

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 or send this form to reach us by 31 July 2020*.

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

**UPDATE 16 June 2020: Consultation period was extended from 17 July 2020 for a further two-week period.*



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

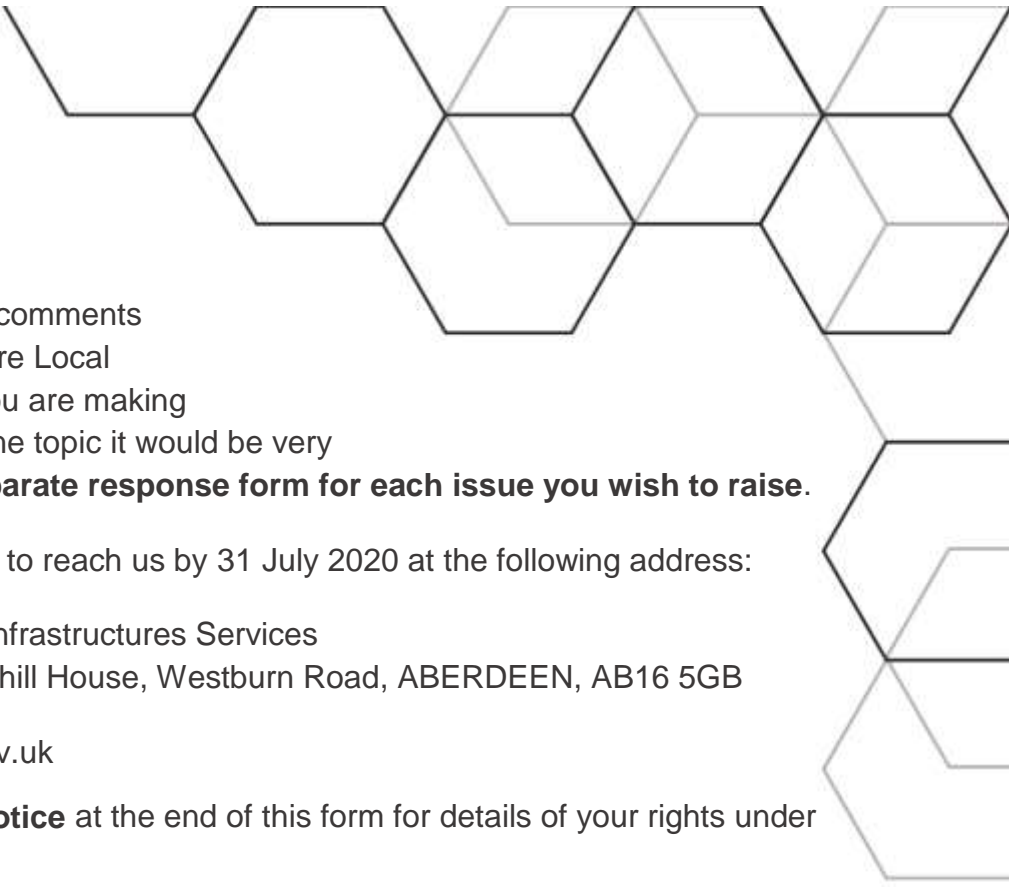
Tel: 01467 536230

Email: ldp@aberdeenshire.gov.uk

Web: www.aberdeenshire.gov.uk/ldp

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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.



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 31 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

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:	Mrs
First Name:	Claire
Surname:	Coutts
Date:	24 July 2020
Postal Address:	Ryden LLP, [REDACTED]
Postcode:	[REDACTED]
Telephone Number:	[REDACTED]
Email:	[REDACTED]

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?

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):

Objection is made to the failure of the Proposed Plan to identify land to the south of Arnhall Business Park (Phase 4), Westhill (GR106 as contained in the Main Issues Report) for commercial development.

It is requested that the settlement boundary of Westhill (as contained on 627 of the Proposed Plan) is extended to include this site and that the site is identified as an Opportunity Site for employment land and a hotel.

If this is not accepted, at the very least, the site should be contained as Strategic Reserve land within Appendix 1. This will ensure flexibility in the delivery of sufficient employment land in the area, should a demand be established, in the period 2021 – 2032.

Reason for change:

Background

Part of the site at Arnhall (Phase 4) was identified in the 2017 Local Development Plan as reserved for the future expansion of sub-sea industries. That Plan stated that development should be located primarily in the western part of the site due to the presence of the [REDACTED] pipeline to the east and that a transport assessment will be required and mitigation of localised and potentially wider strategic traffic impacts should be addressed.

On behalf of Westhill Developments (Brodiach) Ltd, an initial development bid (Appendix 1) for the site was submitted to Aberdeenshire Council on 28 March 2018, requesting the expansion of R1 on the basis that the HSE and road capacity issues were not an impediment to development. It was argued that this was a logical location to expand Arnhall Business Park.

The Main Issues Report (MIR) was published in January 2019, which identified the site as GR106 as an Officer's Preference for a mixed use development, including employment uses and a hotel. The Officer's assessment stated that **"the proposed site includes part of site R1, extending to the east along the settlement boundary"** and acknowledged that the site is well related to the existing BUS site.

As such, **"the site should be taken forward as a reserved option to allow for expansion of the employment hub to the south of Westhill should a need for further employment land in Westhill be established"**. The site was also identified in the Draft Proposed Local Development Plan (DPLDP) as Future Opportunity Site FOP2 (Appendix 2) for uses associated with the expansion of subsea industries.

A representation was submitted to the MIR (Appendix 3) which supported the identification of the site as an Officer's preference for development. However, objection was taken to its identification as a reserved site rather than a site suitable for immediate development. Similarly, while support was given to its identification in the DPLDP, objection was made to the FOP designation, rather than its identification as an Opportunity Site.

This representation should therefore be read in conjunction with the initial development bid (Appendix 1) and the MIR Representation (Appendix 3) which together demonstrate the site is suitable for employment and hotel development in the Local Plan period.

Justification

The Proposed Plan sets out exactly where development is expected to take place over the next five years, and beyond, up to 2032. One of the aims is “**to increase and diversify the economy**”. In terms of employment land, Aberdeenshire Council are confident that the target in the Proposed Strategic Development Plan of a minimum 60 hectares at all times in the Strategic Growth Areas will be maintained well beyond the lifespan of the Local Development Plan 2021. It states that given the underperformance of employment sites in rural communities many undelivered aspirational employment land allocations have been removed from the Plan, but that very few new employment allocations are made.

Although Westhill is not identified as a Strategic Growth area, it is located only 10km from Aberdeen. The vision for Westhill contained in the MIR and DPLDP both recognise that Westhill is a thriving town. It has expanded significantly since the 1960s and the Proposed Plan acknowledges that Westhill functions as an established employment hub and is a focus for specialist subsea engineering businesses, which is central to the town’s status as a global subsea centre of excellence.

The Council’s Employment Land Audit accepts that demand for employment land is focussed on settlements around Aberdeen, specifically including Westhill, given its proximity to the City. Therefore, it is argued that it has many of the same characteristics of a Strategic Growth Area and it must identify sufficient employment land to meet demand in this accessible location in order to maintain its status.

Objection is therefore taken to the failure of the Proposed Plan to allocate any employment land in Westhill to support its function as a successful employment centre. If no new employment allocations are identified in the period to 2032, this function will be adversely affected. In addition to this, if constrained sites that were identified but not delivered through the 2017 LDP have been removed, but very few new allocations have been made (as stated in the Proposed Plan) it is argued that a sufficient supply of employment land, in the right place, is not being delivered.

This is compounded by the removal of site R1 from the 2017 LDP as a site “reserved” for future expansion of subsea industries in Westhill. The 2017 LDP set out exactly where development was expected over that five year period and beyond to 2026. Therefore, that reserved land (which is contained within bid site GR106 to the south of Arnhall Business Park) was considered suitable for development in the second plan period (post 2021 and up to 2026) effectively through the 2021 Local Development Plan process.

The 2019 Main Issues Report suggested suitable locations for development in the period 2021 – 2032. Reserved sites were identified that were considered suitable for development post 2032. Identifying the land to the south of Arnhall Business Park as a “reserved” site in the 2021 LDP means that its suitability will be assessed through the next LDP process. However, the removal of this site completely from the Proposed Plan indicates that it is not even a suggested location for employment development post 2032. As such, there are no new opportunities for employment land in Westhill in the period 2021 – 2032 and beyond. In fact, the last employment land allocation made in Westhill was within the 2012 LDP. This is not acceptable for this important employment location.

