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LOCAL DEVELOPMENT PLAN

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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.

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HALLIDAY FRASER MUNRO

CHARTERED ARCHITECTS & PLANNING CONSULTANTS

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 refer to Aberdeenshire Council's Privacy Notice at the end of this form for details of your rights under the Data Protection Act.

Your Details

Date:	24.7.2020
Name:	HALLIDAY FRASER MUNRO
Telephone Number:	[REDACTED]
Email address:	[REDACTED]
Postal Address:	[REDACTED]
Postcode:	[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? **ANM GROUP LTD**

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.



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Your Comments (no more than 2000 words)

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):

Appendix 7d Settlement Statements – Garioch (Westhill, page 620)

Modification Sought: Allocate site GR025 for 120 homes.

Reason for change:

PLEASE SEE SUPPORTING STATEMENT



HALLIDAY FRASER MUNRO
CHARTERED ARCHITECTS & PLANNING CONSULTANTS

PROPOSED ABERDEENSHIRE LOCAL DEVELOPMENT PLAN 2020

RESPONSE TO PLDP

GR025 LAND AT KINMUNDY, WESTHILL

JULY 2020

On behalf of
ANM Group Ltd



HALLIDAY FRASER MUNRO
CHARTERED ARCHITECTS & PLANNING CONSULTANTS

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- KM1 – Development Bid Document**
- KM2 – Main Issues Report Response**



HALLIDAY FRASER MUNRO

CHARTERED ARCHITECTS & PLANNING CONSULTANTS

1. Introduction

- 1.1. This report has been prepared by Halliday Fraser Munro Chartered Architects and Planning Consultants in response to the Proposed Local Development Plan (PLDP) 2020.
- 1.2. On behalf of the ANM Group Ltd, Halliday Fraser Munro submitted a development bid at the 'Call for Sites' stage of the LDP process for land at Kinmundy on the east side of Westhill for around 120 homes. The bid reference is GR025.
- 1.3. The Kinmundy site (GR025) offers an ideal opportunity to develop a well-connected residential community on the Eastern edge of the Westhill settlement. The site is south facing, with multiple access opportunities allowing for good connectivity. The site is adjacent to established residential areas.
- 1.4. Site GR025 has not been taken forward as an allocation in the PLDP. It is noted that the only new housing allocation currently preferred in Westhill is site OP3, a brownfield opportunity on former industrial land. Sites OP1 and OP2 have been carried over from the previous LDP and are identified as constrained in the Housing Land Audit. Westhill then, as one of Aberdeenshire's main settlements, only has a single new and small housing allocation on a difficult brownfield site and extant allocations that are constrained. For a place the size of Westhill with the facilities it has, that scale of development is not appropriate. We therefore consider that additional residential allocations are required in Westhill to take advantage of its facilities and allow for a sustainable extension to an existing large settlement in Aberdeenshire. The Aberdeen City and Shire Strategic Development Plan Examination Report clearly states new housing land will need to be identified due to amended housing land requirement being recommended.
- 1.5. This report sets out the reasons and justification for including GR025 as a residential allocation in the Proposed LDP. For clarity, the modification sought to the PLDP is outlined below:

Modification Sought: *Allocate site GR025 for 120 homes.*

Reason for Change: *To meet the requirement for additional housing in the Aberdeen housing market area of Aberdeenshire, ensure that there is a choice and range of sites available in Westhill to meet local demand and make best use of existing infrastructure and services in one of Aberdeenshire's main towns.*

2. Westhill Summary

- 2.1. The market has proven that Westhill is a popular place and a location that supports successful development. The completions table in the Housing Land Audit (see figure 1) shows that Westhill historically had an average of 88 homes completed per year (from 2010-2015). No substantive allocations were made in Westhill in the 2017 LDP, despite almost all of the allocations made in the 2012 LDP being built out. Due to lack of allocations, there was only one completion in 2018,



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and there is only forecast to be 3 completions are forecast over the next 5 years. This is despite the evidence that housing delivery is strong in the settlement.

Admin Area	Settlement	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2026 +	Con
	Westhill	110	62	134	28	4	0	3	10	0	0	0	0	0	0	0	0	0	0	38

Housing Land Audit 2015 – ‘Housing Completions by settlement’

Admin Area	Settlement	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2030 +	Con
	Westhill	62	134	28	4	1	0	1	2	0	0	0	0	0	0	0	0	0	0	48

Housing Land Audit 2019 – ‘Housing Completions by Settlement’

Figure 1: Extracts from Housing Land Audit’s

- 2.2. Additional housing allocations are needed to sustain supply. Westhill has a population of 12290 people and is the fourth largest town in Aberdeenshire yet it only has an allocation for 111 new homes over the next ten years, 48 of which are identified as constrained. In comparison, Stonehaven, which is smaller than Westhill has over 650 houses allocated and Fraserburgh has 1220 houses allocated, despite its population being only 900 people more.
- 2.3. The only new housing allocation currently preferred in Westhill is site OP3, a brownfield opportunity on former industrial land. Sites OP1 and OP2 have been carried over from the previous LDP and are identified as constrained in the Housing Land Audit. Additional measured future development is needed to sustain the town’s role as a key employment centre and support shops and services. For a settlement the size of Westhill with the facilities it has, that scale of development is not appropriate. We therefore consider that additional residential allocations are required in Westhill to take advantage of its facilities and allow for a sustainable extension to an existing large settlement in Aberdeenshire. The Aberdeen City and Shire Strategic Development Plan Examination Report clearly states new housing land will need to be identified due to amended housing land requirement being recommended.
- 2.4. The Strategic Development Plan Examination Report considers that Westhill has a housing need, and notes that its position is favourable in terms of employment provision and local infrastructure.

