that this site is unsuitable for urban development.

### Mundurno

17. This is a substantial area of greenfield land situated on rising ground north of the Denmore area of Bridge of Don, and, according to the representation, is capable of accommodating 1,000 houses and ancillary uses. The land is of no great inherent landscape quality, and the southward-facing slope means that development would be unlikely to be excessively prominent in views from further north. However the land is visible from areas of the city to the south, and from approaches to Aberdeen along the A90 and the B999. It therefore contributes to the landscape setting of the city. Its green belt status also serves to direct development to the sites identified for development in the proposed plan, and which we have found to be suitable for that development elsewhere in this report. The green belt status of the land at Mundurno therefore remains appropriate in terms of the factors set out in paragraph 49 of Scottish Planning Policy.

18. Releases of additional green belt land are sometimes required, but in this case I have concluded under Issue 2 that there is very little scope to allocate additional greenfield land. A release of the scale envisaged at Mundurno would represent an excessive and unjustified overallocation of housing land when set against the housing land requirement defined in the strategic development plan. For this reason I conclude that, whatever the potential merits of development at Mundurno in the longer term, this land should not be allocated for development in this local development plan.

### Land at Shielhill

19. This is an elevated area of scrubland located to the west of the OP10 Dubford development site on the northern fringes of Bridge of Don. It is highly visible in views from the north and is situated in a green wedge separating the Middleton Park and Denmore areas of Bridge of Don. I therefore consider it has an important role in the landscape setting of the city, and that its green belt status is justified.

20. The site's rising topography and natural vegetation lend it a landscape quality that I note has been recognised through inclusion in a Prime Landscape Area. The council has also provided evidence of the site's value for nature conservation. The site is not well related to existing services. There are therefore a range of factors indicating this site's unsuitability for development.

21. I acknowledge the potential benefit of providing additional housing for key workers. However the plan includes significant releases of housing land, which will be subject, under Policy H5, to a 25% affordable housing contribution. Under Issue 28 I note that, according to the council's supplementary guidance on this topic, this contribution could include various forms of 'intermediate housing', which might be suitable for key workers. I do not therefore consider that the potential for provision of key worker housing at Shielhill is sufficient to override my concerns regarding loss of green belt and intrusion into open countryside. Given also the very limited scope that exists in numerical terms to allocate additional greenfield land, I conclude that this site should remain in the green belt and not be allocated

for development.

Causewayend

22. This is an area of relatively low-lying and level agricultural land on the northern edge of the Middleton Park area of Bridge of Don. The site is significantly more prominent in views from the north than the existing housing areas at Middleton Park, which are largely screened in approaches to the city on the B997. Development would therefore constitute a significant urban extension into open countryside. While the B997 and existing tree belts would provide a strong green belt boundary around parts of the proposed development, much of the southern boundary consists of a relatively weak field boundary. The site is distant from most local facilities.

23. The merits of this site were considered at the time of the examination of the existing adopted plan, when it was concluded that the removal of the site from the green belt and its allocation for development was unjustified. I agree with the reasoning and conclusions reached at that time, and am not aware of any changes in circumstance of such significance as to lead me to reach a different conclusion now. The site has a number of disadvantages as a development site, and for these reasons, and given the absence of a pressing need for further housing land release, I conclude that the site should remain in the green belt and not be allocated for development.

Shielhill Farm

24. This land forms a significant part of the larger proposed development area at Mundurno considered above, and similar considerations apply. The site currently contributes to the landscape setting of the city and its green belt status is therefore justified. Releases of additional green belt land are sometimes required, but in this case I have concluded under Issue 2 that there is very little scope to allocate additional greenfield land. A release of the scale envisaged at Shielhill Farm would represent an excessive and unjustified overallocation of housing land when set against the housing land requirement defined in the strategic development plan. For this reason I conclude that, whatever the potential merits of development at Shielhill Farm in the longer term, this land should not be allocated for development in this local development plan.

Land at Perwinnes/ North of Don masterplan

25. The representation proposes a major development in open countryside to the north of Bridge of Don containing significant areas of housing land and a new town centre. The site itself is of a pleasing agricultural character, but not of exceptional landscape quality. It is however on an area of elevated land that currently helps to contain the northern part of Aberdeen in landscape terms. Development would clearly be a major incursion into open countryside and significantly affect the landscape setting of the city. As such, its current green belt status is fully justified.

26. Releases of additional green belt land are sometimes required, but in this case I have concluded under Issue 2 that there is very little scope to allocate additional greenfield land. A release of the scale envisaged at Perwinnes would represent an excessive and unjustified overallocation of housing land when set against the housing land requirement defined in the strategic development plan. While the future role of land north of Bridge of Don, and the network of centres across Aberdeen, may be worthwhile topics of future debate, this cannot be contemplated now in the context of the current strategic development plan. For these

reasons I conclude that, whatever the potential merits of development at Perwinnes in the longer term, this land should not be allocated for development in this local development plan.

OP7 Aberdeen College Gordon Street

27. It is suggested that the existing OP7 site should be extended westwards to include the remainder of the North East Scotland College landholding to the Ellon Road frontage, and that the entire extended site be identified for mixed use development. The proposed extension area consists of a low rise complex of buildings grouped around a courtyard. There is a mix of modern and more traditional buildings, some of which, I note from the council's assessment, are listed. The site has a reasonable existing access from the southbound A956 Ellon Road. The only severe constraint identified in the council's site assessment report is distance to shopping/ health/ recreation facilities, but the extension area will be no worse in this regard (indeed slightly better) than the designated OP7 site, and I note the existence of some shops and other local services in Bridge of Don. I therefore consider that this land is suitable for redevelopment in some form.

28. The council points to Policy H1 of the proposed plan as giving scope to approve satisfactory development proposals, but is resistant to a mixed use allocation on the grounds that it is uncertain what use may be proposed. It appears to me that there is a limited amount of practical difference between the policy tests that would be applied under Policies H1 (Residential Areas) and H2 (Mixed Use Areas). Both policies support residential development subject to various caveats, and allow for uses complementary to residential use while protecting existing residences from harm to their amenity. It is not in the normal nature of a mixed use designation for the precise nature of the new use or mix of uses to always be known at the outset. Rather the mixed use designation signals some flexibility in this regard on appropriate sites.

29. It seems clear from the representation that this land is likely to be available for redevelopment, and the council does not appear to be strongly resistant to this in some form. Where the development of particular pieces of land is in prospect I consider that it is preferable for the local development plan to include these as clear proposals rather than rely on generic policies. I therefore conclude that site OP7 should be extended to include the remainder of the College's landholding to the west.

30. Because this is an accessible and central site within Bridge of Don, with a history of non-residential use and a number of non-residential uses nearby (including the armed forces facility directly to the north), I consider that a mixed use designation would be more appropriate than a residential zoning. This would serve to indicate that while residential use would be appropriate, a number of other uses complementary to the surrounding area would also potentially be acceptable subject to the terms of Policy H2 (including no adverse impact on the amenity of local residents). These considerations apply to the entirety of the extended OP7 site.

**Reporter's recommendations:**

I recommend that:

1. Site OP7 be extended westwards to include the remainder of the North East Scotland College landholding in this area, as indicated in the plan attached to representation 109, and

that the entirety of the extended area be designated on the proposals map as Mixed Use Area (H2).

2. The site area in Appendix 2 be amended, the Policy be changed to Mixed Use, and the first sentence of Other Factors be amended to “Location suitable for residential or mixed use development.”

<b>Issue 5</b>	<b>ALLOCATED SITES &amp; GENERAL AREA STRATEGY: DYCE, BUCKSBURN &amp; WOODSIDE</b>	
<b>Development plan reference:</b>	Pages 11-12; Pages 80-82; Proposals Map; Appendix 2; Appendix 4; Appendix 6; Masterplan Table Page 38	<b>Reporter:</b> Stephen Hall
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
<p>Evelyn Clark (14)  Rented Accommodation (15)  Susan Fraser (19)  Sandra Rae (20)  CALA Management Ltd and SRUC (24)  Hugh Cumming (32)  Mr &amp; Mrs Ewen (48)  North East of Scotland Transport Partnership (59)  The University of Aberdeen/Bon Accord Land Promotion Ltd (73)  Miller Development Ltd (74)  Bancon Developments (183)</p>		
<b>Provision of the Development Plan to which the issue relates:</b>	Overview of Direction for Growth in this area and specific OP sites	
<b>Planning authority's summary of the representation(s):</b>		
<p><u>Land Supply</u></p> <p><u>OP21 Rowett South</u></p> <p>73: To be consistent with the Strategic Development Plan the full allocation of 1940 units should be allocated within the Local Development Plan. Constraints on site due to the Council postponing the determination of pending applications within the Newhills Expansion Area and Dyce Drive Corridor until a cumulative impact assessment was undertaken and infrastructure requirements established. Build rates have been pushed back. University request that the 240 units within Phase 2 be brought forward to Phase 1 allocation.</p> <p><u>OP23 Dyce Drive</u></p> <p>74: Welcome the Land Release Strategy. OP23 has been omitted from the Table and no detailed reference to its contribution to the development of land supply is provided. This is important in representing the land supply in this location correctly.</p> <p><u>Shortfall of Units</u></p> <p>183: The 2015 Housing Land Audit suggested the delivery rate anticipated in the Plan will not be achieved. There is a shortfall of 2,290 units in this area</p>		

OP18 Craibstone North and Walton Farm

24: Object to allocation. Employment land in this corridor is in excess of the Structure Plan requirement of 60 hectares available at all times. Dyce Drive and Rowett North will meet the requirements. The site will not be required by 2027 and its continued reservation is having a blighting effect for no productive or sustainable reason. Assumed as generating traffic in Newhills traffic model by 2023 but the LDP doesn't envisage development until past 2027. This requires clarification.

OP14 Bankhead Academy

19: Respondent's home, Bankhead School Lodge, is within the boundary of the site. Request to remove this from the Opportunity Site.

OP86 Dyce Railway Station Objection

14, 15, 20, 32, 48: on the basis of loss of amenity space and open views. Car parking close to rear of properties. Negative impact on residents through noise and disturbance, especially at night, possible increase in anti-social behaviour and overlooking. Increase in traffic, light pollution and possible damage to residential properties. Union Row and Station Road not suitable for an increase in traffic.

Access - 20, 32: No access or detail given on the car park entrance.

Support - 59: Welcome allocation of the site. The North East of Scotland Transport Partnership (Nestrans) have commissioned a study to support this allocation. It includes background and context; demand; consultations; objectives; appraisal of options; design of car park and next steps.

**Modifications sought by those submitting representations:**

Land Supply

OP21 Rowett South

73: The full allocation of 1940 units should be allocated in the next Local Development Plan.

OP23 Dyce Drive

74: Amendment to Table 4 of the Proposed Plan to record Dyce Drive as an active development site.

Shortfall of Units

183: Additional housing sites need to be allocated.

OP18 Craibstone North and Walton Farm

24: Re-allocate the site as mixed use, residential and educational. Remove as a reserved site for employment uses. This will avoid planning blight and assist the proposals the shorter-term allocated sites OP19 and OP23.

OP14 Bankhead Academy

19: Bankhead School Lodge removed out of the boundary of the proposed site.

OP86 Dyce Railway Station

14, 15: Leave it as green space. If car park goes ahead ensure space between the houses, walls and car park.

20: More parking restrictions.

32: Respondent would like the opportunity to purchase land behind his property to provide a buffer between his house and the proposed car park.

**Summary of response (including reasons) by planning authority:**

Land Supply

OP21 Rowett South

73: As discussed in Issues 2, we contend that the Proposed Plan is consistent with the Aberdeen City and Shire Strategic Development Plan (SDP) 2014 (CD12). Table 2 of the Proposed Plan (page 9) shows that up to the period 2026 the Proposed Plan allocates 16,982 greenfield homes. This is 18 homes short of the 17,000 SDP allowance over the same period. The 0.1% shortfall is not considered to be of any material significance and therefore it is not considered necessary to bring forward the 240 homes within Phase 2 to the Phase 1 allocation for Rowett South. The SDP is also clear (in paragraph 5.5), that in exceptional circumstances planning permission can be granted on sites within the 2027-2035 period. Work is currently underway on a transport study in the area and until the completion of this study it would also be premature to make any changes to the phasing.

OP23 Dyce Drive

74: Proposed Plan site OP23 is not included in Table 4 of the Proposed Plan because it was identified in the Aberdeen Local Plan 2008 (CD43). It therefore pre-dates the allocations that have arisen out of the Aberdeen City and Shire Strategic Development Plan 2014 and the Aberdeen City and Shire Structure Plan 2009 (CD19). It is still proposed as an Opportunity Site because parts of the site are undeveloped and still have to obtain planning consent.

Shortfall of Units

183: The issue regarding any shortfall of housing units is addressed within Issue 2: Housing and Employment Land Supply.

Sites

In preparing the Proposed Plan a Development Options Assessment (CD28/30/31), Strategic Environmental Assessment (CD27), and Main Issues Report (CD29) were used to identify the most suitable locations to deliver the required growth. The majority of greenfield sites identified in the Proposed Plan have been carried over from the Aberdeen Local Development Plan 2012 (CD42) which went through a similar process at that time. Most of

these sites are at an advanced stage in terms of planning consents and Masterplans as detailed in the latest version of the Action Programme (CD47).

The Aberdeen City and Shire Strategic Development Plan (SDP) 2014 (CD12) sets the requirements for greenfield housing and employment land allowances and these are set out in Figure 1 of the SDP on page 12 and in Schedule 1 on page 42. Under Issue 2 we conclude that the SDP greenfield requirements have been fully met and we are confident that a continuous 5 year housing land supply can be met throughout the lifetime of this LDP.

OP18 Craibstone North and Walton Farm

24: This site was chosen following a rigorous assessment of all proposed development options during the preparation of the extant Local Development Plan 2012. It was found to be ideally located for employment development particularly, due to the existing allocations for employment land and Park & Choose in the immediate area. At the Examination into the extant Local Development Plan 2012 the Reporter found the site to be suitable for development. In the Examination report (CD13, Issue 14) the Reporter recognised that, in order to guarantee the availability of the employment land target set out by the Strategic Development Plan, an over-allocation for the Plan period is appropriate. Paragraph 2.16 of the Proposed Plan states that “The overall allocations are more than required by the Strategic Development Plan. It is important to take account of factors that will reduce the actual developable area of employment land such as strategic landscaping, the presence of pylons or other uses within zoned sites and land required for transportation”. Therefore a change in the zoning of this site to that of mixed use, residential and educational is considered to be unnecessary. In relation to traffic modelling, the site is identified for 1.5 hectares up to 2027 and 18.5 hectares post 2027. The plan is therefore clear that regardless of separate traffic modelling projects the site is not due to come forward until 2027.

OP14 Bankhead Academy

19: It is not the purpose of the Local Development Plan Proposals Map to make a distinction between private and public property. The map is intended to show land use zonings and allocations for new development sites across the city. The identification of a property such Bankhead School Lodge within an Opportunity Site does not force the landowner to develop the site but simply identifies that the site is suitable for development for the identified purpose. No change is therefore proposed.

OP86 Dyce Railway Station

59: Support for OP86 is welcomed. The existing car park and surrounding streets have a limited capacity of 82 spaces (RD72). A recent report prepared for the North East of Scotland Transport Partnership (Nestrans), Dyce Rail Station Car Park – Initial Appraisal (RD72), has shown that the available car parking is reaching capacity and that with improvement works due to be undertaken by Network rail demand could reach 164 spaces by 2035.