Although there are existing opportunities on the BUS land to the north, the 2018 Employment Land Audit identifies 4.65 ha of established employment land at Arnhall, with 1ha under construction. This leaves 3.65ha left to develop. Historic development rates in Westhill has shown that over the last 12 years, development rates are averaging 2.99 ha per annum. Obviously this rate is cyclical, with the current market affected by the downturn in the oil industry

and the coronavirus pandemic. However, based on the average development rate over those years, the available employment land in Westhill could be fully developed by 2022. Some of this has already commenced, through the construction of a McDonalds and Starbucks at this location and there is very little left to deliver.

The Proposed Plan does provide “**an opportunity to review new development areas at a mid-term review in 2026**”, which will allow them to identify new sites for the period 2031 – 2036. However, if current employment land allocations are developed in Westhill by 2022, there is no prospect of additional employment requirements to meet demand in Westhill until at least 2032. Westhill therefore has to rely on the current 3.65 ha available for the next 12 years. Again, this is not acceptable for this important location and does not provide any flexibility for the delivery of further employment when a need is established in Westhill.

It is therefore argued that the identification of the site to the south of Arnhall Business Park within the Local Development Plan will maintain Westhill’s function as a global centre of subsea excellence. As such, this site should be identified as an Opportunity site for employment and hotel use, within the Aberdeenshire Local Development Plan. Existing allocations would naturally be built prior to Phase 4, however, the allocation of Phase 4 as an Opportunity Site would provide flexibility in delivering additional employment land in Westhill when the business land to the north is completed and if a need is established in the period 2021-2032. If provision is not made for this, there is a real danger that employment opportunities could be lost in Westhill. Much can change in that time and everything needs to be done to protect Westhill’s employment status to allow flexibility at this important time.

Arnhall Phase 4 is a logical location for employment development. Scottish Planning Policy (SPP) introduces a presumption in favour of development that contributes to sustainable development. This means that policies and decisions should be guided by making efficient use of existing capacities of land and infrastructure and supporting the delivery of accessible business and leisure development. The identification of this site for employment uses would comply with that requirement and the Proposed Plan acknowledges that “**expansion around existing settlements is essential to deliver a sustainable settlement pattern**” and that “**proposals for employment land allocations must be very carefully thought out to allow them to come forward as part of a mixed development, or as an extension to employment areas already identified in the Plan**”. The location of this site, immediately adjacent to existing employment land and the settlement boundary of Westhill, would ensure a sustainable employment development is delivered.

The Proposed Plan further highlights that development in Westhill remains stalled until transport assessments are undertaken over the next few years and the Regional Transport Strategy identifies the nature of a solution that may be required “*to allow further development to take place in the town*”. However, a package of road improvement measures (funded by land owner) to improve capacity and traffic flow was implemented as part of Phase 3 of Arnhall Business Park which was successful in alleviating traffic congestion in the area. The identification of Phase 4 of Arnhall Business Park would make efficient use of the investment made in this infrastructure and comply with SPP.

In addition to this, the AWPR is completed and operating. This includes a grade separated junction between Westhill and Kingswells, located approximately 0.8 miles from the site. This will improve capacity, encourage demand and support the delivery of this accessible business location and allow the site to be identified in the first plan period of the 2021 LDP. In turn, this will support the future growth of this internationally important sub-sea cluster. Additional mitigation measures required as part of any development would be agreed and provided as part of the planning application process in due course.

The location of the land to the south of the B9119 ensures it is in a sustainable location, well related to access roads and the wider transport network. SPP encourages the development of

such locations and efficient use can therefore be made of the existing transport network through the development of this site.

Aberdeenshire Council acknowledge through the Proposed Plan that many undelivered employment land allocations have been removed from the Plan. It is therefore contended that there is scope to amend or remove other employment allocations, to allow the delivery of further employment land at this accessible location. For example, it is questioned whether 11ha of employment land is appropriate at Newmachar, when only 5ha was identified in the 2017 LDP. Similarly, the Proposed Plan identifies Strategic Reserve land in small rural areas such as Rashierieve and Foveran, when Westhill is arguably a more suitable and sustainable location.

If the identification of the site as an Opportunity Site is not accepted, at the very least, the site should be identified as Strategic Reserve land. Policy B2: Employment/Business Land allows for the early release of such sites where there is a justified economic need. Strategic Reserve Land is identified in Appendix 1: Employment Land Allocations and no land is identified in Westhill for such uses. It is therefore requested that the site at Arnhall Phase 4 is identified as Strategic Reserve land in Appendix 1 given the importance of this area. This would provide some certainty that there is an opportunity to bring forward land, should a demand arise, during the lifetime of the Local Development Plan, within Westhill.

Officers have already considered that this site is suitable as a reserved option within the MIR and as a Future Opportunity Site in the DPLDP, to allow for expansion of the employment hub to the south of Westhill should a need for further employment land in Westhill be established. This was supported through the MIR Representation for the site and continues to be supported through this Proposed Plan representation. As argued above, the last employment land allocation made in Westhill was within the 2012 LDP and although there are existing opportunities for employment on the land to the north, this remaining land could be fully developed by 2021.

Aberdeenshire Council acknowledged the need for further employment land in Westhill should a need be established, but the removal of this site completely from the LDP means that the delivery of such land becomes increasingly difficult. Even if there is demand, the proposed mid-way review would only identify land for employment post 2032. This is considered to be too restrictive and there needs to be flexibility to allow provision as soon as the land to the north is developed. Much can happen to supply and demand and the failure to identify additional land, or future opportunities for employment land in Westhill through the 2021 LDP increases the changes of no employment opportunities being available for this important settlement when they are most needed.

Conclusion

Aberdeenshire Council acknowledge that Arnhall Business Park is a defining feature of Westhill, which itself is a focus for specialist subsea engineering businesses and central to Westhill's status as a global subsea centre of excellence.

Some employment opportunities exist within the Proposed Plan on the BUS land to the north, however, it is argued that this could be developed by 2022. With investment in infrastructure in this location opening up further demand in the future, it is considered essential to allocate further employment land within the 2021 LDP plan period (2021-2032) in order to maintain Westhill's function as a successful employment centre.

Aberdeenshire Council acknowledged the potential of this site to deliver future opportunities should demand for employment land in Westhill be established and the identification of this site as an Opportunity Site would provide flexibility in taking forward additional employment land in Westhill, when the business land to the north is completed and a need is established. As it stands, the Proposed Plan does allow for a review of in 2026, however, this will only identify new sites for the period 2031 – 2036. This means that there could potentially be no new employment allocations in

Westhill for an almost 20 year period, which is not acceptable in this important employment location.

At the very least, the site should be identified as a Strategic Reserve site within Appendix 1 of the Local Development Plan which could be considered for early release should a need be established.

Recommendation

It is respectfully requested that site (MIR Ref: GR106) is identified as an Opportunity site for uses associated with the expansion of subsea industries in the Local Development Plan. This would provide flexibility to allow employment development once the existing land at Arnhall Business Park is developed, to support the town's status as a global centre of excellence for subsea operations.

If this is not accepted, at the very least the site should be identified as Strategic Reserve land in Appendix 1 of the LDP which could be released early should an economic need be established in the period 2021 – 2032.

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

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
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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:

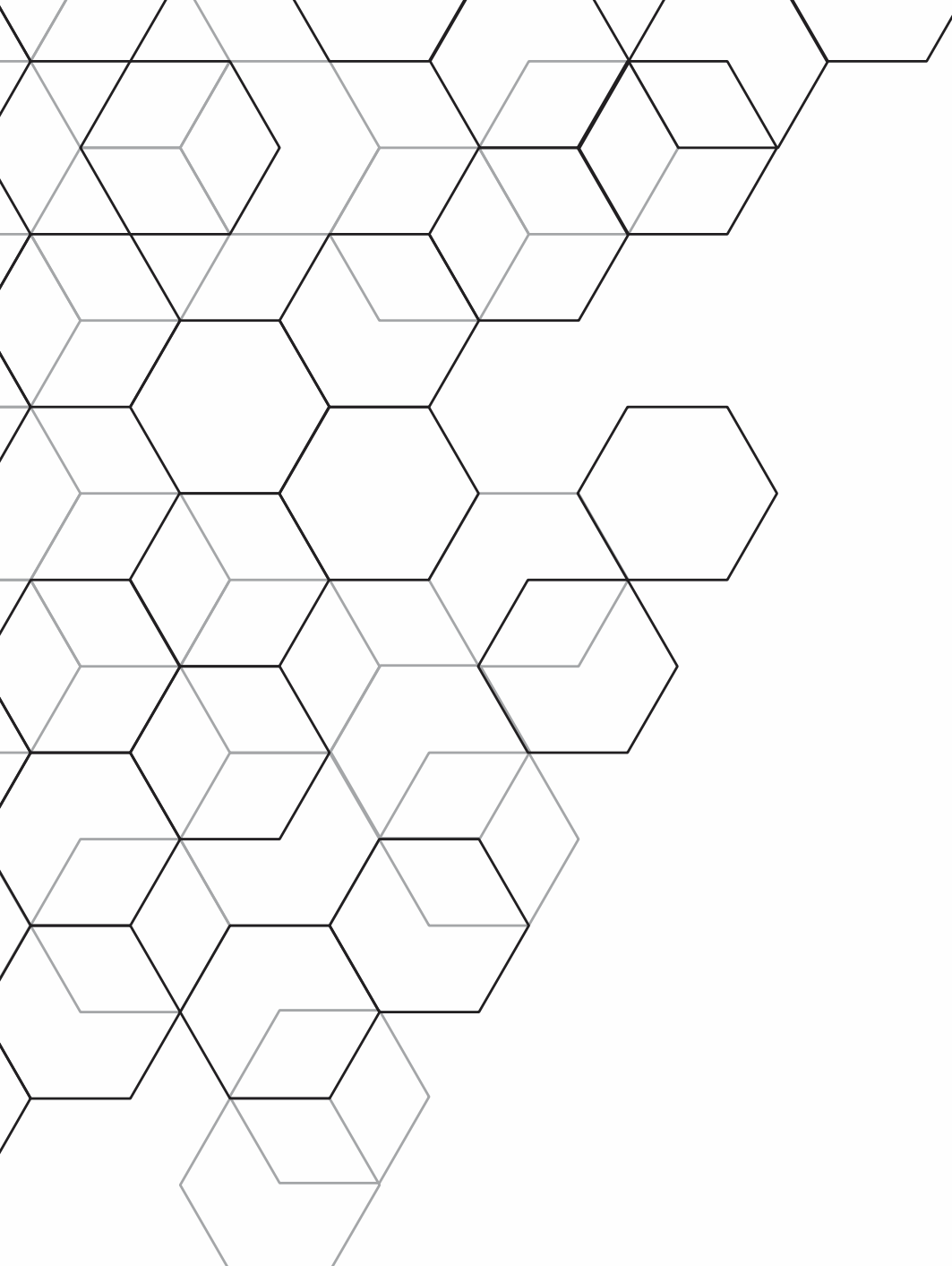
Aberdeenshire Council will only keep your personal data for as long as is needed. Aberdeenshire Council will retain your response and personal data for a retention period of 5 years from the date upon which it was collected. After 5 years Aberdeenshire Council will review whether it is necessary to continue 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.



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

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)	Ryden LLP
Address	[REDACTED]
Telephone number	[REDACTED]
Email address	[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	Westhill Developments (Brodiach) Ltd
Organisation (if applicable)	
Address	c/o agent
Telephone number	
Email address	

3. Other Owners

Please give name, organisation, address, email details of other owner(s) where appropriate:	As above
Do these owners know this is being proposed for development?	Yes

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

Appendix 1 – Development Bid

4. Site Details

Name of the site (Please use the LDP name if the site is already allocated)	Arnhall (Phase 4), Westhill
Site address	Land to the south of Arnhall Business Park and B9119
OS grid reference (if available)	NJ832059
Site area/size	11.6ha
Current land use	Open fields
Brownfield/greenfield	Greenfield
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 (Please list the owners in question 3 above)	Sole owners
Is the site under option to a developer?	No
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? (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? (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	A Proposal of Application Notice (PoAN) was submitted back in May 2014 by Portico Design for a mixed use development to include Class 4, 5 and 6 uses, plus a Hotel. An application was not submitted as it was considered prudent to await the progression of applications at Phase 3, Arnhall, PPIP for which has now been extended until 2023.
Previous 'Call for sites' history. See Main Issues Report 2013 at www.aberdeenshire.gov.uk/ldp	Please provide Previous 'Call for sites'/'Bid' reference number: Ga034 Aberdeenshire Council considered that the bid site was well related to the existing business park and would further enhance employment opportunities in the settlement. It was therefore an appropriate location for

Appendix 1 – Development Bid

	<p>the further expansion of the Arnhall Business Park. It was stated at that time that there was insufficient capacity in the road network to accommodate the proposal in full as a strategic solution to that issue had not been identified. Only the western part of the site was carried forward into the Main Issues Report and LDP.</p>
<p>Local Development Plan status www.aberdeenshire.gov.uk/ldp</p>	<p>Is the site currently allocated for any specific use in the existing LDP?</p> <p>Yes. Part of the site is identified as RI. This is reserved land for future expansion of sub-sea industries. The LDP states that development should be located primarily in the western part of the site due to the presence of the [REDACTED] pipeline to the east and will need to accord with HSE Planning Advice for Developments near Hazardous Installations. A transport assessment will be required and mitigation of localised and potentially wider strategic traffic impacts should be addressed.</p> <p>The bid site is an expansion of this RI site and it is considered that HSE and road capacity issues are not an impediment to development. It is a logical location to expand Arnhall Business Park.</p>

8. Proposed Use

Proposed use		Mixed use development comprising Class 4 (Business), Class 5 (General Industrial), Class 6 (Storage or distribution) and Class 7 (Hotel)
Housing	Approx. no of units	n/a
	Proposed mix of house types	Number of:
		<ul style="list-style-type: none"> • Detached: • Semi-detached: • Flats: • Terrace: • Other (e.g. Bungalows):
		Number of:
	<ul style="list-style-type: none"> • 1 bedroom homes: • 2 bedroom homes: • 3 bedroom homes: • 4 or more bedroom homes: 	
	Tenure (Delete as appropriate)	n/a
	Affordable housing proportion	n/a
Employment	Business and offices	Area unknown at this stage – to be determined during the detailed design stage
	General industrial	As above
	Storage and distribution	As above
	Do you have a specific occupier for the site?	No
Other	Proposed use (please specify) and floor space	Class 7 (hotel use) area to be determined at detailed design stage.
	Do you have a specific occupier for the site?	No

Appendix 1 – Development Bid

Is the area of each proposed use noted in the OS site plan?	No, to be determined at detailed design stage
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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	
	Funding would be available by the developer at the time of development for this site	
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"> • https://www.environment.gov.scot/ • EU priority habitats at http://gateway.snh.gov.uk/sitelink/index.jsp • UK or Local priority habitats at http://www.biodiversityscotland.gov.uk/advice-and-resources/habitat-definitions/priority/ • Local Nature Conservation Sites in the LDP's Supplementary Guidance No. 5 at www.aberdeenshire.gov.uk/ldp 	RAMSAR Site	No
	Special Area of Conservation	No
	Special Protection Area	No
	Priority habitat (Annex I)	No
	European Protected Species	No
	Other protected species	No
	Site of Special Scientific Interest	No
	National Nature Reserve	No
	Ancient Woodland	No
	Trees, hedgerows and woodland (including trees with a Tree Preservation Order)	No
	Priority habitat (UK or Local Biodiversity Action Plan)	No
	Local Nature Conservation Site	No
	Local Nature Reserve	No
	If yes, please give details of how you plan to mitigate the impact of the proposed development:	
Biodiversity enhancement		
<p>Please state what benefits for biodiversity this proposal will bring (as per paragraph 194 in Scottish Planning Policy), http://www.gov.scot/Resource/0045/00453827.pdf) by ticking all that apply. Please provide details.</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	

Appendix 1 – Development Bid

<p>See Planning Advice 5/2015 on Opportunities for biodiversity enhancement at: www.aberdeenshire.gov.uk/media/19598/2015_05-opportunities-for-biodiversity-enhancement-in-new-development.pdf</p> <p>Advice is also available from Scottish Natural Heritage at: https://www.snh.scot/professional-advice/planning-and-development/natural-heritage-advice-planners-and-developers and http://www.nesbiodiversity.org.uk/.</p>	Living roofs	
	Ponds and soakaways	
	Habitat walls/fences	
	Wildflowers in verges	
	Use of nectar rich plant species	✓
	Buffer strips along watercourses	✓
	Show home demonstration area	
	Other (please state):	
	<p>The site has been used for spoil storage during the construction phase of Arnhall to the north and as such has no biodiversity or natural heritage value. Any development will provide strategic landscaping and open space which will provide opportunities for biodiversity. Native tree planting and nectar rich plant species will be used to enhance biodiversity on the site.</p>	

11. Historic environment

Historic environment enhancement		
Please state if there will be benefits for the historic environment.	No impact on the historic environment If yes, please give details:	
<p>Does the site contain/is within/can affect any of the following historic environment assets? Please tick any that apply and provide details. You can find details of these designations at:</p> <ul style="list-style-type: none"> http://historicscotland.maps.arcgis.com/apps/Viewer/index.html?appid=18d2608ac1284066ba3927312710d16d http://portal.historicenvironment.scot/ https://online.aberdeenshire.gov.uk/smrpub/master/default.aspx?Authority=Aberdeenshire 	Scheduled Monument or their setting	No
	Locally important archaeological site held on the Sites and Monuments Record	No
	Listed Building and/or their setting	No
	Conservation Area (e.g. will it result in the demolition of any buildings)	No
	Inventory Gardens and Designed Landscapes	No
	Inventory Historic Battlefields	No
	If yes, please give details of how you plan to mitigate the impact of the proposed development	