“I note that Westhill and its surroundings are in close proximity to employment opportunities locally and in Aberdeen City. The area is also well served by road links and public transport. I further note the recent investment in infrastructure projects locally which could be capitalised upon; and that Westhill has priority housing need and a history of housing delivery.”

Paragraph 14. Page 60

The SDP also notes that *“where justified, there would remain opportunities for growth in Westhill and the surrounding area if not identified within a strategic growth area”* paragraph 11, page 59. This means that there is scope to make allocations in Westhill in line with its location in a local growth and diversification area.
- 2.5. Westhill provides a high number of quality jobs partly thanks to being known as the ‘Global Centre for Subsea Excellence’. 53% of Aberdeenshire’s jobs in the energy and water sector are found in the Westhill and District ward (see KM4: Garioch Area Profile). It operates as a self-



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sustaining town with many residents also working in the town, along with an effective public transport network, core paths and an established and well used town centre.

2.6. The settlement vision for Westhill in Appendix 7d 'Settlement Statements Garioch' notes that the lack of affordable homes is an issue for the local community. The current strategy for delivery of affordable homes is as part of allocated housing sites which are required to deliver 25% of the site as affordable. If no additional housing land is made available there will be no provision of new affordable housing in Westhill and this issue will remain despite Westhill being able to accommodate future measured housing development.

2.7. The Westhill Capacity Study Update (Aberdeenshire Council 2014) has identified a lack of housing diversity and choice in the Westhill housing market. Residential areas are dominated by owner occupied private family dwellings and there is a limited provision of flats and small homes. The current housing provision does not cater to a wide range of needs and does not meet market demand. To address this, future residential allocations are required that allow diversity in the housing market.

3. Site GR025

3.1 The site is located on the eastern edge of Westhill, and extends to 12.4 ha. The site sits to the north of Kinmundy House and borders existing housing and public open space on the eastern edge of Westhill. The site slopes gently downwards to the south.



Figure 2: Site Location



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- 3.2 The proposed site at Kinmundy offers an opportunity to rationally extend the settlement of Westhill in a measured way that would assist in balancing the settlement's growth eastwards against the recent development that has occurred to the west of the town. The site is located adjacent to existing public open space to the west and the established residential edge to the south, providing scope to expand the settlement locally. The site is in close proximity to the town centre, schools, and can be easily reached through a network of pedestrian footpaths.
- 3.3 The development bid (KM1) provides more detail, but it is envisaged that the existing open space could be expanded to the west, taking in the highest part of the site, see indicative masterplan below. Vehicular access to the site is provided via Hillside Road, with a secondary access directly from eastern boundary road which links back to Westhill via the Brodiach Road. The site could accommodate around 120 houses. There is a pipeline to the east of the site but the constraints associated with this have been taken into account in the masterplan layout below. The proposed layout is compliant with the HSE PADHI guidelines.



Figure 3: Indicative masterplan

4. Response to the Proposed Local Development Plan

- 4.1 The Issues and Actions Paper for Westhill prepared by Planning Authority officers suggests that due to constraints in Westhill, no significant new development should be promoted.



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“..., respondents make reference to the Westhill Capacity Study, updated in 2014. Whilst it is recognised that many bids lie within areas identified as being “most suitable” or “suitable” for potential development, the study does not identify the timeline of when it would be suitable, or most suitable in terms of delivery. Additionally, the Study identified that in order to facilitate development it would be necessary to undertake a number of significant improvements to the transport network around Westhill. The Study also recommends that a number of further studies should be undertaken to consider the more sustainable way for Westhill to develop in the future. These studies include a Transport Infrastructure Feasibility Study, a review of the green belt and a Westhill Strategic Masterplan, amongst others.”