The current situation has resulted in a reasonable amount of on-street parking in the vicinity that could be attributed to commuters. Scottish Planning Policy (SPP) Para 275 (CD05) is clear that Development Plans are required to identify rail infrastructure and support its delivery. Within National Planning Framework 3 (CD04) there is programmed investment in the Aberdeen to Inverness rail line including improvements between Aberdeen and Inverurie due to be complete by 2019. With these improvements now committed, as noted earlier

demand at Dyce Railway Station is likely to increase. Through the Nestrans Regional Transport Strategy Refresh, approved by ministers January 2014, the section in relation to Rail (IC1), on page 24, (RD51) actively promotes commuter rail travel. Dyce Railway Station forms a key part of this network. The provision of the car park will encourage and promote a sustainable transport method and help to alleviate parking congestion in the area.

14, 15, 20, 32, 48: Issues in relation to the layout of the car park and the impacts of noise, light, overlooking etc. will all be considered as part of any future planning application. The provision of buffer strips and landscape to protect the amenity of the surrounding residences will be considered at that time. Issues in relation to Anti Social Behaviour are a matter for the police however the provision of a formal managed carpark will likely discourage the type of anti social behaviour that could take place on the current unmanaged open space.

Access – 20, 32: As the proposal is an extension to the existing car park, details surrounding access are more appropriately dealt with at the planning application stage and not within the Proposed Plan.

Purchase of Land – 32: The Local Development Plan does not cover matters involving the buying and selling of land.

**Reporter's conclusions:**

Shortfall of Units

1. The arguments made in the representation from Bancon Developments with regard to the housing land supply in Dyce, Bucksburn and Woodside form a part of its wider case relating to the city-wide housing land position, and are discussed under Issue 2.

OP14 Bankhead Academy

2. Site OP14 is described in Appendix 2 as being the former Bankhead Academy secondary school. The site largely consisted of a cleared site at the time of my site inspection. However it was also apparent that the property Bankhead School Lodge was a separate private residence and was currently occupied. The curtilage of this house is peripheral to the main site and is not required for the main site's successful development. I consider it is misleading, and possibly damaging to the interests of the owners of the property, to include the curtilage of Bankhead School Lodge within the opportunity site when it is clearly not the intention that it should form part of this development. I therefore agree with the representation that the curtilage of this property should be removed from this opportunity site.

OP18 Craibstone North and Walton Farm

3. Table 2 of the proposed plan shows that 130 hectares of employment land have been allocated on greenfield land in the plan area, compared to a strategic development plan allocation of 118 hectares. I note the allocation stated in Figure 6 of the strategic development plan is actually 105 hectares. There is therefore an apparent significant over-allocation of employment land in the proposed plan. The justification for this is explained at paragraph 2.16 of the plan, and relates to factors that will reduce the actual developable area of sites and the need to maintain a 60 hectare supply of business land at all times. There is no evidence before me to indicate that these reasons are not valid. I also note from

the footnote to Table 4 of the proposed plan that 18.5 hectares of the OP18 site may be required for a higher education and research institute. Development for such a use would reduce the total amount of land available for general employment uses across the city.

4. The appropriate zoning for this land was considered at the time of the examination of the existing adopted plan, when it was concluded that the 1.5 hectare site (Walton Farm) allocated for employment between 2007-2023 should remain and that the future growth area identified should be amended to allow employment or higher education and research uses. I agree with the reasoning and conclusions reached at that time, and am not aware of any changes in circumstance of such significance as to lead me to reach a different conclusion now.

5. Finally, I concluded under Issue 2 that there is very little requirement to identify additional housing land. Therefore there is no need in terms of the wider housing land supply to identify Site OP18 as suitable for residential development.

6. For these reasons I consider that the plan should remain unchanged as regards Site OP18.

#### OP21 Rowett South

7. It is suggested that the 240 homes identified for development on this site in Phase 2 (2027 to 2035) be included within Phase 1 (2017 to 2026). I appreciate the increased certainty that such a change would bring for the developer, and that this would facilitate a single planning application being considered for the entirety of the site. I am also unclear what the practical benefit would be of withholding planning permission for 240 homes out of this larger development until after the adoption of the next local development plan. This is especially the case given that only 12% of the total development is proposed to fall within Phase 2, the smallest proportion of any of the housing sites that are split over two phases. No separate area of land is identified for Phase 2 on the proposals map, so the intention does not appear to be to ensure that one particular part of the site is developed before another (the avoidance of piecemeal development).

8. However, the law requires that the local development plan be consistent with the approved strategic development plan. The strategic development plan defines the housing land requirement (termed 'housing allowances') that local development plans are required to fulfil, and identifies the two phases that are reflected in the proposed local development plan. Including the 240 Phase 2 homes at Rowett South in Phase 1 would have a knock-on effect on the overall totals for the Aberdeen City greenfield requirements. This would take the local development plan out of step with the strategic development plan, albeit by a relatively small amount.

9. Given the expected build rates for this site set out in the Housing Land Audit up to 2022, it is unlikely that the entirety of the site will be built out by 2026. Therefore the inclusion of a proportion of the site in the 2027 to 2035 phase could be seen as a reflection of the reality that development will extend into this period.

10. For these reasons I conclude that, on balance, the phasing for the Rowett South site should remain as stated in the proposed plan. However I suggest that it is possible that the exceptional circumstances referred to in paragraph 5.5 of the strategic development plan could apply to this site, and that planning permission could potentially be granted in due course for the entirety of the OP21 site.

OP23 Dyce Drive

11. Regarding the non-inclusion of Site OP23 in Table 4 of the proposed plan, I accept the council's argument that this table (and the related tables for other parts of the city) are intended to demonstrate how the requirements of the strategic development plan have been achieved. This is made clear in paragraphs 2.14 to 2.16 of the plan. In this context, the inclusion of this longer standing site (which dates from the 2008 local plan) would be confusing. The council's ongoing support for business and industrial development on this land is clear from its inclusion on the proposals map and in Appendix 2. No modification is therefore required.

OP86 Dyce Railway Station

12. The Dyce Rail Station Car Park Initial Appraisal study forecasts (Table 3.6) that passenger numbers at Dyce Station could rise from around 900,000 today to around 1,500,000 in 2026. This equates to an increase in the potential car parking demand (Table 3.7) from under 80 to over 120 in that period. The capacity of the existing car park of 82 spaces is therefore inadequate for forecast future demand. The car park was fully occupied at the time of my site inspection. If the car park were not to be extended, use of the station could be discouraged or increasing amounts of station-related car parking could occur on nearby streets, causing potential congestion and reducing parking availability for local residents and businesses. For these reasons I am satisfied that a need for a car park extension at Dyce Station has been demonstrated.

13. The site selected for the car park extension, and allocated in the proposed plan, is the southern part of a larger area of open space, backing on to a number of residential properties in Merrivale and Union Row. I found no evidence on my site inspection of formal use of this open space for recreation, but it is a pleasant green area that will provide an attractive amenity to local residents. A number of pathways had been worn in the grass (in addition to the tarmac path) indicating a good level of use, at least as a through route. I consider the loss of this area of open space to be unfortunate, and I also recognise that the introduction of a car park will introduce new levels of noise, light and activity at the rear of a number of residential properties, and so have a real effect on these properties' amenity.

14. However, having established the need for the car park, there are extremely limited options for the location of this facility, given that the vehicular access to the station is to the east and the extent of existing building in the area. The Initial Appraisal Study considers the option of building an additional parking deck above the existing car park, but identifies financial and aviation safeguarding constraints. Another possibility might have been to use the industrial land north of the existing car park, but this would be more distant from the station, and would be likely to have ownership constraints. Overall I consider that the allocated site is the only reasonable option for a car park extension. Given the relatively small area of open space that will be lost and the limited number of residential properties that will be affected, on balance I conclude that the car park allocation should remain in the plan.

15. I note the likelihood (if either Option 1A or 1B from the initial Appraisal Study are taken forward as suggested in the Study) that not all of the site OP86 will be required for the new car park. However I consider that it remains sensible to retain the entire allocation until the choice of final design is finalised.

**Reporter's recommendations:**

I recommend that the curtilage of the property known as Bankhead School Lodge be removed from Site OP14 Bankhead Academy on the proposals map, and the site size shown in Appendix 2 be amended accordingly.

<b>Issue 6</b>	<b>ALTERNATIVE SITES: DYCE, BUCKSBURN &amp; WOODSIDE</b>	
<b>Development plan reference:</b>	No reference in the Plan	<b>Reporter:</b> Stephen Hall
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
<p>University of Aberdeen (63)                  MacTaggart and Mickel Homes (123)                  MacTaggart and Mickel Homes and Fabrizio Necchi (163)                  Transport Scotland (167)                  Park Home Estates (170)                  Bancon Developments (183)</p>		
<b>Provision of the Development Plan to which the issue relates:</b>	Alternative sites in Dyce, Bucksburn & Woodside	
<b>Planning authority's summary of the representation(s):</b>		
<p><u>Land at Hillhead Centre (B0601)</u></p> <p>63: Object to the land at Hillhead Centre not being included as an Opportunity Site for residential development on the basis that, the site should not be identified as Green Belt, is close to the University, is a brownfield site and due to the shortfall in housing numbers. Lands adjacent to Bucksburn Primary School (B0102)</p> <p>123: Object to the lands adjacent to Bucksburn Primary School not being included as an Opportunity Site for residential development on the basis that, the site is well connected to services, it should not be identified as Green Belt or Green Space Network (and that these issues can be addressed through landscaping), that the site was previously identified in the Proposed Local Development Plan 2010 and only removed at Examination, that the site could help improve biodiversity and that site could address housing need in the short to medium term.</p> <p><u>Land South and West of Bucksburn Primary School</u></p> <p>163: Object to the land South and West of Bucksburn Primary School not being included as an Opportunity Site for residential development, on the basis that the site is well connected to services, should not be identified as Green Belt or Green Space Network (and that these issues can be addressed through landscaping), that the site was previously identified in the Proposed Local Development Plan 2010 and only removed at Examination, that the site could help improve biodiversity and that site could address housing need in the short to medium term.</p> <p><u>Green Belt and Green Space Network</u></p> <p>163: There should be a review of the Green Belt and Green Space Network.</p>		

Housing Land Supply

163: Reference to how shortfalls from the Masterplan Zone developments are to be dealt should be included in the Proposed Plan.

Dyce Transport Study

167: Suggestion that details of the ongoing cumulative microsimulation transport modelling of land allocations adjacent to the A96T near Dyce, should be included in the Action Programme.

Cairnfield Place

170: Proposal to rezone land off Cairnfield Place, Bucksburn as residential or mixed use. Persley Park

170: Proposal to rezone Persley Park Mobile Home Park as Residential or Mixed Use on the grounds that the identification of the site as Green Belt is no longer appropriate, that the site will remain developed as a Mobile Home Park regardless of its status in the Plan and due to changes in the level of development in the surrounding area.

Clinterty (B0104)

183: Object to the non-allocation of Clinterty (B0104) for approximately 100 houses and associated facilities on the grounds that, the site should not be identified as Green Belt, that the site will consolidate a scattered group of houses and will make up for constrained housing supplies in the area.

**Modifications sought by those submitting representations:**

Land at Hillhead Centre (B0601)

63: The site should be identified for residential development and open space provision, incorporating student and key workers accommodation.

Lands adjacent to Bucksburn Primary School (B0102)

123: Include land at Bucksburn as a site for residential development in the Proposed Plan. Remove the Green Space Network designation at land at Bucksburn to allow for sensitive residential development to take place and green networks to be created and enhanced via a well-designed and appropriate landscape framework. The Green Belt boundary as depicted on the Proposed City Wide Proposals Map reviewed to exclude land at Bucksburn and create a stronger boundary between the built form and the Green Belt beyond.

Land South and West of Bucksburn Primary School

163: Include land at Bucksburn as a site for residential development in the emerging Local Development Plan.

Green Belt and Green Space Network

163: Review how the Masterplan Zones (particularly Zone 3 and 4) affect the area of Bucksburn. Have a review of the Green Belt and Green Space Network to assist in linking these Zones without detrimentally affecting the small area of Bucksburn which has been omitted from either Zone. Form a robust, defined Green Belt boundary linking Masterplan Zones 3 and 4, which will allow for small-scale development/infill to take place on our client's site (land at Bucksburn).

Housing Land Supply

163: Include reference to how shortfalls from the masterplan zone developments are to be dealt with as the Plan progresses.

Dyce Transport Study

167: The Proposed Plan Action Programme should be amended to recognise the on-going study of the cumulative impacts of the allocations within the Dyce area, the associated transport constraints and the likely nature, scale and cost of transport interventions required to support the delivery of these allocations.

Cairnfield Place

170: Change classification (from yellow with black dots) to Residential or Mixed Use.  
Persley Park

170: Change zoning from Green Belt/Brownfield to Residential or Mixed Use.

Clinterty (B0104)

183: Remove Clinterty from the Green Belt and allocate as a small scale, up to 100 houses, development with local services.

**Summary of response (including reasons) by planning authority:**

In preparing the Proposed Plan a Development Options Assessment (CD28/30/31), Strategic Environmental Assessment (CD27), and Main Issues Report (CD29) were used to identify the most suitable locations to deliver the required growth. The majority of greenfield sites identified in the Proposed Plan have been carried over from the Aberdeen Local Development Plan 2012 (CD42) which went through a similar process at that time. Most of these sites are at an advanced stage in terms of planning consents and Masterplans as detailed in the latest version of the Action Programme (CD47).

The Aberdeen City and Shire Strategic Development Plan (SDP) 2014 (CD12) sets the requirements for greenfield housing and employment land allowances and these are set out in Figure 1 of the SDP on page 12 and in Schedule 1 on page 42. Under Issue 2 we conclude that the SDP greenfield requirements have been fully met and we are confident that a continuous 5 year housing land supply can be met throughout the lifetime of this LDP. Accordingly, we do not consider it necessary to allocate any further greenfield sites beyond those already identified in the Proposed Plan.

Land at Hillhead Centre (B0601)

63: We do not propose to allocate this site for development. Aberdeen City Council have assessed this site, considered it undesirable and rejected it on the grounds set out in the Proposed Plan Site Assessment Report (CD31). The proposal would lead to the loss of open space and tree cover in the Old Aberdeen Conservation Area. The site is also classified as Green Belt and Green Space Network. In terms of school capacity, St Machar Academy is due to reach capacity by 2022 and Seaton Primary is currently over capacity at 112% in 2015 (CD32).

Lands adjacent to Bucksburn Primary School (B0102)

123: We do not propose to allocate this site for development. The site was previously considered during the extant Local Development Plan 2012 Examination and rejected by the Reporter who recommended that this site (known then as OP27) should remain as Green Belt and part of the Green Space Network “to ensure a robust defensible green belt boundary for this part of Bucksburn”. (CD44, Issue 18). Aberdeen City Council have reassessed this site, considered it undesirable and rejected it on the grounds set out in the Proposed Plan Site Assessment Report (CD31). While the site is in a relatively sustainable location with access to services there is no clear access to the site for vehicular traffic with an already constrained access point to the school from the A96. The topography of the site would also make development challenging in terms of layout, and as the site is within the Airport Contour Zone there may be restrictions on building heights. In terms of school capacity, Bucksburn Academy is due to reach capacity by 2020 and Brimmond Primary by 2018 (CD32).

Land South and West of Bucksburn Primary School

163: The representation suggests that this site was included in the Proposed Local Development Plan 2010 (known then as OP27 (refer text above)) and subsequently removed by the Reporter at Examination, which is incorrect. The site is adjacent to the OP27 site (Lands adjacent to Bucksburn School) which was removed by the Reporter, and the site subject to this representation did not form part of that allocation.

We do not propose to allocate this site for development. This site was not put forward at the Pre-Main Issues Report Call For Sites stage in 2013, or submitted as a representation to the Main Issues Report in 2014. It has therefore only been proposed as a representation to the Proposed Plan. Aberdeen City Council has assessed this site, considered it undesirable and rejected it on the grounds set out in the Proposed Plan Site Assessment Report (CD31). Many of the site constraints from the adjoining site (discussed above) also apply to this site. The topography of this site is extremely challenging with a very steep incline for the majority of the site (approximately 1:6). Vehicular access would be particularly difficult due to this incline as would the site layout. The site is within the Airport Contour Zone which may restrict building heights and is also identified as potential contaminated land from a former quarry. In terms of school capacity, Bucksburn Academy is due to reach capacity by 2020, and Brimmond Primary by 2018 (CD32).