12. Landscape Impact

Is the site within a Special Landscape Area (SLA)? (You can find details in Supplementary Guidance 9 at www.aberdeenshire.gov.uk/ldp)	No If yes , 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	If your site is not within an SLA , 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:

Appendix 1 – Development Bid

<p>below) or have been identified as Special Landscape Areas of local importance.</p> <ul style="list-style-type: none"> • SNH: Landscape Character Assessments https://www.snh.scot/professional-advice/landscape-change/landscape-character-assessment • SNH (1996) Cairngorms landscape assessment http://www.snh.org.uk/pdfs/publications/review/075.pdf • SNH (1997) National programme of landscape character assessment: Banff and Buchan http://www.snh.org.uk/pdfs/publications/review/037.pdf • SNH (1998) South and Central Aberdeenshire landscape character assessment http://www.snh.org.uk/pdfs/publications/review/102.pdf 	<p>The land has been used for spoil storage during the construction phase of Arnhall to the north and any development would improve the landscape. The principle of development on part of the site is accepted due to the LDP designation on land to the west. Landscaping and open space on this land and the remainder of the site would ensure the integration of the site with the wider area as demonstrated by the business land to the north which is well contained within an attractive network of open space and landscaping.</p> <p>The site is well screened from the A944 due to the landform to the south which would screen any development. On closer approach from the east and west it would be seen in the context of existing development in the area. From the north it is screened by existing business development.</p>
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13. Flood Risk

<p>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?</p> <p>(You can view the SEPA flood maps at http://map.sepa.org.uk/floodmap/map.htm)</p>	<p>River - Yes. The Brodiach Burn runs along the eastern boundary and a search of SEPA's Flood Risk map indicates some potential localised flooding from that.</p> <p>Surface Water – Yes. There is some risk from surface water flooding on the allocated part of the site.</p> <p>As part of the planning application for the Phase 3 site, both SEPA and the Council's Flood Prevention Unit were satisfied with the Drainage Impact Assessment and SUDs proposals. Accordingly it is considered that this site can be adequately drained without risk of flooding.</p>
<p>Could development on the site result in additional flood risk elsewhere?</p>	<p>No</p> <p>If yes, please specify and explain how you intend to mitigate or avoid this risk:</p>
<p>Could development of the site help alleviate any existing flooding problems in the area?</p>	<p>Yes</p> <p>SUDs on the site would resolve any surface water drainage issues and localised flood risk.</p>

14. Infrastructure

a. Water / Drainage

<p>Is there water/waste water capacity for the proposed development (based on Scottish Water asset capacity search tool http://www.scottishwater.co.uk/business/Connections/Connecting-your-property/Asset-Capacity-Search)?</p>	<p>Water</p>	<p>Yes</p>
	<p>Waste water</p>	<p>Yes</p>

Appendix 1 – Development Bid

Has contact been made with Scottish Water?	No, but part of the site is already allocated for development in the LDP and it is understood that capacity would be made available for the additional land if it was identified for development in the LDP.
Will your SUDS scheme include rain gardens? http://www.centernalscotlandgreennetwork.org/campaigns/greener-gardens	n/a
b. Education – housing proposals only	
Education capacity/constraints https://www.aberdeenshire.gov.uk/schools/parents-carers/school-info/school-roll-forecasts/	n/a
Has contact been made with the Local Authority’s Education Department?	No
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?	n/a
Has contact been made with the Local Authority’s Transportation Service? They can be contacted at transportation.consultation@aberdeenshire.gov.uk	Not in relation to this bid. However, during the promotion of the site during the 2017 LDP process, it was concluded by Aberdeenshire Council that there was insufficient capacity in the road network to accommodate the proposal in full. However, a package of road improvement measures (funded by the bid proposer) to improve capacity and traffic flow has been implemented as part of Phase 3 which is considered to be successful in alleviating traffic congestion in the area. In addition to this, the AWPR is under construction and nearing completion, which includes a grade separated junction between Westhill and Kingswells, approximately 0.8 miles from the bid site. This will improve capacity and allow the entire site to be allocated in the 2021 LDP in order to support the future growth of the internationally important Westhill sub-sea cluster. Additional mitigation measures required as part of the development of the bid site would be provided as required.
Public transport	Westhill is well served by public transport services, connecting to Aberdeen and the wider area. Bus stops are located within Arnhall Business Park to the north, less than 400m from the site providing public transport services 7 days a week.
Active travel (i.e. internal connectivity and links externally)	The site will provide footpaths which will link with existing footpaths offsite and with the wider area.

Appendix 1 – Development Bid

d. Gas/Electricity/Heat/Broadband	
Has contact been made with the relevant utilities providers?	Gas: No
	Electricity: No
	Heat: No
	Broadband: No
Have any feasibility studies been undertaken to understand and inform capacity issues?	No feasibility studies have been undertaken at this stage, however, there are utilities in the area and this is not considered to be an impediment to development, given the business development located to the north.
Is there capacity within the existing network(s) and a viable connection to the network(s)?	This is unknown at this stage, however, it is not considered to present an impediment to development
Will renewable energy be installed and used on the site? For example, heat pump (air, ground or water), biomass, hydro, solar (photovoltaic (electricity) or thermal), or a wind turbine (freestanding/integrated into the building)	Unknown at this stage, but would be considered in more detail at the appropriate design stage.
e. Public open space	
Will the site provide the opportunity to enhance the green network? (These are the linked areas of open space in settlements, which can be enhanced through amalgamating existing green networks or providing onsite green infrastructure) You can find the boundary of existing green networks in the settlement profiles in the LDP	The site has been used for spoil storage during the construction phase of Arnhall to the north and any development will provide attractive areas of open space appropriate to the business and industrial development proposed. This will link to areas of open space in the wider area and provide opportunities to enhance the green network.
Will the site meet the open space standards, as set out in Appendix 2 in the Aberdeenshire Parks and Open Spaces Strategy? https://www.aberdeenshire.gov.uk/media/6077/approvedpandospacesstrategy.pdf	Yes, the development will provide open space in line with Aberdeenshire LDP standards. This will provide open space at a scale appropriate to the size and use of the site.
Will the site deliver any of the shortfalls identified in the Open Space Audit for specific settlements? https://www.aberdeenshire.gov.uk/communities-and-events/parks-and-open-spaces/open-space-strategy-audit/	The Open Space Audit for Westhill focusses on play space and sporting facilities. While the development of this business and industrial site will not deliver any direct shortfalls for Westhill, it will provide open space appropriate to its size and function.
f. Resource use	
Will the site re-use existing structure(s) or recycle or recover existing on-site materials/resources?	n/a
Will the site have a direct impact on the water environment and result in the need for	No

Appendix 1 – Development Bid

watercourse crossings, large scale abstraction and/or culverting of a watercourse?	
--	--

15. Other potential constraints

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

Aberdeen Green Belt https://www.aberdeenshire.gov.uk/media/20555/appendix-3-boundaries-of-the-greenbelt.pdf	No
Carbon-rich soils and peatland http://www.snh.gov.uk/planning-and-development/advice-for-planners-and-developers/soils-and-development/cpp/	No
Coastal Zone https://www.aberdeenshire.gov.uk/media/20176/4-the-coastal-zone.pdf	No
Contaminated land	No
Ground instability	No
Hazardous site/HSE exclusion zone (You can find the boundary of these zones in Planning Advice 1/2017 Pipeline and Hazardous Development Consultation Zones at https://www.aberdeenshire.gov.uk/planning/plans-and-policies/planning-advice/ and advice at http://www.hse.gov.uk/landuseplanning/developers.htm)	Yes
Minerals – safeguarded or area of search https://www.aberdeenshire.gov.uk/ldpmedia/6_Area_of_search_and_safeguard_for_minerals.pdf	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. http://map.environment.gov.scot/Soil_maps/?layer=6	No
'Protected' open space in the LDP (i.e. P sites) www.aberdeenshire.gov.uk/ldp and choose from Appendix 8a to 8f	No
Rights of way/core paths/recreation uses	No
Topography (e.g. steep slopes)	No
Other	No

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:

The [REDACTED] pipeline lies to the east and the site lies within the pipeline consultation zone. It is considered that this does not constrain development on the wider site, but only limits the size of units that can be located on site. This is evident in the amount of employment development that is located elsewhere in Arnhall Business Park, also within the pipeline consultation zone. It is argued that Aberdeenshire Council acknowledged during the 2017 LDP process that an employment development could be achieved on the site that accords with PADHI+ guidance and it is argued that the site should not have been restricted for gas pipeline reasons in the 2017 LDP. The entire site should therefore be allocated for business and hotel uses in the 2021 LDP considering the gas pipeline corridor does not prevent development and traffic impact will be relieved through the package of road improvements already undertaken and the AWPR junction to the east.

