

# PROPOSED ABERDEENSHIRE LOCAL DEVELOPMENT PLAN 2020 RESPONSE FORM

As part of the production of the Local Development Plan, a 'Main Issues Report' was published in January 2019. The responses from these consultations have helped to inform the content of the Proposed Local Development Plan ("the Proposed Plan").

The Aberdeenshire Local Development Plan will direct decision-making on land-use planning issues and planning applications in Aberdeenshire for the 10-year period from 2021 to 2031. The Proposed Plan was agreed by Aberdeenshire Council in March 2020 as the settled view of the Council. However, the Proposed Plan will be subjected to an independent examination and is now open for public comment.

**This is your opportunity to tell us if anything should be changed in the Proposed Plan, and why.**

When writing a response to the Proposed Plan it is important to specifically state the modification(s) that you would wish to see to the Plan.

This is the only remaining opportunity to comment on the Proposed Plan. The reasons for any requested changes will be analysed and reported to Scottish Ministers. They will then appoint a person known as a Reporter to conduct a public examination of the Proposed Plan, focusing particularly on any unresolved issues and the changes sought.

Ministers expect representations (or responses) to be concise (no more than 2000 words) and accompanied by limited supporting documents. It is important to ensure that all of the information that you wish to be considered is submitted during this consultation period as there is no further opportunity to provide information, unless specifically asked.

Please email comments to [ldp@aberdeenshire.gov.uk](mailto:ldp@aberdeenshire.gov.uk) or send this form to reach us by 17 July 2020.

We recommend that you keep a copy of your representation for your own records.



## ACCESSIBILITY

If you need information from this document in an alternative language or in a Large Print, Easy Read, Braille or BSL, please telephone 01467 536230.

Jeigu pageidaujate šio dokumento kita kalba arba atspausdinto stambiu šriftu, supaprastinta kalba, parašyta Brailio raštu arba britų gestų kalba, prašome skambinti 01467 536230.

Dacă aveți nevoie de informații din acest document într-o altă limbă sau într-un format cu scrisul mare, ușor de citit, tipar pentru nevăzători sau în limbajul semnelor, vă rugăm să telefonați la 01467 536230.

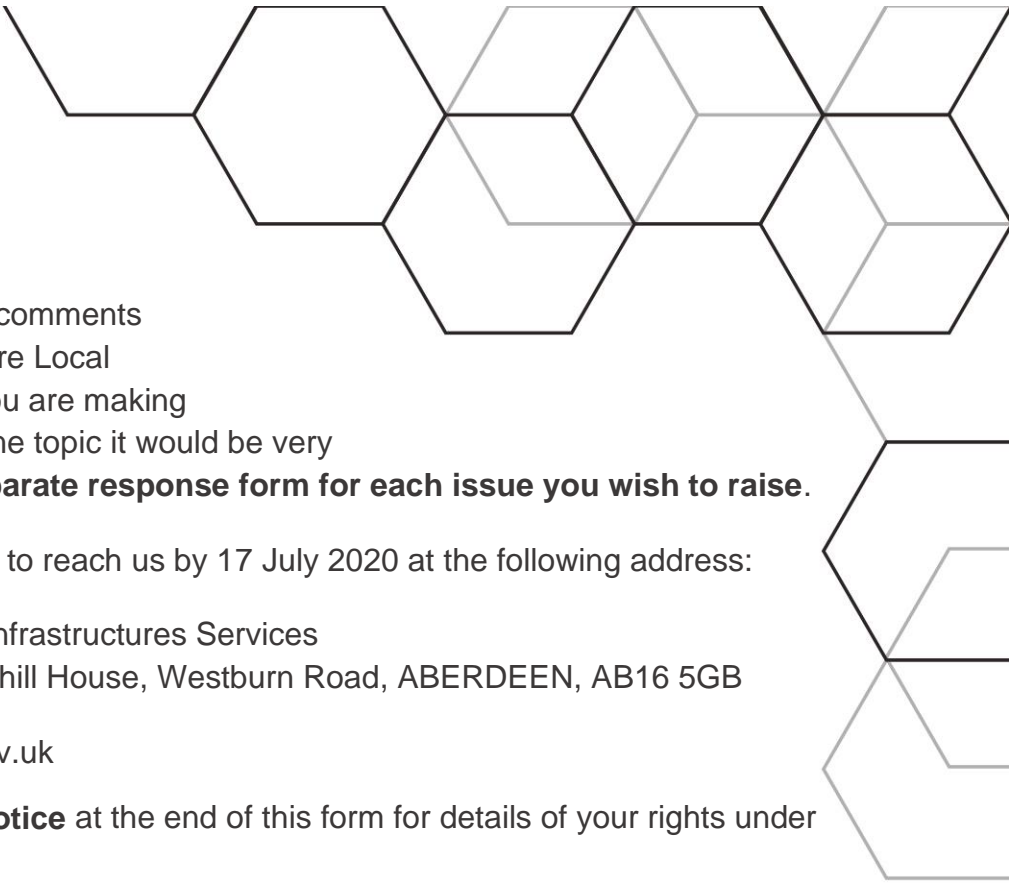
Jeśli potrzebowali będą Państwo informacji z niniejszego dokumentu w innym języku, pisanych dużą czcionką, w wersji łatwej do czytania, w alfabecie Braille'a lub w brytyjskim języku migowym, proszę o telefoniczny kontakt na numer 01467 536230.

Ja jums nepieciešama šai dokumentā sniegtā informācija kādā citā valodā vai lielā drukā, viegli lasāmā tekstā, Braila rakstā vai BSL (britu zīmju valodā), lūdzu, zvaniet uz 01467 536230.

Aberdeenshire Local Development Plan  
Woodhill House, Westburn Road, Aberdeen, AB16 5GB

Tel: 01467 536230  
Email: [ldp@aberdeenshire.gov.uk](mailto:ldp@aberdeenshire.gov.uk)  
Web: [www.aberdeenshire.gov.uk/ldp](http://www.aberdeenshire.gov.uk/ldp)  
Follow us on Twitter @ShireLDP

If you wish to contact one of the area planning offices, please call 01467 534333 and ask for the relevant planning office or email [planning@aberdeenshire.gov.uk](mailto:planning@aberdeenshire.gov.uk).



Please use this form to make comments on the Proposed Aberdeenshire Local Development Plan 2020. If you are making comments about more than one topic it would be very helpful if you could fill in **a separate response form for each issue you wish to raise**.

Please email or send the form to reach us by 17 July 2020 at the following address:

Post: Planning Policy Team, Infrastructures Services  
Aberdeenshire Council, Woodhill House, Westburn Road, ABERDEEN, AB16 5GB

Email: [ldp@aberdeenshire.gov.uk](mailto:ldp@aberdeenshire.gov.uk)

Please refer to our **Privacy Notice** at the end of this form for details of your rights under the Data Protection Act.

## YOUR DETAILS

|                   |                      |
|-------------------|----------------------|
| Title:            |                      |
| First Name:       | Pippa                |
| Surname:          | Robertson            |
| Date:             | 17 July 2020         |
| Postal Address:   | ████████████████████ |
| Postcode:         | ████████             |
| Telephone Number: | ██████████           |
| Email:            | ████████████████████ |

Are you happy to receive future correspondence only by email? Yes ☒ No ☐

Are you responding on behalf of another person? Yes ☒ No ☐

If yes who are you representing? Andrew Strachan

☐ Tick the box if you would like to subscribe to the Aberdeenshire LDP eNewsletter:

*An acknowledgement will be sent to this address soon after the close of consultation.*

# YOUR COMMENTS

Please provide us with your comments below. We will summarise comments and in our analysis will consider every point that is made. Once we have done this we will write back to you with Aberdeenshire Council's views on the submissions made. We will publish your name as the author of the comment, but will not make your address public.

**Modification that you wish to see** (please make specific reference to the section of the Proposed Plan you wish to see modified if possible, for example Section 9, paragraph E1.1):

1. Re-allocation of the BUS1 designation in Pitmedden as an opportunity site for residential or mixed use development (preferred option); or
2. Removal of the BUS1 designation to allow residential or mixed use development to be considered under the provisions on redevelopment of rural brownfield sites in Policy R2 Development Proposals Elsewhere in the Countryside of the emerging Local Development Plan (alternative option).

## Reason for change:

Our client owns the land in Pitmedden which the Proposed Aberdeenshire Local Development Plan (PLDP) identifies as BUS1, safeguarded for business use. This is currently occupied by a vacant workshop, together with external hardstanding and fencing, photos of which are provided as Appendix One, with planning permission for a larger building granted in 2015 (application reference APP/2015/0049).

Our client previously sought the re-allocation of the site for either housing or mixed use development, and copies of the responses to the call for sites and the consultation on the Main Issues Report are attached as Appendix Two for ease of reference. In particular, it should be noted that our client has proactively marketed the site through [REDACTED], with marketing activities including website advertisement on various platforms, an agency board on the site and particulars distributed to local agents and solicitors. As yet however, there has been no take up and, in the current economic climate, it is unlikely that any demand for such units will arise in the short to medium term, such that alternative options require to be considered in accordance with **Scottish Planning Policy (2014) (SPP)** (for further details on which, see below).

The Council's response to our client's previous submissions, as set out in the Issues and Actions Paper for Pitmedden and Milldale did not support the proposed re-allocation. It did, however, acknowledge that at least part of the site is brownfield land and concluded that:

*"The removal of a business land allocation of this size will not impact on the overall employment land supply."*

And that:

*“If the site was removed from the Plan, the landowner could develop the brownfield elements on the site for small scale employment or residential use.”*

It was accordingly recommended that the BUS1 allocation be removed from the Settlement Statement.

That recommendation was considered by the Formartine Area Committee at its meeting of 10 September 2019, the Minute of which does not record any queries or objections being raised in respect of the proposed removal of the BUS1 designation.

The Minute does though record that a director of the Udney Development Trust tabled a plan illustrating the community's preferred options for the settlement, covering bid sites FR108, FR007, FR132 and FR133, and that it was agreed to accept that plan as the Settlement Statement for Pitmedden and Milldale. It was also agreed to remove the reference to Milldale in the settlement title. There is however no indication that the Committee did not also accept the officers' recommendations in respect of the BUS1 designation.

Bid sites FR108, FR007, FR132 and FR133 are all located to the south of Pitmedden, and so the proposed allocation of these presents no conflict with any changes to the BUS1 designation.

The only issue relating to Pitmedden that was then reported to the subsequent Infrastructure Services Committee on 3 October 2019 related to concerns about the proposed allocation of FR132 and FR133, and, the Minute of that meeting also did not record any decision not to accept the officers' recommendation in respect of the proposed removal of the BUS1 designation.

The above notwithstanding, the PLDP shows the BUS1 allocation, with the site continuing to be safeguarded for business use. However, the officers' recommendations and Minutes of both the Formartine Area Committee and the Infrastructure Services Committee suggest that it is the Council's settled view that the BUS1 allocation should be removed since it is not required to maintain the overall employment land supply, and that re-development of the brownfield element for small scale employment or residential use would be appropriate.

In light of the above, our client submitted a pre-application enquiry seeking feedback on the principle of residential development on the site if the BUS1 designation were removed and proposals assessed against the PLDP Policy R2. A copy of an email sent in response to that enquiry is attached as Appendix Three and makes it clear that, in the case officer's view:

- while hardstanding would not be considered to be brownfield, remediation of this would be positive, with no concerns raised about the area of land on which development was shown;

- the site was considered to have a good relationship to the village; and
- development of the site could be done in a way that would not necessarily be considered suburbanisation of the countryside, thanks in part to the close proximity of the village.

In this regard, **Policy R2 Development Proposals Elsewhere in the Countryside** of the PLDP indicates that 3 houses is the maximum number that will usually be permitted when rural brownfield sites are redeveloped, subject to an exception in circumstances where the planning authority is satisfied that a larger development can be accommodated on the site, and it can be demonstrated beyond reasonable doubt that the scale of development proposed will not cause adverse social or environmental impacts, including suburbanisation of the countryside (albeit it is understood that this could be achieved in this instance, as set out above). The Policy then goes on to state that development of larger brownfield sites will be capped at 7 homes, and that sites capable of accommodating 8 or more homes should be promoted through the Local Development Plan process. In this regard, it is clear that Policy R2 of the PLDP seeks to support small-scale development, and that proposals for more extensive development on larger sites should be allocated in the Local Development Plan, with the PLDP Glossary defining larger brownfield sites as those being:

*“...of a size greater than 0.5 hectares or that are considered capable of accommodating more than 3 homes.”*

On the basis that the previously developed element of our client’s site extends to more than 0.5 hectares, and given the support expressed for the redevelopment of this for residential use as set out above, the most appropriate approach to allow it to be redeveloped in accordance with the PLDP would be for it to be re-allocated as an opportunity site for residential or mixed use development.

In terms then of the reasons given in the Issues and Actions Paper for not supporting the re-allocation of our client’s site, the only issues were that:

- the site was not considered to be well related to the settlement, such that development would be isolated from the main settlement and conflict with the existing pattern of development; and
- development of this under the emerging plan’s provisions on the redevelopment of brownfield land would allow the greenfield elements of the site to act as a buffer between development and Pitmedden Gardens.

However, this assessment conflicts with the pre-application advice received as set out above, which makes it clear that the site is considered to have a good relationship to the village, while allocation in the emerging plan could specify the need for a buffer around any development on the site, ensuring this is delivered as desired.

With regards to the site's relationship to the settlement in particular, it should be noted that this is located on the edge of the 30mph speed limit zone with an existing footpath from the south end of the site to allow easy and safe access to local services and facilities by walking and cycling, with room to extend that path within the site. Stagecoach bus service 290/291 Aberdeen to Methlick and service 49 Ellon to Inverurie both go through Pitmedden along the B999, with the site having direct access to the B999 and the furthest part of the site being less than 400m away from this.

In addition, the site has previously been assessed as suitable for development to serve the village, through both its current allocation and the planning consent granted for the warehouse in 2015. No concerns were raised in terms of the accessibility of the site and its relationship with the existing settlement in respect of either of these.

Related to this, it should also be noted that land at Cloisterseat (some distance to the south of the main settlement area) which is safeguarded for business uses (BUS2) in the extant ALDP is re-allocated for 10 homes and 0.8ha of employment land in the PLDP. On the basis that this is further away from the main settlement than our client's site is, there is no justification for concluding that this is suitably related to the settlement, but our client's site is not.

In light of the above, there are no reasons in the Issues and Actions Paper as to why the site should not now be re-allocated as an opportunity site for residential or mixed use development in the emerging plan. Indeed, reallocation of the site would be in line with the presumption in favour of sustainable development set out in SPP which makes it clear that decisions should be guided by principles of (amongst others):

- responding to economic issues, challenges and opportunities;
- making efficient use of existing capacities of land; and
- supporting delivery of accessible housing

SPP also makes it clear that the planning system should allocate sites that meet the diverse needs of different sectors in a way that is flexible enough to accommodate changing circumstances and allow the realisation of new opportunities, with Local Development Plans expected to take account of (amongst other considerations) current market demand. In doing this, SPP expressly states that:

*“New sites should be identified where existing sites no longer meet current needs and market expectations. Where existing business sites are underused, for example where there has been an increase in vacancy rates, reallocation to enable a wider range of viable business or alternative uses should be considered, taking careful account of the potential impacts on existing businesses on the site.”* [paragraph 103].