Green Belt and Green Space Network

163: The issue of the boundary of the Green Space Network is dealt with in Issue 30 Policy NE1: Green Space Network and the boundary of the Green Belt is dealt with in Issue 31 Policy NE2: Green Belt.

Housing Land Supply

163: The issue of Housing Land Supply is dealt with in Issue 2 Housing and Employment Land Supply and Policy LR1.

Dyce Transport Study

167 At the time of preparing the Proposed Plan the scope of the transport study at Dyce was still being investigated. While an outline of the scope of the project and the expected detail are included in Proposed Supplementary Guidance Developer Obligations (CD25), it is proposed to significantly increase this detail prior to adoption of the Supplementary Guidance and once the study is complete. The development industry has been fully engaged with the study from the outset, and has provided significant assistance including working on draft legal agreements (under Section 75 of the Town and Country Planning (Scotland) Act 1997, as amended) and costings for developments in the surrounding area. The inclusion sought by the respondent in relation to the Proposed Action Programme (CD47) is reasonable. It is proposed to make the modification sought prior to adoption of the Proposed Action Programme.

Cairnfield Place

170: Land off Cairnfield Place is currently identified as Mixed Use, as is requested by the representation. The 'green dots' represent Green Space Network which would need to be considered as part of any future development of the site. Proposed Plan Policies H2 Mixed Use Areas and NE1 Green Space Network set out details of what development is acceptable in this regard. No action is therefore required.

Persley Park

170: This site was not put forward at the Pre-Main Issues Report Call For Sites stage in 2013, or submitted as a representation to the Main Issues Report in 2014. It has therefore only been proposed as a representation to the Proposed Plan. We do not propose to allocate this site for development. Aberdeen City Council has assessed this site, considered it undesirable, and rejected it on the grounds set out in the Proposed Plan Site Assessment Report (CD31). While the site is in a relatively sustainable location, close to some services and facilities, it is very prominent from the A90 which forms a strong boundary for the Green Belt. The existing Mobile Home Park is low density and very well screened and, as such, it has a very limited visual impact. Development on the site would have a negative impact on the Dyce Valley Prime Landscape Area and the adjacent River Don Corridor Local Nature Conservation Site. It would also weaken the strong Green Belt boundary that is formed by the A90. In terms of school capacity, Bucksburn Academy is due to reach capacity, by 2020 and Brimmond Primary by 2018 (CD32).

Clinterty (B0104)

183: Aberdeen City Council have assessed this site, considered it undesirable and rejected it on the grounds set out in the Proposed Plan Site Assessment Report (CD31) Whilst the site could potentially be developed and is free from absolute constraints, it is divorced from Aberdeen with no local services or transport links, and providing such links for walking, cycling and public transport would be difficult. The issue of housing land supply is dealt with in Issue 1 Vision and Spatial Strategy.

**Reporter's conclusions:**General Remarks

1. I concluded at Issue 2 that the proposed plan contained a shortfall of only 18 units in meeting the greenfield housing land requirement, and that Aberdeen City is making a reasonable contribution to ensuring that the housing supply target for the Aberdeen housing market area is met. There is therefore very little requirement to identify additional housing land. However some limited scope does exist to allocate small new greenfield sites, should any suitable opportunities emerge through the examination process.

2. Several proposed sites have previously been considered at the time of the examination into the current adopted local development plan. Where this has been raised in evidence, I have read and agree with the conclusions reached at that time. It is generally not helpful to the certainty that the development planning system is intended to provide to revisit the principle of development on sites that have been considered through earlier equivalent processes unless circumstances have clearly and significantly changed.

Land at Hillhead Centre

3. The southern part of this site is occupied by a sports complex including two floodlit pitches, tennis courts, a small pavilion and areas of car parking. The northern part comprises a wooded amenity area. The sports facilities appeared to be of a high quality and still in use at the time of my site inspection. The site lies to the east of the Hillhead Student Village, and the suggestion in the representation is that it be redeveloped for a mix of open space and residential accommodation, incorporating student and key worker housing.

4. The land is currently in the green belt and green space network, and does form an integral part of the green corridor through north Aberdeen formed by the River Don. However the site is not strongly visible from surrounding areas. In particular, in the key view westwards from the A956 Don bridge, the site is largely screened by the mature trees lining the southern bank of the river (although this screening would be somewhat less effective in Winter, and the trees could be overtopped by taller forms of development).

5. Therefore, in terms of the green belt purposes set out in paragraph 49 of Scottish Planning Policy, I do not consider the site has a particularly significant role in protecting the character, landscape setting and identity of the city. Nor am I unduly concerned about the site needing to remain undeveloped in order to direct development to more appropriate locations, because this is itself a central accessible site. Green belt status does serve to protect and provide access to open space, though much of this does not appear to be generally available for public use. Overall therefore, while the current green belt status of the site is justified, I do not consider that development would have a serious effect on the overall integrity and functioning of Aberdeen's green belt.

6. Of more potential concern would be the loss of outdoor sports facilities. The site received a quality score of only between 11 and 13 out of 25, the second lowest category out of five, in the Aberdeen Open Space Audit. The formal facilities in the southern part of the site do not appear to be generally available for public use. Paragraph 226 of Scottish Planning Policy describes the circumstances where it is unnecessary for local development plans to safeguard outdoor sports facilities, including where the facility would be replaced by a facility of comparable or greater benefit in a location that is convenient for users. In these

terms, the representation points to the recent development of the Aberdeen Sports Village at Linksfield as providing a base for University sports that more than sufficiently mitigates for the loss of facilities at Hillhead. This is not challenged by the council.

7. However, the enhancements at the Aberdeen Sports Village have already taken place, and yet the facilities at Hillhead still appear to be in active use. The proximity to the neighbouring Hillhead Student Village is likely to make the Hillhead Centre particularly convenient for students living in these residences. For these reasons I am not fully convinced that the Scottish Planning Policy tests have been met.

8. For this reason, and because there is no current overriding need for additional housing land releases, I conclude that this site should not be designated for housing development at this time. However I consider that the site may have some future potential for development should stronger evidence be forthcoming that the national policy tests regarding the loss of outdoor sports facilities emerge. Any such development would need to preserve the mature trees within and around the site, be low-rise so as not to impinge on views along the Don valley, and avoid the public amenity area in the north of the site close to the Brig o' Balgownie. I note also the school capacity constraint that might require any development to be limited to student accommodation.

Lands adjacent to Bucksburn Primary School

9. This land on the southern edge of Bucksburn is currently used as a paddock. It is well related to the range of local facilities and transport options available in Bucksburn. Potential constraints exist in the form of the restricted width of the proposed access route from the A96 trunk road and in terms of schools capacity. However these constraints may not be insurmountable.

10. The land rises from north to south, becoming quite widely visible from the north. As such it has a clear role in the landscape setting of Bucksburn and so contributes positively to green belt objectives. A tree belt to the south separates the site from a golf course. This contains the site from this direction and would potentially form a strong green belt boundary along this side of the site. However the western boundary comprises a simple broken down wall and post-and-wire fence field boundary. This would be a weaker green belt boundary than the existing lane to the east of the site. A reasonably strong new green belt boundary could be created if this site and the land south and west of Bucksburn School (considered below) were both removed from the green belt, as the latter site is contained by trees and woodland to the west.

11. However, the current green belt status is justified, and, as noted under Issue 2, there is no overriding need for additional greenfield release at this time. Therefore, while I would not rule out the potential of this land in the longer term should a need arise and the various constraints be satisfactorily addressed, I conclude that the land should remain in the green belt and not be allocated for development at this time.

12. The merits of this site were considered at the time of the examination of the existing adopted plan, when it was concluded that the site should remain in the green belt and not be allocated for development. I agree with the reasoning and conclusions reached at that time, and am not aware of any changes in circumstance of such significance as to lead me to reach a different conclusion now.

Land South and West of Bucksburn Primary School

13. This land lies immediately adjacent and to the west of the site considered above, and similar considerations apply. This site is similarly well related to facilities and transport options, but a number of potential constraints apply, as noted by the council above, including the steepness of the slope and school capacity. However these constraints may not be insurmountable.

14. This site is also prominent in views from the built up area to the north, and makes a clear contribution to the landscape setting of this part of Aberdeen. Its current green belt status is therefore justified. As noted above, this site is bounded to the west by mature trees and woodland that could theoretically form a new strong green belt boundary. While the existing green belt boundary around Bucksburn School is weak, that to the south along Howes Road is strong. Therefore I do not consider there is an overriding need to define a new green belt boundary in this area.

15. The development of this site in isolation (i.e. without the development of the land to the east) would give the appearance of piecemeal development. Its release could therefore only be contemplated in conjunction with the land to the east. I have established that the current green belt status of both sites is justified, and, as noted under Issue 2, there is no overriding need for additional greenfield release at this time. Therefore, while I would not rule out the potential of this land in the longer term should a need arise and the various constraints be satisfactorily addressed, I conclude that the land should remain in the green belt and not be allocated for development at this time.

Dyce Transport Study

16. It appears that the transport modelling of the land allocations adjacent to the A96(T) near Dyce is ongoing, and is yet to reach conclusions as to the transport interventions that will be required to support development. Therefore it is not currently possible to define in the local development plan the new transport infrastructure that is required in this area, as sought by paragraph 275 of Scottish Planning Policy. However there is no suggestion that, with suitable interventions, the proposed allocations will not be capable of being developed.

17. Paragraph 275 also refers to the role of supplementary guidance and of the action programme. Supplementary guidance also forms part of the development plan, and I note the council's commitment above to include more detail regarding the outcome of the modelling in the relevant supplementary guidance in due course. The content of the action programme falls outwith the scope of this examination, but paragraphs 130 and 131 of Circular 6/2013 suggest that the delivery of key infrastructure to deliver development proposals should form part of action programmes. Both supplementary guidance and action programmes are able to respond more quickly to new information, such as in this case the outcome of transport modelling, than the local development plan itself. In these circumstances I conclude that the council's suggestion to deal with these matters within the supplementary guidance and action programmes is reasonable.

Cairnfield Place

18. This untidy and uneven area of open land is enclosed by the Blacksmiths Croft mobile home park to the south and by residential development to the east and north. It adjoins a more formal area of open space to the west, but does not form a link with any other part of the green space network. The site is already designated in the proposed plan as a mixed

use area (as sought in the representation). As such a range of uses would receive a measure of support from Policy H2 of the plan. The site is also covered by the green space network designation, which is protected by Policy NE1.

19. The site is currently severely unkempt, and is characterised by various excavations, piles of rubble and other rubbish and an abandoned vehicle. It received a quality score of 11-13 (the second lowest category out of five) in the Aberdeen Open Space Audit. The land is undergoing a degree of natural regeneration which may lend it some biodiversity value. It may also be used informally for outdoor play by local children, but there was no evidence of this on my site inspection.

20. Overall I consider that the site contributes little of value to the green space network, and indeed detracts significantly from the amenity of nearby residential areas in its current state. Development would provide an opportunity to improve the appearance of the site, but is constrained by the presence of the green space network designation. I therefore conclude that this designation should be removed from the site.

#### Persley Park

21. This small residential home park sits between the River Don and Mugiemoos Road. Its appearance is typical of such parks involving quite large areas of hardstanding and a relatively high density of caravans. The representation seeks the site's removal from the green belt.

22. Mugiemoos Road currently forms a strong defensible green belt boundary in this location. The River Don to the north would form an even stronger boundary, but there is no particular need to strengthen the boundary at this point.

23. There is a clear contrast between the urban uses to the south of this stretch of Mugiemoos Road and the open countryside to the north. Although this contrast is disrupted to some extent by the presence of the mobile home park, such parks are by their nature lower rise and more readily associated with the countryside than most urban forms of development. The site is ringed by trees which form a partial green visual barrier. I consider that other urban forms of development on this site would damage the landscape setting of this part of Aberdeen to a significantly greater degree than the current use does. I therefore conclude that this land meets the purposes of the green belt as described in paragraph 49 of Scottish Planning Policy, and so should remain a part of the green belt.

#### Clinterty

24. The representation seeks the allocation of land for what would essentially be a small new village set in a rural valley in the countryside some three kilometres north-west of the existing built up area of Aberdeen. Some sporadic development already exists at Clinterty, including a small campus of North East Scotland College, a farm, some individual houses and a travelling people's site.

25. Paragraph 51 of Scottish Planning Policy refers to excluding existing settlements and major educational and research uses from the green belt. However I do not consider the loose scattering of development at Clinterty to constitute a settlement, and the small college building cannot be considered a major use in this context. In the absence of any positive development proposal, I am therefore content that the green belt designation for this land remains appropriate.

26. Turning to the suitability of the site for a small new settlement, such a proposal would introduce urban development into an area with a strongly rural existing character. The landscape capacity study submitted with the representation accepts that the development would be visible from the busy A96 trunk road, albeit 'softened by various elements in the landscape'. There are no local facilities to serve the residents of a new settlement, and the scale of development proposed would be unlikely, in my view, to be large enough to support such facilities as a shop, bus route or primary school. Those facilities that do exist in surrounding settlements such as Blackburn, Westhill, Kingswells and Dyce are beyond a reasonable walking distance. I therefore consider that future residents would be likely to rely on private cars for accessing most of their daily needs. For these reasons, and given the absence of any overriding need to identify additional housing land, I conclude that the land at Clinterty is unsuitable for designation as a housing development.

27. The suggestion that the housing land supply in Aberdeen is overly dominated by large sites is discussed under Issue 2. There I concluded that, across Aberdeen, the balance between larger and smaller sites in the proposed plan was appropriate.

28. My analysis of the 2015 Housing Land Audit also indicates that in Dyce, Bucksburn and Woodside 945 completions are programmed on the allocated 'Phase 1: 2017 – 2026' sites by 2022 (compared to an allocation of 1,200 to 2026). These greenfield releases will be supplemented by a number of brownfield sites identified on the proposals map, and doubtless also by a certain amount of windfall development. I am not therefore unduly concerned about lack of housing delivery or diversity in this part of the city.

29. In any event, the Dyce, Bucksburn and Woodside area forms one part of the larger Aberdeen housing market area. The principle described in paragraph 111 of Scottish Planning Policy is that demand for housing is relatively self-contained across a housing market area. Although Scottish Planning Policy goes on to acknowledge the possible existence of sub-market areas, it is not suggested that such a recognisable sub-market exists in Dyce, Bucksburn and Woodside. Therefore I do not believe it is appropriate to look at one part of the city in isolation when considering the balance between different types of site.

**Reporter's recommendations:**

I recommend that the green space network designation be removed from the land at Cairnfield Place (and edged red in representation 170) on the proposals map.