16. Proximity to facilities

How close is the site to a range of facilities?	Local shops	400m-1km
	Community facilities (e.g. school, public hall)	>1km
	Sports facilities (e.g. playing fields)	400m – 1km
	Employment areas (garage)	<400m
	Residential areas	400m – 1km
	Bus stop or bus route	400m
	Train station	n/a
	Other	n/a

17. Community engagement

Has the local community been given the opportunity to influence/partake in the design and specification of the development proposal?	Yes
	If yes, please specify the way it was carried out and how it influenced your proposals: Public consultation was carried out in June 2014 in relation to the bid site. Roads were the most frequently cited issue. It is considered that the improvements provided as part of the Phase 3 development and the opening of the AWPR will mean that there is sufficient capacity on the network for the proposals. However, a full transport assessment would be carried out in relation to the proposals and appropriate mitigation provided.

18. Residual value and deliverability

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.	I have considered the likely 'residual value' of the site, as described above, and fully expect the site to be viable: Please tick: <input checked="" type="checkbox"/>
---	--

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

Westhill is identified in the 2017 LDP as a thriving town, which has expanded significantly since the 1960's. The LDP acknowledges Arnhall Business Park as a focus for specialist subsea engineering businesses and is central to Westhill's status as a global subsea centre of excellence.

Although traffic congestion is identified as an issue facing the town, the package of road improvements as part of Phase 3 have been completed and viewed as a successful measure in alleviating traffic congestion in the area at peak commuter times. Further to this, the AWPR and

Appendix 1 – Development Bid

grade separated junction between Westhill and Kingswells will free up additional capacity in the local road network for additional development at the bid site.

Thorough analysis and traffic modelling as part of the Phase 4 development would ensure a cohesive strategy for the delivery of any further road network improvements which will enable the delivery of the bid site which is considered vital to the expansion of Westhill, maintaining its function as an employment centre and subsea centre of excellence.

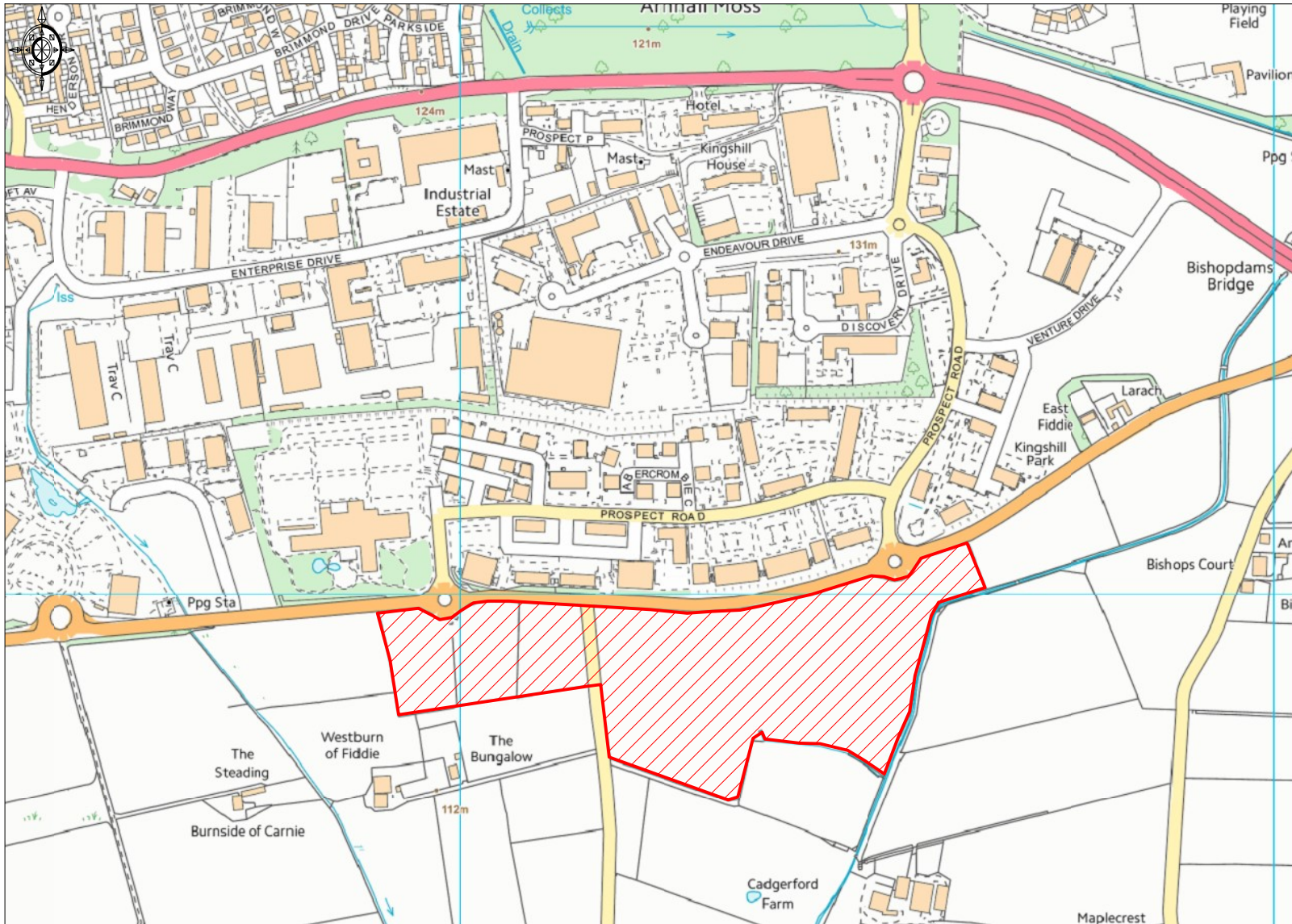
The landowner has been involved in the development of Arnhall Business Park and funded the package of road improvements delivered as part of Phase 3. They are therefore well aware of the issues surrounding the development of the site and do not see the provision of necessary infrastructure as an impediment to development. The landowner is therefore confident that there is a residual value following development of the site and the provision of the necessary infrastructure.

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.



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Appendix 2 – Draft Proposed Local Development Plan - Westhill

WESTHILL

Vision

Westhill is a thriving town located approximately 10-km west of Aberdeen on the A944. It was planned as a new town during the 1960s, and has expanded significantly since. Defining features of the town are the town centre and the Arnhall Business Park, which is a focus for specialist subsea engineering businesses and is central to Westhill's status as a global subsea centre of excellence. There is also a good network of open spaces within the town, including Arnhall Moss and Carnie Woods which are both particularly important features. There are a number of physical constraints to further expansion within the town, including pipelines and topography, which slopes steeply to the north of the town, and the need to avoid coalescence with Kirkton of Skene to the east of the settlement. Significant traffic congestion also remains an issue, particularly along Hay's Way and around the shopping centre. These constraints, combined with the fact that the Proposed Strategic Development Plan 2018 does not include Westhill within a strategic Strategic growth Growth area-Area(SGA), means that development within the pPlan period will be focused primarily on meeting local needs and maintaining Westhill's function as a successful employment centre.

The lack of smaller and affordable homes is an issue for the local community, particularly to meet the needs of an aging population. It has been suggested that outdoor play and recreation facilities do not meet the needs of the community. There is a desire for a skate park to be developed at the heart of the town, as well as support for the delivery of allotments for use by those living in the community. A gym or improved sports facilities would also be welcomed.