- 4.2 The response does not raise any specific issues with site GR025. However, ANM Group disagree with the proposed approach that no development can come forward in Westhill until further assessment has taken place. The Group are concerned about the impact on Westhill if no additional housing allocations are made in the settlement. The site at Kinmundy is not of a significant scale and can be accommodated within the existing infrastructure, albeit with contributions made through S75 contributions where appropriate which would be the norm for any development. The traffic impact of the proposed development would be fully considered at a planning application stage, and any improvements identified as required would be delivered. The commitment suggested by the Council to undertake the transport and masterplan study ‘during the early part of the Plan period’ is vague and there is no specified timescale in the Delivery Programme. Westhill could therefore be left with little development opportunity to meet housing demand until those studies are carried out. The scale of development proposed here when compared to the scale of Westhill as a settlement is limited and will not make any major impact on infrastructure that could not be accommodated within the existing infrastructure or by upgrading that where necessary.
- 4.3 Whilst there is a commitment to undertake a green belt review by the mid term review of the LDP, we are not clear what the benefits would be, given that the LDP process has been used in the past to identify where the green belt should be revised. The purpose of green belt is to direct development to the most appropriate locations, protect and enhance the character, landscape setting and identity of the settlement, and protect and provide access to open space (paragraph 49 of Scottish Planning Policy). The site at Kinmundy is not required to meet the functions of the green belt. Suggesting that decisions should be held off until such a Green Belt review is undertaken is unreliable and has an open-ended timescale that is not acceptable when planning ahead.
- 4.4 Westhill, as the global centre of subsea excellence (see Westhill Town Profile and the Garioch Area Profile) has seen significant employment growth, and it is important to ensure there is housing available to attract incoming workers to live and work sustainably in the same town.

5. Strategy

- 5.1. The housing strategy contained within the PLDP relies heavily on existing allocated sites, a generic densification across sites within the Aberdeen Housing Market Area, and some limited small-scale allocations across the area to meet Strategic Development Plan (SDP) housing requirement. Despite the SDP Report of Examination recommending that additional land will need to be identified, Aberdeenshire Council did not identify additional allocations to meet this requirement.



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- 5.2. This approach raises serious concerns on the range and scale of housing that can be delivered on the back of that do-minimum strategy, the practicality of delivering significantly increased density on certain sites, and the relationship between that strategy, the SDP in its final form when approved and national policy on delivering more housing and a range of housing more effectively.
- 5.3. Additional allocations, in appropriate locations, particularly in established locations within the AHMA such as Westhill are required to deliver the SDP's housing requirement. This is more important considering the SDP Examination recommendations as explained above. Bid site GR025 at Kinmundy presents such a deliverable opportunity.

6. Conclusion

- 6.1. Westhill has a need for a diverse range of house types and tenures to meet market demand and local housing needs. The SDP report of examination notes the housing need, as does the Westhill Capacity Study, and the plan itself sites a requirement for affordable housing in the settlement. Whilst the Strategic Development Plan has not recommended to include Westhill as a Strategic Growth Area, the town remains a key location and as the fourth largest town in Aberdeenshire, allocations should be made to sustain the local economy and services.
- 6.2. The SDP Examination Report recommends additional housing land is required and makes clear the consequence is that more land will need to be identified in Future Local Development Plans.
- 6.3. The site at Kinmundy (bid reference GR025) represents a measured, phased expansion of housing in Westhill to the east. There are no absolute constraints to development and the site is laid out in a manner that ensures it will relate to existing development and the wider settlement. The site is close to the town centre, schools, pedestrian networks and existing bus services.
- 6.4. Having regard to the information set out in this response, we respectfully request that the land at GR025 Kinmundy be allocated in the Local Development Plan as a residential allocation for up to 120 homes.



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References

Aberdeen City and Shire Strategic Development Plan Report of Examination:
<http://www.dpea.scotland.gov.uk/CaseDetails.aspx?id=120349>

Westhill Town Profile: <https://www.aberdeenshire.gov.uk/media/24573/westhilltownprofile.pdf>

Garioch Area Profile: <https://www.aberdeenshire.gov.uk/media/23884/gariochprofile.pdf>

Westhill Capacity Study: <https://www.aberdeenshire.gov.uk/media/11446/westhillcapacitystudyupdate2014.pdf>

Supporting Documents:

KM1 – Development Bid Document



LAND AT KINMUNDY, WESTHILL

LOCAL DEVELOPMENT PLAN BID
MARCH 2018

PREPARED BY HALLIDAY FRASER MUNRO FOR ANM GROUP LTD



VISION

The purpose of this document is to support the Local Development Plan bid submission for Land at Kinmundy, which has been prepared on behalf of ANM Group Ltd by Halliday Fraser Munro Architects and Planning Consultants.

The site at Kinmundy offers an excellent opportunity to deliver a high quality residential development, ideally located to meet the local housing needs of Westhill.

This document outlines how the design process has developed following a thorough analysis of the site and its unique opportunities and constraints.