<b>Issue 7</b>	<b>ALLOCATED SITES &amp; GENERAL AREA STRATEGY: KINGSWELLS &amp; GREENFERNS</b>	
<b>Development plan reference:</b>	Pages 12-13, Pages 82-83, Proposals Map, Table 5, Table 5 notes, Appendix 2, Appendix 4: Masterplan Zones Table	<b>Reporter:</b> Stephen Hall
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
<p>Albion Boarding Kennels (53)  EnerMech Group Limited (81)  Drum Kingswells Business Park Ltd (134)  Aberdeen Civic Society (136)  Scotia Homes (152)  Kingswells Community Council (177)  Bancon Developments (183)</p>		
<b>Provision of the Development Plan to which the issue relates:</b>	Overview of Direction for Growth in this area and specific Opportunity Sites	
<b>Planning authority's summary of the representation(s):</b>		
<p><u>OP31 Maidencraig South East</u></p> <p>53: Object to residential development on this site due to the fact that there is an existing boarding kennel business within the site. The boarding kennels could cause loss of privacy for local residents, and potential noise and disturbance issues.</p> <p><u>OP33 Greenferns</u></p> <p>81: Supports the continued allocation of OP33 for mixed use development. Seeks the removal of Green Space Network designation from the campus area. Seeks the following changes to the Development Framework - the EnerMech campus should not be identified as an area of residential use. The blocks currently identified as 'C' and 'I' should be zoned for the expanded EnerMech campus. Phasing should also be altered to include areas C and I within the first phase of the development, and the local distributor road should be constructed in its entirety from Provost Fraser Drive to Provost Rust Drive.</p> <p><u>OP63 Prime Four Extension</u></p> <p>134: Support the site's inclusion in the Proposed Plan as a Specialist Employment area.</p> <p>136: The existing design for the Prime Four Extension is very low density and could be increased. The site appears to be car oriented which is disappointing.</p> <p>177: Objects to the inclusion of OP63 in the Proposed Plan on the following grounds. The site was considered as "undesirable" in the Aberdeen Local Development Plan Main Issues Report due to it's intrusion into the surrounding landscape and there being insufficient over-</p>		

riding benefits to justify its allocation for development.

The developer for this site has argued that their Phase 4 site is isolated from the road network and will be difficult to develop even when AWPR is in place. This temporary isolation of the Phase 4 site should not be used as a reason to press for inclusion of OP63 in the Plan. This access issue has only been highlighted as a problem post MIR despite the site being identified on plans for at least 4 years.

The developer for this site is seeking to expand their overall land allocation. The developer has not said they wish to substitute OP63 for the Phase 4 site and intends to develop both sites when access becomes available. Aberdeen City Council should not be supporting this as the combined land allocation exceeds the requirements of the Strategic Development Plan.

The inclusion of OP63 as an additional site will have a serious visual impact on the local landscape, damage the natural environment and have an adverse impact on the local road traffic.

Access for Phase 4 can be achieved through the existing road network within Prime Four. The developer has expressed a preference to access Phase 4 (and OP63) from the AWPR. However this would result in additional traffic congestion.

Aberdeen City Council made it clear from the outset of the new ALDP that no additional employment land was required as the adopted ALDP already met the requirements of the Strategic Development Plan.

The ALDP must take account of the other large business park developments under construction in and around the city together with premises being vacated as employers relocate to new developments. If OP63 is included in the Development Plan, then the Phase 4 site becomes immediately accessible by means of a shared access route.

The developer is pressing for OP63 to be included in the ALDP to justify the expense of an access from the AWPR.

OP63 is an elevated site and is clearly visible from Westhill and the A944. The Quaker Burial Ground sits prominently in one of the fields of OP63 and will be devalued by a backdrop of modern buildings. The Burial Ground gives the area uniqueness and sense of place.

OP63 is bounded by West Woods of Hatton to the east and north which is both Ancient Woodlands and a Local Nature Conservation Site. The majority of OP63 was previously designated as Green Space Network in recognition of its conservation and landscape value. Further development at OP63 will box in most of the Ancient Woodland and impact on its capacity to serve as a shelter and wildlife corridor.

Scottish Government ensured that the line of the AWPR avoided both the Burial Ground and Ancient Woodland. Respondent argues that Aberdeen City Council should not be prepared to ruin both sites now by allocating OP63 as a major development site.

#### Development at Kingswells and Greenferns

152: Table 5 of the Proposed Plan identifies the two main housing sites as Maidencraig (750 homes) and Greenferns (1,350 homes plus 10 hectares employment land). The

housing land supply for this area is dependent on the deliverability of these two strategic sites. The allocation of the Kingswells East site for 80 homes would provide increased flexibility in the delivery of effective housing land. The Kingswells East site is well located in relation to existing settlement and planned expansion.

183: Only the Greenferns site is phased to continue into 2017 and onwards to 2035. The 2015 Housing Land Audit suggests that up to 2026 there will be a shortfall of 950 units. An additional 350 units need to be allocated to meet the Strategic Development Plan requirements for 2017-2026.

**Modifications sought by those submitting representations:**

OP33 Greenferns

81: Page 83 of the Plan should refer to the requirement to update the current Development Framework to identify EnerMech's campus within Greenferns as an area of commercial use, along with the areas of land which they have identified as suitable for their expansion plans. The Green Space Network should be removed from the campus, as it will restrict opportunities to develop the site. The detail of the development of the campus and the open space within the site should be determined as part of a masterplan for the EnerMech campus.

OP63 Prime Four Extension

177: Delete OP63 as a site for development.

Development at Kingswells and Greenferns

152: Include land at Kingswells East for 80 homes.

183: Additional housing sites need to be allocated for this area.

**Summary of response (including reasons) by planning authority:**

OP31 Maidencraig South East

53: The principle of development on this site has already been established. This site was Examined by Reporters as part of the Examination into the Aberdeen Local Development Plan 2012 (CD44, Issue 29) and has been carried forward into the Proposed Plan from the extant Local Development Plan (previously known as OP43). The Maidencraig Masterplan (RD52) was adopted as Supplementary Guidance to the extant Local Development Plan in March 2013, and sets out how this site, and the site to the north (Proposed OP32 Maidencraig North East), are to be developed. Page 3 of the Maidencraig Masterplan shows the area of land where the boarding kennel business is located as developed land. Detailed Planning Permission ([P130491](#)) was approved subject to conditions for the erection of 92 dwellings (Phase 1A) on 05 April 2013 and development is underway on site.

OP33 Greenferns

81: Support for Proposed Plan site OP33 Greenferns is welcomed and noted. The purpose

of the Green Space Network is to maintain a strategic network of woodland and other habitats, active travel and recreation routes, greenspace links, watercourses and waterways, providing an enhanced setting for development and other land uses and improved opportunities for outdoor recreation, nature conservation and landscape enhancement. For this particular site, the Green Space Network designation covers the Bucksburn Local Nature Conservation Site. Proposed Plan Policy NE1 clearly states that, "Masterplanning of new developments should consider the existing areas of Green Space Network and identify new areas incorporating Green Space Network. Masterplans will determine the location, extent and configuration of the Green Space Network within the area, and its connectivity with the wider network." Appendix 2 of the Proposed Plan states in the 'Other Factors' section for OP33 that, "Proposals for a Special Needs School and extension to Enermec will need to be accommodated in a masterplan."

OP63 Prime Four Extension

134, 136, 177: Support for Proposed Plan site OP63 Prime Four Extension is welcomed and noted. Following the publication of the Aberdeen Local Development Plan Main Issues Report 2014 (CD29) in which OP63 Prime Four Extension was considered to be 'undesirable', several factors have come to light and been considered which have led to the designation of this site for development in the Proposed Plan. The south west corner of Proposed Plan site OP29 Prime Four Business Park is constrained and undevelopable at present due to access issues. The Prime Four Business Park has been exceptionally successful, bringing a significant positive economic impact to Aberdeen over the last 3 years. The developable land has been built out and demand for plots is continuing. There is therefore a strong argument for allocating more land for the Prime Four Extension now to allow for the continued growth and success of the site in order to capture this current demand.

Concern over traffic impact and suggestions about roads changes are noted, however this will be assessed as part of the Masterplan and planning application process. The Aberdeen Masterplanning Process - A Guide for Developers (CD46 ) explains what is expected from Masterplans and Development Frameworks including, in Section 3, their content. This should include a site description, including the surrounding area on issues such as open spaces, the landscape, greenspace network and so on and the context, identity and connections between them. In the 'Other Factors' section of Proposed Plan Appendix 2 (page 82) for the site it states, "Masterplan required. A TIA (Traffic Impact Assessment) will be required. In addition, adequate buffer zones for the Quaker Burial Ground and the woodland will need to be identified in the masterplan." In doing so there may be opportunities to secure better management of the woodland and Burial Ground as both appear to be somewhat neglected at the moment.

It is accepted that OP63 will be visible from the road network. However, the overall character of the immediate area is likely to change substantially with the construction of the Aberdeen Western Peripheral Route (AWPR). The western boundary of OP63 has been drawn to coincide with the boundary of land required for the construction of the AWPR. OP63 will therefore sit alongside the road and will not be seen as isolated or unduly prominent.

In terms of comments on density, it is always possible to increase this. However, this has to be balanced against the character of the site and the nature of the uses there. Prime Four is regarded as a high quality employment site that has been masterplanned from the start. Whilst some of the plot sizes are large, so are some of the buildings and it is considered that the uses and densities present are appropriate.

Development at Kingswells and Greenferns

152, 183: The Aberdeen City and Shire Strategic Development Plan 2014 (CD12) sets the requirements for greenfield housing/employment allowances and these are set out in Figure 1 of the SDP on page 12 and in Schedule 1 on page 42. Under Issue 2 we conclude that the SDP greenfield requirements have been fully met and are confident that a continuous 5 year housing land supply can be met throughout the lifetime of this LDP. Accordingly, we do not consider it necessary to allocate any further greenfield sites beyond those already identified in the Proposed LDP. The suggested reasons for the release of additional land including the delay in delivery of sites, the number of large sites being too high and the overall target being unambitious were dealt with in the examination of the Strategic Development Plan (CD13) and it was found that there was no requirement to allocate additional land. The modifications suggested above by respondents 152 and 183 are dealt with in Issue 8 Alternative Sites in Kingswells and Greenferns.

**Reporter's conclusions:**

OP31 Maidencraig South East

1. The representation is concerned that residential development may be incompatible with the established kennels business on this site. Firstly I note that Policy T5 of the proposed plan states that housing will not normally be permitted close to existing noisy land uses without significant mitigation measures in place to reduce the impact of noise. Therefore, if the noise emanating from the existing kennels business is indeed significant, then the application of this policy should ensure that any impact is reduced to an acceptable level, perhaps by requiring a certain separation distance to new housing.
2. The principle of housing development on the wider site has been established for many years. I have read and agree with the report of the examination into the current adopted plan which concluded that there was no justification for deleting the allocation. It is not helpful to the certainty that the planning system is intended to create for the principle of development in development plans to be revisited unless circumstances have clearly changed. In this case, it appears that the kennels business has been established in this location for 21 years, and I am not aware of any changes in circumstance since the adoption of the current plan other than the approval of a detailed planning permission for the first phase of residential development. This latter factor only serves to reinforce the fact that the principle of development here is established.
3. For these reasons I conclude that the residential allocation should remain in place.

OP33 Greenferns

4. The representation seeks the inclusion of stronger references in the plan to the requirement for the development framework for this site to identify the EnerMech campus and land suitable for its expansion. However I note that among the factors listed for Site OP33 in Appendix 2 of the proposed plan is that 'proposals for an ... extension to EnerMech will need to be accommodated in a masterplan'. In my mind this reference already accommodates this aspect of the concerns expressed in the representation and so no further change or addition is required.
5. The representation also seeks a number of changes to the development framework for

this site. However as this framework does not form a part of the local development plan, this matter is beyond the scope of this examination.

6. Finally the representation seeks the removal of the green space network designation from the EnerMech campus. The eastern part of the EnerMech site is designated as green space network, as is land along the southern boundary. On my site inspection I found that the eastern area did indeed contain some rows of mature trees, but that the area was largely taken up with car parking. The trees do contribute to the landscape character and local amenity of the area, but as such they are separately protected under Policy NE5 of the proposed plan.

7. The narrow strip of land between the EnerMech development and the (currently) agricultural land to the south contains few trees of any significance and has the character of an internal landscaping area within business premises. It does not seem to me that this strip contributes in any significant way to the wider green space network of the city. Policy NE1 serves to protect the green space network, and is quite restrictively worded. I therefore consider that the presence of this designation within and along the southern boundary of the EnerMech site represents a real and unnecessary constraint to the company's options for expansion. For these reasons I recommend that the green network designation in this area be removed.

#### OP63 Prime Four Extension

8. The Prime Four Business Park is a high quality business park to the west of Kingswells. It is clearly a successful development in terms of its economic benefit to the city region and the attractive working environment it provides. The first three phases of the business park are complete, and a fourth phase remains to be developed within Site OP29. This area is carried forward from the adopted plan and is not subject to any representations before this examination. A fifth phase is now proposed as Site OP63.

9. It is clear from Table 2 of the proposed plan that there is already something of an oversupply of employment land in Aberdeen. The justification for this is given in paragraph 2.16 of the plan. However it remains the case that there is not an absolute strategic requirement to release as much employment land as the plan proposes, and the removal of Site OP63 would not bring the plan into conflict with the strategic development plan.

10. The particular reasons for the release of Site OP63 given in paragraph 2.16 of the plan relate to the exceptional demand for employment land in this area, and access constraints on part of the existing site. With regard to the first of these factors, it is reasonable for the council and the developer to wish to build upon the success of the existing business park. Paragraph 93 of Scottish Planning Policy states that the planning system should give due weight to net economic benefit of proposed development, and paragraph 101 states that local development plans should take account of current market demand in allocating sites for business.

11. Despite issuing a further information request (partially) regarding the supposed access constraints on the final phase of the existing site, I remain unclear as to the nature of these constraints. Plans included within the draft development framework for the OP63 site show access arrangements within the established OP29 allocation that appear workable without requiring additional land in OP63.

12. It appears that the release of Site OP63 is intended to provide a short term alternative

to the development of the final phase of Site OP29. However DRUM Property Group (in their response to the further information request) state that only 40% of OP63 can be developed before a new access is created through the final phase of OP29. Overall I am not fully satisfied that a convincing and coherent case has been made either that OP29 suffers from serious access constraints or that the release of OP63 is required to compensate for an inability to develop the remainder of OP29.

13. The development of Site OP63 would extend the Prime Four Business Park further to the north-west and onto higher land than the existing business park. While it is already the case that some of the taller buildings within the business park are visible from areas to the west, this visual impact will be increased markedly by the development of OP63. Where previously the undeveloped nature of this high land maintained a visual separation between Westhill and Kingswells, the development of OP63 will contribute to a sense of an increasingly urbanised corridor along the A944. The value of the green belt in this area in protecting the landscape setting and identity of Westhill, particularly as experienced from the A944, will be appreciably diminished as a consequence.

14. The character of this area is changing in any event due to the construction of the Aberdeen Western Peripheral Route (AWPR), which runs north to south immediately to the west of Site OP63. This will itself have something of an urbanising effect, though the road will run partially in cutting. Between Dyce and Milltimber, the AWPR runs through open countryside. The development of Site OP63 would introduce urban development alongside the new road, and therefore change the otherwise largely rural character of the road at this point.

15. Various other potential environmental impacts have been raised by Kingswells Community Council, including potential damage to the setting of the ancient woodland around the site, a Quaker burial ground within the site and the consumption dyke ancient monument to the east. These are all important assets whose fabric and setting need to be protected. However I do not consider this to be incompatible with the principle of development on OP63. The precise approach that will need to be followed to avoid damaging these assets is a matter of detail that could be suitably addressed in the emerging development framework.

16. The desirability or otherwise of increasing the density of development in the extended business park could similarly be addressed in the development framework.

17. To conclude, I have not identified a strategic need for the development of OP63 and consider that its development would have a materially damaging impact on the effectiveness of the green belt between Westhill and Kingswells. However, given the economic success and quality of the existing Prime Four Business Park, I consider it likely that development would deliver a significant economic benefit. Scottish Planning Policy requires me to give due weight to the economic benefit of development, and for this reason, on balance, I conclude that the allocation should be maintained.

#### Development at Kingswells and Greenferns

18. It is the case that greenfield land release in Kingswells and Greenferns is dominated by Sites OP31, 32 and 33. However I do not find this surprising given that this is a relatively small area of the city largely characterised by green belt land. The Kingswells and Greenferns area forms one part of the larger Aberdeen housing market area. The principle described in paragraph 111 of Scottish Planning Policy is that demand for housing is

relatively self-contained across a housing market area. Although Scottish Planning Policy goes on to acknowledge the possible existence of sub-market areas, it is not suggested in these representations that such a recognisable sub-market exists in Kingswells and Greenferns. Therefore I do not believe it is appropriate to look at one part of the city in isolation when considering the balance between different types of site.