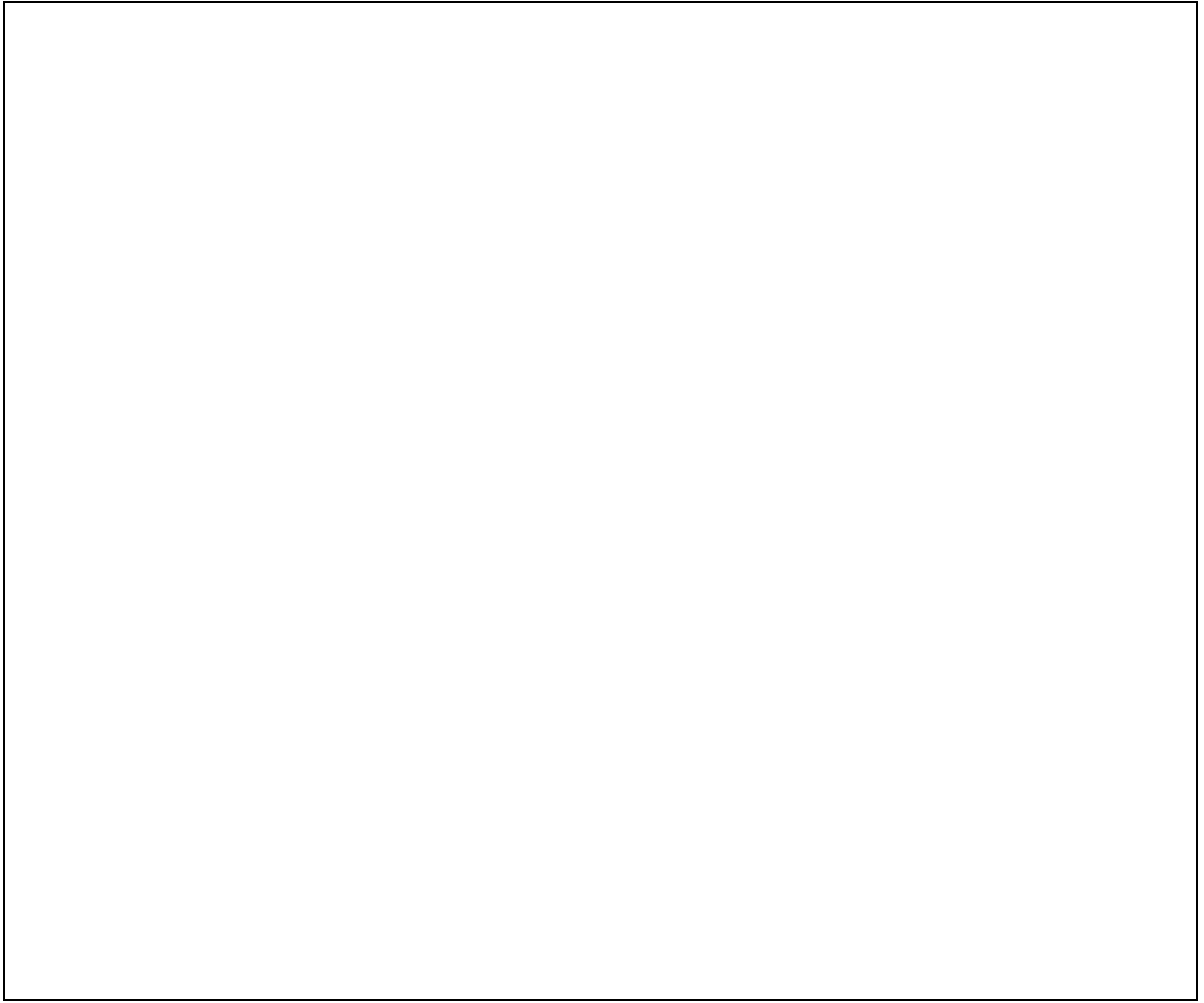
In this regard it should be highlighted that, as set out in this statement:

- there is no demand for the current business use and no prospect of future demand;
- the Council's response to our client's submission on the Main Issues Report makes it clear that the BUS1 designation is not required to maintain the employment land supply; and
- redevelopment of the site would make efficient use of previously developed land to deliver housing or other development in a location with a good relationship to the existing settlement (all as confirmed above).

The site should therefore be reallocated in accordance with the principles of SPP, with the appropriate number of units to be determined through the development management process to ensure the most efficient use is made of the site, as also required by SPP.

Whilst our client's strong preference is for the site to be reallocated for housing or mixed use development, should that not be considered appropriate for whatever reason, then the BUS1 designation should be removed as advocated in the Issues and Actions Paper. That would then allow for the redevelopment of the brownfield elements of the site to be considered under the relevant provisions of Policy R2 in the emerging plan, again as advocated in the Issues and Actions Paper, rather than retaining an allocation which is constraining the development of site for any productive purpose.





# PRIVACY NOTICE



## LOCAL DEVELOPMENT PLAN PUBLIC COMMENT

The Data Controller of the information being collected is Aberdeenshire Council.

The Data Protection Officer can be contacted at Town House, 34 Low Street, Banff, AB45 1AY.

Email: [dataprotection@aberdeenshire.gov.uk](mailto:dataprotection@aberdeenshire.gov.uk)

Your information is being collected to use for the following purposes:

- To provide public comment on the Aberdeenshire Local Development Plan. The data on the form will be used to inform Scottish Ministers and individual(s) appointed to examine the Proposed Local Development Plan 2020. It will inform the content of the Aberdeenshire Local Development Plan 2021.

### Your information is:

|  |   |
|--|---|
| Being collected by Aberdeenshire Council | X |
|--|---|

### The Legal Basis for collecting the information is:

|                   |   |
|-------------------|---|
| Personal Data     |   |
| Legal Obligations | X |

Where the Legal Basis for processing is either Performance of a Contract or Legal Obligation, please note the following consequences of failure to provide the information:

It is a Statutory Obligation under Section 18 of the Town and Country (Scotland) Act 1997, as amended, for Aberdeenshire Council to prepare and publish a Proposed Local Development plan on which representations must be made to the planning authority within a prescribed period of time. Failure to provide details requested in the 'Your Details' section of this form will result in Aberdeenshire Council being unable to accept your representation.

Your information will be shared with the following recipients or categories of recipient:

Members of the public are being given this final opportunity to comment on the Proposed Aberdeenshire Local Development Plan. The reasons for any changes that the Council receives will be analysed and reported to Scottish Ministers. They will then appoint a person to conduct a public examination of the Proposed Plan, focusing particularly on the unresolved issues raised and the changes sought.

Your name and respondent identification number (provided to you by Aberdeenshire Council on receipt of your

submission) will be published alongside a copy of your completed response on the Proposed Local Development Plan website (contact details and information that is deemed commercially sensitive will not be made available to the public).

In accordance with Regulation 22 of the Town and Country (Development Planning) (Scotland) Regulations 2008 where the appointed person determines that further representations should be made or further information should be provided by any person in connection with the examination of the Proposed Plan the appointed person may by notice request that person to make such further representations or to provide such further information.

Your information will be transferred to or stored in the following countries and the following safeguards are in place:

Not applicable.

The retention period for the data is:

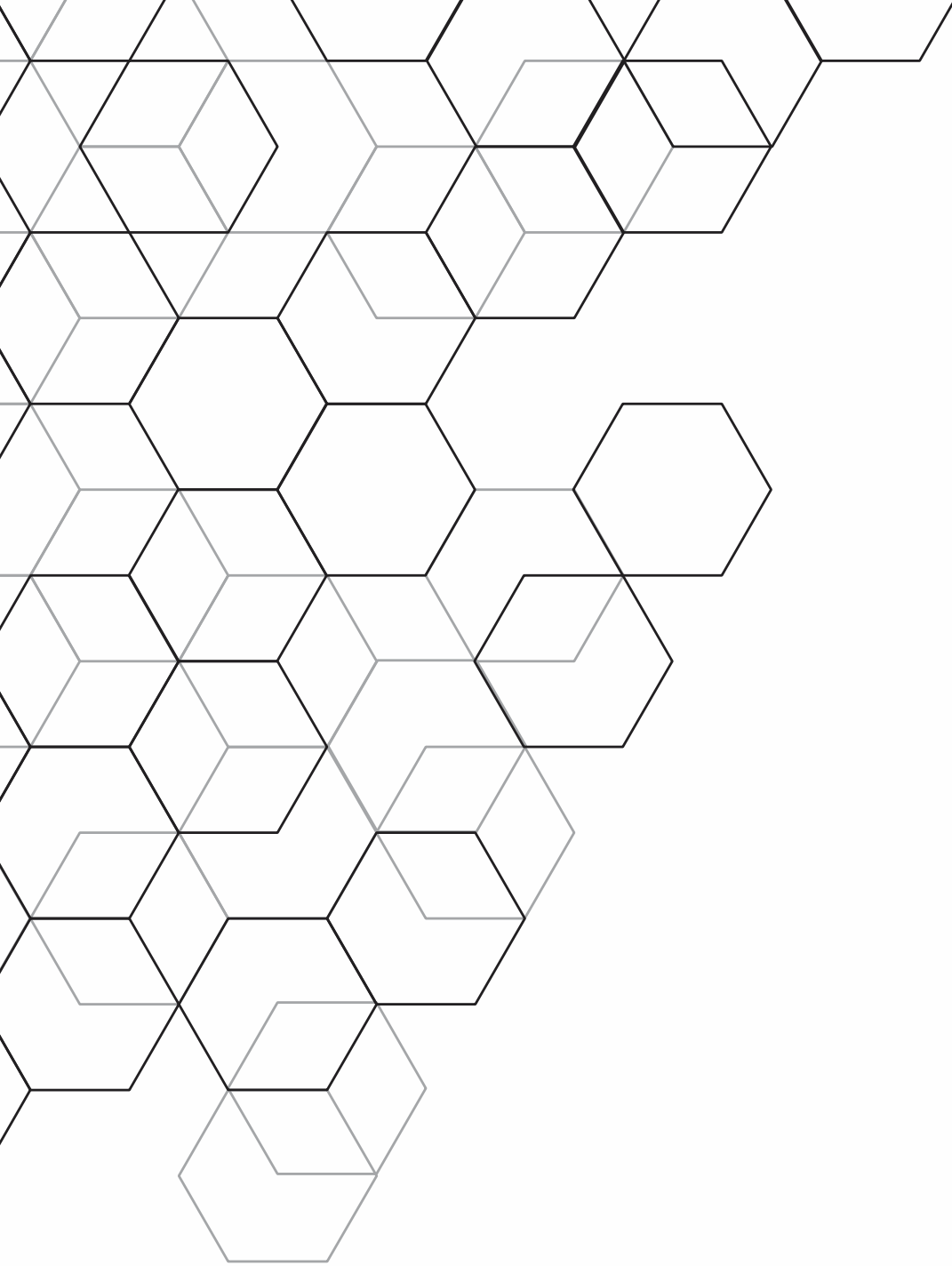
Aberdeenshire Council will only keep your personal data for as long as is needed. Aberdeenshire Council will retain your response and personal data for a retention period of 5 years from the date upon which it was collected. After 5 years Aberdeenshire Council will review whether it is necessary to continue to retain your information for a longer period. A redacted copy of your submission will be retained for 5 years beyond the life of the Local Development Plan 2021, possibly until 2037.

The following automated decision-making, including profiling, will be undertaken:

Not applicable.

Please note that you have the following rights:

- to withdraw consent at any time, where the Legal Basis specified above is Consent;
- to lodge a complaint with the Information Commissioner's Office (after raising the issue with the Data Protection Officer first);
- to request access to your personal data;
- to data portability, where the legal basis specified above is:
  - (i) Consent; or
  - (ii) Performance of a Contract;
- to request rectification or erasure of your personal data, as so far as the legislation permits.



## Appendix One – Photos of site











## Local Development Plan 2021



### Call for Sites Response Form

Aberdeenshire Council would like to invite you to use this form to submit a site for consideration within the next Local Development Plan (LDP 2021) for the period 2021 to 2031. A separate form should be completed for each site you wish to submit.

This is not a speculative plan. It is a fresh 'call for sites', so please re-submit any sites that do not or are not expected to have planning permission by 2021.

In order for the bids to be fully assessed, it is crucial that the questions in the bid form are answered fully and concisely with clear evidence of deliverability. The submission of a supporting statement, often known as a paper apart, should be avoided, and only assessments, such as a Flood Risk Assessment that has already been undertaken, should be submitted in support of your proposed site.

Completed forms and Ordnance Survey "Landline" site maps should be returned by email to: [ldp@aberdeenshire.gov.uk](mailto:ldp@aberdeenshire.gov.uk)

Alternatively, you can return the form and Ordnance Survey map by post to:  
Planning Policy, Infrastructure Services, Woodhill House, Westburn Road, Aberdeen AB16 5GB

**All forms must be submitted by 31 March 2018.**

#### 1. Your Details

|   |                         |
|---|-------------------------|
| Name  | [REDACTED]              |
| Organisation (if applicable)                | Aurora Planning Limited |
| Address                                     | [REDACTED]              |
| Telephone                                   | [REDACTED]              |
| Email                                       | [REDACTED]              |
| Do you wish to subscribe to our newsletter? | Yes                     |

#### 2. If you are acting as an agent on behalf of a third party, please give their details

|                              |                 |
|------------------------------|-----------------|
| Name                         | Andrew Strachan |
| Organisation (if applicable) | [REDACTED]      |
| Address                      | [REDACTED]      |
| Telephone                    | [REDACTED]      |
| Email                        | [REDACTED]      |

#### 3. Other Owners

|   |     |
|---|-----|
| Please give name, organisation, address, email details of other owner(s) where appropriate: | N/A |
| Do these owners know this is being proposed for development?                                | N/A |

**For data protection purposes, please complete the rest of this form on a new page**

#### 4. Site Details

|   |   |
|---|---|
| Name of the site<br>(Please use the LDP name if the site is already allocated)  | BUSI  |
| Site address  | Norse Yard, Pitmedden, Ellon, Aberdeenshire |
| OS grid reference (if available)  |   |
| Site area / size  | 1.27ha                                      |
| Current land use  | Employment                                  |
| Brownfield / greenfield   | Brownfield                                  |
| Please include an Ordnance Survey map (1:1250 or 1:2500 base for larger sites, e.g. over 2ha) showing the location and extent of the site, points of access, means of drainage etc. |   |

#### 5. Ownership / Market Interest

|   |                             |
|---|-----------------------------|
| Ownership<br>(Please list the owners in question 3 above) | Sole owner                  |
| Is the site under option to a developer?                  | No                          |
|   | If yes, please give details |
| Is the site being marketed?                               | No                          |
|   | If yes, please give details |

#### 6. Legal Issues

|  |                             |
|--|-----------------------------|
| Are there any legal provisions in the title deeds that may prevent or restrict development?<br>(e.g. way leave for utility providers, restriction on use of land, right of way etc.) | No                          |
|  | If yes, please give details |
| Are there any other legal factors that might prevent or restrict development?<br>(e.g. ransom strips / issues with accessing the site etc.)  | No                          |
|  | If yes, please give details |

#### 7. Planning History

|  |  |
|--|--|
| Have you had any formal/ informal pre-application discussions with the Planning Service and what was the response? | No   |
|  | If yes, please give details  |
| Previous planning applications   | Please provide application reference number(s), description(s) of the development, and whether planning permission was approved or refused:<br><br>APP/2015/0049 for erection of workshop – approved July 2015<br><br>APP/2013/2467 for the erection of a boundary fence and gates – approved September 2013 |



|  |  |
|--|--|
| Previous 'Call for sites' history.<br>See Main Issues Report 2013 at<br><a href="http://www.aberdeenshire.gov.uk/ldp">www.aberdeenshire.gov.uk/ldp</a> | Please provide Previous 'Call for sites' / 'Bid' reference number:<br><br>Allocation carried forward from LDP 2012.  |
| Local Development Plan status<br><a href="http://www.aberdeenshire.gov.uk/ldp">www.aberdeenshire.gov.uk/ldp</a>  | Is the site currently allocated for any specific use in the existing LDP?<br><br>Yes – employment uses.  |
|  | If yes, do you wish to change the site description and or allocation?<br><br>Yes - change from employment uses to allocation for residential development of 10 – 15 units. |