Settlement Features

Protected Land	
P1	To conserve the nature reserve, which contributes to the green network, and to provide land for access improvements.
P2	To conserve the Arnhall Moss, which contributes to the green network.
P3 –P8	For education and community issues associated with the primary school and to conserve recreational open space. To conserve the playing fields.
P4	For education and community issues associated with the secondary school and to conserve recreational open space.
P5	For education and community issues associated with the primary school and to conserve recreational open space.
P6	For education and community issues associated with the primary school and to conserve recreational open space.
P7	To conserve recreational open space.
P8	To conserve recreational open space.
P9	To conserve the play area.
P10	To conserve the golf course.
P11	To conserve the playing field.
Reserved Land	
R1	For future expansion of sub-sea industries. Development should be located primarily in the western part of the site due to the presence of the BP Forties pipeline to the east and will need to accord with HSE Planning Advice for Developments near Hazardous Installations. A transport assessment will be required and mitigation of localised and potentially wider strategic traffic impacts should be addressed.
R 1 ₂	Reserved for the future expansion of the health centre. Development on this site must accord with Policy P4 (Hazardous and potentially polluting developments and contaminated land) and the Health and Safety Executive "Planning Advice for

	Developments near Hazardous Installations”, owing to the presence of one or more oil or gas pipelines in the vicinity.
Other Designations	
BUS	Safeguarded for employment-business uses. Development on this site must accord with Policy P4 (Hazardous and potentially polluting developments and contaminated land) and the Health and Safety Executive “Planning Advice for Developments near Hazardous Installations”, owing to the presence of one or more oil or gas pipelines in the vicinity.
TC	Westhill town centre.
GB	Aberdeen-g Green_belt.
FOP1 (Bid GR106)	Future opportunity site for uses associated with the expansion of subsea industries (11.4 hectares).
FOP2 (Bid GR125)	Future opportunity site for housing (1.4 hectares)

Flood Risk

- ~~• The eastern part of site OP3 lies within the Scottish Environment Protection Agency’s (SEPA’s) indicative 1 in 200 flood risk area. A Flood Risk Assessment may be required depending on site layout.~~
- There are water courses running adjacent to and through sites ~~R1 and~~ BUS. A Flood Risk Assessment will be required, and adequate buffer strips will also be required.

Oil and Gas Pipelines

- Part of the settlement is within the Health and Safety Executive (HSE) consultation distance associated with one or more oil or gas pipelines in the vicinity. Developments within this distance must comply with Policy P4: Hazardous and potentially polluting developments and contaminated land, and with the HSE “Planning Advice for Developments near Hazardous Installations”.

Services and Infrastructure

- Local transportation: The provision of new pathways and cycleways will be required.
- Strategic drainage and water supply: Water Impact Assessments will be required as Westhill storage tank is nearing capacity.
- Community facilities: All residential development may be required to contribute towards facilities that serve the community in Westhill. These may be identified in the Community Plan or relevant Community Action Plan.
- Sports and recreation facilities: All residential development may be required to contribute to indoor and outdoor sports and learning facilities in Westhill. These may be identified in the Community Plan or relevant Community Action Plan.

Allocated Sites

OP1: Strawberry Field Road	Allocation: 10 homes
<p>This site was previously allocated as site OP1 in the 2017 LDP, H2 in the 2012 LDP. <u>Planning Permission in Principle for 10 houses was approved in May 2016.</u></p> <p>Located on the western edge of Westhill, the site is bounded by the A944 to the south, Broadstraik Road to the east, Strawberry Fields Road to the north, and a line of mature trees</p>	

which contain the site to the west. The site layout will need to take account of the presence of a pylon line which crosses the western part of the site, and built development is therefore likely to be focussed in the eastern part of the site. Access is most likely to be appropriate via Strawberry Fields Road and/or Broadstraik Road. The development should comprise a mix of house types and sizes in keeping with the character of the surrounding area, including two affordable houses integrated within the site design.

~~An application for planning permission in principle for 10 houses on the site (APP/2010/0289) has been submitted.~~

OP2: Burnland

Allocation: 38 homes

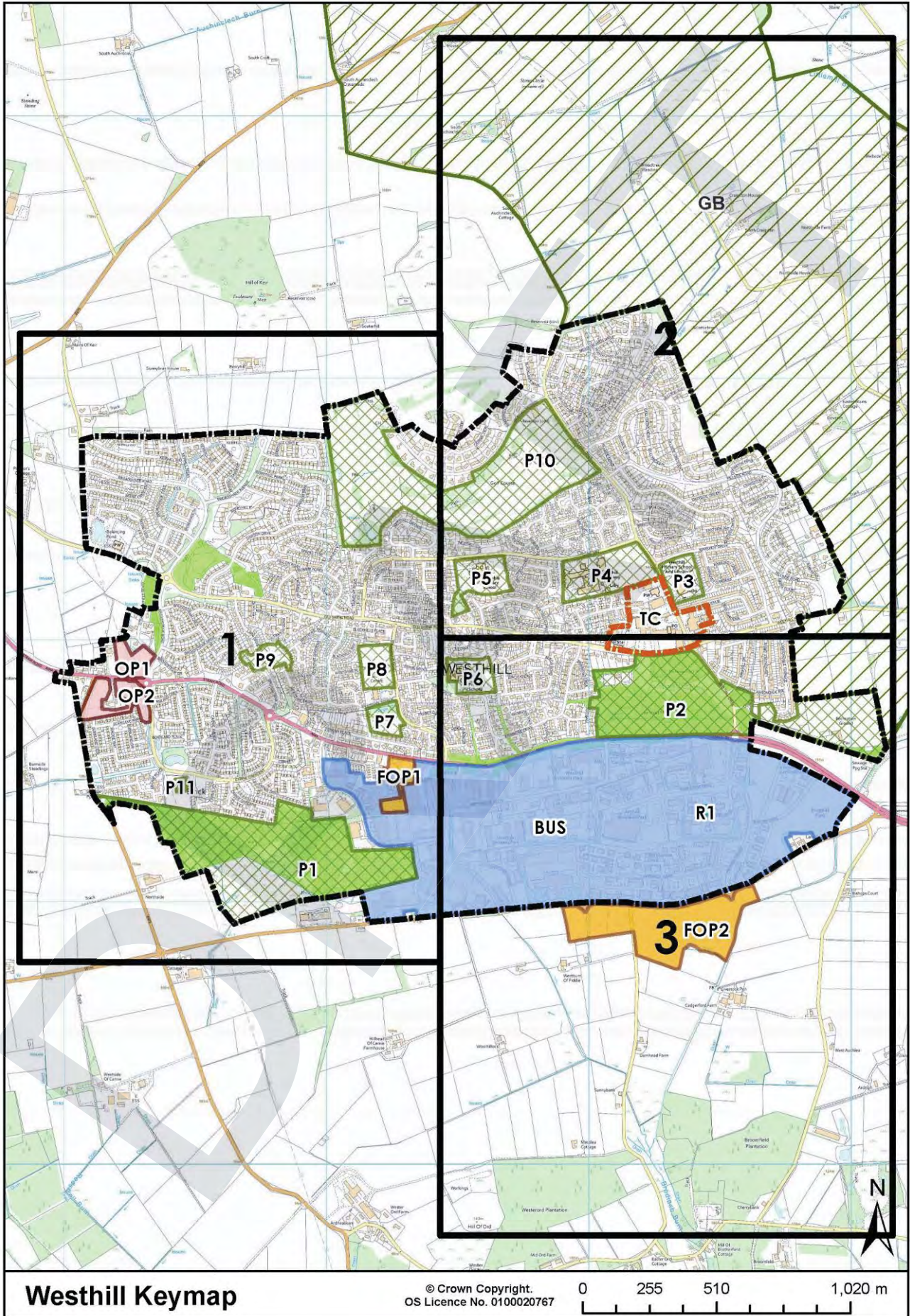
~~This site is subject to an extant planning permission. Efforts should be made to deliver this remaining part of a wider development.~~