19. Bancon Developments identifies a shortfall of 950 units when comparing programmed development (as shown in the housing land audit) with the allowances made in Table 5 of the proposed plan for Kingswells and Greenferns. I note from the housing land audit that this shortfall is due to the OP33 Greenferns site not having been marketed yet. Given that, according to Appendix 6 of the proposed plan, the site is within council ownership, there would not appear to be a significant barrier to this constraint being overcome.

20. In any event, I concluded under Issue 2 that, overall, Aberdeen City is making a reasonable contribution to ensuring that the housing supply target for the Aberdeen housing market area is met, and that there is a reasonable likelihood of the housing supply target in the housing market area being achieved. Within this context, there is no requirement to consider anticipated build rates in individual parts of the city in isolation.

**Reporter's recommendations:**

I recommend that the green space network designation be removed from land within and along the southern boundary of the EnerMech site within Site OP33.

<b>Issue 8</b>	<b>ALTERNATIVE SITES: KINGSWELLS &amp; GREENFERNS</b>	
<b>Development plan reference:</b>	No reference in the Plan	<b>Reporter:</b> Stephen Hall
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
<p>Carlton Rock Limited (75)                  Leto Limited (89)                  Stewart Milne Homes (117)                  Barratt North Scotland (125)                  S Barrack (141)                  Scotia Homes (152)                  ANM Group (155)                  AA Webster and Sons (162)                  Bancon Developments (183)</p>		
<b>Provision of the Development Plan to which the issue relates:</b>	Alternative sites in Kingswells and Greenferns	
<b>Planning authority's summary of the representation(s):</b>		
<p><u>Hayfield Riding Centre and Fields to the East of Hazledene Road</u></p> <p>75: Two sites - subject to planning application 141026 for the construction of a hotel with swimming pool, spa, restaurants, banqueting/ conference facilities (Site A) and for the redevelopment of the Hayfield Riding School to form an equestrian centre (Site B) have been referred to the Scottish Ministers after Full Council gave a willingness to approve pending the securing of developer contributions, towards upgrading of access roads and paths, recreational and wildlife enhancements to Hazlehead Park, public bus services and the Strategic Transport Fund.</p> <p><u>Former Dobbies Garden Centre</u></p> <p>75: Former Dobbie Garden Centre should be removed from the Green Belt and Green Space Network and identified as an Opportunity Site for development. The Plan fails to meet the housing allowances in the Strategic Development Plan. The shortfall is likely to be exacerbated by delays in bringing forward large scale releases, such as the Council owned land at Greenfems which has failed to come forward for development despite having been allocated since 2008. The Council require to consider other smaller sites which can help to maintain a five year land supply.</p> <p><u>Site East of Lidl, Lang Stracht</u></p> <p>89: Allocate the site to the east of the existing Lidl store on the Lang Stracht as 'Retail'. There has been a long identified need for additional floorspace in the west of Aberdeen that is confirmed in the Aberdeen City Council Retail Study. There is an opportunity for linked trips with the existing Lidl store and this additional retail space would address the needs of a growing residential population. The site is immediately adjacent to a previous detailed</p>		

planning permission for a supermarket demonstrating that there is no traffic concern. There are no sites available for this type/scale of retail at either Rousay Drive District Centre or Lang Stracht or Mastrick Local Centres. There is good road and public transport access and it is well located in terms of proposed new residential areas.

Derbeth, Gillahill & Huxterstone (Kingswells Expansion) (B0303)

117: Object to the non-allocation of Derbeth (part of Development Option B0303) for the allocation of a mixed use development comprising 900 homes and 6.5 hectares of employment land. The AWPR upon completion will effectively become the defining boundary to the settlement, which is situated in the Green Belt. The land at Derbeth will become infill, maximising land resource whilst enhancing the character and setting of the area. With the high volume of employment allocation there needs to be further residential allocation to create a balanced and sustainable community. The site is effective and can be delivered quickly. It is served by good public transport.

162: The land at Derbeth Farm lies to the immediate northwest of Kingswells. It represents a logical and suitable location for development to take place with the ability to provide a mixed use development, new local centre and potentially educational facilities adjacent and connected to the existing Kingswells settlement. It is currently designated Green Belt and (partially) Green Space Network. The Plan has placed significant focus on greenfield land release and it is acknowledged that in many areas this is a necessity to meet LDP requirements. However, the Local Authority have a duty to release land in locations which are confirmed as viable and are or can become effective in the Plan period to deliver development. The Proposed Plan Green Belt boundary around the settlement of Kingswells is inappropriate and fails to acknowledge the terms of SPP. The boundary should be moved westwards to align with the visual and physical boundary of the AWPR. This would allow for development to take place at Derbeth Farm. This site is deemed suitable in terms of location for medium/long term development, which would represent a logical and viable expansion to the urban form in this area. It has been noted that the Council have not suggested to include a draw-down mechanism to meet any shortfall which may occur in Phase 1 or 2 of the land release schedule. It is therefore urged that the Council should review its position in respect of Derbeth Farm.

117: Object to the non-allocation of Gillahill (part of Development Option B0303) for the allocation of a mixed use development comprising 600 homes and a new primary school. Development at Gillahill would maximise land resources and enhance the character and setting of the area. Site relates well to and fits with the wider settlement, avoiding coalescence. With the growth of employment land at Kingswells there needs to be further housing allocations to create a sustainable and balanced community. The road network due to upgrades associated with the delivery of Prime Four, would be able to accommodate traffic generated from the proposed residential development. There are good walking, cycling and public transport links.

117: Object to the non-allocation of Huxterstone (part of Development Option B0303) for the allocation of a mixed use development comprising 90 dwellings. The site relates well to existing development, nearby services, employment land at Prime Four and the public transport network, which enhances the site's connectivity. The principle of residential development has been accepted upon the land at Huxterstone owing to the area being recognised in the Finalised Aberdeen Local Plan 2004 as a Future New Community. The site is unconstrained and developable in the short term. It will maximise land resource and enhance the appearance and setting of the area. Housing will be required to balance the

employment allocations at Kingswells. The site will maximise land resource whilst preserving the setting of Kingswells as well as implementing a defining eastern edge to the settlement.  
Huxsterstone Healthcare Facility (B0947)

155: The land at Huxsterstone (B0947) should be removed from the Green Belt/Green Space Network and allocated as an Opportunity Site suitable for the creation of a Healthcare Village for healthcare and related uses. The site lies within an area where major developments are being delivered, including Countesswells, Prime Four Business Park and the AWPR. There is only one private hospital in Aberdeen at present and there is a need for such a facility.

Land at Newton East, Old Skene Road (B0306)

125: Object to the non-inclusion of site B0306 as a residential development for 20 units within Phase 1 of the Plan. The site is located to the south of Old Skene Road. Development will not create an unacceptable impact on the surrounding landscape, there are well defined clearly identifiable visual and robust boundaries.

Land at Kingswells East (B0305)

152: The land at Kingswells East should be allocated for residential development in order to bring forward land in an appropriate location capable of delivering effective housing land in the first period of the Plan. The site is located to the east of Kingswells and to the north of Old Lang Stracht. The land is capable of delivering approximately 80 houses together with new public open space provision.

Brownfield Site at Skene Road, Maidencraig (B0301)

141: Request that the brownfield site at Skene Road in the Maidencraig area is included as an Opportunity Site in the Local Development Plan. It is 0.7 hectares and can accommodate 15 dwellings with open space. A pedestrian link would be provided to the nature reserve. It lies outwith the flood area. The Local Nature Reserve would be untouched by the development and measures would be taken to ensure the protection of bats. The approval of the Maidencraig Masterplan to the north shows the acceptability of development in close proximity to the LNR. SPP and SDP advocate that brownfield land is the preferred location for development. There is potentially a large shortfall in the supply of sites on brownfield land and the site at Maidencraig represents a suitable site for allocation.

Maidencraig (B0311)

183: Object to the non-allocation of site B0311 Maidencraig for either residential (200 units) or employment development. Due to the constrained housing developments in the area, an additional 350 houses are required to be allocated in the period 2017-2026 to meet SDP requirements. Additional land is also required to meet employment allocations as these mostly tied to constrained housing sites. The house site would be deliverable in the 2017-2026 period, and would be an extension of the existed masterplanned area. The development could be accommodated within the landscape up to the 145 metre contour line without risk of significant visual impact or risk of coalescence with Kingswells. Once new facilities are built in the Masterplan Zone these will be in close proximity. Either a residential, business or mixed use development on the proposed site is therefore proposed as suitable for addressing the shortfall identified in the delivery of sites allocated in the Local Development Plan 2012.

**Modifications sought by those submitting representations:**

Hayfield Riding Centre and Fields to the East of Hazledene Road

75: Identify both sites as Opportunity Sites in Appendix 2 and in the Proposals Map, referring to the Council's willingness to approve application reference P141026.

Former Dobbies Garden Centre

75: Remove the former Dobbies Garden Centre from the Green Belt and Green Space Network and identify it as an Opportunity Site for development. It should be included in Appendices 1 and 2 of the Plan as a brownfield site.

Derbeth, Gillahill & Huxsterstone (Kingswells Expansion) (B0303)

117: Remove land at Derbeth from the Green Belt and Green Space Network. Allocate the site for mixed use development for 900 homes. Table 5 should be modified accordingly.

162: Remove the Green Belt/Green Space Network status and allocate the site for longer term residential development.

117: Remove land at Gillahill from the Green Belt and Green Space Network. Allocate the site for mixed use development for 600 homes and a primary school. Table 5 should be modified accordingly.

117: Remove Green Belt status from the remaining land at Huxsterstone

Huxsterstone Healthcare Facility (B0947)

155: Remove Green Belt status from Huxsterstone and allocate as an Opportunity Site suitable for the creation of a Healthcare Village.

Land at Newton East, Old Skene Road (B0306)

125: Remove site from the Green Belt and allocate as LR1. Modify Table 5 and Appendix 2 as required.

Land at Kingswells East (B0305)

152: Allocate land at Kingswells East for residential development in the Local Development Plan.

Brownfield Site at Skene Road, Maidencraig (B0301)

141: Allocate additional land at Maidencraig through the inclusion of the Skene Road brownfield site.

Maidencraig (B0311)

183: Remove the site from the Green Belt and allocate it as an Opportunity Site.

**Summary of response (including reasons) by planning authority:**

In preparing the Proposed Plan a Development Options Assessment (CD28, CD30, CD31), Strategic Environmental Assessment (CD27), and Main Issues Report (CD29) were used to identify the most suitable locations to deliver the required growth. The majority of greenfield sites identified in the Proposed Plan have been carried over from the Aberdeen Local Development Plan 2012 (CD42) which went through a similar process at that time. Most of these sites are at an advanced stage in terms of planning consents and Masterplans as detailed in the latest version of the Action Programme (CD47).

The Aberdeen City and Shire Strategic Development Plan (SDP) 2014 (CD12) sets the requirements for greenfield housing and employment land allowances and these are set out in Figure 1 of the SDP on page 12 and in Schedule 1 on page 42. Under Issue 2 we conclude that the SDP greenfield requirements have been fully met and we are confident that a continuous 5 year housing land supply can be met throughout the lifetime of this LDP. Accordingly, we do not consider it necessary to allocate any further greenfield sites beyond those already identified in the Proposed Plan.

Hayfield Riding Centre and Fields to the East of Hazledene Road

75: We do not propose to remove the Green Belt designation for these sites at this time. Both of the sites referred to by the respondent were received by Aberdeen City Council as proposals at the Proposed Plan stage of the Local Development Plan process. The sites were not put forward at the Pre-Main Issues Report Call For Sites stage in 2013, or submitted as a representation to the Main Issues Report in 2014. As such, the only occasion the Council has had to formally consider these sites in terms of their suitability for inclusion in the Local Development Plan has been at Proposed Plan stage in response to this representation. It is recognised that on 13 May 2015 Aberdeen City Council stated a willingness to approve planning permission for a country house hotel circa 200 bedrooms, spa, swimming pool, function and conference facilities, restaurants and equestrian centre on the Hayfield site, associated car parking and alterations to access roads ([P141026](#)), subject to conditions and the negotiation of a legal agreement under Section 75 of the Town and Country Planning (Scotland) Act 1997, as amended (CD02). This Section 75 agreement has not yet been finalised.

If the Council were to identify these sites as Opportunity Sites at this point in Plan preparation then this would be a Notifiable Modification to the Proposed Plan which would cause significant delays to the adoption process. Paragraph 87 of the Circular 06/2013 – Development Planning (CD10) makes it clear that delays to the adoption of a Plan should be avoided, “Scottish Ministers expect an authority’s priority to be to progress to adoption as quickly as possible. Pre-Examination negotiations and notifiable modifications can cause significant delay and so should not be undertaken as a matter of course”. Site assessments have been carried out (CD31) which found both sites to be desirable for the uses for which there is a willingness to approve planning permission. Given that both sites have a willingness to approve (pending the securing of developer contributions P141026) it is not deemed necessary to identify them as OP sites in the Proposed Plan at this time. We would however expect the next iteration of the Local Development Plan to reflect this planning permission, assuming that a consent will have been issued by this point.

Former Dobbies Garden Centre

75: We do not propose to allocate this site for development. Aberdeen City Council have assessed this site, considered it undesirable and rejected it on the grounds set out in the Proposed Plan Site Assessment Report (CD31). There are issues accessing the site, Hazledene Road is very narrow and there are several corners that have to be negotiated slowly due to blind spots. Development on this site would erode the rural setting and have a negative impact on the landscape of the area. Development would be unrelated to existing settlement and public transport links making the development potentially heavily car reliant. The site is surrounded by the Denwood - Hazlehead Local Nature Conservation Site (LNCS) (CD40) which contains a good network of paths and is well used by local people. The LNCS supports a number of breeding birds and mammals including Red Squirrel and Wych Elm. This site is not considered to be suitable for development and should remain as Green Belt.

Site East of Lidl, Lang Stracht

89: We do not propose to alter the zoning of this site. Aberdeen City Council has assessed this site, considered it undesirable for the use proposed, and considered the proposal to be undesirable (CD31). This site was not put forward at the Pre-Main Issues Report Call For Sites stage in 2013, or submitted as a representation to the Main Issues Report in 2014. It has therefore only been proposed as a representation to the Proposed Plan. The site is currently zoned under Proposed Plan Policy B1 Business and Industrial Land and rezoning to allow for retail development would result in the loss of this Business and Industrial Land. The site is currently occupied by a functioning car garage/workshop. The Aberdeen City and Aberdeenshire Retail Study 2013 (CD16) identifies retail deficiencies across the region. One of these deficiencies lies within Zone 29 West Aberdeen. The Retail Study (page 14) states that new convenience floorspace is required in Zone 29 and states that no specific location has been identified for this zone. It is however expected that the Countesswells development (Proposed Plan Opportunity Site 38) will meet some of the qualitative deficiencies for this area. The site East of the Lang Stracht lies on the border between Zone 29 West and Zone 28, as set out in Figure 3 of the Retail Study (page 10). Given the resultant loss of Business and Industrial land, Aberdeen City Council are of the opinion that the current zoning should remain. It is not considered that the findings of the Retail Study provide a sufficient reason for the zoning of this site to be altered.

Derbeth, Gillahill & Huxsterstone (Kingswells Expansion) (B0303)

117, 162, 155: We do not propose to allocate these three sites ((Derbeth, Gillahill & Huxsterstone) for development. These sites were previously considered during the extant Local Development Plan 2012 Examination and rejected by the Reporter (CD44, Issue 35). The Reporter concluded that the Green Belt status of these sites was justified by reasons of protecting the setting of Kingswells and preventing encroachment into the countryside that separates Kingswells from Aberdeen.