## 8. Proposed Use

|   |   |  |
|---|---|--|
| Proposed use  |   | Housing / employment / mixed use / other (please specify):<br><br>Housing  |
| Housing   | Approx. no of units                           | 10 - 15  |
|   |   | Number of:<br><ul style="list-style-type: none"> <li>Detached: 10 - 15</li> <li>Semi-detached:</li> <li>Flats:</li> <li>Terrace:</li> <li>Other (e.g. Bungalows):</li> </ul>       |
|   |   | Number of:<br><ul style="list-style-type: none"> <li>1 bedroom homes:</li> <li>2 bedroom homes:</li> <li>3 bedroom homes: 5 - 7</li> <li>4 or more bedroom homes: 5 - 7</li> </ul> |
|   | Tenure<br>(Delete as appropriate)             | Private / Rented / Self-Build / Supported houses (e.g. for elderly) / Other (please specify): Private  |
|   | Affordable housing proportion                 | 25 %   |
| Employment  | Business and offices                          | Indicative floor space: m <sup>2</sup>   |
|   | General industrial                            | Indicative floor space: m <sup>2</sup>   |
|   | Storage and distribution                      | Indicative floor space: m <sup>2</sup>   |
|   | Do you have a specific occupier for the site? | Yes / No   |
| Other   | Proposed use (please specify) and floor space | m <sup>2</sup>   |
|   | Do you have a specific occupier for the site? | Yes / No   |
| Is the area of each proposed use noted in the OS site plan? |   |  |

## 9. Delivery Timescales

|  |  |   |
|--|--|---|
| We expect to adopt the new LDP in 2021. How many years after this date would you expect development to begin? (please tick)          | 0-5 years  | ✓ |
|  | 6-10 years   |   |
|  | 10+ years  |   |
| When would you expect the development to be finished? (please tick)  | 0-5 years  | ✓ |
|  | 6-10 years   |   |
|  | + 10years  |   |
| Have discussions taken place with financiers? Will funding be in place to cover all the costs of development within these timescales | No   |   |
|  | If yes, please give details (e.g. bank facility, grant funding, secured loan etc.) |   |
| Are there any other risk or threats (other than finance) to you delivering your proposed development                                 | No   |   |
|  | If yes, please give details and indicate how you might overcome them:              |   |

## 10. Natural Heritage

|   |  |   |
|---|--|---|
| <p>Is the site located in or within 500m of a nature conservation site, or affect a protected species?</p> <p>Please tick any that apply and provide details.</p> <p>You can find details of these designations at:</p> <ul style="list-style-type: none"> <li>• <a href="https://www.environment.gov.scot/">https://www.environment.gov.scot/</a></li> <li>• EU priority habitats at <a href="http://gateway.snh.gov.uk/sitelink/index.jsp">http://gateway.snh.gov.uk/sitelink/index.jsp</a></li> <li>• UK or Local priority habitats at <a href="http://www.biodiversityscotland.gov.uk/advice-and-resources/habitat-definitions/priority/">http://www.biodiversityscotland.gov.uk/advice-and-resources/habitat-definitions/priority/</a></li> <li>• Local Nature Conservation Sites in the LDP's Supplementary Guidance No. 5 at <a href="http://www.aberdeenshire.gov.uk/ldp">www.aberdeenshire.gov.uk/ldp</a></li> </ul> | RAMSAR Site:   | X |
|   | Special Area of Conservation   | X |
|   | Special Protection Area  | X |
|   | Priority habitat (Annex I)   | X |
|   | European Protected Species   | X |
|   | Other protected species  | X |
|   | Site of Special Scientific Interest  | X |
|   | National Nature Reserve  | X |
|   | Ancient Woodland   | X |
|   | Trees, hedgerows and woodland (including trees with a Tree Preservation Order) | ✓ |
|   | Priority habitat (UK or Local Biodiversity Action Plan)                        | X |
|   | Local Nature Conservation Site   | X |
|   | Local Nature Reserve   | X |
| If yes, please give details of how you plan to mitigate the impact of the proposed development: The development will have no impact on the existing trees, which form an important setting for Pitmedden Gardens and screening of the site from the entrance to the Gardens.  |  |   |
| <b>Biodiversity enhancement</b>   |  |   |
| Please state what benefits for biodiversity this proposal will bring (as per paragraph 194 in Scottish Planning Policy, <a href="http://www.gov.scot/Resource/0045/00453827.pdf">http://www.gov.scot/Resource/0045/00453827.pdf</a> ) by ticking all that apply. Please provide details.  | Restoration of habitats  |   |
|   | Habitat creation in public open space  | ✓ |
|   | Avoids fragmentation or isolation of habitats                                  | ✓ |
|   | Provides bird/bat/insect boxes/Swift bricks (internal or external)             | ✓ |
|   | Native tree planting   | ✓ |

|  |                                  |          |
|--|----------------------------------|----------|
| <p>See Planning Advice 5/2015 on Opportunities for biodiversity enhancement at:<br/> <a href="http://www.aberdeenshire.gov.uk/media/19598/2015_05-opportunities-for-biodiversity-enhancement-in-new-development.pdf">www.aberdeenshire.gov.uk/media/19598/2015_05-opportunities-for-biodiversity-enhancement-in-new-development.pdf</a></p> <p>Advice is also available from Scottish Natural Heritage at:<br/> <a href="https://www.snh.scot/professional-advice/planning-and-development/natural-heritage-advice-planners-and-developers">https://www.snh.scot/professional-advice/planning-and-development/natural-heritage-advice-planners-and-developers</a> and <a href="http://www.nesbiodiversity.org.uk/">http://www.nesbiodiversity.org.uk/</a>.</p> | Drystone wall                    | retained |
|  | Living roofs                     |          |
|  | Ponds and soakaways              | ✓        |
|  | Habitat walls/fences             | ✓        |
|  | Wildflowers in verges            | ✓        |
|  | Use of nectar rich plant species | ✓        |
|  | Buffer strips along watercourses | Maybe    |
|  | Show home demonstration area     | Maybe    |
|  | Other (please state):            |          |
| <p>If yes, please provide details:</p> <p>Please see proposed site layout.</p>   |                                  |          |

## 11. Historic environment

| Historic environment enhancement   |   |   |
|--|---|---|
| Please state if there will be benefits for the historic environment.   |   |   |
|  | If yes, please give details:  |   |
| <p>Does the site contain/ is within/ can affect any of the following historic environment assets?</p> <p>Please tick any that apply and provide details.</p> <p>You can find details of these designations at:</p> <ul style="list-style-type: none"> <li><a href="http://historicscotland.maps.arcgis.com/apps/Viewer/index.html?appid=18d2608ac1284066ba3927312710d16d">http://historicscotland.maps.arcgis.com/apps/Viewer/index.html?appid=18d2608ac1284066ba3927312710d16d</a></li> <li><a href="http://portal.historicenvironment.scot/">http://portal.historicenvironment.scot/</a></li> <li><a href="https://online.aberdeenshire.gov.uk/smrpub/master/default.aspx?Authority=Aberdeenshire">https://online.aberdeenshire.gov.uk/smrpub/master/default.aspx?Authority=Aberdeenshire</a></li> </ul> | Scheduled Monument or their setting   | X |
|  | Locally important archaeological site held on the Sites and Monuments Record  | X |
|  | Listed Building and/or their setting  | X |
|  | Conservation Area (e.g. will it result in the demolition of any buildings)  | X |
|  | Inventory Gardens and Designed Landscapes   | ✓ |
|  | Inventory Historic Battlefields   | X |
|  | <p>If yes, please give details of how you plan to mitigate the impact of the proposed development</p> <p>The site is adjacent to Pitmedden Gardens. The development would be screened by native planting.</p> |   |

## 12. Landscape Impact

|   |   |
|---|---|
| <p>Is the site within a Special Landscape Area (SLA)?<br/>         (You can find details in Supplementary Guidance 9 at <a href="http://www.aberdeenshire.gov.uk/ldp">www.aberdeenshire.gov.uk/ldp</a>)</p> | No  |
|   | <p><b>If yes</b>, please state which SLA your site is located within and provide details of how you plan to mitigate the impact of the proposed development:</p>  |
| <p>SLAs include the consideration of landscape character elements/features. The characteristics of landscapes are defined in the Landscape Character Assessments</p>  | <p><b>If your site is not within an SLA</b>, please use this space to describe the effects of the site's scale, location or design on key natural landscape elements/features, historic features or the</p> |

|   |   |
|---|---|
| <p>produced by Scottish Natural Heritage (see below) or have been identified as Special Landscape Areas of local importance.</p> <ul style="list-style-type: none"> <li>• SNH: Landscape Character Assessments <a href="https://www.snh.scot/professional-advice/landscape-change/landscape-character-assessment">https://www.snh.scot/professional-advice/landscape-change/landscape-character-assessment</a></li> <li>• SNH (1996) Cairngorms landscape assessment <a href="http://www.snh.org.uk/pdfs/publications/review/075.pdf">http://www.snh.org.uk/pdfs/publications/review/075.pdf</a></li> <li>• SNH (1997) National programme of landscape character assessment: Banff and Buchan <a href="http://www.snh.org.uk/pdfs/publications/review/037.pdf">http://www.snh.org.uk/pdfs/publications/review/037.pdf</a></li> <li>• SNH (1998) South and Central Aberdeenshire landscape character assessment <a href="http://www.snh.org.uk/pdfs/publications/review/102.pdf">http://www.snh.org.uk/pdfs/publications/review/102.pdf</a></li> </ul> | <p>composition or quality of the landscape character:</p> <p>The site is located in the Formative Lowlands landscape character area, much of which was reclaimed moorland, and is described as being liberally scattered with settlements. Within this, Pitmedden is described as being characteristic of the relatively large and compact settlements which are a key feature of the landscape, and one of the aims of the landscape character assessment is to encourage compact and traditional settlement patterns of this nature. Residential development on Site BUSI, forming as it does part of the existing settlement would be entirely consistent with this aim.</p> |
|---|---|

### 13. Flood Risk

|  |   |
|--|---|
| Is any part of the site identified as being at risk of river or surface water flooding within SEPA flood maps, and/or has any part of the site previously flooded? | Yes   |
| (You can view the SEPA flood maps at <a href="http://map.sepa.org.uk/floodmap/map.htm">http://map.sepa.org.uk/floodmap/map.htm</a> )                               | If yes, please specify and explain how you intend to mitigate this risk:          |
|  | Attenuation pond(s) incorporated into landscaping.                                |
| Could development on the site result in additional flood risk elsewhere?   | No  |
|  | If yes, please specify and explain how you intend to mitigate or avoid this risk: |
| Could development of the site help alleviate any existing flooding problems in the area?   | Yes   |
|  | If yes, please provide details:   |
|  | Attenuation ponds.  |

### 14. Infrastructure

#### a. Water / Drainage

|   |   |     |
|---|---|-----|
| Is there water / waste water capacity for the proposed development (based on Scottish Water asset capacity search tool <a href="http://www.scottishwater.co.uk/business/Connections/Connecting-your-property/Asset-Capacity-Search">http://www.scottishwater.co.uk/business/Connections/Connecting-your-property/Asset-Capacity-Search</a> )? | Water   | Yes |
|   | Waste water                                   | Yes |
| Has contact been made with Scottish Water?  | No<br>If yes, please give details of outcome: |     |

|   |   |
|---|---|
| Will your SUDS scheme include rain gardens?<br><a href="http://www.centralscotlandgreennetwork.org/campaigns/greener-gardens">http://www.centralscotlandgreennetwork.org/campaigns/greener-gardens</a>                                  | Yes<br>Please specify: Although no detailed designs have been yet been drawn up pending the outcome of the LDP process, it is intended that, given the nature of this site, it would incorporate elements of rain gardens, both as a means of creating a successful place and for managing water efficiency.  |
| <b>b. Education – housing proposals only</b>  |   |
| Education capacity / constraints<br><a href="https://www.aberdeenshire.gov.uk/schools/parents-carers/school-info/school-roll-forecasts/">https://www.aberdeenshire.gov.uk/schools/parents-carers/school-info/school-roll-forecasts/</a> | Please provide details of any known education constraints. Is additional capacity needed to serve the development?<br><br>Pitmedden Primary School is currently at 66% capacity, with this projected to fall to 61% by 2022, indicating a clear need for new housing development to support the primary school roll. Similarly, the forecasts for Meldrum Academy also show numbers in 2022 starting to fall off from the previous year, although it is recognised that it will be at capacity at this point contributions may be required to address this. |
| Has contact been made with the Local Authority's Education Department?  | No<br>If yes, please give details of outcome:   |
| <b>c. Transport</b>   |   |
| If direct access is required onto a Trunk Road (A90 and A96), or the proposal will impact on traffic on a Trunk Road, has contact been made with Transport Scotland?  | No<br>If yes, please give details of outcome:   |
| Has contact been made with the Local Authority's Transportation Service? They can be contacted at <a href="mailto:transportation.consultation@aberdeenshire.gov.uk">transportation.consultation@aberdeenshire.gov.uk</a>                | No<br>If yes, please give details of outcome:   |
| Public transport  | Please provide details of how the site is or could be served by public transport:<br><br>Stagecoach bus services 290/291 Aberdeen to Methlick and 49 Ellen to Inverurie both go through Pitmedden along the B999. The site would have an access directly on to the B999 with the furthest part of the site being less than 400m away from the B999.   |
| Active travel   | Please provide details of how the site can or   |

|  |   |
|--|---|
| (i.e. internal connectivity and links externally)  | could be accessed by walking and cycling:<br><br>There is an existing footpath connecting the site to facilities in Pitmedden around 800m away, meaning that there is easy access between the two on foot or by bike, |
| <b>d. Gas / Electricity / Heat / Broadband</b>   |   |
| Has contact been made with the relevant utilities providers?   | Gas: No<br>If yes, please give details of outcome(s):   |
|  | Electricity: No<br>If yes, please give details of outcome(s):   |
|  | Heat: No<br>If yes, please give details of outcome(s):  |
|  | Broadband: No<br>If yes, please give details of outcome(s):   |
| Have any feasibility studies been undertaken to understand and inform capacity issues?   | No<br>Please specify:   |
| Is there capacity within the existing network(s) and a viable connection to the network(s)?  | No<br>Please specify:   |
| Will renewable energy be installed and used on the site?<br>For example, heat pump (air, ground or water), biomass, hydro, solar (photovoltaic (electricity) or thermal), or a wind turbine (freestanding / integrated into the building)  | While details will be subject to final site design, it is anticipated that any development will incorporate either ground or air heat pump and perhaps solar thermal to provide heating and hot water.                |
| <b>e. Public open space</b>  |   |
| Will the site provide the opportunity to <b>enhance the green network?</b> (These are the linked areas of open space in settlements, which can be enhanced through amalgamating existing green networks or providing onsite green infrastructure)<br><br>You can find the boundary of existing green networks in the settlement profiles in the LDP. | Yes<br><br>Please specify:<br><br>Residential development on the site will help link Pitmedden Gardens to the village.  |
| Will the site meet the open space standards, as set out in Appendix 2 in the <b>Aberdeenshire Parks and Open Spaces Strategy?</b><br><a href="https://www.aberdeenshire.gov.uk/media/6077/approvedpandospacesstrategy.pdf">https://www.aberdeenshire.gov.uk/media/6077/approvedpandospacesstrategy.pdf</a>   | Yes<br><br>Please specify:<br><br>Please see proposed site plan.  |
| Will the site deliver any of the shortfalls identified in the <b>Open Space Audit</b> for  | Not applicable  |

|  |  |
|--|--|
| specific settlements?<br><a href="https://www.aberdeenshire.gov.uk/communities-and-events/parks-and-open-spaces/open-space-strategy-audit/">https://www.aberdeenshire.gov.uk/communities-and-events/parks-and-open-spaces/open-space-strategy-audit/</a> | Please specify:  |
| <b>f. Resource use</b>   |  |
| Will the site re-use existing structure(s) or recycle or recover existing on-site materials / resources?   | No<br><br>If yes, please specify:  |
| Will the site have a direct impact on the water environment and result in the need for watercourse crossings, large scale abstraction and/or culverting of a watercourse?  | There is currently a culvert on the site which would most likely be upgraded and retained. |