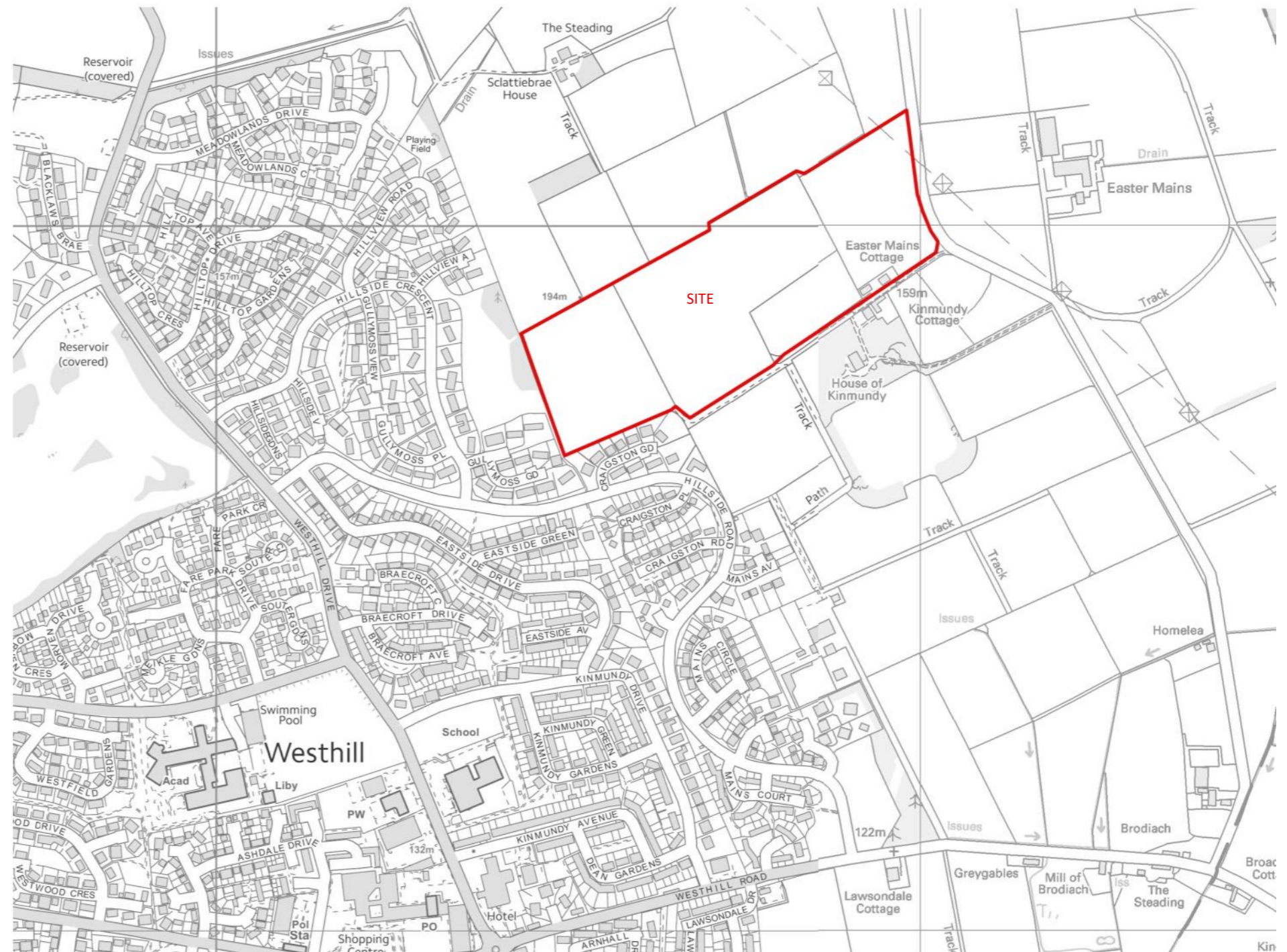


“The Kinmundy site offers an opportunity to develop a well connected residential community on the Eastern edge of the Westhill settlement”

SITE DESCRIPTION

The Site

The site, is located on the eastern edge of Westhill, and extends to 12.4 ha. The site sits to the north of Kinmundy House and borders existing housing and public open space on the eastern edge of Westhill. The site slopes gently downwards to the south. The bid is submitted on behalf of ANM Group Ltd, the owners of the land. The site is believed to be suitable for the development of up to 120 houses as an allocation in the forthcoming Aberdeenshire Local Development Plan 2021.



Location Plan

GROWTH OF WESTHILL

Growth of Westhill

Westhill has undergone a period of rapid expansion since construction of the first houses during the 1960's. Initially, development spread northwards from Elrick and took advantage of south facing slopes, but more recently expansion has seen the town grown to the south, west and north.