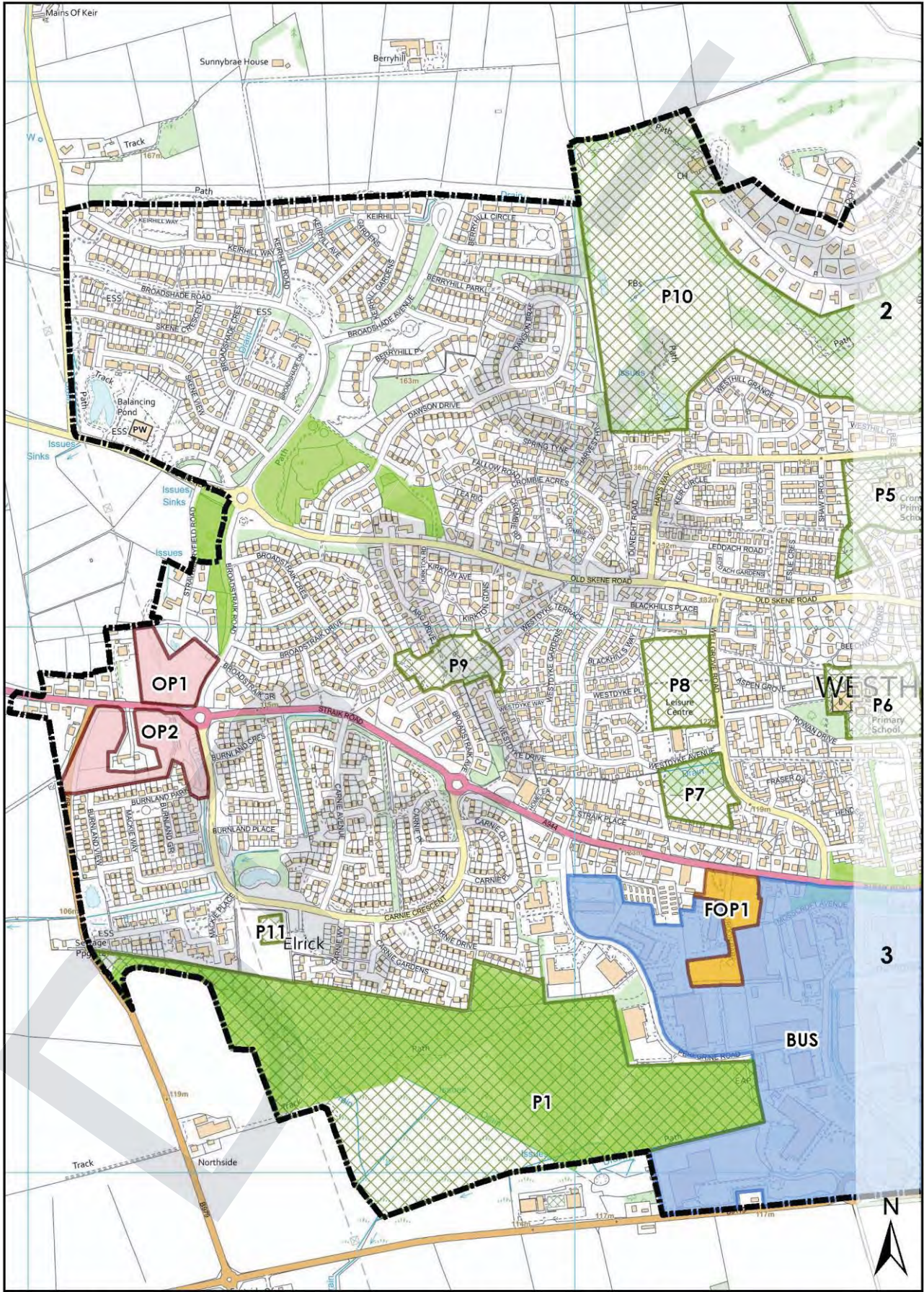
OP2: Arnhall Gateway

Allocation: 4.4ha employment land

~~This site was previously allocated as site E1 in the 2012 LDP. The eastern part of the site lies within the 200-year flood extent of the Brodiach Burn and a flood risk assessment may therefore be required depending on the detailed site layout. Development will also need to comply with the Health and Safety Executive's Planning Advice for Developments near Hazardous Installations (PADHI) owing to the presence of pipeline corridors in proximity to the site.~~

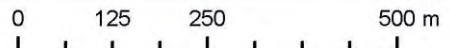
~~The site is covered by a number of planning permissions. These include full planning permission for the formation of infrastructure, roads and drainage (APP/2013/2276), and planning permission in principle for business and industrial development (APP/2006/2551). Approval has also been granted on appeal for a number of the matters specified in conditions on the planning permission in principle (APP/2013/3019). An additional full planning permission for office development also covers part of the site (APP/2013/3560).~~