Aberdeen City Council has reassessed this site, again considered them undesirable, and rejected them on the grounds set out in the Proposed Plan Site Assessment Report (CD31). In addition to the Green Belt status, there is no primary school capacity at Kingswells Primary School (CD32). There are also problems in terms of successfully integrating these sites with the existing Kingswells community, particularly pedestrian links and strong links to the Three Hills Local Nature Conservation Site (LNCS). We remain of the opinion that the Derbeth, Gillahill and Huxsterstone sites should remain as Green Belt.

Huxterstone Healthcare Facility (B0947)

155. We do not propose to allocate this site for development. The site was previously assessed at Pre-Main Issues Report stage in 2013 (CD28) for retail/commercial and was considered to be undesirable for development. The site is now proposed for a Healthcare facility and the Council has reassessed this site on this basis. The Council still consider the site undesirable and rejected it on the grounds set out in the Proposed Plan Site Assessment Report (CD31).

The site is located close to the proposed Aberdeen Western Peripheral Route's South Kingswells Junction, and it is acknowledged that healthcare in this location would be easily accessed. However, the land in question lies south of the A944 and this busy road helps to form a very well defined and robust Green Belt boundary, as is highlighted in the Green Belt Review (CD38). Allowing development in this area would weaken this boundary and could lead to coalescence with the proposed Countesswells development. It is for these reasons that this land should remain as Green Belt.

Land at Newton East, Old Skene Road (B0306)

125: We do not propose to allocate this site for development. Aberdeen City Council has assessed this site, considered it undesirable, and rejected it on the grounds set out in the Proposed Plan Site Assessment Report (CD31). Although the site is small, the site contributes to maintaining the open setting between Kingswells and Aberdeen. Development on this site would have a negative impact on landscape and views and Kingswells Primary School is at capacity so any additional pupils generated by this development would compound this situation (CD32). We are of the opinion that this site should remain as Green Belt.

Land at Kingswells East (B0305)

152: We do not propose to allocate this site for development. Aberdeen City Council has assessed this site, considered it undesirable, and rejected it on the grounds set out in the Proposed Plan Site Assessment Report (CD31). The site sits just below Newpark Hill and occupies a significant position within the landscape. It is visible from Old Kingswells, many parts of new Kingswells, and the surrounding area to the south, east and west. The site is especially visible from the A944. Its development would encroach into the open countryside which separates Kingswells from Aberdeen. We are of the opinion that this site should remain as Green Belt.

Brownfield Site at Skene Road, Maidencraig (B0301)

141: We do not propose to allocate this site for development. Aberdeen City Council have assessed this site, considered it undesirable and rejected it on the grounds set out in the Proposed Plan Site Assessment Report (CD31). It is acknowledged that this proposal would include an area of land that has previously been developed and the development would be closely linked to the new community identified in the existing Local Development Plan at Maidencraig. However, the Den of Maidencraig (LNCS) (CD40) is an important feature that runs along the boundary of this site with the Maidencraig site. Any development in this area may increase the risk of flooding and increase the area of land at risk from flooding. Taking into account the potential impact on the Den of Maidencraig it is considered that there is no over-riding benefits arising from this site which would justify allocating it for development. Maidencraig (B0311)

183: We do not propose to allocate this site for development. Aberdeen City Council have assessed this site, considered it undesirable and rejected it on the grounds set out in the Proposed Plan Site Assessment Report (CD31). This site was submitted for consideration during the process of preparing the extant Local Development Plan 2012 and it was determined through the Aberdeen Green Belt Review (CD38) that the existing track from the Lang Stracht to Fernhill cottage provides a robust boundary for the allocated Maidencraig development. This site is part of an area of open countryside which serves to prevent the coalescence of Kingswells and Aberdeen and helps to maintain their unique identities. Given that we have already concluded that we do not consider it necessary to allocate any further greenfield sites beyond those already identified in the Proposed Plan, we are of the opinion that this site should remain as Green Belt.

**Reporter's conclusions:**

General Remarks

1. I concluded at Issue 2 that the proposed plan contained a shortfall of only 18 units in meeting the greenfield housing land requirement, and that Aberdeen City is making a reasonable contribution to ensuring that the housing supply target for the Aberdeen housing market area is met. There is therefore very little requirement to identify additional housing land. However some limited scope does exist to allocate small new greenfield sites, should any suitable opportunities emerge through the examination process.
2. Several proposed sites have previously been considered at the time of the examination into the current adopted local development plan. Where this has been raised in evidence, I have read and agree with the conclusions reached at that time. It is generally not helpful to the certainty that the development planning system is intended to provide to revisit the principle of development on sites that have been considered through earlier equivalent processes unless circumstances have clearly and significantly changed.

Hayfield Riding Centre and Fields to the East of Hazledene Road

3. The Hayfield Riding Centre is an established equestrian business in the Aberdeen green belt. The council has formally stated its willingness to approve an application for its upgrading to form an 'equestrian centre', subject to a legal agreement under Section 75 of the Planning Act.
4. Paragraph 52 of Scottish Planning Policy indicates that recreational uses that are compatible with an agricultural or natural setting may be appropriate within a green belt. I therefore consider that the ongoing green belt status of this land is appropriate. It would nevertheless be possible to designate the site as an opportunity site within the green belt, as has been done elsewhere on the proposals map. However I do not consider this to be essential, given the similar nature of the proposed use to the current use, and the council's formal statement that it is minded to approve the redevelopment. I therefore conclude that no change to the plan is required.
5. The fields to the east of Hazledene Road are currently in use as paddocks and are surrounded by woodland. The site is in the green belt, currently has a strongly rural character and is divorced from the built-up area of the city. The council has formally stated its willingness to approve an application for the construction of a hotel and associated facilities on this land, subject to a Section 75 agreement.

6. Such a use would not normally be acceptable in the green belt, but exceptional circumstances may have applied in this case. However it is not unusual for occasional non-conforming uses to exist within green belts, and this remains appropriate if the land continues to contribute to the green belt function. Given the site's rural character and separation from the built-up area of the city, I consider that its green belt status remains appropriate.

7. As with the Riding Centre site, it would nevertheless be possible to designate the site as an opportunity site within the green belt. However I do not consider this to be essential, given that the council's formal statement that it is minded to approve the hotel application has already established the principle of development. I therefore conclude that no change to the plan is required.

Former Dobbies Garden Centre

8. This former garden centre site is located in the green belt to the west of the Hazledene housing development on the western fringes of Aberdeen. The site includes the former garden centre buildings, which now appear to be largely in use for a variety of low intensity retail and café uses, areas of hardstanding, areas previously used for horticulture, a large pond, and woodland. The site's former garden centre use was an appropriate one for the green belt (paragraph 52 of Scottish Planning Policy refers to horticulture and connected retailing in this regard).

9. The site is well screened by woodland around its periphery from views in from the surrounding countryside. The playing fields to the north of the site introduce a level of noise and urban activity into the area, and the council has expressed support for a hotel development on land to the west. However, on balance I consider the current green belt status of the former garden centre site to remain appropriate because the limited amount of existing development on the site does not detract significantly from the quiet rural character of the land to the south of Hazledene Road. The largely undeveloped character of the site therefore contributes to protecting the character, landscape setting and identity of the city, particularly as approached along Hazledene Road. Conversely, large scale development would represent a clear incursion into open countryside at this point.

10. Releases of additional green belt land are sometimes required, but in this case I have concluded under Issue 2 that there is very little scope to allocate additional greenfield land. I am also conscious that residential development on this land has not been subject to public consultation up to this point. Furthermore, the site is not well located for new residential development being relatively distant from local services and employment opportunities.

11. I accept that parts of the site could be classed as brownfield land because they have previously been developed. However not all brownfield sites will be suitable for redevelopment for different uses. In this case, the site's ongoing contribution to the function of the Aberdeen green belt suggests that development for non-green belt uses, such as housing, would be inappropriate. However the site may benefit from established use rights for certain retail, food and drink and business activities.

Site East of Lidl, Lang Stracht

12. This site is located in the south-western corner of a larger area of business and employment land to the north of Lang Stracht in west Aberdeen. The site is currently occupied by an active auto-electricians business. A Lidl store is situated immediately to the

east.

13. It appears from the Aberdeen City and Aberdeenshire Retail Study that a retail deficiency for convenience floorspace does exist in west Aberdeen/ Countesswells. No specific sites are allocated in the plan to meet this deficiency, though the council and the retail study suggest that a proportion of the required floorspace could be provided within the Countesswells development. The Lang Stracht site is defined in the retail study as falling just outside the west Aberdeen/ Countesswells zone (the Lang Stracht itself forming the boundary). Therefore the site may not be best located to meet the identified deficiency, although it is likely that it could do so to some extent.

14. The site appears physically capable of being developed for retail use and has the benefit of a good quality existing access from Lang Stracht. The proximity to the existing Lidl store could encourage some shared journeys and so limit car use to some extent. However the site is occupied by an existing business, and the wider business and industry designation appears to be largely occupied and operating successfully. There is not therefore any indication that the site is surplus to business/ employment land requirements.

15. Overall I am satisfied that retail development on the Lang Stracht site could help meet an identified deficiency in convenience floorspace. However the site is not ideally located for this purpose, and there may be better located sites elsewhere in west Aberdeen. Retail development would result in a loss of employment land and force the closure or relocation of an existing business. For these reasons I conclude that the site should not be allocated for retail use in the plan. However I note that Policy NC5 of the plan provides a set of criteria under which any application for a store in this out-of-centre location could be assessed.

Derbeth, Gillahill and Huxsterstone (Kingswells Expansion)

16. The Derbeth site would constitute a significant urban expansion to the north-west of Kingswells, occupying rising ground between the existing settlement and the line of the Aberdeen Western Peripheral Route. Gillahill is another large site occupying elevated agricultural land to the east of Kingswells. The Huxsterstone site is a smaller area of land to the south-east of the settlement.

17. All three sites are currently in the green belt. The road bypassing Kingswells to the west currently forms a strong green belt boundary, and the rising agricultural land to the west of this road (the Derbeth site) makes a clear contribution to the landscape setting of Kingswells. Gillahill is much less prominent from Kingswells due to its landform and the presence of tree belts. This site consequently has less of a role in the setting of the settlement. Development would result in a significant encroachment into the existing open gap between Kingswells and Aberdeen, but the extent to which this would be readily apparent from viewpoints on the ground would require further study. The Huxsterstone site would more clearly and visibly encroach into this gap due to its high level of visibility from the A944 and the lack of any strong boundary feature to the east to act as a 'full stop' to development towards Aberdeen. Derbeth and Gillahill in particular are large sites, promoted for 900 and 600 houses respectively. Their ongoing green belt status therefore serves to direct growth pressure to the land that is identified for development in the plan, and which we have found to be appropriate for that development. For these reasons I consider that the ongoing green belt status of these sites remains appropriate.

18. Releases of additional green belt land are sometimes required, but in this case I have concluded under Issue 2 that there is very little scope to allocate additional greenfield land.

A release of the scale envisaged around Kingswells would represent an excessive and unjustified overallocation of housing land when set against the housing land requirement defined in the strategic development plan.

19. The merits of expanding Kingswells were considered at the time of the examination of the existing adopted plan, when it was concluded that there were no over-riding benefits that would justify making these large scale development allocations. I agree with the reasoning and conclusions reached at that time. A number of potential changes in circumstance since the previous examination have been highlighted. Regarding the construction of the Aberdeen Western Peripheral Route, I accept this could potentially form a strong green belt boundary, but development up to the new road could change its currently largely rural character. I agree that the success of the Prime Four business park strengthens the case for further housing development in Kingswells somewhat, and that with development of the scale proposed it may be possible to resolve education constraints. However these factors do not override the negative factors associated with developing these sites at this time.

20. For these reasons I conclude that, whatever the potential merits of development at Kingswells in the longer term, these sites should not be allocated for development in this local development plan.

#### Huxterstone Healthcare Facility

21. This site comprises a number of north-facing fields located on the opposite side of the A944 from the Prime Four business park and park and ride site. The A944 at this point forms a very strong green belt boundary, whereas the southern boundary of the proposed development site is largely formed by weak field boundaries. Development would contribute to the further urbanisation of the approach to Aberdeen along the A944 and so affect the landscape setting of the city to a degree. The site encroaches into the green belt gap between Kingswells and the new Countesswells development, particularly as experienced by drivers on the road to the east of the site. However the dipping landform towards the A944 means that there would be unlikely to be significant intervisibility between Countesswells and any development. Overall I consider that the openness of this land does fulfil green belt functions as outlined in Scottish Planning Policy, and that therefore the current green belt status is justified.

22. Releases of additional green belt land are sometimes required, and I accept the evidence that commercial or market demand may exist for additional private healthcare facilities in the Aberdeen area, and that this could be a relevant planning consideration. However I do not consider that such demand carries the same weight as a proven need for a public healthcare facility, which could be classed as an essential public service. Ideally, a regional need for land for a facility such as this would be established through the strategic development plan.

23. The existence of a demand for a facility does not necessarily justify the development of this particular site. I have noted above the impact that development here would have on the green belt. On the other hand the site's location on the A944, opposite a park and ride site, makes it potentially highly accessible by both cars and public transport. While I would not rule out the possibility that the land at Huxterstone may be the best located for a healthcare facility of the type proposed, equally there may be other suitable sites, including on land already designated for development in the plan.

24. The proposed plan makes extensive allocations of business land, and I note that Policy

B1 of the plan states that other uses that may be suited to a business location shall be treated on their merits. In addition Policy CF2 offers in principle support for new community facilities. I consider these policies to provide a reasonably positive framework for the consideration of a proposal such as the healthcare village on a suitable site, be this on allocated business land or, potentially and if necessary, on a greenfield site.

25. In conclusion, while demand may exist for a new private healthcare facility in the Aberdeen area, I am not satisfied that the release of the land at Huxterstone is necessarily required to achieve this. I therefore recommend no change to the proposed plan.

Land at Newton East, Old Skene Road

26. This small agricultural field to the south-east of Kingswells benefits from strong defensible boundaries in the form of the A944 to the south, woodland to the east, the Old Skene Road (now footpath) to the north and existing development to the west. Although development would represent an encroachment into the narrow green belt gap between Kingswells and Aberdeen at this point, tree belts to north and south limit visibility into the site somewhat. However the site would appear to narrow the gap between Kingswells and Aberdeen when viewed from higher land to the north. The council has also pointed to a lack of schools capacity to accommodate additional development in Kingswells.

27. Overall I consider that the development of this site would have a limited but real impact on the effectiveness of the green belt in protecting the separate identities of Kingswells and Aberdeen. The school capacity constraint may be capable of resolution, but given my conclusion under Issue 2 that there is very little scope to release additional greenfield land, I conclude that this site should not be allocated for development at the current time.

Land at Kingswells East

28. Due to its location on a south-facing slope overlooking the southern part of Kingswells and the countryside beyond, any development on this site would be highly visible in views from the south, including from sections of the A944. Although parts of Kingswells extend closer to Aberdeen than this site, because this site is on higher ground, development would nevertheless appear to encroach upon the green belt gap between Kingswells and Aberdeen. I therefore consider that the site contributes to the landscape setting and separate identity of Kingswells and that its current green belt status is therefore justified.

29. Releases of additional green belt land are sometimes required, but in this case I have concluded under Issue 2 that there is very little scope to allocate additional greenfield land. I therefore conclude that this site should not be removed from the green belt at this time.

Brownfield Site at Skene Road, Maidencraig

30. This site consists of a level area of hardstanding currently in use primarily for the storage of buses. The council accepts that it could be classed as a brownfield site, and I agree. The site is enclosed by roads and existing housing to the south and west, but is currently lent a rural character by the open agricultural land to the north-east. This character will however change following the development of this land as part of the OP31 Maidencraig South East housing site. Because of this enclosure by other development, I do not consider that this site makes any significant contribution to the Aberdeen green belt.