### 15. Other potential constraints

Please identify whether the site is affected by any of the following potential constraints:

|   |  |
|---|--|
| Aberdeen Green Belt<br><a href="https://www.aberdeenshire.gov.uk/media/20555/appendix-3-boundaries-of-the-greenbelt.pdf">https://www.aberdeenshire.gov.uk/media/20555/appendix-3-boundaries-of-the-greenbelt.pdf</a>  | No   |
| Carbon-rich soils and peatland<br><a href="http://www.snh.gov.uk/planning-and-development/advice-for-planners-and-developers/soils-and-development/cpp/">http://www.snh.gov.uk/planning-and-development/advice-for-planners-and-developers/soils-and-development/cpp/</a>   | No   |
| Coastal Zone<br><a href="https://www.aberdeenshire.gov.uk/media/20176/4-the-coastal-zone.pdf">https://www.aberdeenshire.gov.uk/media/20176/4-the-coastal-zone.pdf</a>   | No   |
| Contaminated land   | The site was a former agricultural depot and may therefore contain contaminated land, although this was not considered to be such as to refuse application APP/2015/0049 for a workshop on the site. |
| Ground instability  | No   |
| Hazardous site / HSE exclusion zone<br>(You can find the boundary of these zones in Planning Advice 1/2017 Pipeline and Hazardous Development Consultation Zones at <a href="https://www.aberdeenshire.gov.uk/planning/plans-and-policies/planning-advice/">https://www.aberdeenshire.gov.uk/planning/plans-and-policies/planning-advice/</a> and advice at <a href="http://www.hse.gov.uk/landuseplanning/developers.htm">http://www.hse.gov.uk/landuseplanning/developers.htm</a> ) | No   |
| Minerals – safeguarded or area of search<br><a href="https://www.aberdeenshire.gov.uk/ldpmedia/6_Area_of_search_and_safeguard_for_minerals.pdf">https://www.aberdeenshire.gov.uk/ldpmedia/6_Area_of_search_and_safeguard_for_minerals.pdf</a>   | No   |
| Overhead lines or underground cables  | No   |
| Physical access into the site due to topography or geography  | No   |
| Prime agricultural land (grades 1, 2 and 3.1) on all or part of the site.<br><a href="http://map.environment.gov.scot/Soil_maps/?layer=6">http://map.environment.gov.scot/Soil_maps/?layer=6</a>  | No   |
| ‘Protected’ open space in the LDP (i.e. P sites)<br><a href="http://www.aberdeenshire.gov.uk/ldp">www.aberdeenshire.gov.uk/ldp</a> and choose from Appendix 8a to 8f  | No   |

|  |                     |
|--|---------------------|
| Rights of way / core paths / recreation uses | No                  |
| Topography (e.g. steep slopes)               | No                  |
| Other  | No (please specify) |

If you have identified any of the potential constraints above, please use this space to identify how you will mitigate this in order to achieve a viable development:

In approving application APP/2015/0049 the Council advised that should any contamination of the ground be discovered during development the Planning Authority shall be notified immediately. The extent and nature of the contamination shall be investigated and a suitable scheme for the mitigation of any risks arising from the contamination should be agreed and implemented to the satisfaction of the Planning Authority. The same advice would apply to the development of housing on the site.

### 16. Proximity to facilities

|   |   |                                 |
|---|---|---------------------------------|
| How close is the site to a range of facilities? | Local shops                                     | 600m                            |
|   | Community facilities (e.g. school, public hall) | 600m                            |
|   | Sports facilities (e.g. playing fields)         | 600m                            |
|   | Employment areas                                |                                 |
|   | Residential areas                               | 200m                            |
|   | Bus stop or bus route                           | 200m to bus stop                |
|   | Train station                                   | 15km to Inverurie train station |
|   | Other, e.g. dentist, pub (please specify)       | 800m pub, doctors and church    |

### 17. Community engagement

|  |   |
|--|---|
| Has the local community been given the opportunity to influence/partake in the design and specification of the development proposal? | Not yet   |
|  | If yes, please specify the way it was carried out and how it influenced your proposals:   |
|  | <p>If not yet, please detail how you will do so in the future:</p> <p>Landowners met with Pitmedden Gardens and Udry Community Council to discuss previous planning applications and would propose to follow a similar process to inform future development proposals for the site.</p> |

### 18. Residual value and deliverability

|   |   |
|---|---|
| Please confirm that you have considered the 'residual value' of your site and you are | I have considered the likely 'residual value' of the site, as described above, and fully expect |
|---|---|



confident that the site is viable when infrastructure and all other costs, such as constraints and mitigation are taken into account.

the site to be viable:

Please tick:



If you have any further information to help demonstrate the deliverability of your proposal, please provide details.

This response is accompanied by an indicative site layout plan and a paper apart to provide further background and information in support of re-allocation of Site BUS1 for residential development of 10 – 15 units. In summary, the key points are that:

- there is no demand for the existing employment land in the village and site BUS2 remains available for development should any such demand arise in future;
- the allocation would help meet local housing need;
- there are no suitable alternative housing sites within the village;
- the site is well located relative to the existing settlement and can be developed without impacting on the Designed Landscape of Pitmedden Gardens; and
- there are no infrastructure or other constraints to the development of the site.

For further details, please see the paper apart.

### 19. Other information

Please provide any other information that you would like us to consider in support of your proposed development (please include details of any up-to-date supporting studies that have been undertaken and attach copies e.g. Transport Appraisal, Flood Risk Assessment, Drainage Impact Assessment, Peat / Soil Survey, Habitat / Biodiversity Assessment etc.)

Please tick to confirm your agreement to the following statement:



By completing this form I agree that Aberdeenshire Council can use the information provided in this form for the purposes of identifying possible land for allocation in the next Local Development Plan. I also agree that the information provided, other than contact details and information that is deemed commercially sensitive (questions 1 to 3), can be made available to the public.



## **Aberdeenshire Local Development Plan 2012**

### **Call for sites response – BUS1, Pitmedden, for housing**

Our client wishes land in their ownership at Pitmedden, currently designated for employment use as Site BUS1, to be reallocated in the Aberdeenshire Local Development Plan 2021 for residential development of 1.7ha for 10 - 15 units. Details of the site and an outline of the proposed development are set out in the Call for Sites Response Form and accompanying plan, which shows the site's capacity to accommodate 14 units in large plots.

This paper provides further background and information in terms of the wider policy context that supports the reallocation of the site, in light of which it is submitted that it should be reallocated for housing.

#### **Current designation**

In the current Local Development Plan (LDP), both Pitmedden and the adjacent village of Milldale are covered by a single settlement statement, the planning objectives for which include meeting development pressure for both homes and employment uses.

Within this, Site BUS 1 is designated for employment use, and is also identified as being within the Pitmedden Designed Landscape. Planning permission for the erection of a new warehouse on Site BUS 1 was granted in July 2015 (planning application reference APP/2015/0049), however our client has found that there is not in fact any demand for such use, such that alternative uses for the site now require to be considered in accordance with the wider planning policy principles and particularly taking account of the neighbouring Designed Landscape.

It should also be noted that, although allocated for employment use, the nature of the current use as warehousing does not provide any significant local employment opportunities, instead involving the movement of vehicles and storage of goods with very little staffing required.

#### **Housing land requirements**

In terms of the Strategic Development Plan (SDP) 2014, Pitmedden is located in a Local Growth and Diversification Area within the Aberdeen Housing Market Area, where growth is expected to relate to local needs. The scale of growth proposed in terms of



this submission, i.e. 10 – 15 units, is intended to meet such local needs in Pitmedden, in accordance with the SDP spatial strategy in this regard.

Further, in terms of future housing growth, the Main Issues Report for the current review of the SDP states that *“...any new greenfield (land which has never been built on) allocations should preferably be under 100 units in size, aim to deliver affordable housing above 25%, and not be extensions to existing sites which could delay their delivery.”* (paragraph 6.5). The allocation of this site, with 25% affordable housing provision, would be consistent with that Preferred Option.

In line with the last point above, the Council’s initial call for sites response form stated that *“Given the large scale of effective allocations in the LDP 2017, we do not believe there is a need for new development sites of any substantial scale. Instead smaller sites should be considered, in locations where there is sufficient infrastructure, and where there is a demonstrable demand for housing or business land.”* Again, the allocation of this site would be consistent with that view.

The importance of having adequate housing land allocations in Pitmedden was also emphasised by Udney Community Council during Examination of the current LDP, with them stating that:

*“The lack of housing sites in Pitmedden is an impediment to the needs of the village.”*

The allocation of BUS1 for residential development would help address this impediment and contribute to meeting the needs of the village.

### **Alternative sites**

Should Site BUS1 be reallocated for residential use, there will still be employment land available at Site BUS2. Here, planning permission in principle for 7 business units (plus 5 residential units on land immediately to the West) was granted in 2014 pursuant to planning application reference APP/2011/2880). However, the Council’s website shows no Matters Specified by Conditions application ever having been made, with the deadline for doing so now having passed. As such, that consent will have lapsed and there is no immediate prospect of Site BUS2 being developed, but it instead remains available for future proposals. This is indicative of the lack of demand for employment land in the area which, in turn, does not support the continued allocation of two separate employment sites.



Meanwhile, in terms of housing, it should be noted that:

- On Site OP1, which is allocated for 14 units, planning permission for this number was granted in February 2017 (planning application reference APP/2016/0609) and development has now started on site. As such, this is expected to be built out ahead of the adoption of the emerging LDP; and
- Site OP2, which is allocated for 64 units, was subject to pre-application consultation in January 2018, with development also expected to be well underway during the course of the current plan.
- In light of the above, and with no other housing land currently allocated in Pitmedden or Milldale, there is a clear need to allocate additional land to meet local housing needs during the emerging LDP and, in the absence of an equivalent need for employment land, reallocating Site BUS1 to this end is the obvious way of meeting this need. That is particularly the case given that there are no constraints to the development of the site, such that it can be brought forward within the timescale of the emerging LDP.

### **Direction of growth**

In terms of location, it is submitted that Site BUS1 is the logical direction for Pitmedden to grow in because:

- As expressed in both the officer's assessment of sites promoted during the preparation of the current LDP and the Examination Report for this, development to the south of the existing settlement would be visually prominent and impact on the setting of the town, not least through reducing the physical separation of the villages of Pitmedden and Milldale and allowing coalescence of the two, the distinct identities of which should be protected and preserved.
- At the same time, development to the east or west would diverge from the prevailing settlement pattern, which is centred around A920 (as recognised in the settlement description in the current LDP, which expressly refers to the two villages in terms of their relationship with the A920).

Consequently, it is submitted that any new development should be directed to the North of Pitmedden, with Site BUS1 being well located for this. In this regard it should be noted that the site is on the edge of the 30 mph speed limit zone and



there is an existing footpath from the south end of the site to the village core, with room to extend that within the site.

Further support for growth to the North through the reallocation of Site BUS1 for residential use can be found in the officer's assessment of the land directly to the south of this (identified as bid site FM063), which was also proposed for residential development in the current LDP, and which was said to be well related to the settlement and local services. However, that land was not preferred due to concerns about the proximity to Pitmedden Gardens and both primary and secondary school capacity.

Unlike bid site FM063 however, Site BUS1 has already been identified as suitable for built development, recognising that this can be accommodated on the site without having a negative impact on the Gardens, as explored in more detail in below.

Finally, the Council's concerns about educational capacity also no longer apply, as Pitmedden primary school is at 66% capacity, with this projected to fall to 61% by 2022, indicating a clear need for new housing development to support the primary school roll. Similarly, the forecasts for Meldrum Academy also show numbers in 2022 starting to fall off from the previous year.

Taking these points together, it is submitted that none of the Council's concerns about bid site FM063 apply to BUS1, while the Council's support for FM063 as a site that is well related to the settlement and local services should equally be taken as support for BUS1.

### **Positive change in the historic environment**

While Site BUS1's location in relation to Pitmedden Gardens is acknowledged, it should be recognised that the principle of development in this location has already been accepted through the allocation of the site for employment use, and the subsequent grant of planning permission, most recently for a workshop with yard and fencing, pursuant to application reference APP/2015/0049. In particular, the Report of Handling for application reference APP/2015/0049 states that Historic Scotland had no objection to the proposed development, and that: *"Given the presence of mature woodland between the walled garden and the development site, Historic Scotland is satisfied that this proposal will not have a significant adverse impact on the Inventory Designed Landscape..."*. Similarly, the mature woodland would equally ensure that residential development has no adverse impact either.



Further, compared to employment use, it is submitted that residential use provides much more of an opportunity to plan and design a development which is not just sympathetic to the historic setting, but which positively enhances it. This is in line with Scottish Planning Policy (2014) (SPP), which states that planning should enable positive change in the historic environment, informed by a clear understanding of the importance of the heritage assets affected. In other words, proximity to the historic garden does not necessarily impede development, but should be seen as an opportunity to enable positive change as advocated by SPP.