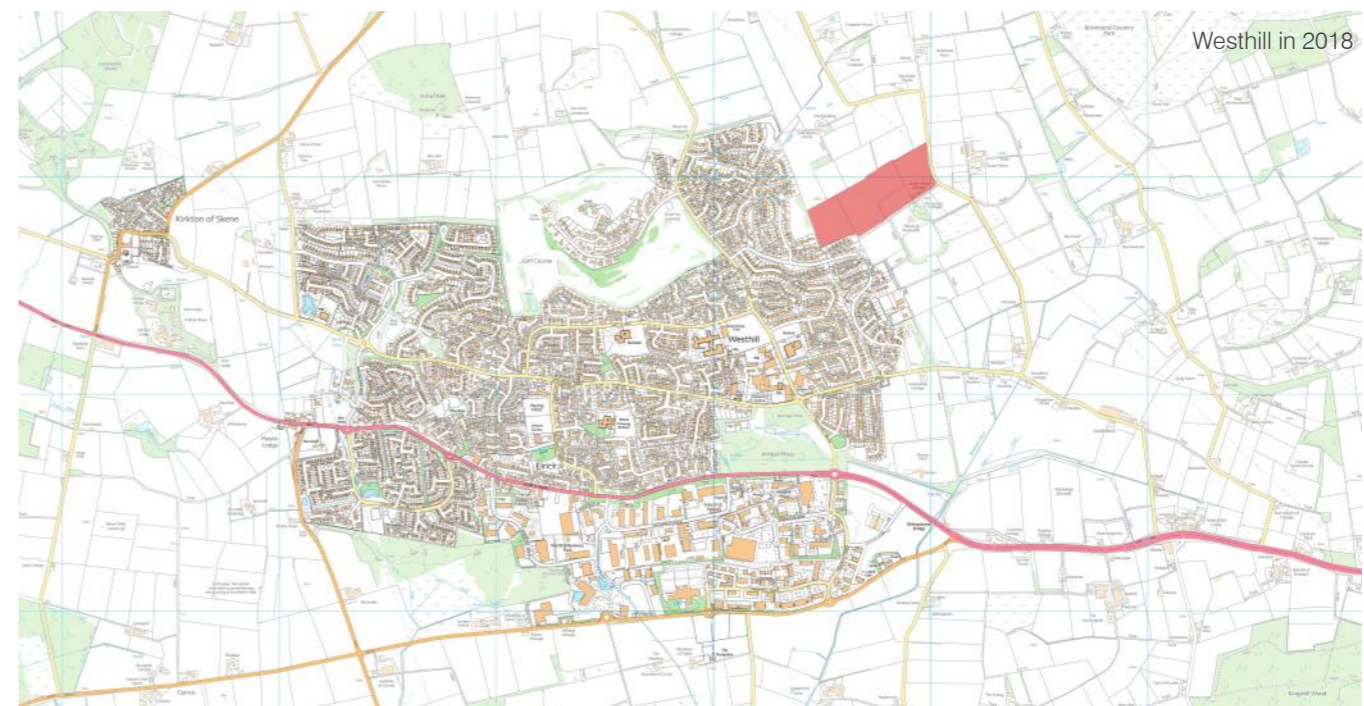
The diagrams opposite illustrate the pattern of growth within Westhill over the past 10 years.

Planning Opportunities

The proposed site at Kinmundy offers an opportunity to rationally extend the settlement of Westhill in a measured way that would assist in balancing the settlement's growth against the recent development that has occurred to the east of the town.

The site is located adjacent to existing public open space to the west and the established residential edge to the south, providing scope to expand the settlement locally. The site is in close proximity to the town centre, schools, and can be easily reached through a network of pedestrian footpaths.

Substantial development has occurred in Westhill in the recent past with a dramatic increase in large office developments and overall economic activity in the area. This has occurred in spite the fact the settlement does not lie within a Strategic Growth Corridor. Westhill is clearly a key settlement with development opportunities.