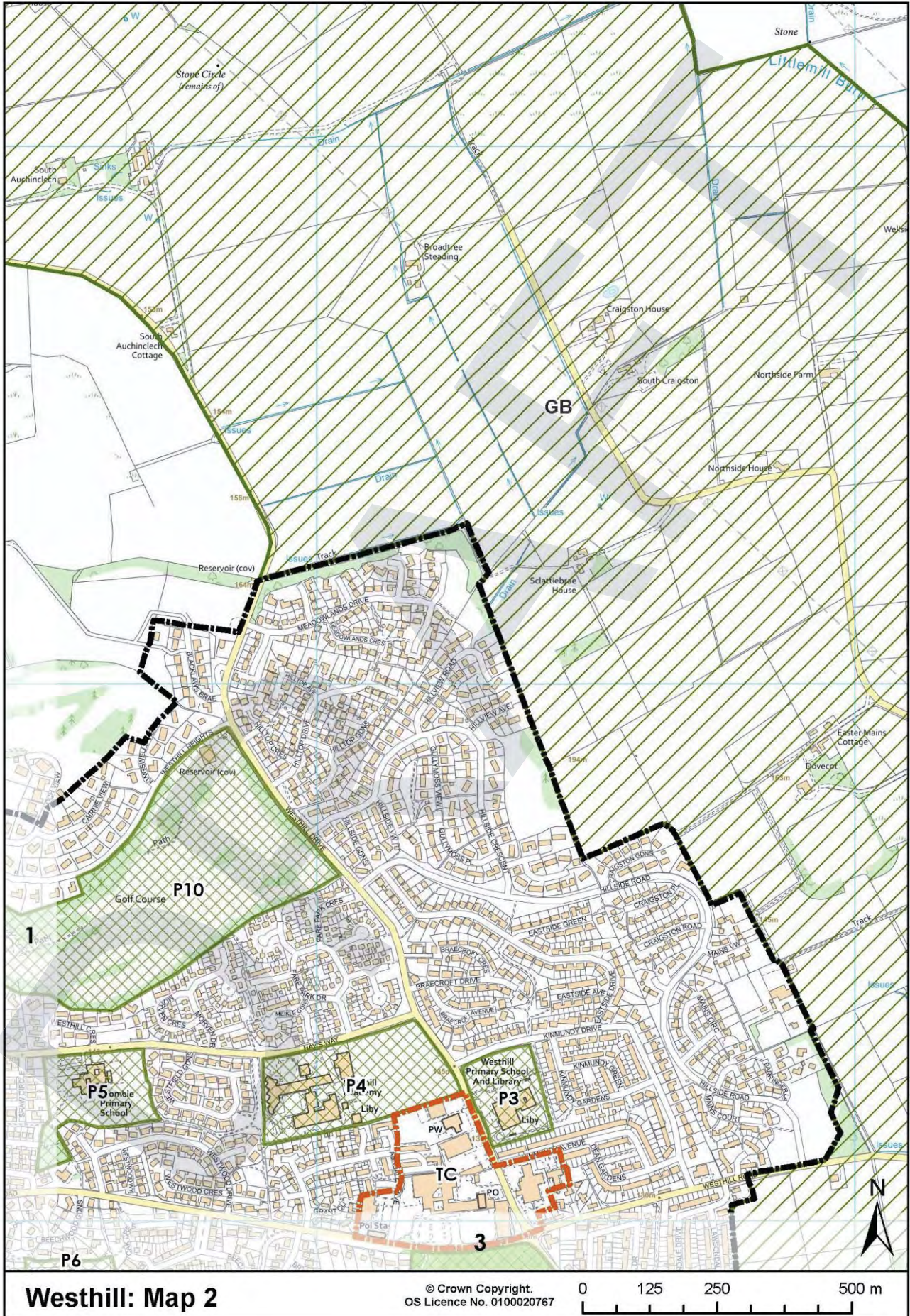


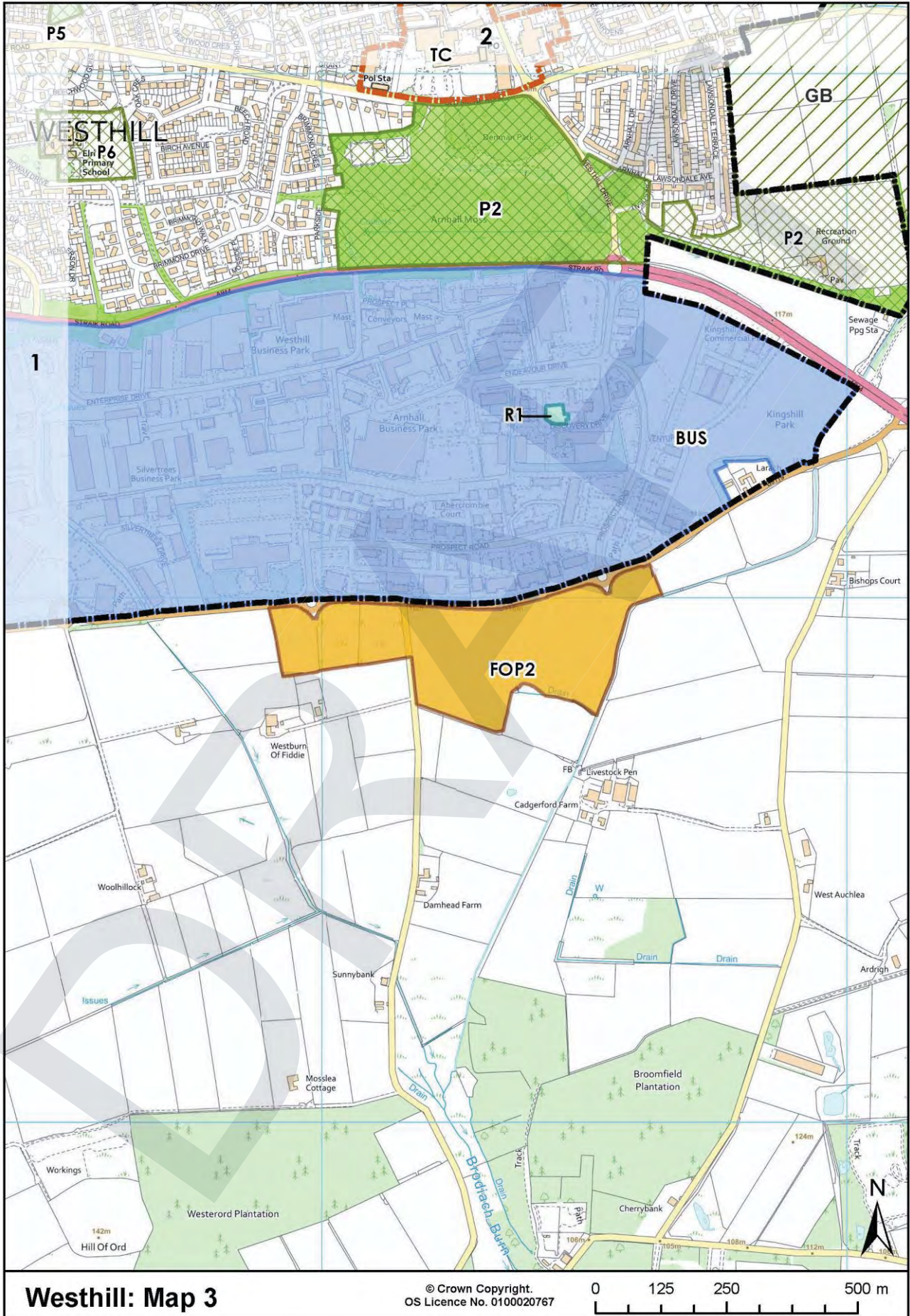


Westhill: Map 1

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Appendix 3 – MIR Representation

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 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. 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.

Name	██████████
Organisation (optional)	Ryden LLP
On behalf of (if relevant)	Westhill Developments (Brodiach) Ltd
Address	██████████ ██████████ ██████████
Postcode	██████████
Telephone (optional)	██████████
E-mail (optional)	████████████████████



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	✓
	Draft Proposed Aberdeenshire Local Development Plan	✓
	Strategic Environmental Assessment Interim Environmental Assessment	<input type="checkbox"/>
	Other	<input type="checkbox"/>

Your comments

Site GR106 – Land South of Arnhall Business Park (Phase 4) – mixed use

On behalf of Westhill Developments (Brodiach) Ltd, support is given to the identification of bid site GR106 as an Officer's preference for the development of employment land and a hotel. However, objection is taken to the identification of this as a reserved site, rather than a site suitable for immediate development.

Therefore, although the identification of this site for uses associated with the expansion of subsea industries is supported in the Draft Proposed Local Development Plan (DPLDP), objection is taken to its identification as a Future Opportunity (FOP) site rather than an Opportunity (OP) site. It should also be highlighted that bid site GR106 is identified as FOP1 in the DPLDP text, but FOP2 in the plan. This requires clarification going forward.

This representation should be read in conjunction with the development bid submitted on behalf of Westhill Developments at the pre-MIR stage. That bid and this representation demonstrate that the site is suitable for identification for immediate employment development.

Officers have made the following comments within the MIR to which we would like to respond.

“The site lies relatively well to the existing BUS site, however, would result in development on the south side of the B9119”

This is not considered to be a constraint to development. The location of the land to the south of the B9119 ensures it is in a sustainable location, well related to access roads and the wider transport network. SPP encourages the development of such locations and efficient use can therefore be made of the existing transport network through the development of this site.

“the site should be taken forward as a reserved option to allow for expansion of the employment hub to the south of Westhill should a need for further employment land in Westhill be established”

Bid site GR106 includes site R1 which was contained in the 2017 Local Development Plan as a site “reserved” for the future expansion of subsea industries. The 2017 LDP set out exactly where development was expected over the next five years and beyond up to 2026. Therefore, the reserved land was considered suitable for development in the second plan period (post 2021 and up to 2026) effectively through the 2021 Local Development Plan.

The 2019 Main Issues Report suggests suitable locations for development for the 2021 LDP, in the period 2021 – 2032. Reserved sites are considered suitable for development post 2032. Identifying bid site GR106 as a “reserved” site in the 2021 LDP means that its suitability will be assessed through the next LDP process and as a result, there are no new opportunities for employment land in Westhill in the period 2021 – 2032. In fact, there were no employment sites allocated in the first plan period in the 2017 LDP and the last employment land allocation was within the 2012 LDP.

Although there are opportunities on the BUS land to the north, the 2018 Employment Land Audit identifies 4.65 ha of established employment land at Arnhall, with 1ha under construction. This leaves 3.65ha left to develop. Historic development rates in Westhill has shown that over the last 12 years, development rates are averaging 2.99 ha per annum. Obviously this is in cycles, with the current market affected by the downturn in the oil industry. However, at the average development rate, the available employment land in Westhill could be fully developed by 2021.

The vision for Westhill contained in the MIR and DPLDP both acknowledge that Westhill is a thriving town. Arnhall Business Park is recognised as a defining feature of the town which is a focus for specialist subsea engineering businesses and is central to Westhill's status as a global subsea centre of excellence. The MIR states that development within the plan period is focussed "primarily on meeting local needs and maintaining Westhill's function as a successful employment centre". Although this strategy is supported, objection is taken to the failure to allocate any employment land in the period 2021-2032 to meet this aim and support Westhill's function as a successful employment centre. If no new employment allocations are identified in the period to 2032, Westhill's function as a successful employment centre will be adversely affected.

It is therefore argued that there is scope for the identification of the entire GR106 bid site within the first plan period to maintain Westhill's function as a global centre of subsea excellence. As such, this site should be identified as an Opportunity site within the Proposed Aberdeenshire Local Development Plan. This would provide flexibility in taking forward additional employment land in Westhill, when the business land to the north is completed and if a need is established in the period 2021-2032.

Scottish Planning Policy (SPP) introduces a presumption in favour of development that contributes to sustainable development. This means that policies and decisions should be guided by making efficient use of existing capacities of land and infrastructure and supporting the delivery of accessible business and leisure development. A package of road improvement measures (funded by the bid proposer) to improve capacity and traffic flow was implemented as part of Phase 3 which was successful in alleviating traffic congestion in the area. The identification of the entire bid site would make efficient use of the investment made in this infrastructure and comply with SPP.

In addition to this, the AWPR is completed and operating. This includes a grade separated junction between Westhill and Kingswells, located approximately 0.8 miles from the bid site. This will improve capacity, encourage demand and support the delivery of this accessible business location and allow bid site GR106 to be identified in the first plan period of the 2021 L. In turn, this will support the future growth of this internationally important sub-sea cluster. Additional mitigation measures required as part of any development would be agreed and provided as part of the planning application process in due course.

Considering the R1 site was reserved for development in the period 2021 – 2026 in the 2017 LDP, it is argued that if it is not appropriate to identify the entire site for immediate development, then at the very least, part of the site (which was previously R1) should be identified for development in the first plan period in the 2021 LDP, rather than becoming part of a larger reserved site for future development in the next LDP.

Conclusion

Aberdeenshire Council acknowledge that Arnhall Business Park is a defining feature of Westhill, which itself is a focus for specialist subsea engineering businesses and central to Westhill's status as a global subsea centre of excellence. Although there are business land opportunities in the area, it is considered essential to allocate further employment land within the first plan period (2021-2032) of the 2021 LDP to maintain Westhill's function as a successful employment centre.

Some employment opportunities exist within the BUS land to the north, however, it is argued that this could be developed by 2021, with investment in infrastructure in this location opening up further demand in the future. Although support is given to the identification of the site as an opportunity for uses associated with the expansion of subsea industries, it is argued that the site should be identified for immediate development rather than a reserved site in the MIR and subsequently a FOP site in the Draft Proposed LDP. This would provide flexibility in taking forward additional employment land in Westhill, when the business land to the north is completed and a need is established.

As such, it is respectfully requested that bid site GR106 is identified as an Opportunity (OP) site for uses associated with the expansion of subsea industries in the Proposed Local Development Plan. Although there is scope to allocate the entire site for immediate development, if this is not agreed, then at the very least the R1 site from the 2017 LDP should be identified for immediate development, with the remainder of the site allocated as a FOP to ensure there are opportunities for immediate employment development in this important employment area.