## **Conclusion**

As set out in both the Call for Sites Response Form and this paper apart, it is submitted that:

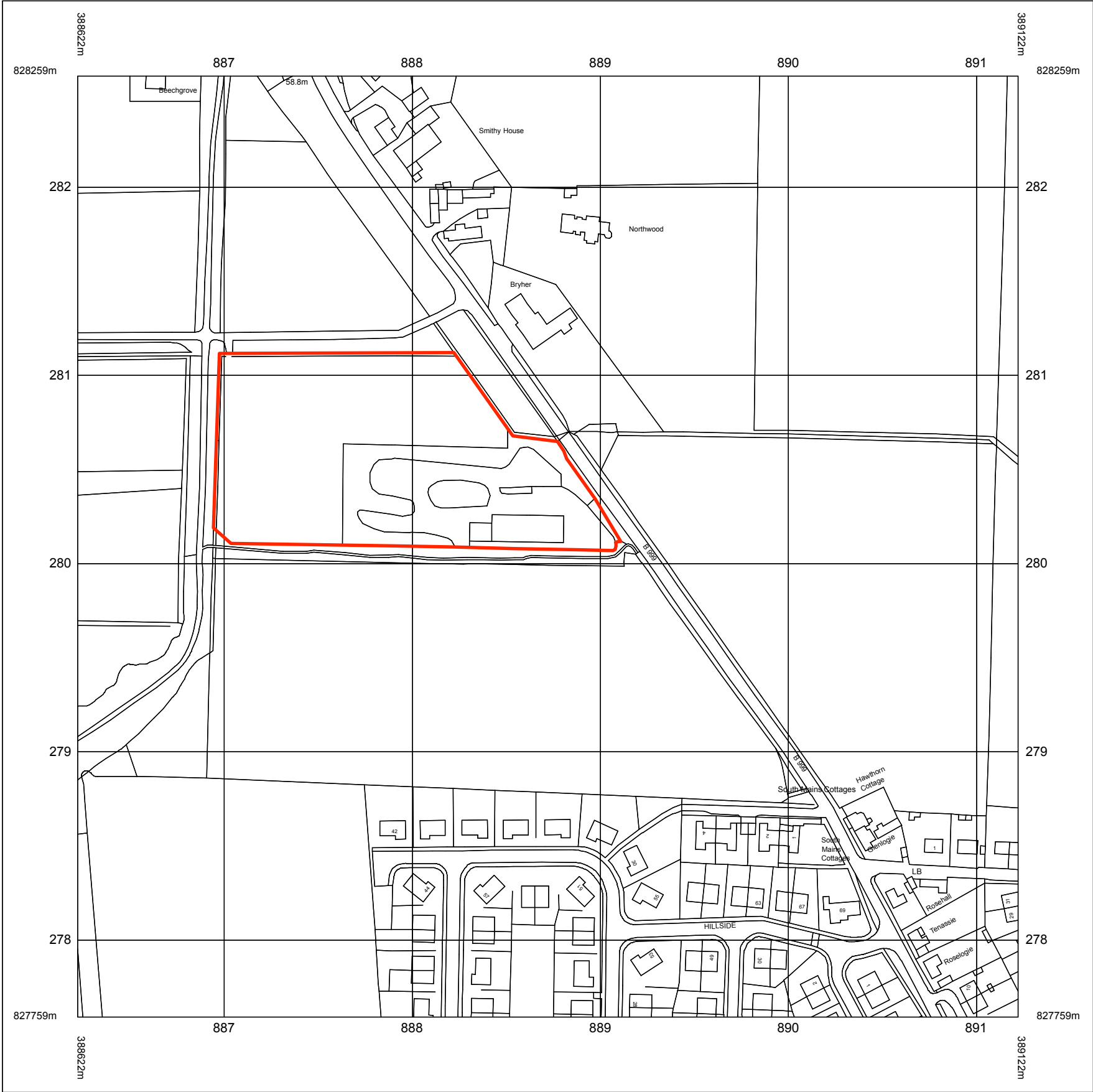
- there is no demand for the existing employment land in the village and site BUS2 remains available for development should any such demand arise in future;
- the allocation would help meet local housing need;
- there are no suitable alternative housing sites within the village;
- the site is well located relative to the existing settlement and can be developed without impacting on the Designed Landscape of Pitmedden Gardens; and
- there are no infrastructure or other constraints to the development of the site.



Consequently, it is submitted that Site BUS1 should be reallocated in the emerging LDP for residential development of 10 - 15 units in accordance with this response.









|                         |   |           |
|-------------------------|---|-----------|
| Project Title           |   |           |
| Norse Yard<br>Pitmedden |   |           |
| Drawing Title           |   |           |
| OS Location Plan        |   |           |
| Job no                  | Drawn   | Scale     |
| 1311                    |  | 1:2500@A3 |
| Date                    | Checked   |           |
| Feb 2018                |  |           |
| Sketch no               |   | Rev       |
| 1311-003                |   | -         |

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|                         |          |         |            |
|-------------------------|----------|---------|------------|
| Project Title           |          |         |            |
| Norse Yard<br>Pitmedden |          |         |            |
| Drawing Title           |          |         |            |
| Site Layout             |          |         |            |
| Job no                  | 1311     | Drawn   | Scale      |
|                         |          | █       | 1:600 @ A3 |
| Date                    | Feb 2018 | Checked |            |
|                         |          | █       |            |
| Sketch no               | 1311-001 |         | Rev        |
|                         |          |         | -          |



# Local Development Plan 2021

## Call for Sites Response Form

Aberdeenshire Council would like to invite you to use this form to submit a site for consideration within the next Local Development Plan (LDP 2021) for the period 2021 to 2031. A separate form should be completed for each site you wish to submit.

This is not a speculative plan. It is a fresh 'call for sites', so please re-submit any sites that do not or are not expected to have planning permission by 2021.

In order for the bids to be fully assessed, it is crucial that the questions in the bid form are answered fully and concisely with clear evidence of deliverability. The submission of a supporting statement, often known as a paper apart, should be avoided, and only assessments, such as a Flood Risk Assessment that has already been undertaken, should be submitted in support of your proposed site.

Completed forms and Ordnance Survey "Landline" site maps should be returned by email to: [ldp@aberdeenshire.gov.uk](mailto:ldp@aberdeenshire.gov.uk)

Alternatively, you can return the form and Ordnance Survey map by post to:  
Planning Policy, Infrastructure Services, Woodhill House, Westburn Road, Aberdeen AB16 5GB

**All forms must be submitted by 31 March 2018.**

### 1. Your Details

|   |                         |
|---|-------------------------|
| Name  |                         |
| Organisation (if applicable)                | Aurora Planning Limited |
| Address                                     |                         |
| Telephone                                   |                         |
| Email                                       |                         |
| Do you wish to subscribe to our newsletter? | Yes                     |

### 2. If you are acting as an agent on behalf of a third party, please give their details

|                              |                 |
|------------------------------|-----------------|
| Name                         | Andrew Strachan |
| Organisation (if applicable) |                 |
| Address                      |                 |
| Telephone                    |                 |
| Email                        |                 |

### 3. Other Owners

|   |     |
|---|-----|
| Please give name, organisation, address, email details of other owner(s) where appropriate: | N/A |
| Do these owners know this is being proposed for development?                                | N/A |

**For data protection purposes, please complete the rest of this form on a new page**

#### 4. Site Details

|   |   |
|---|---|
| Name of the site<br>(Please use the LDP name if the site is already allocated)  | BUSI  |
| Site address  | Norse Yard, Pitmedden, Ellon, Aberdeenshire |
| OS grid reference (if available)  |   |
| Site area / size  | 1.27ha                                      |
| Current land use  | Employment                                  |
| Brownfield / greenfield   | Brownfield                                  |
| Please include an Ordnance Survey map (1:1250 or 1:2500 base for larger sites, e.g. over 2ha) showing the location and extent of the site, points of access, means of drainage etc. |   |

#### 5. Ownership / Market Interest

|   |                             |
|---|-----------------------------|
| Ownership<br>(Please list the owners in question 3 above) | Sole owner                  |
| Is the site under option to a developer?                  | No                          |
|   | If yes, please give details |
| Is the site being marketed?                               | No                          |
|   | If yes, please give details |

#### 6. Legal Issues

|  |                             |
|--|-----------------------------|
| Are there any legal provisions in the title deeds that may prevent or restrict development?<br>(e.g. way leave for utility providers, restriction on use of land, right of way etc.) | No                          |
|  | If yes, please give details |
| Are there any other legal factors that might prevent or restrict development?<br>(e.g. ransom strips / issues with accessing the site etc.)  | No                          |
|  | If yes, please give details |

#### 7. Planning History

|  |  |
|--|--|
| Have you had any formal/ informal pre-application discussions with the Planning Service and what was the response? | No   |
|  | If yes, please give details  |
| Previous planning applications   | Please provide application reference number(s), description(s) of the development, and whether planning permission was approved or refused:<br><br>APP/2015/0049 for erection of workshop – approved July 2015<br><br>APP/2013/2467 for the erection of a boundary fence and gates – approved September 2013 |

|  |  |
|--|--|
| Previous 'Call for sites' history.<br>See Main Issues Report 2013 at<br><a href="http://www.aberdeenshire.gov.uk/ldp">www.aberdeenshire.gov.uk/ldp</a> | Please provide Previous 'Call for sites' / 'Bid' reference number:<br><br>Allocation carried forward from LDP 2012.  |
| Local Development Plan status<br><a href="http://www.aberdeenshire.gov.uk/ldp">www.aberdeenshire.gov.uk/ldp</a>  | Is the site currently allocated for any specific use in the existing LDP?<br><br>Yes – employment uses.  |
|  | If yes, do you wish to change the site description and or allocation?<br><br>Yes - change from employment uses to allocation for mixed use commercial and housing development. |

## 8. Proposed Use

|              |   |   |
|--------------|---|---|
| Proposed use |   | Housing / employment / mixed use / other (please specify):<br><br>Mixed use commercial and housing  |
| Housing      | Approx. no of units                           | 12  |
|              |   | Number of:<br><ul style="list-style-type: none"> <li>Detached: 12</li> <li>Semi-detached:</li> <li>Flats:</li> <li>Terrace:</li> <li>Other (e.g. Bungalows):</li> </ul>   |
|              |   | Number of:<br><ul style="list-style-type: none"> <li>1 bedroom homes:</li> <li>2 bedroom homes:</li> <li>3 bedroom homes:</li> <li>4 or more bedroom homes:</li> </ul>  |
|              | Tenure<br>(Delete as appropriate)             | Private / Rented / Self-Build / Supported houses (e.g. for elderly) / Other (please specify): Private   |
|              | Affordable housing proportion                 | 25 %  |
| Employment   | Business and offices                          | Indicative floor space: m <sup>2</sup>  |
|              | General industrial                            | Indicative floor space: m <sup>2</sup>  |
|              | Storage and distribution                      | Indicative floor space: m <sup>2</sup>  |
|              | Do you have a specific occupier for the site? | Yes / No  |
| Other        | Proposed use (please specify) and floor space | 1,000 m <sup>2</sup> of commercial floor space, which could accommodate up to four small units for local enterprises serving the Pitmedden community. That could include, for example, a farmshop or start up business unit, along with associated car parking. |

|  |   |                    |
|--|---|--------------------|
|  | Do you have a specific occupier for the site?               | Yes / No<br><br>No |
|  | Is the area of each proposed use noted in the OS site plan? | Yes                |

### 9. Delivery Timescales

|  |  |   |
|--|--|---|
| We expect to adopt the new LDP in 2021. How many years after this date would you expect development to begin? (please tick)          | 0-5 years  | ✓ |
|  | 6-10 years   |   |
|  | 10+ years  |   |
| When would you expect the development to be finished? (please tick)  | 0-5 years  | ✓ |
|  | 6-10 years   |   |
|  | + 10years  |   |
| Have discussions taken place with financiers? Will funding be in place to cover all the costs of development within these timescales | No   |   |
|  | If yes, please give details (e.g. bank facility, grant funding, secured loan etc.) |   |
| Are there any other risk or threats (other than finance) to you delivering your proposed development                                 | No   |   |
|  | If yes, please give details and indicate how you might overcome them:              |   |

### 10. Natural Heritage

|   |  |   |
|---|--|---|
| <p>Is the site located in or within 500m of a nature conservation site, or affect a protected species?</p> <p>Please tick any that apply and provide details.</p> <p>You can find details of these designations at:</p> <ul style="list-style-type: none"> <li>• <a href="https://www.environment.gov.scot/">https://www.environment.gov.scot/</a></li> <li>• EU priority habitats at <a href="http://gateway.snh.gov.uk/sitelink/index.jsp">http://gateway.snh.gov.uk/sitelink/index.jsp</a></li> <li>• UK or Local priority habitats at <a href="http://www.biodiversityscotland.gov.uk/advice-and-resources/habitat-definitions/priority/">http://www.biodiversityscotland.gov.uk/advice-and-resources/habitat-definitions/priority/</a></li> <li>• Local Nature Conservation Sites in the LDP's Supplementary Guidance No. 5 at <a href="http://www.aberdeenshire.gov.uk/ldp">www.aberdeenshire.gov.uk/ldp</a></li> </ul> | RAMSAR Site:   | X |
|   | Special Area of Conservation   | X |
|   | Special Protection Area  | X |
|   | Priority habitat (Annex I)   | X |
|   | European Protected Species   | X |
|   | Other protected species  | X |
|   | Site of Special Scientific Interest  | X |
|   | National Nature Reserve  | X |
|   | Ancient Woodland   | X |
|   | Trees, hedgerows and woodland (including trees with a Tree Preservation Order) | ✓ |
|   | Priority habitat (UK or Local Biodiversity Action Plan)                        | X |
|   | Local Nature Conservation Site   | X |
|   | Local Nature Reserve   | X |
| If yes, please give details of how you plan to mitigate the impact of the proposed development: The development will have no impact on the existing trees, which form an important setting for Pitmedden Gardens and screening of the site from the entrance to the Gardens.  |  |   |

| Biodiversity enhancement  |  |          |
|---|--|----------|
| <p>Please state what benefits for biodiversity this proposal will bring (as per paragraph 194 in Scottish Planning Policy, <a href="http://www.gov.scot/Resource/0045/00453827.pdf">http://www.gov.scot/Resource/0045/00453827.pdf</a>) by ticking all that apply. Please provide details.</p> <p>See Planning Advice 5/2015 on Opportunities for biodiversity enhancement at: <a href="http://www.aberdeenshire.gov.uk/media/19598/2015_05-opportunities-for-biodiversity-enhancement-in-new-development.pdf">www.aberdeenshire.gov.uk/media/19598/2015_05-opportunities-for-biodiversity-enhancement-in-new-development.pdf</a></p> <p>Advice is also available from Scottish Natural Heritage at: <a href="https://www.snh.scot/professional-advice/planning-and-development/natural-heritage-advice-planners-and-developers">https://www.snh.scot/professional-advice/planning-and-development/natural-heritage-advice-planners-and-developers</a> and <a href="http://www.nesbiodiversity.org.uk/">http://www.nesbiodiversity.org.uk/</a>.</p> | Restoration of habitats  |          |
|   | Habitat creation in public open space                              | ✓        |
|   | Avoids fragmentation or isolation of habitats                      | ✓        |
|   | Provides bird/bat/insect boxes/Swift bricks (internal or external) | ✓        |
|   | Native tree planting   | ✓        |
|   | Drystone wall  | retained |
|   | Living roofs   |          |
|   | Ponds and soakaways  | ✓        |
|   | Habitat walls/fences   | ✓        |
|   | Wildflowers in verges  | ✓        |
|   | Use of nectar rich plant species                                   | ✓        |
|   | Buffer strips along watercourses                                   | Maybe    |
|   | Show home demonstration area                                       | Maybe    |
|   | Other (please state):  |          |
| If yes, please provide details:   |  |          |
| Please see proposed site layout.  |  |          |

## 11. Historic environment

| Historic environment enhancement   |  |   |
|--|--|---|
| Please state if there will be benefits for the historic environment.   | If yes, please give details:   |   |
| <p>Does the site contain/ is within/ can affect any of the following historic environment assets?</p> <p>Please tick any that apply and provide details.</p> <p>You can find details of these designations at:</p> <ul style="list-style-type: none"> <li><a href="http://historicscotland.maps.arcgis.com/apps/Viewer/index.html?appid=18d2608ac1284066ba3927312710d16d">http://historicscotland.maps.arcgis.com/apps/Viewer/index.html?appid=18d2608ac1284066ba3927312710d16d</a></li> <li><a href="http://portal.historicenvironment.scot/">http://portal.historicenvironment.scot/</a></li> <li><a href="https://online.aberdeenshire.gov.uk/smrpub/master/default.aspx?Authority=Aberdeenshire">https://online.aberdeenshire.gov.uk/smrpub/master/default.aspx?Authority=Aberdeenshire</a></li> </ul> | Scheduled Monument or their setting  | X |
|  | Locally important archaeological site held on the Sites and Monuments Record                   | X |
|  | Listed Building and/or their setting   | X |
|  | Conservation Area (e.g. will it result in the demolition of any buildings)                     | X |
|  | Inventory Gardens and Designed Landscapes  | ✓ |
|  | Inventory Historic Battlefields  | X |
|  | If yes, please give details of how you plan to mitigate the impact of the proposed development |   |
| The site is adjacent to Pitmedden Gardens. The development would be screened by native planting.   |  |   |