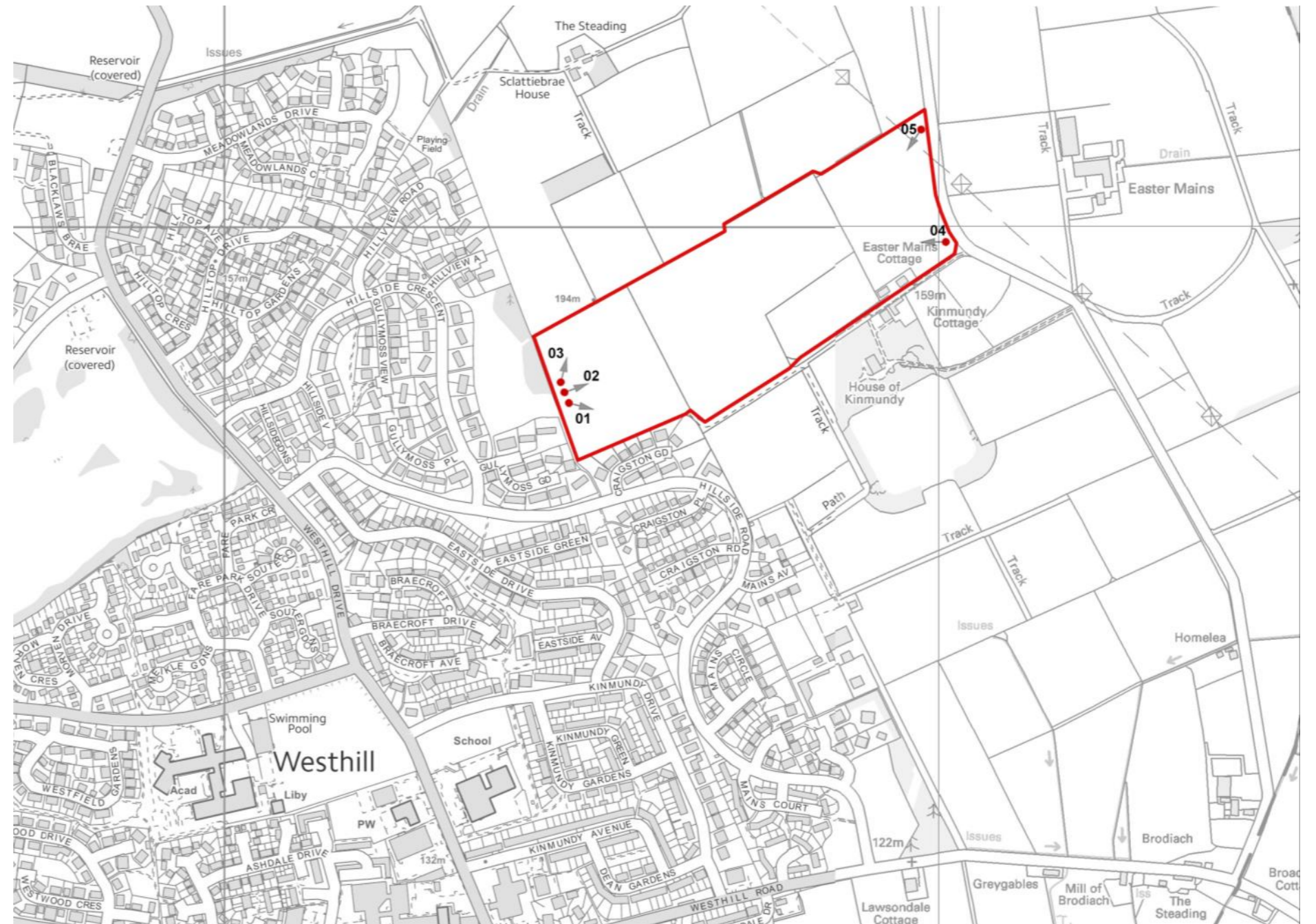


VISUAL APPRAISAL

Views

Viewpoints have been selected to illustrate both the existing site character and surrounding context. These viewpoints have informed a visual analysis of the potential impacts on the surrounding area and to guide the proposed layout of the site.

A number of representative photographs of the site and its surroundings are contained within this document, which correspond with the viewpoint locations indicated on the adjacent plan.



Viewpoints Diagram



Viewpoint 01 — View to site from open space on western boundary looking south towards Kingshill



Viewpoint 02—View to site from open space on western boundary looking east towards Brimmond Hill — note adjacent housing



View 03—View to site from open space on western boundary looking north to highest point



Viewpoint 04—View towards site on approach from South along eastern boundary, looking North-West from boundary road.