31. The council raises concerns relating to flood risk and potential impact on the Den of

Maidencraig local nature conservation site. However the level developable area of the site sits significantly above the level of the watercourse that runs in a steep-sided valley along the north-western boundary. I consider it very unlikely that the majority of the site would be at risk of flooding. The nature conservation site is to the east and has a much shorter boundary with the proposed development site than the OP31 site in the proposed plan. I consider that any potential impact would be likely to be much less than from existing proposed developments in the plan.

32. Under Issue 2 I did not identify any requirement to allocate additional brownfield sites in order to meet the housing land requirements. However given this site's brownfield status, lack of contribution to green belt purposes and general apparent suitability for development, I conclude that it should be identified as an opportunity site in the plan. In reaching this conclusion I also note that the site has been the subject of a degree of public consultation through the main issues report. The representation suggests 15 houses as a potential capacity, and I agree this appears reasonable. Safeguards relating to flooding and impact on the local nature conservation site can be included in the notes in Appendix 2.

Maidencraig

33. The site comprises a number of level agricultural fields to the north-west of the existing Maidencraig opportunity sites and the Dobbies Garden Centre. Other than a potential education constraint, the site appears capable of development for housing or employment use, is relatively accessible and is capable of integrating with the established development proposals at Maidencraig.

34. Development would result in a major incursion into the open countryside gap between Aberdeen and Kingswells. This would be more apparent to travellers using the A944 than to static observers as intervening higher ground blocks any intervisibility between the site and Kingswells. Nevertheless I consider that the site has a role in maintaining the landscape setting of the city and protecting the separate identities of Aberdeen and Kingswells. Avoiding development on this site also helps to direct development to the sites that are allocated in the proposed plan, and which we have found to be appropriate for that development. I therefore consider that the green belt status of the Maidencraig site is justified in terms of the green belt purposes set out in Scottish Planning Policy.

35. Releases of additional green belt land are sometimes required, but in this case I have concluded under Issue 2 that there is very little scope to allocate additional greenfield land for housing. It is also clear from Table 2 of the plan that there is already something of an overallocation of employment land. Therefore, whatever the long term potential of this land, I conclude that it should not be removed from the green belt at this time.

**Reporter's recommendations:**

I recommend that:

1. The site at Skene Road, Maidencraig illustrated in red in representation 141 from Archial Norr be removed from the green belt and included as a residential area and opportunity site on the proposals map and in Appendix 2.
2. In Appendix 2, the appropriate site area for this site be given; the Policy given as 'Residential'; and the Other Factors given as 'Site capable of accommodating around 15

homes. A flood risk assessment will be required to accompany any future development proposals for this site. Development should seek to avoid any adverse impacts on the Den of Maidencraig local nature conservation site.'

<b>Issue 9</b>	<b>ALLOCATED SITES &amp; GENERAL AREA STRATEGY: COUNTESSWELLS</b>	
<b>Development plan reference:</b>	Pages 13-14 and Page 83. Proposals Map, Table 6, Table 6 notes, Masterplan Zones Table, Appendix 2	<b>Reporter:</b> Michael Cunliffe
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
<p>Ken Hutcheson (9)  George and Maureen Findlay (22)  Mark &amp; Karen Souter (27)  Alexander Hamilton (36)  Jane Hamilton (37)  Dorothy Semple (43)  E W Boyd (49)  Eve Glegg (50)  Joan Robertson (61)  Sandy Hutchison (113)  Aberdeen Civic Society (136)  Scotia Homes (152)  P M Fullerton (168)  Stewart Milne Homes (173)  Bancon Developments (183)</p>		
<b>Provision of the Development Plan to which the issue relates:</b>	Overview of Direction for Growth in this area and specific OP sites	
<b>Planning authority's summary of the representation(s):</b>		
<p><u>Area Spatial Strategy</u></p> <p>152, 183: There is over-reliance on a single, large scale development to provide the required housing land supply in this area. There are concerns about the delivery.</p> <p>43, 50: There is significant development in this and surrounding areas. The cumulative impact of development needs to be addressed.</p> <p>173: Object to the allocation of 10 hectares of employment land. The focus should be on smaller scale business spaces, with flexible uses. This would promote a higher density, town centre approach.</p> <p>168: The building of large number of houses will not help the housing shortage, and there is an insufficient mix of housing. There is not the population to fill these houses.</p> <p><u>Transportation</u></p> <p>9, 22, 27, 36, 37, 43, 49, 50, 113, 168: Concerns about road infrastructure capacity.</p>		

43: The Bridge of Dee is at capacity at present.

22, 27: New road required prior to development.

22, 27: Emergency vehicles are struggling to access the roads in this area at present.

27: Building on site should be postponed until the completion and opening of the Aberdeen Western Peripheral Route.

136: Ensure there are sustainable means of travel, allowing and giving people the opportunity to travel to work on foot.

Infrastructure and Services

27, 168: The schools at Kingswells and Cults are at capacity.

168: There are a lack of services in the area.

173: Support retail provision in the development but are disappointed the Proposed Plan has not stipulated where this will be. A mid-range supermarket will anchor retail provision. 7,000 metres squared should be allocated to Countesswells. A 2016 start date at Countesswells will provide an established population by 2025 coinciding with the Retail Strategy timescale for retail provision within Zone 29N.

Scale of Development

36: Concern about the size and scope of the development.

Environmental Concerns

113, 168: The development will have a negative environmental impact.

50, 61: The Green Belt, Hazelhead Woods and Hazelhead Park are needed and should be protected.

61: Wildlife is dependent on these areas.

Financial Impact

113: Financial risk due to the downturn in oil at present.

Detail of the Development

136: The site needs to be mixed in terms of uses and residential property size.

**Modifications sought by those submitting representations:**

Area Spatial Strategy

43: Remove Countesswells. Build on brownfield land, possibly the old Hall Russell Yard.

152: Allocate Foggieton for 650 houses and other Mixed Use developments.

183: Allocate additional housing sites.

173: Reduce the employment land allowance.

Transportation

22, 27, 50: Build a new road before construction begins.

36, 37, 49, 168: Scale back development until the appropriate infrastructure is in place.

Infrastructure and Services

173: Allocate the full 7,000 metres squared retail provision identified for Zone 29 West in Countesswells.

Environmental Concerns

61: Retain the green areas.

Financial Impact

113: The site should be on hold until the economy has stabilised.

**Summary of response (including reasons) by planning authority:**

Area Spatial Strategy General and Scope of Development

36, 43, 50, 152, 168, 173, 183: The Aberdeen City and Shire Strategic Development Plan (SDP) 2014 (CD12) proposed not to allocate additional land, but to 'roll forward' the allocations from the Aberdeen City and Shire Structure Plan 2009 (CD20) into the SDP, and this was accepted by the Reporter during the SDP's Examination (Issue 5 pages 54 - 74) (CD13). The Reporter's conclusion stated "Drawing all of these matters together, I conclude that the scale and distribution of growth provided for in the housing allowances is appropriate and sufficient, in accordance with the requirement of paragraph 117 of Circular 6/2013." Aberdeen City Council agrees with these conclusions.

The Vision and Objectives for the Proposed Plan are the same as the Aberdeen City and Shire Strategic Development Plan 2014. The role of the Strategic Development Plan is to "set clear parameters for subsequent Local Development Plans and inform decisions about strategic infrastructure investment." (Circular 06/2013 paragraph 41, CD10). The Strategic Development Plan sets a clear strategy for development in Aberdeen, which includes housing allowances to be delivered through Local Development Plans.

Large, strategic-scale housing sites form an important part of the Proposed Plan's ambition to create sustainable, mixed communities. This allocation has been carried forward from the Aberdeen Local Development Plan 2012 (CD42). The principle of Countesswells allocation was tested during the Examination of the 2012 Aberdeen Local Development Plan (CD44, Issue 33). It remains appropriate to identify the site as a development opportunity for 3,000 houses and 10 hectares of employment land as there has been no significant change in

circumstances which would justify an amendment to this designation.

The site is subject to an approved [Development Framework and Phase 1 Masterplan](#) which was adopted as Supplementary Guidance to the extant Local Development Plan in July 2014. The intention is for these documents to be re-adopted with the Proposed Plan upon its adoption. Planning Permission in Principle ([140438](#)) was approved by Full Council on 19 August 2015 (RD62). It was previously deferred to the Full Council meeting on 8 October 2014 (RD63), where Members were minded to approve the application subject to a legal agreement signed under Section 75 of the Town and Country Planning (Scotland) Act 1997 ('Section 75 agreement') relating to a number of matters. The Section 75 agreement has still to be signed and registered and a large number of parties are involved. Two further Planning Permission in Principle applications ([141888](#) and [141889](#)) have been lodged for alternative access arrangements, and a number of Detail Planning Applications ([140730](#), [141110](#) and [141665](#)) have been lodged. The principle and scale of the development has been well established and is deemed acceptable. No detail was provided on the Old Hall Russell Yard; therefore no assessment could be carried out to determine if the site was suitable.

### Transportation

9, 22, 27, 36, 37, 43, 49, 50, 113, 136, 168: A development of 3,000 dwelling houses, 10 hectares of employment land and associated services and facilities is going to necessitate a need for significant transport improvements. The Countesswells site, once complete will be a new community and the existing road network is clearly not currently suitable to deal with additional traffic. The Masterplan for the site has identified transport and road upgrades, as does the Proposed Action Programme (CD21). The Aberdeen Western Peripheral Route is now being built, which will take traffic away from unsuitable roads heading north and south of the city. It is the Council's contention that this infrastructure is necessary to support this development.

Transport Assessment and infrastructure thresholds have been submitted with the current pending planning applications, and have been assessed by the Council's Roads Projects Team and Transport Scotland; these have been deemed acceptable. A Condition shall be applied to the Planning Permission in Principle [140438](#) limiting development to Phase 1 (comprising 1,000 residential units; 1,000 square metres Ground Floor Area Class 4 office space; 2,500 square metres Ground Floor Area Class 1 retail space; and associated ancillary uses) for the period prior to the Aberdeen Western Peripheral Route being open to traffic, and the consequent removal of Trunk Road status for the A90 Anderson Drive. Planning Permission in Principle Application [141889](#) requires the Kingswells roundabout to be upgraded by 401 units, and Planning Permission in Principle [141888](#) requires the Jessiefield Link by the 1001st unit.

### Infrastructure and Services

27, 168, 173: The required infrastructure for this area is identified in the Proposed Action Programme (CD21), the Infrastructure and Developer Contributions Manual SG (CD25), the [Development Framework and Phase 1 Masterplan](#) and the Planning Permission in Principle application [140438](#). The Planning Permission in Principle application identified that the development would provide one secondary school, and two primary schools, with one being a two stream, with the other capable of being a three stream if deemed necessary. The Development Framework and Phase 1 Masterplan, and Planning Permission in Principle application ([140438](#)) outlines two neighbourhood centres to accommodate shops and

community facilities thereby providing services for the local community. The Planning Permission in Principle application outlines a further application would be required to be submitted on the detail of this. A UK Treasury guarantee for a £80 million loan to help finance infrastructure for the development was announced by the Chief Secretary to the Treasury on 15 August 2014 (RD64).

The Development Framework and Phase 1 Masterplan outlines a supermarket to meet the needs of the local community. The Aberdeen City and Aberdeenshire Retail Study 2013(CD16) states a requirement for 5,500 square metres (gross floor area) for the west of Aberdeen/Countesswells for a supermarket/superstore/other convenience. This does not all have to be provided in one location. It also specifically recommends for Countesswells a maximum 1,500 square metres (gross floor area) of general comparison floorspace - see Table 7 in the Executive Summary and Part 6 of the main report – Recommended Retail Strategy. Any retail proposals for Countesswells should align with these recommendations as outlined in paragraph 3.28 of the Proposed Plan and would need to be considered against the Plan’s retail policies.

### Environmental Concerns

50, 61, 113, 168: The site was removed from the Green Belt with the adoption of the extant Local Development Plan 2012. Boundaries have been drawn as such to reduce impact on adjacent woodland areas, and Green Space Network is used to maintain a wildlife corridor through the site. Within the area identified there are no local, national or international natural heritage designations.

The impact of the development on Hazelhead Park is likely to be limited to an increase in recreational use. Providing doorstep opportunities for people to gain easy access to open space, woodland and parks is considered beneficial to the health and wellbeing of the population. As proposed in the Development Framework and Phase 1 Masterplan and the Planning Permission in Principle ([140438](#)), a proposed access road post 300 units will be formed from the Switchback (Jessiefield) and will cut through Hazelhead Woods. The woods will be furthered enhanced as an area of urban space through a core path linking Hazelhead Woods and Countesswells Woods.

### Financial Impact

113: The development would assist with meeting the housing and employment land need identified in the City, and complies with the Aberdeen City and Aberdeenshire Strategic Development Plan. The Plan is a long term vision for the city. It needs to be ensured that the opportunity is there to provide sufficient homes, places of employment and leisure activities to support this demand.

### Detail of the development

136: The development would be mixed use, as its allocation includes both housing and employment uses. Both the [Development Framework and Phase 1 Masterplan](#), and the Planning Permission in Principle application ([140438](#)) outline the development would be mixed use with neighbourhood centres. The development would need to comply with housing mix and affordable housing policies, and again both the Development Framework and Phase 1 Masterplan, and the Planning Permission in Principle application outlined this to be the case.

**Reporter's conclusions:**Area Spatial Strategy General and Scope of Development

1. Under Issue 2 it is concluded that a relatively high proportion of housing completions are proposed for large sites in the Aberdeen area, and that the high levels of growth that are planned for are likely to necessitate major investments in transport and community infrastructure. Such infrastructure is more easily delivered and funded through large strategic releases than through a plethora of small sites. While a range of types of site is beneficial, in the context of Scotland's third largest city the balance between larger and smaller sites in the proposed plan is appropriate.
2. The Countesswells development has been carried forward from the existing local development plan, and is well advanced through the development management process. The Development Framework and Phase 1 Masterplan are in place, planning permission in principle has been granted and good progress has been made towards a start of construction. A Treasury guarantee has been provided to underwrite the delivery of infrastructure. It would be inappropriate at this late stage in the development process to call into question the development plan status of this major project.
3. I note the suggestion (representation 43) that housing development should instead be focused on brownfield sites, including the old Hall Russell Yard. Brownfield sites have an important contribution to make towards the provision of housing land, but cannot on their own provide sufficient sites to meet needs, so that greenfield releases must also be made. The former Hall Russell site forms part of the operational area of Aberdeen Harbour, and is in use as such. Even if it were suitable for housing development, it could contribute only a small proportion of the 3,000 houses that can be provided at Countesswells.
4. Representations on behalf of Stewart Milne Homes (173) seek a reduction in the 10 hectares of employment land allocated to Countesswells in Table 6 of the proposed plan. I agree that a focus on smaller scale business spaces, with flexible uses, would promote a higher density, town centre approach. The Development Framework states that it is designed to be flexible and responsive to change in market conditions, and as such provides what is considered the maximum potential developable land take to provide the appropriate scale of uses in relation to what is identified within the local plan. It appears to me that the framework provides enough flexibility to allow a dense core development of retail and small businesses, with the adjacent areas providing for expansion if market conditions allow, or other land uses if employment demand does not materialise. I do not consider that there are grounds at this stage for reducing the 10 hectares provided in the proposed plan.  
Transportation
5. It is clear that the present road network in the area around Countesswells is inadequate to serve the proposed development in addition to existing traffic. This is accepted by the council. It appears to me that there are two main aspects, peripheral traffic and radial traffic. Peripheral traffic is seeking to move between outer suburbs of Aberdeen, or to bypass the city altogether. This will be catered for by the Aberdeen Western Peripheral Route (AWPR) whose construction is well advanced, with completion expected in winter 2017. I note that a condition of planning permission in principle limits the Countesswells development to 1,000 houses in advance of the AWPR being completed. Given the construction timelines of the two projects, it appears to me unlikely that this number of houses would be occupied before the AWPR has been completed and has relieved the local road network of peripheral traffic

unrelated to the area.