## 12. Landscape Impact

|  |  |
|--|--|
| Is the site within a Special Landscape Area (SLA)?<br>(You can find details in Supplementary Guidance 9 at <a href="http://www.aberdeenshire.gov.uk/ldp">www.aberdeenshire.gov.uk/ldp</a> )  | No<br><b>If yes</b> , please state which SLA your site is located within and provide details of how you plan to mitigate the impact of the proposed development:   |
| SLAs include the consideration of landscape character elements/features. The characteristics of landscapes are defined in the Landscape Character Assessments produced by Scottish Natural Heritage (see below) or have been identified as Special Landscape Areas of local importance. <ul style="list-style-type: none"> <li>• SNH: Landscape Character Assessments <a href="https://www.snh.scot/professional-advice/landscape-change/landscape-character-assessment">https://www.snh.scot/professional-advice/landscape-change/landscape-character-assessment</a></li> <li>• SNH (1996) Cairngorms landscape assessment <a href="http://www.snh.org.uk/pdfs/publications/review/075.pdf">http://www.snh.org.uk/pdfs/publications/review/075.pdf</a></li> <li>• SNH (1997) National programme of landscape character assessment: Banff and Buchan <a href="http://www.snh.org.uk/pdfs/publications/review/037.pdf">http://www.snh.org.uk/pdfs/publications/review/037.pdf</a></li> <li>• SNH (1998) South and Central Aberdeenshire landscape character assessment <a href="http://www.snh.org.uk/pdfs/publications/review/102.pdf">http://www.snh.org.uk/pdfs/publications/review/102.pdf</a></li> </ul> | <b>If your site is not within an SLA</b> , please use this space to describe the effects of the site's scale, location or design on key natural landscape elements/features, historic features or the composition or quality of the landscape character:<br><br>The site is located in the Formative Lowlands landscape character area, much of which was reclaimed moorland, and is described as being liberally scattered with settlements. Within this, Pitmedden is described as being characteristic of the relatively large and compact settlements which are a key feature of the landscape, and one of the aims of the landscape character assessment is to encourage compact and traditional settlement patterns of this nature. Residential development on Site BUSI, forming as it does part of the existing settlement would be entirely consistent with this aim. |

## 13. Flood Risk

|  |   |
|--|---|
| Is any part of the site identified as being at risk of river or surface water flooding within SEPA flood maps, and/or has any part of the site previously flooded?<br><br>(You can view the SEPA flood maps at <a href="http://map.sepa.org.uk/floodmap/map.htm">http://map.sepa.org.uk/floodmap/map.htm</a> ) | Yes<br><br>If yes, please specify and explain how you intend to mitigate this risk:<br><br>Attenuation pond(s) incorporated into landscaping. |
| Could development on the site result in additional flood risk elsewhere?   | No<br><br>If yes, please specify and explain how you intend to mitigate or avoid this risk:   |
| Could development of the site help alleviate any existing flooding problems in the area?   | Yes<br><br>If yes, please provide details:<br><br>Attenuation ponds.  |

## 14. Infrastructure



| a. Water / Drainage   |   |     |
|---|---|-----|
| Is there water / waste water capacity for the proposed development (based on Scottish Water asset capacity search tool <a href="http://www.scottishwater.co.uk/business/Connections/Connecting-your-property/Asset-Capacity-Search">http://www.scottishwater.co.uk/business/Connections/Connecting-your-property/Asset-Capacity-Search</a> )? | Water   | Yes |
|   | Waste water   | Yes |
| Has contact been made with Scottish Water?  | No<br>If yes, please give details of outcome:   |     |
| Will your SUDS scheme include rain gardens? <a href="http://www.centernalscotlandgreennetwork.org/campaigns/greener-gardens">http://www.centernalscotlandgreennetwork.org/campaigns/greener-gardens</a>   | Yes<br>Please specify: Although no detailed designs have been yet been drawn up pending the outcome of the LDP process, it is intended that, given the nature of this site, it would incorporate elements of rain gardens, both as a means of creating a successful place and for managing water efficiency.  |     |
| b. Education – housing proposals only   |   |     |
| Education capacity / constraints <a href="https://www.aberdeenshire.gov.uk/schools/parents-carers/school-info/school-roll-forecasts/">https://www.aberdeenshire.gov.uk/schools/parents-carers/school-info/school-roll-forecasts/</a>  | Please provide details of any known education constraints. Is additional capacity needed to serve the development?<br><br>Pitmedden Primary School is currently at 66% capacity, with this projected to fall to 61% by 2022, indicating a clear need for new housing development to support the primary school roll. Similarly, the forecasts for Meldrum Academy also show numbers in 2022 starting to fall off from the previous year, although it is recognised that it will be at capacity at this point contributions may be required to address this. |     |
| Has contact been made with the Local Authority's Education Department?  | No<br>If yes, please give details of outcome:   |     |
| c. Transport  |   |     |
| If direct access is required onto a Trunk Road (A90 and A96), or the proposal will impact on traffic on a Trunk Road, has contact been made with Transport Scotland?  | No<br>If yes, please give details of outcome:   |     |
| Has contact been made with the Local Authority's Transportation Service? They can be contacted at <a href="mailto:transportation.consultation@aberdeenshire.gov.uk">transportation.consultation@aberdeenshire.gov.uk</a>  | No<br>If yes, please give details of outcome:   |     |
| Public transport  | Please provide details of how the site is or  |     |

|  |   |
|--|---|
|  | <p>could be served by public transport:</p> <p>Stagecoach bus services 290/291 Aberdeen to Methlick and 49 Ellen to Inverurie both go through Pitmedden along the B999. The site would have an access directly on to the B999 with the furthest part of the site being less than 400m away from the B999.</p> |
| Active travel<br>(i.e. internal connectivity and links externally)   | <p>Please provide details of how the site can or could be accessed by walking and cycling:</p> <p>There is an existing footpath connecting the site to facilities in Pitmedden around 800m away, meaning that there is easy access between the two on foot or by bike,</p>                                    |
| <b>d. Gas / Electricity / Heat / Broadband</b>   |   |
| Has contact been made with the relevant utilities providers?   | <p>Gas: No<br/>If yes, please give details of outcome(s):</p>   |
|  | <p>Electricity: No<br/>If yes, please give details of outcome(s):</p>   |
|  | <p>Heat: No<br/>If yes, please give details of outcome(s):</p>  |
|  | <p>Broadband: No<br/>If yes, please give details of outcome(s):</p>   |
| Have any feasibility studies been undertaken to understand and inform capacity issues?   | <p>No<br/>Please specify:</p>   |
| Is there capacity within the existing network(s) and a viable connection to the network(s)?  | <p>No<br/>Please specify:</p>   |
| <p>Will renewable energy be installed and used on the site?</p> <p>For example, heat pump (air, ground or water), biomass, hydro, solar (photovoltaic (electricity) or thermal), or a wind turbine (freestanding / integrated into the building)</p> | <p>While details will be subject to final site design, it is anticipated that any development will incorporate either ground or air heat pump and perhaps solar thermal to provide heating and hot water.</p>   |
| <b>e. Public open space</b>  |   |
| Will the site provide the opportunity to <b>enhance the green network?</b> (These are the linked areas of open space in settlements, which can be enhanced through amalgamating existing green networks or providing onsite green infrastructure)    | <p>Yes</p> <p>Please specify:</p> <p>Mixed use commercial and housing development on the site will help link Pitmedden Gardens to the village.</p>  |

|  |  |
|--|--|
| You can find the boundary of existing green networks in the settlement profiles in the LDP.  |  |
| Will the site meet the open space standards, as set out in Appendix 2 in the <b>Aberdeenshire Parks and Open Spaces Strategy?</b><br><a href="https://www.aberdeenshire.gov.uk/media/6077/approvedpandospacesstrategy.pdf">https://www.aberdeenshire.gov.uk/media/6077/approvedpandospacesstrategy.pdf</a>   | Yes<br><br>Please specify:<br><br>Please see proposed site plan.                           |
| Will the site deliver any of the shortfalls identified in the <b>Open Space Audit</b> for specific settlements?<br><a href="https://www.aberdeenshire.gov.uk/communities-and-events/parks-and-open-spaces/open-space-strategy-audit/">https://www.aberdeenshire.gov.uk/communities-and-events/parks-and-open-spaces/open-space-strategy-audit/</a> | Not applicable<br><br>Please specify:  |
| <b>f. Resource use</b>   |  |
| Will the site re-use existing structure(s) or recycle or recover existing on-site materials / resources?   | No<br><br>If yes, please specify:  |
| Will the site have a direct impact on the water environment and result in the need for watercourse crossings, large scale abstraction and/or culverting of a watercourse?  | There is currently a culvert on the site which would most likely be upgraded and retained. |

## 15. Other potential constraints

Please identify whether the site is affected by any of the following potential constraints:

|   |  |
|---|--|
| Aberdeen Green Belt<br><a href="https://www.aberdeenshire.gov.uk/media/20555/appendix-3-boundaries-of-the-greenbelt.pdf">https://www.aberdeenshire.gov.uk/media/20555/appendix-3-boundaries-of-the-greenbelt.pdf</a>  | No   |
| Carbon-rich soils and peatland<br><a href="http://www.snh.gov.uk/planning-and-development/advice-for-planners-and-developers/soils-and-development/cpp/">http://www.snh.gov.uk/planning-and-development/advice-for-planners-and-developers/soils-and-development/cpp/</a>   | No   |
| Coastal Zone<br><a href="https://www.aberdeenshire.gov.uk/media/20176/4-the-coastal-zone.pdf">https://www.aberdeenshire.gov.uk/media/20176/4-the-coastal-zone.pdf</a>   | No   |
| Contaminated land   | The site was a former agricultural depot and may therefore contain contaminated land, although this was not considered to be such as to refuse application APP/2015/0049 for a workshop on the site. |
| Ground instability  | No   |
| Hazardous site / HSE exclusion zone<br>(You can find the boundary of these zones in Planning Advice I/2017 Pipeline and Hazardous Development Consultation Zones at <a href="https://www.aberdeenshire.gov.uk/planning/plans-and-policies/planning-advice/">https://www.aberdeenshire.gov.uk/planning/plans-and-policies/planning-advice/</a> and advice at | No   |

|  |                     |
|--|---------------------|
| <a href="http://www.hse.gov.uk/landuseplanning/developers.htm">http://www.hse.gov.uk/landuseplanning/developers.htm</a> )  |                     |
| Minerals – safeguarded or area of search<br><a href="https://www.aberdeenshire.gov.uk/ldpmedia/6_Area_of_search_and_safeguard_for_minerals.pdf">https://www.aberdeenshire.gov.uk/ldpmedia/6_Area_of_search_and_safeguard_for_minerals.pdf</a>  | No                  |
| Overhead lines or underground cables   | No                  |
| Physical access into the site due to topography or geography   | No                  |
| Prime agricultural land (grades 1, 2 and 3.1) on all or part of the site.<br><a href="http://map.environment.gov.scot/Soil_maps/?layer=6">http://map.environment.gov.scot/Soil_maps/?layer=6</a>   | No                  |
| 'Protected' open space in the LDP (i.e. P sites)<br><a href="http://www.aberdeenshire.gov.uk/ldp">www.aberdeenshire.gov.uk/ldp</a> and choose from Appendix 8a to 8f   | No                  |
| Rights of way / core paths / recreation uses   | No                  |
| Topography (e.g. steep slopes)   | No                  |
| Other  | No (please specify) |
| <p>If you have identified any of the potential constraints above, please use this space to identify how you will mitigate this in order to achieve a viable development:</p> <p>In approving application APP/2015/0049 the Council advised that should any contamination of the ground be discovered during development the Planning Authority shall be notified immediately. The extent and nature of the contamination shall be investigated and a suitable scheme for the mitigation of any risks arising from the contamination should be agreed and implemented to the satisfaction of the Planning Authority. The same advice would apply to the development of housing on the site.</p> |                     |

## 16. Proximity to facilities

|   |   |                                 |
|---|---|---------------------------------|
| How close is the site to a range of facilities? | Local shops                                     | 600m                            |
|   | Community facilities (e.g. school, public hall) | 600m                            |
|   | Sports facilities (e.g. playing fields)         | 600m                            |
|   | Employment areas                                |                                 |
|   | Residential areas                               | 200m                            |
|   | Bus stop or bus route                           | 200m to bus stop                |
|   | Train station                                   | 15km to Inverurie train station |
|   | Other, e.g. dentist, pub (please specify)       | 800m pub, doctors and church    |

## 17. Community engagement

|  |   |
|--|---|
| Has the local community been given the opportunity to influence/partake in the design and specification of the development proposal? | Not yet   |
|  | If yes, please specify the way it was carried out and how it influenced your proposals: |
|  | If not yet, please detail how you will do so in the future:                             |

|  |  |
|--|--|
|  | Landowners met with Pitmedden Gardens and Udney Community Council to discuss previous planning applications and would propose to follow a similar process to inform future development proposals for the site. |
|--|--|

### 18. Residual value and deliverability

|  |  |
|--|--|
| <p>Please confirm that you have considered the 'residual value' of your site and you are confident that the site is viable when infrastructure and all other costs, such as constraints and mitigation are taken into account.</p>   | <p>I have considered the likely 'residual value' of the site, as described above, and fully expect the site to be viable:</p> <p>Please tick: <input checked="checked" type="checkbox"/></p> |
| <p>If you have any further information to help demonstrate the deliverability of your proposal, please provide details.</p> <p>This response is accompanied by an indicative site layout plan and a paper apart to provide further background and information in support of re-allocation of Site BUS1 for mixed use commercial and housing development. In summary, the key points are that:</p> <ul style="list-style-type: none"> <li>• there is no demand for the existing employment land and the associated warehouse consent in the village and site BUS2 remains available for development should any such demand arise in future;</li> <li>• there is, however, potential to support small local businesses through the provision of small scale commercial units associated with new housing development;</li> <li>• the including of housing on the site would help meet local housing need;</li> <li>• there are no suitable alternative housing sites within the village;</li> <li>• the site is well located relative to the existing settlement and can be developed without impacting on the Designed Landscape of Pitmedden Gardens; and</li> <li>• there are no infrastructure or other constraints to the development of the site.</li> </ul> <p>For further details, please see the paper apart.</p> |  |

### 19. Other information

Please provide any other information that you would like us to consider in support of your proposed development (please include details of any up-to-date supporting studies that have been undertaken and attach copies e.g. Transport Appraisal, Flood Risk Assessment, Drainage Impact Assessment, Peat / Soil Survey, Habitat / Biodiversity Assessment etc.)

Please tick to confirm your agreement to the following statement:



By completing this form I agree that Aberdeenshire Council can use the information provided in this form for the purposes of identifying possible land for allocation in the next Local Development Plan. I also agree that the information provided, other than contact details and information that is deemed commercially sensitive (questions 1 to 3), can be made available to the public.



## **Aberdeenshire Local Development Plan 2021**

### **Call for sites response – BUS1, Pitmedden, for mixed use development**

Our client wishes land in their ownership at Pitmedden, currently designated for employment use as Site BUS1, to be reallocated in the Aberdeenshire Local Development Plan 2021 for 1.7ha of mixed use commercial and housing development. Details of the site and an outline of the proposed development are set out in the Call for Sites Response Form and accompanying plan, which shows the site's capacity to accommodate 1,000m<sup>2</sup> of commercial floorspace plus 12 houses in large plots.