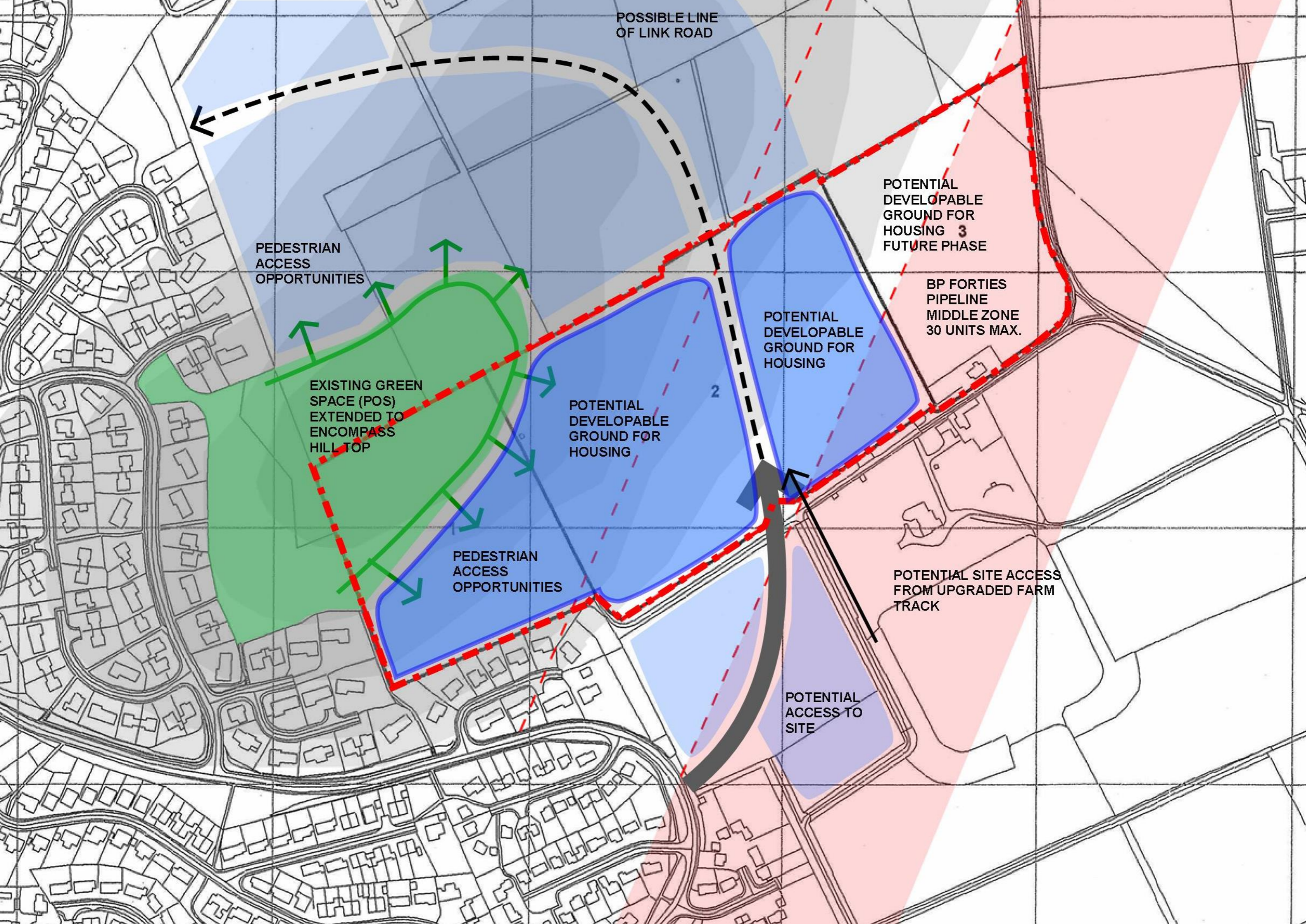


View 05—View towards site on approach from North along eastern boundary, looking South-West from roadside toward House of Kinmundy.

ANALYSIS & CONSTRAINTS

Constraints & Opportunities

- South facing sloping site;
- [REDACTED] pipeline outer and middle zone passes over the south eastern corner of the site;
- Access opportunities from east and west;
- Potential for future link road provision;
- Strong relationship to existing adjacent housing;
- Opportunities for enhanced public open space / parkland creation.



POSSIBLE LINE OF LINK ROAD

PEDESTRIAN ACCESS OPPORTUNITIES

EXISTING GREEN SPACE (POS) EXTENDED TO ENCOMPASS HILL TOP

POTENTIAL DEVELOPABLE GROUND FOR HOUSING

PEDESTRIAN ACCESS OPPORTUNITIES

2

POTENTIAL DEVELOPABLE GROUND FOR HOUSING

POTENTIAL DEVELOPABLE GROUND FOR HOUSING 3 FUTURE PHASE

BP FORTIES PIPELINE MIDDLE ZONE 30 UNITS MAX.

POTENTIAL SITE ACCESS FROM UPGRADED FARM TRACK

POTENTIAL ACCESS TO SITE

MASTERPLAN CONCEPT

Accommodation Schedule

Gross Site Area	29.7 acres
Public Open Space	12 acres (40%)
Total Unit Numbers	120 houses

Key Design Principles

- The site can accommodate approximately 120 residential units, consisting of a mix of housing tenures and types, including terraced, semi-detached and detached;
- The development addresses and enhances the existing parkland amenity along the western boundary, providing extensive connections back through pockets of green space linking existing pedestrian networks back towards the town centre.
- The green network covers the highest point within the site, offering screening, wind shelter and allowing growth of the existing natural environment. This expanse of amenity will bring benefit to the wider community through maximising connectivity and extending woodland walkways within the settlement. This area could include path networks, woodland planting and picnic seating. Smaller green parks could include play equipment.
- The street pattern follows the natural topography of the site, sweeping from west to north east around the parkland space. This character echo's the relationship of similar streets to the south and west in Craigston Place, Craigston Gardens and Gullymoss Gardens.
- The layout has been designed around the existing wider connections and developing a relationship to the parkland space. Due to the site topography, the majority of houses benefit from a good solar aspect and views south toward Kingshill;
- Vehicular access to the site is provided via Hillside Road, with a secondary access directly from eastern boundary road which links back to Westhill via the Brodiach Road.





Supporting Documents:

KM2 – Main Issues Report Response



HALLIDAY FRASER MUNRO
CHARTERED ARCHITECTS & PLANNING CONSULTANTS

**ABERDEENSHIRE LOCAL DEVELOPMENT PLAN
RESPONSE TO MAIN ISSUES REPORT
GR025 LAND AT KINMUNDY, WESTHILL**

APRIL 2019

On behalf of
ANM Group Ltd



HALLIDAY FRASER MUNRO
CHARTERED ARCHITECTS & PLANNING CONSULTANTS



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3. Response to MIR
4. Housing Strategy
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HALLIDAY FRASER MUNRO