6. Radial traffic will arise between the Countesswells development and inner parts of the city. The existing Countesswells Road provides the most direct route, but it is narrow and feeds into a junction with the A93 at its eastern end, making it unsuitable for a major increase in traffic. The main alternative is to provide a link northwards from the development onto the A944 (Lang Stracht) and B9119 (Skene Road), and the Development Framework and Phase 1 Masterplan provide for this in the form of the Jessiefield Link and improved junctions on the A944 at Jessiefield and (for buses only) at Kingswells. I note that the planning permissions in principle require the Kingswells roundabout to be upgraded by 401 units, and the Jessiefield Link by the 1001st unit. I consider that these provisions, in combination with measures to improve public transport and provide pedestrian and cycle access, are likely to control road congestion to an acceptable level.

### Infrastructure and Services

7. Countesswells is proposed as a mixed development that will provide, as well as houses, the infrastructure and services to meet the needs of residents. The Development Framework and Phase 1 Masterplan allocate sites for a community campus, a secondary school and two primary schools, along with retail and commercial centres. The development proposals therefore address the shortfall in educational and other infrastructure provision in the area.

8. Representations on behalf of Stewart Milne Homes (173) argue for the full 7,000 square metres gross floor area of retail space identified for Zone 29N (West Aberdeen/Countesswells) in the Aberdeen City and Aberdeenshire Retail Study 2013 to be allocated to Countesswells. Tables 6.2 and 7 of the study report propose 5,500 square metres of supermarket/superstore/other convenience space for the zone. There is no specified location and the floorspace may (my emphasis) be in more than one location. A proportion of the floorspace is encouraged to be provided within Countesswells to form the basis of a new centre comprising both convenience and comparison floorspace. The latter should have an indicative maximum of 1,500 square metres.

9. It appears to me that the retail study does not preclude 100 per cent of the convenience space for Zone 29N (5,500 square metres) being provided at Countesswells which, combined with the 1,500 square metres of comparison space, would achieve the 7,000 square metres sought by the developers. Policy NC8 of the proposed plan (Retail Development Serving New Development Areas) calls for masterplans to allocate land for retail and related uses (which the Countesswells plan does), and states that proposals for retail development which serves a wider catchment area will be subject to a sequential test and retail impact assessment in accordance with Policy NC4. Such an assessment would be required for retail development of over 2,500 square metres. Subject to that, there does not appear to me to be anything in the proposed plan, the proposed supplementary guidance, the retail study or the Development Framework and Phase 1 Masterplan that would prevent the granting of planning permission for 7,000 square metres of retail floorspace at Countesswells. I do not consider that there is any need to modify the proposed plan in this regard.

### Environmental Concerns

10. The removal of the site from the green belt was considered in the examination of the existing local development plan, and was deemed justified on balance. It is not possible to

provide sufficient housing land to meet the needs of the city region without some greenfield development. It does not appear to me that the proposed development would have any negative impact on Hazlehead Park, or on the adjacent woodland except for the limited loss of trees arising from construction of the Jessiefield Link road. The Development Framework and Phase 1 Masterplan and the planning permissions in principle provide for parks, green spaces and woodland planting within the development. I consider that the environmental concerns have been adequately addressed.

Financial Impact

11. While I acknowledge the recent downturn in Aberdeen's economy due to the decline in oil prices, the proposed plan has to provide for development needs over the next 10 years. There have been economic fluctuations in the past, and a robust plan needs to make provision for future growth as and when it occurs. Normal commercial pressures will dictate the rate at which Countesswells progresses and (as I have mentioned in paragraph 2 above) the development is well down the road to a construction start. I do not accept that a brake should be put on the timing of the development.

Detail of the Development

12. The proposed development will be mixed-use, combining different types of housing with retail and other employment uses, educational and community facilities. The Development Framework and Phase 1 Masterplan seek to integrate these components of a balanced new community, and to make provision for sustainable transport.

**Reporter's recommendations:**

No modifications.

<b>Issue 10</b>	<b>ALTERNATIVE SITES: COUNTESSWELLS</b>	
<b>Development plan reference:</b>	No reference in the Plan	<b>Reporter:</b> Michael Cunliffe
<b>Body or person(s) submitting a representation raising the issue (reference no.):</b>		
<p>The Reid Family (138)                  Scotia Homes (152)                  Stewart Milne Homes (173)</p>		
<b>Provision of the Development Plan to which the issue relates:</b>	Alternative sites in Countesswells	
<b>Planning authority's summary of the representation(s):</b>		
<p><u>Thornhill (B0944)</u></p> <p>138: Object to the non-allocation of site B0944 for residential development. The site provides easy access to Aberdeen, would provide local leisure and recreation facilities and 25% of the housing would be affordable.</p> <p><u>Foggieton (B0921)</u></p> <p>152: Object to the non-allocation of site B0921 for 650 houses, a neighbourhood centre, public open space and woodland walks. The site would be closely aligned in location and principle of development of Countesswells and development would be guided through the masterplanning process</p> <p>Countesswells Expansion (B0918)</p> <p>173: Object to the non-allocation of site B0918. The development comprise six pockets of land, and would allocated 1,500 homes, with 1,000 homes in Phase 1 and 500 in Phase 2. New infrastructure will be delivered, as is outlined in the Countesswells Development Framework and Phase 1 Masterplan and the Planning Permission in Principle for Countesswells, and it is logical to build development off this road. Development would respect landscape.</p>		
<b>Modifications sought by those submitting representations:</b>		
<p><u>Thornhill (B0944)</u></p> <p>138: Allocate Thornhill for future residential development</p> <p><u>Foggieton (B0921)</u></p> <p>152: Allocate Foggieton as a residential led mixed use development</p>		

Countesswells Expansion (B0918)

173: Expand the boundaries of OP38 to include these parcels of land as a suitable location for development to be delivered post 2023.

**Summary of response (including reasons) by planning authority:**

General Strategy

In preparing the Proposed Plan a Development Options Assessment (CD28, CD30, CD31), Strategic Environmental Assessment (CD27), and Main Issues Report (CD29) were used to identify the most suitable locations to deliver the required growth. The majority of greenfield sites identified in the Proposed Plan have been carried over from the Aberdeen Local Development Plan 2012 (CD42) which went through a similar process at that time. Most of these sites are at an advanced stage in terms of planning consents and Masterplans as detailed in the latest version of the Action Programme (CD47).

The Aberdeen City and Shire Strategic Development Plan (SDP) 2014 (CD12) sets the requirements for greenfield housing and employment land allowances and these are set out in Figure 1 of the SDP on page 12 and in Schedule 1 on page 42. Under Issue 2 we conclude that the SDP greenfield requirements have been fully met and we are confident that a continuous 5 year housing land supply can be met throughout the lifetime of this LDP. Accordingly, we do not consider it necessary to allocate any further greenfield sites beyond those already identified in the Proposed Plan.

Thornhill (B0944)

138: We do not propose to allocate this site for development. The site was previously considered during the extant Local Development Plan 2012 Examination and rejected by the Reporter (CD44, Issue 53). Aberdeen City Council has assessed this site, considered it undesirable, and rejected it on the grounds set out in the Proposed Plan Site Assessment Report (CD31). The site would constitute a substantial but isolated development in the Green Belt, undermining the existing separation between Cults and Aberdeen. The site is remote in transport terms and there is insufficient capacity to accommodate school pupils within the current schools (CD32).

Foggieton (B0921)

152: We do not propose to allocate this site for development. Aberdeen City Council has assessed this site, considered it undesirable, and rejected it on the grounds set out in the Proposed Plan Site Assessment Report (CD31). The site forms part of the Foggieton Local Nature Conservation Site (CD40, also see Proposed Plan Additional City Wide Proposals Map CD23) and development would result in the loss and/or disturbance of designated species and priority habitats. The site is also highly visible in the surrounding landscape and would have a negative impact on the character of the surrounding area.

Countesswells Expansion (B0918)

173: We do not propose to allocate these sites for development. Aberdeen City Council has assessed this site, considered it undesirable, and rejected it on the grounds set out in the Proposed Plan Site Assessment Report (CD31).

The six areas for expansion about the existing allocated site, Countesswells (extant Local Development Plan OP Site 58, Proposed Plan OP Site 38). The site boundary of the Countesswells Site was subject to Examination as Issue 33 during the Examination into the extant Local Development Plan 2012 (CD44, Issue 33). Three of the proposed areas of expansion proposed by this representation have been subject to Examination previously, these are areas identified as '1', '4' and '5' in the Proposed Plan 2010 consultation response.

As part of the submission to the Pre-Main Issues Report consultation in 2009, bid 9/24: Countesswells covered an area larger than the eventual allocated site for Countesswells (RD53). The non-allocation of the larger site was subject to representation during the previous proposed plan consultation (RD54 & RD55).

The 2009 9/24: Countesswells submission included the land which is identified as '1' and '3' in this current representation to the Proposed Plan. The land identified as '3' in the submission to this Proposed Plan was not subject to a representation in the Examination into the extant Local Development Plan 2012, yet was nevertheless subject to Examination as the boundary of the Countesswells site was examined.

The areas identified as '4' and '5' in the representation to this Proposed Plan were also a subject of the Examination into the extant Plan. Area '4' and '5' were submitted in 2009 as Bid 9/50: Land to the West of Loanhead Road (RD56), and were subject to representation during the previous proposal plan consultation (RD57 & RD58).

The Reporter's Report following the Examination of the extant Local Development Plan 2012 Examination (CD44, Issues 33), in response to the representations on the site boundary, acknowledged that a review of the Green Belt was used by the Council to help identify the most appropriate boundary.

The Reporter's finding into Issue 33, point 9 further outlined, "I recognise that there could also be scope for extending the development area at Countesswells to incorporate suggested areas of land to the south-west and to the north-east. However, I agree that the boundaries defined by the Council are the most appropriate and that the area identified is likely to be sufficient to accommodate the scale of the development which is proposed, and at the densities of development envisaged. On this basis, I consider that no modifications to the site boundary shown on the proposals map are justified". The Proposed Plan currently subject to Examination again seeks to make the most efficient use of land, and paragraph 3.76 states that a net density of 30 dwellings per hectare should be achieved, in line with sustainable mixed communities targets on page 37 of the SDP. It is submitted by the Council that by making the most efficient use of land there would not be a requirement to increase site boundaries for the Countesswells site. Basing the calculation on 20 dwellings per hectare to take account of landscaping, strategic road infrastructure and large areas of open space, there is sufficient land to provide 3,000 dwelling houses.

The placement of the access road within the [Development Framework and Phase 1 Masterplan](#) which is currently adopted as Supplementary Guidance to the extant Local Development Plan 2012, and the Planning Permission in Principle afforded to the development of the site ([140438](#)) do not automatically mean the land surrounding the access road would be developable land.

Further, this proposed expansion would lead to loss of woodland and disturbance to designated species and their habitats. Development on these sites would be visually

intrusive and would have a detrimental impact on the surrounding landscape. The Countesswells allocation is anticipated to build out at a rate of about 200-250 units per year and is not expected to be complete until post 2020 (CD17). Adding additional land to the OP58 allocation is not likely to increase housebuilding on this site in the next plan period.

**Reporter's conclusions:**

General Strategy

1. It has been concluded at Issue 2 that there is a shortfall of only 18 units in meeting the greenfield housing land requirement, and that Aberdeen City is making a reasonable contribution to ensuring that the housing supply target for the Aberdeen housing market area is met. There is therefore very little requirement to identify additional housing land. However some limited scope does exist to allocate small new greenfield sites, should any suitable opportunities emerge through the examination process.

2. The need and scope for further allocations of housing land in the Countesswells area has to be considered in the context of the proposed major development (OP38) at Countesswells, which will provide 3,000 houses and 10 hectares of employment land. I have concluded under Issue 9 that OP38 should remain without modification. It is also relevant to have regard to Friarsfield (OP41) on the northern edge of Cults.

Thornhill (B0944)

3. The site would adjoin OP38 and lie to the east of it. It would be narrowly separated from OP41 which lies to the south. It would represent a major intrusion into the green belt separating Cults, the new development at Countesswells (whose removal from the green belt was accepted in the examination of the present local development plan), and the existing built-up area of Aberdeen lying to the east. The site is traversed by power lines supported by pylons, and is fringed by woodland.

4. I agree with the conclusions of the reporter who examined the existing local development plan, who found that large-scale development to the north of site OP41 (then OP51) would have an unacceptable landscape impact and would constitute a substantial but isolated development in the green belt undermining the separation between Cults and the western edge of Aberdeen. I also agree that at present the site is remote from transport links and shopping facilities, so that travel would likely be by car, and that there are education capacity issues. These factors would over time change to some extent with the development of Countesswells (OP38) which would provide new shops and schools. However, the phasing strategy set out in the Development Framework and Phase 1 Masterplan for Countesswells indicates that development will begin at the centre of the site and expand outwards, so that it would be some years before the part adjoining Thornhill would be developed. Any development at Thornhill in the meantime would be isolated.

5. The representation (138) in support of Thornhill considers it likely that the number of housing units that can be delivered at Countesswells will fall short of the 3,000 planned. The basis for this view is not explained, and I have at present no reason to suppose that there will be a shortfall. If such a deficit arose because of lower than expected densities, there are other sites that could be used to expand Countesswells (see below) that suffer from fewer drawbacks than Thornhill. I therefore conclude that Thornhill should not be added to the proposed plan.

Foggieton (B0921)

6. This mixed-use proposal with 650 houses would be an isolated major development within the green belt. The site is crossed by lines of electricity pylons. Part of it is occupied by a section of the Foggieton Local Nature Conservation Site, and while the indicative plan that forms part of representation 152 shows this area as public open space, there would inevitably be disturbance to habitats and species through development of the adjacent land. The site, on a south-facing slope below the level of the east-west road at Blacktop, is highly visible in the surrounding landscape, and development would be prominent and intrusive. The site is remote from facilities and public transport. Even when Countesswells is developed, residents at Foggieton would be heavily dependent on private cars. For these reasons, I conclude that Foggieton should not be added to the proposed plan.

Countesswells Expansion (B0918)

7. Representations on behalf of Stewart Milne Homes (173) put forward six areas for the expansion of the OP38 site. Three of these (1, 4 and 5) were considered in the examination of the present local development plan, but the reporter considered that the established boundaries of the main Countesswells site were appropriate. The Countesswells site is expected to develop at a rate of 200-250 completions a year. With earliest completions in 2017, it would be at least 2029 – beyond the period covered by the proposed plan – before the site is built out. Given the general position as regards greenfield housing development set out in paragraph 1 above, there is therefore no need at this stage to allocate additional land.

8. Additional site 1 consists of woodland to the north-east of the main site. While I accept that this is a commercial woodland, its loss (beyond what is necessary to construct the Jessiefield Link road) would involve disturbance of wildlife habitat and adversely affect the landscape setting of the new development. Additional site 2 overlaps the Thornhill proposal, and should be rejected for the same reasons as set out in paragraphs 3-5 above. Additional site 3 adjoins the south-west boundary of OP38 and is well screened by trees. Subject to their retention, I consider it would be an acceptable site for expansion if one were required. Likewise additional site 4, though more prominently located at a road junction, is backed by trees to the north and west, and adjoins the western boundary of site OP38, making it a credible enlargement of the main site. Sites 5 and 6 are on steeply sloping land with woods to the north and south, and would constitute a finger of development projecting westwards into the green belt. They would not relate well either to the main Countesswells site or to the rural character of the surrounding area, and I do not consider either of them appropriate.

9. If a need to expand site OP38 arose, therefore, additional sites 3 and 4 would offer opportunities worthy of further consideration. However, there is at present no such need and I do not propose any modification of the existing boundaries.

**Reporter's recommendations:**

No modifications.