This paper provides further background and information in terms of the wider policy context that supports the reallocation of the site, in light of which it is submitted that it should be reallocated for mixed use commercial and housing development.

#### **Current designation**

In the current Local Development Plan (LDP), both Pitmedden and the adjacent village of Milldale are covered by a single settlement statement, the planning objectives for which include meeting development pressure for both homes and employment uses.

Within this, Site BUS 1 is designated for employment use, and is also identified as being within the Pitmedden Designed Landscape. Planning permission for the erection of a new warehouse on Site BUS 1 was granted in July 2015 (planning application reference APP/2015/0049), however our client has found that there is not in fact any demand for warehouse use. As such, alternative uses for the site now require to be considered, in accordance with wider planning policy principles and particularly taking account of the neighbouring Designed Landscape.

It should also be noted that, although allocated for employment use, the nature of the current use as warehousing does not provide any significant local employment opportunities, instead involving the movement of vehicles and storage of goods with very little staffing required.





## Commercial development

Although there has been no demand for the current consented warehouse which would provide any commercial return, and recognising the limited employment opportunities such use would in any event provide, our client is nevertheless keen to provide support for small local businesses. As such it is submitted that it would be appropriate to include an element of commercial floorspace which could accommodate up to four small units for local enterprises serving the Pitmedden community. That could include, for example, a farmshop or start up business unit, along with associated car parking.

## Housing land requirements

In terms of the Strategic Development Plan (SDP) 2014, Pitmedden is located in a Local Growth and Diversification Area within the Aberdeen Housing Market Area, where growth is expected to relate to local needs. The scale of growth proposed in terms of this submission, i.e. approximately 12 units, is intended to meet such local needs in Pitmedden, in accordance with the SDP spatial strategy in this regard.

Further, in terms of future housing growth, the Main Issues Report for the current review of the SDP states that *"...any new greenfield (land which has never been built on) allocations should preferably be under 100 units in size, aim to deliver affordable housing above 25%, and not be extensions to existing sites which could delay their delivery."* (paragraph 6.5). The allocation of this site, with 25% affordable housing provision, would be consistent with that Preferred Option.

In line with the last point above, the Council's initial call for sites response form stated that *"Given the large scale of effective allocations in the LDP 2017, we do not believe there is a need for new development sites of any substantial scale. Instead smaller sites should be considered, in locations where there is sufficient infrastructure, and where there is a demonstrable demand for housing or business land."* Again, the allocation of this site would be consistent with that view.

The importance of having adequate housing land allocations in Pitmedden was also emphasised by Udney Community Council during Examination of the current LDP, with them stating that: *"The lack of housing sites in Pitmedden is an impediment to the needs of the village."*

The allocation of BUS1 for residential development would help address this impediment and contribute to meeting the needs of the village.



## **Alternative sites**

Should Site BUS1 be reallocated for mixed commercial and residential use, there will still be additional larger scale employment land available at Site BUS2. Here, planning permission in principle for 7 business units (plus 5 residential units on land immediately to the West) was granted in 2014 pursuant to planning application reference APP/2011/2880). However, the Council's website shows no Matters Specified by Conditions application ever having been made, with the deadline for doing so now having passed. As such, that consent will have lapsed and there is no immediate prospect of Site BUS2 being developed, but it instead remains available for future proposals. This is indicative of the lack of demand for this type of employment land in the area which, in turn, does not support the continued allocation of two separate employment sites.

Meanwhile, in terms of housing, it should be noted that:

- On Site OP1, which is allocated for 14 units, planning permission for this number was granted in February 2017 (planning application reference APP/2016/0609) and development has now started on site. As such, this is expected to be built out ahead of the adoption of the emerging LDP; and
- Site OP2, which is allocated for 64 units, was subject to pre-application consultation in January 2018, with development also expected to be well underway during the course of the current plan.

In light of the above, and with no other housing land currently allocated in Pitmedden or Milldale, there is a clear need to allocate additional land to meet local housing needs during the emerging LDP and, in the absence of an equivalent need for employment land, reallocating Site BUS1 to this end is the obvious way of meeting this need. That is particularly the case given that there are no constraints to the development of the site, such that it can be brought forward within the timescale of the emerging LDP.

## **Direction of growth**

In terms of location, it is submitted that Site BUS1 is the logical direction for Pitmedden to grow in because:

- As expressed in both the officer's assessment of sites promoted during the preparation of the current LDP and the Examination Report for this, development to the south of the existing settlement would be visually prominent and impact on the setting of the town, not least through reducing the physical separation of



the villages of Pitmedden and Milldale and allowing coalescence of the two, the distinct identities of which should be protected and preserved.

- At the same time, development to the east or west would diverge from the prevailing settlement pattern, which is centred around A920 (as recognised in the settlement description in the current LDP, which expressly refers to the two villages in terms of their relationship with the A920).
- It is also an obvious location for small scale commercial development. With the proposed commercial element of the site being located at the roadside, the units are easy to access by all modes of transport, as well as being visible for picking up passing trade, which will contribute to their sustainability.

Consequently, it is submitted that any new development should be directed to the North of Pitmedden, with Site BUS1 being well located for this. In this regard it should be noted that the site is on the edge of the 30 mph speed limit zone and there is an existing footpath from the south end of the site to the village core, with room to extend that within the site.

Further support for growth to the North through the reallocation of Site BUS1 for mixed commercial and residential use can be found in the officer's assessment of the land directly to the south of this (identified as bid site FM063), which was also proposed for residential development in the current LDP, and which was said to be well related to the settlement and local services. However, that land was not preferred due to concerns about the proximity to Pitmedden Gardens and both primary and secondary school capacity.

Unlike bid site FM063 however, Site BUS1 has already been identified as suitable for built development, recognising that this can be accommodated on the site without having a negative impact on the Gardens, as explored in more detail in below.

Finally, the Council's concerns about educational capacity also no longer apply, as Pitmedden primary school is at 66% capacity, with this projected to fall to 61% by 2022, indicating a clear need for new housing development to support the primary school roll. Similarly, the forecasts for Meldrum Academy also show numbers in 2022 starting to fall off from the previous year.

Taking these points together, it is submitted that none of the Council's concerns about bid site FM063 apply to BUS1, while the Council's support for FM063 as a site that is well related to the settlement and local services should equally be taken as support for BUS1.



## Positive change in the historic environment

While Site BUS1's location in relation to Pitmedden Gardens is acknowledged, it should be recognised that the principle of development in this location has already been accepted through the allocation of the site for employment use and the subsequent grant of planning permission, most recently for a workshop with yard and fencing pursuant to application reference APP/2015/0049. In particular, the Report of Handling for application reference APP/2015/0049 states that Historic Scotland had no objection to the proposed development, and that: *"Given the presence of mature woodland between the walled garden and the development site, Historic Scotland is satisfied that this proposal will not have a significant adverse impact on the Inventory Designed Landscape..."*. Similarly, the mature woodland would equally ensure that mixed use commercial and residential development has no adverse impact either.

Further, compared to the current consented employment use, it is submitted that a mixed small scale commercial and residential use provides much more of an opportunity to plan and design a development which is not just sympathetic to the historic setting, but which positively enhances it. This is in line with Scottish Planning Policy (2014) (SPP), which states that planning should enable positive change in the historic environment, informed by a clear understanding of the importance of the heritage assets affected. In other words, proximity to the historic garden does not necessarily impede development, but should be seen as an opportunity to enable positive change as advocated by SPP.

## Conclusion

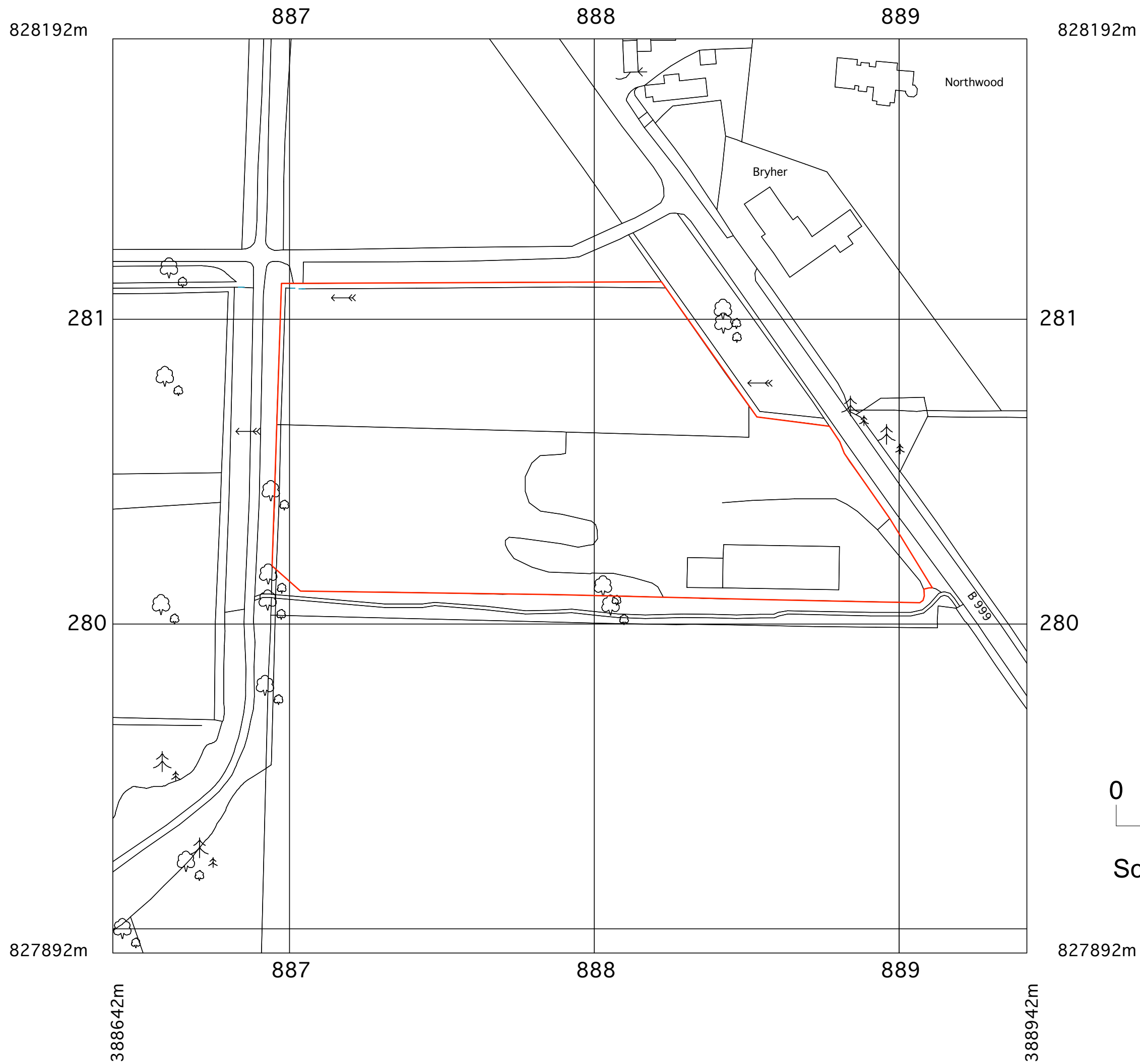
As set out in both the Call for Sites Response Form and this paper apart, it is submitted that:

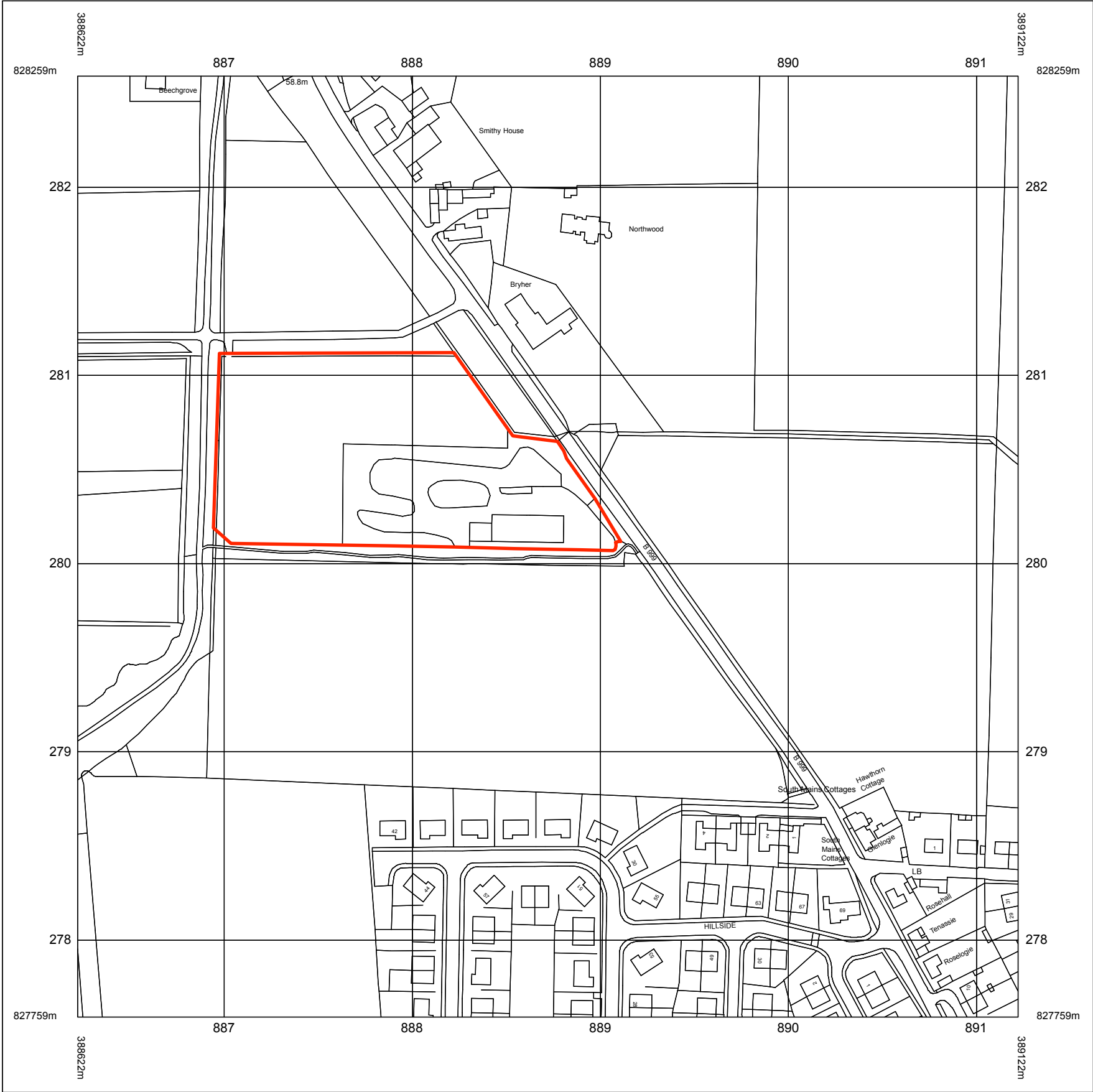
- there is no demand for the existing employment land and the associated warehouse consent in the village and site BUS2 remains available for development should any such demand arise in future;
- there is, however, potential to support small local businesses through the provision of small scale commercial units associated with new housing development;
- the including of housing on the site would help meet local housing need;
- there are no suitable alternative housing sites within the village;
- the site is well located relative to the existing settlement and can be developed without impacting on the Designed Landscape of Pitmedden Gardens; and
- there are no infrastructure or other constraints to the development of the site.



Consequently, it is submitted that Site BUS1 should be reallocated in the emerging LDP for mixed use commercial and residential development in accordance with this response.







|                         |         |           |
|-------------------------|---------|-----------|
| Project Title           |         |           |
| Norse Yard<br>Pitmedden |         |           |
| Drawing Title           |         |           |
| OS Location Plan        |         |           |
| Job no                  | Drawn   | Scale     |
| 1311                    |         | 1:2500@A3 |
| Date                    | Checked |           |
| Feb 2018                |         |           |
| Sketch no               |         | Rev       |
| 1311-003                |         | -         |

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|                         |          |         |            |
|-------------------------|----------|---------|------------|
| Project Title           |          |         |            |
| Norse Yard<br>Pitmedden |          |         |            |
| Drawing Title           |          |         |            |
| Site Layout             |          |         |            |
| Job no                  | 1311     | Drawn   | Scale      |
|                         |          | █       | 1:600 @ A3 |
| Date                    | Feb 2018 | Checked |            |
|                         |          | █       |            |
| Sketch no               | 1311-002 |         | Rev        |
|                         |          |         | -          |



## **Aberdeenshire Local Development Plan 2021: Main Issues Report 2019**

### **Main Issues Report Response Form**

#### **Important Information: Please Read**

The Main Issues Report (MIR) is a key stage in preparing the Aberdeenshire Local Development Plan 2021 (LDP 2021). The MIR sets out options for how the LDP 2021 could be improved both in terms of the policies that Aberdeenshire Council will use to determine planning applications as well as identifying land allocations for development. The MIR has been published along with a Monitoring Report and Interim Environmental Report of the Strategic Environmental Assessment. These, along with other supporting documents are available at: <https://www.aberdeenshire.gov.uk/planning/plans-and-policies/ldp-2021/main-issues-report/>.

**Comments are sought on the MIR and Interim Environmental Report, or indeed any other matter that you feel that we need to consider, by 5pm on Monday, 8 April 2019.** Responses can be emailed to us at [ldp@aberdeenshire.gov.uk](mailto:ldp@aberdeenshire.gov.uk) or received via post, Planning Policy Team, Infrastructure Services, Aberdeenshire Council, Woodhill House, Westburn Road, Aberdeen, AB16 5GB.

Please note that in order for comments to be considered as valid you must include your contact details.

We will use these details to confirm receipt of your comments and to seek clarification or request further information as required. Should you have any concerns regarding the holding of such information please contact [ldp@aberdeenshire.gov.uk](mailto:ldp@aberdeenshire.gov.uk). Anonymous comments will not be considered as part of the consultation process. Petitions will only be noted in the name of the person submitting the document.

All comments received will be carefully assessed and will be used to inform the preparation of the Proposed Aberdeenshire Local Development Plan. There will be a further opportunity to comment on the Proposed Plan when it is published in December 2019.

|                                       |                         |
|---------------------------------------|-------------------------|
| <b>Name</b>                           | ██████████              |
| <b>Organisation<br/>(optional)</b>    | Aurora Planning Limited |
| <b>On behalf of<br/>(if relevant)</b> | ████████████████████    |
| <b>Address</b>                        | ████████████████████    |
| <b>Postcode</b>                       | ████████                |
| <b>Telephone<br/>(optional)</b>       | ██████████              |
| <b>E-mail<br/>(optional)</b>          | ████████████████████    |



Doing things digitally is our preference. Tick the box if you are not happy to receive correspondence via email:

☐

Tick the box if you would like to subscribe to the Aberdeenshire LDP eNewsletter:



## Fair processing notice

Please tick to confirm your agreement to the following statements:



By submitting a response to the consultation, I agree that Aberdeenshire Council can use the information provided in this form, including my personal data, as part of the review of the Aberdeenshire Local Development Plan. This will include consultation on the Main Issues Report (including any subsequent Proposed Plan).

I also agree that following the end of the consultation, i.e. after 8 April 2019, my name and respondent identification number (provided to you by Aberdeenshire Council on receipt of your submission) can be published alongside a copy of my completed response on the Main Issues Report website (contact details and information that is deemed commercially sensitive will not be made available to the public).

The data controller for this information is Aberdeenshire Council. The data on the form will be used to inform a public debate of the issues and choices presented in the Main Issues Report of the Aberdeenshire Local Development Plan 2021. It will inform the content of the Proposed Aberdeenshire Local Development Plan.

Aberdeenshire Council will only keep your personal data for as long as is needed. Aberdeenshire Council will retain your response and personal data for a retention period of 5 years from the date upon which it was collected. After 5 years Aberdeenshire Council will review whether it is necessary to continue to retain your information for a longer period. A redacted copy of your submission will be retained for 5 years beyond the life of the Local Development Plan 2021, possibly until 2037

### Your Data, Your Rights

You have got legal rights about the way Aberdeenshire Council handles and uses your data, which include the right to ask for a copy of it, and to ask us to stop doing something with your data.

If you are unhappy with the way that Aberdeenshire Council or the Joint Data Controllers have processed your personal data then you do have the right to complain to the Information Commissioner's Officer, but you should raise the issue with the Data Protection Officers first. The Data Protection Officers can be contacted by writing to:

- [REDACTED], Data Protection Officer, Aberdeenshire Council, Business Services, Town House, 34 Low Street, Banff, AB45 1AY

If you have difficulty understanding this document and require a translation, or you need help reading this document (for example if you need it in a different format or in another language), please phone us on 01467 536230.

|  |   |                                     |
|--|---|-------------------------------------|
| Which document(s) are you committing on? | Main Issues Report  | <input checked="" type="checkbox"/> |
|  | Draft Proposed Aberdeenshire Local Development Plan                 | <input checked="" type="checkbox"/> |
|  | Strategic Environmental Assessment Interim Environmental Assessment | <input type="checkbox"/>            |
|  | Other   | <input type="checkbox"/>            |

## Your comments

### **Bid references FR094 Land for Housing at Norse Yard, Pitmedden and FR095 Land for Mixed use at Norse Yard, Pitmedden**

This is a brownfield site of 1.7ha, currently allocated in the extant LDP as BUS 1 for employment use. Our client wishes to contest the officers' recommendation that this site not be reallocated for housing or for a mixed use development in the review of the LDP.

The reallocation has been assessed by officers as being undesirable for a number of reasons, each of which is addressed below:

#### ***The proposed site is not well related to the settlement***

The site is located around 800m away from the village core on the edge of the 30mph speed limit zone. There is an existing footpath from the south end of the site to allow easy and safe access to local services and facilities by walking and cycling, with room to extend that path within the site. Stagecoach bus service 290/291 Aberdeen to Methlick and service 49 Ellon to Inverurie both go through Pitmedden along the B999, with the site having direct access to the B999 and the furthest part of the site being less than 400m away from this.

In addition, the site has previously been assessed as suitable for development to serve the village, through both its current allocation and the planning consent granted for the warehouse in 2015 (application reference APP/2015/0049). No concerns were raised in terms of the accessibility of the site and its relationship with the existing settlement in respect of either of these.

The site is therefore clearly well related to the settlement, and indeed much more so than the proposed OP4 allocation (see below), and no less so than the furthest parts of the other proposed housing allocations.

#### ***It would create infilling of land between the walled garden of Pitmedden designed landscape and the B999 which, with the exception of the existing warehousing, mostly consists of tree lined fields***

The site is currently allocated for employment use, and could in principle be further developed should there be a demand, creating the very infill that officers are now objecting to. Any proposed housing or mixed use development here could though be sited and designed in such a way as to maintain or replace the trees along the boundaries of the site with native planting, as shown on the indicative layout plans submitted with the initial bids. Indeed, housing or mixed use development lends itself more easily to working with the existing landscape setting than an extended warehouse development would. This then should not be a reason for rejecting the reallocation of the site for housing or mixed housing and small scale commercial use.

***Development of the site would have a negative impact on the setting of the designed landscape and Pitmedden village***

In assessing planning application APP/2015/0049, Historic Scotland (now Historic Environment Scotland) did not object to the proposal given the presence of mature woodland between the walled garden of the Pitmedden designed landscape and the development site. Rather, they were satisfied that the proposed development would not have a significant adverse impact on the Inventory Designed Landscape. At the same time, Udney Community Council objected to the application due to concerns about the nature of a warehouse type development adjacent to Pitmedden Gardens. That being the case, and with sensitive siting and design of new housing or a mixed use development, along with native planting, there is no reason why such uses on this site would have any more impact on the setting of the designed landscape than the current employment use allocation, and indeed there is the potential to positively enhance the historic setting in a way that business development alone is unlikely to do.

Such an approach would also be consistent with Scottish Planning Policy (2014) (SPP), which states that planning should enable positive change in the historic environment, informed by a clear understanding of the importance of the heritage assets affected. Proximity to the historic garden should not therefore be seen as preventing development, but rather provides an opportunity to enable positive change, as advocated by SPP.

***There is woodland, watercourse and protected species (red squirrel) have been seen on the site***

These perceived constraints would apply equally to the current employment allocation as to any reallocation for housing or a mixed use development. There is the potential for sensitive siting and design of housing and small-scale commercial units to enhance the environmental quality of the site with, for example, native planting along the boundaries, the incorporation of ponds and soakaways, habitat walls/fences, wildflowers in verges and the use of nectar rich plant species. The scope to do this is much greater in a residential or mixed use scheme than with the provision of more functional employment units which would be allowed for in principle at least under the existing allocation.

***The proposal would result in the loss of all of the employment land on the site, which has consent granted for a new warehouse in 2015 but has not been implemented***

Whilst recognising the stated demand for employment opportunities within the village it is important to note that, although planning permission was granted in July 2015 for the erection of a new warehouse, our client has been unable to secure a tenant for that warehouse, and hence is now seeking to ensure that the site can make an effective and positive contribution to the local area by providing housing or a mixture of housing and small scale commercial units. The settlement statement is clear that there is a demand for more housing in the village and the Draft Proposed Plan recognises that provision should be made for more housing in villages such as Pitmedden, which is specifically cited, where real growth is likely to occur.

It should also be noted that the previous warehousing consent, would not have provided any significant employment opportunities. Rather it primarily involves the movement of vehicles and the storage of goods with very little staffing required. The provision of a mixed residential and commercial development would, however, ensure continued employment opportunities at least equivalent to, and potentially greater than, the current consented warehouse development, allowing for local enterprises serving the Pitmedden community. That could include, for example, a farmshop or start up business unit, along with associated car parking. Allowing for an element of residential development would make such commercial development more viable and hence much more likely to deliver the economic benefits being sought.

At the same time the MIR proposes the reallocation of BUS2, another employment site, for a mixture of 10 homes and business use on the basis that the employment use has not been delivered. That reallocation being despite the fact that planning permission was granted for 7 business units in 2014, the site being significantly more remote from the core of the settlement than our client's site, and it being acknowledged that the sloped nature of the site means that development there could be visually prominent. It is therefore difficult to see how officers can have concluded that the reallocation of that site is acceptable whilst our client's submission has been assessed as being undesirable.

### ***Smaller sized units have not been proposed***

Our client is currently proactively marketing the site through [REDACTED] for five small scale (600m<sup>2</sup>) units which can be subdivided to create smaller units if required. Marketing activities include website advertisement on various platforms, an agency board on the site and particulars distributed to local agents and solicitors. As yet there has been no take up.

Given the current economic climate it is unlikely that any demand for the units will arise in the short to medium term. In such circumstances it is important to note that SPP states that *"Where business sites are underused...reallocation to enable a wider range of viable business or alternative uses should be considered..."* As such it would be entirely appropriate to reallocate the site for residential or mixed residential and commercial use.

### **Other comments**

The Draft Proposed Plan notes that *"We need to be confident that land can be brought forward for development in the Plan period."* That being the case, the reallocation of this site, which can be delivered within the Plan period (which may not be true of the larger allocations), should be reviewed positively. That is particularly so given that the Draft Proposed Plan also highlights that *"Employment land allocation is not an issue."* which suggests that the loss of a small employment site of the scale of this for housing would not undermine the Plan's strategy, and if allocated for a mixed use development, would have no negative impact at all on the potential for new employment opportunities in the village which may instead be enhanced.

The MIR and Draft Proposed Plan allocate a number of sites, including OP2 (an existing allocation) for 64 homes and OP 3 (Bid FR007) for 110 homes, as well as FOP1 (Bid FR006) as a future opportunity for a further 110 homes. These are large allocations and as such are not consistent with the request by both the Council (in its initial call for sites response form) or the Aberdeen City and Shire Strategic Development Plan Authority (in the Proposed Strategic Development Plan) for smaller scale allocations, whilst the allocation of this site for 10 to 15 units would be consistent with that requirement. It is also of a scale to help meet a local need, consistent with its location within a Local Growth and Diversification Area. As a small self-contained site development here could be implemented within the next five years, allowing it to make an immediate contribution to a pressing housing need, including a contribution to much needed affordable housing, and if reallocated as a mixed use site would also continue to provide local employment opportunities.

In terms of those sites which have been assessed in the MIR as desirable as new allocations in the Draft Proposed Plan, including the reallocation of BUS2, these are located to the south of the village. That would seem to be particularly inappropriate given that both the officer's assessment of sites promoted during the preparation of the current LDP, and the Examination Report for this, concluded that development to the south of the existing settlement would be visually prominent and impact on the setting of the town, not least through



reducing the physical separation of the villages of Pitmedden and Milldale and allowing coalescence of the two, the distinct identities of which should be protected and preserved.

Finally, whilst the SDP stresses the importance of giving priority to brownfield land, and the spatial strategy articulated in the Draft Proposed Plan states that “*We are aware of the need to promote the use of previously developed land (brownfield land) as the first opportunity for development and, wherever possible, have tried to exploit the brownfield sites within our settlements.*” that has clearly not been in the case in Pitmedden. Rather officers have accepted that an existing brownfield site should remain vacant, making no contribution to the sustainability of the village, whilst large new greenfield allocations, which as stated above have the potential to have a significant adverse impact on the setting of the village, have been proposed.

Given the above, our client requests the reallocation of site BUS 1 as a housing or mixed housing and commercial site. Further information is provided in the Call for Sites response forms and associated papers apart submitted on behalf of our client.



**From:** Aurora Planning  
**Sent:** 09 July 2020 11:20  
**To:** [REDACTED]  
**Subject:** FW: Aberdeenshire Council Ref No ENQ/2020/0555  
**Attachments:** new plan.JPG

From: [REDACTED]  
Sent: 11 June 2020 15:00  
To: [REDACTED]  
Subject: RE: Aberdeenshire Council Ref No ENQ/2020/0555

Afternoon [REDACTED]

Thinking in the hypothetical,

If the site had been brownfield in a remote rural area elsewhere in Aberdeenshire we would probably see that there is an opportunity for 2 replacement houses provided they broadly kept to the outline of the building to be replaced. If your specific site had been brownfield and outwith the settlement boundary then, given the good relationship of this site to the village in this instance, the maximum of 3 houses would likely have been looked upon favourably, noting also that there is a significant area of hardstanding which in itself is not considered a brownfield opportunity but its remediation is nonetheless positive.

Obviously I'm limited in my ability to comment on how the site can be judged based on policy from the proposed plan. I've attached a snippet from the text of the possible new policy. The only thing that I would comment upon is that development upon the site done in the right way would not necessarily be considered suburbanisation of the countryside, thanks in part to the close proximity to the village. The challenge will be whether its interpreted whether the building to be replaced is large enough to justify more than 3 units.

Regards,

[REDACTED]