CHARTERED ARCHITECTS & PLANNING CONSULTANTS

1. Introduction

- 1.1. This report has been prepared by Halliday Fraser Munro Chartered Architects and Planning Consultants in response to the Main Issues Report (MIR) stage of the forthcoming Aberdeenshire Local Development Plan 2021.
- 1.2. On behalf of the ANM Group Ltd, Halliday Fraser Munro submitted a development bid at the 'Call for Sites' stage of the LDP process for land at Kinmundy on the east side of Westhill for around 120 homes.
- 1.3. The Kinmundy site offers an ideal opportunity to develop a well-connected residential community on the Eastern edge of the Westhill settlement.
- 1.4. The development bid set out an indicative layout of south facing housing arranged in streets running east – west and an eastern parkland area connected with existing public open space and core path networks. Access opportunities exist from both the south and west. The site is situated immediately adjacent to an existing established residential area at Hillside Gardens and Craigston Road on the eastern edge of Westhill.
- 1.5. Bid Site GR025 has not been supported in the Main Issues Report as an Officer's Preference at this stage in the preparation of the forthcoming Aberdeenshire Local Development Plan 2021. It is noted that the only new housing allocation currently preferred in Westhill is GR125, a site for 33 homes on Straik Road.
- 1.6. We consider that additional residential allocations are required in Westhill. The Aberdeen City and Shire Strategic Development Plan for the area is not yet agreed, and we are aware of a large number of submissions made to the Proposed SDP suggesting that Westhill should be included within a Strategic Growth Area and suitable development allocations secured through the LDP. We support this view and propose that site GR025 at Kinmundy is included as a suitable residential development allocation.
- 1.7. This report sets out the reasons and justification for including GR025 as a residential allocation in the Proposed LDP.

2. Westhill Summary

- 2.1. The market has proven that Westhill is a popular place and a location that supports successful development. Westhill provides a high number of quality jobs partly thanks to being known as the 'Global Centre for Subsea Excellence'. It operates as a self-sustaining town with many residents also working in the town, along with an effective public transport network, core paths and an established and well used town centre.



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- 2.2. All substantive allocations in Westhill made in the last LDP have been built out and additional housing allocations are needed to sustain supply. Additional measured future development is needed to sustain the towns role as a key employment centre and support shops and services.
- 2.3. The settlement vision for Westhill notes that the lack of affordable homes is an issue for the local community. The current strategy for delivery of affordable homes is as part of allocated housing sites which are required to deliver 25% of the site as affordable. If no additional housing land is made available there will be no provision of new affordable housing in Westhill and this issue will remain despite Westhill being able to accommodate future measured housing development.
- 2.4. The Westhill Capacity Study Update (Aberdeenshire Council 2014) has identified a lack of housing diversity and choice in the Westhill housing market. Residential areas are dominated by owner occupied private family dwellings and there is a limited provision of flats and small homes. The current housing provision does not cater to a wide range of needs and does not meet market demand. To address this future residential allocations are required that allow diversity in the housing market.

3. Response to the MIR

- 3.1. Site GR025 Kinmundy is not an Officer's Preference in the MIR. The reasons given for not supporting the bid are as follows:

'The proposed site is found on the north east perimeter of Westhill. The site is constrained by its situation within the greenbelt and the Health and Safety Executive's pipeline consultation zone. Access to the site relies on a narrow, unclassified road that would require to be brought up to adoptable standards. A second access point would also be required. This site is considered unsuitable for development.'

- 3.2. The Officer's view and associated issues can be broken down and will be examined in more detail below, however it is worthwhile to note that many of the other development bids in Westhill are criticised for not 'relating well to the existing settlement', however GR025 is not. This is good starting point for the proposal and we would concur that the development on the site would be well related to existing housing and public open space.
- 3.3. ***'The site is constrained by its situation within the greenbelt and the Health and Safety Executive's pipeline consultation zone.'***

It is recognised that the [REDACTED] pipeline consultation zones. This is fully acknowledged in the context plan on page 13 of the LDP bid document that shows the zones. The indicative layout plan has however been designed to take full account of these zones and the proposal



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is in full accordance with the HSE PADHI+ guidance. Many parts of Westhill are affected by pipelines and their related zones, however this does not preclude development providing the HSE PADHI+ guidance is complied with. This is evident most notably in relation to the recently completed housing at Broadshade on the western side of Westhill. We do not therefore consider that the presence of the pipeline represents a valid reason not to support development on the GR025 site.

- 3.4. ***'Access to the site relies on a narrow, unclassified road that would require to be brought up to adoptable standards. A second access point would also be required. This site is considered unsuitable for development.'***
- 3.5. The second and final issue raised through the MIR assessment of the GR025 bid is that of vehicular access. We consider that a number of access options exist to serve the site from both the east and west. These include roads being extended from the adjacent residential streets, however the technically preferable option would be from Hillside Road.
- 3.6. The adjacent development bid for up to 77 homes on site GR042 is noted. The promotion of this site for housing also presents further, shared vehicular access opportunities. The site benefits from excellent pedestrian linkages to public open space.
- 3.7. In summary we do not believe that the technical issues regarding the pipeline proximity and road access options raised through the MIR assessment of Site GR025 represent robust reasons not to allocate it. Having reviewed the MIR in its entirety, there are examples of sites with more notable constraints than GR025 that are 'preferred' by officers.

4. Housing Strategy

- 4.1. The housing strategy contained within the Main Issues Report relies heavily on existing allocated sites, a generic densification across sites within the Aberdeen Housing Market Area, and some limited small-scale allocations across the area to meet Strategic Development Plan (SDP) housing requirement.
- 4.2. This approach raises serious concerns on the range and scale of housing that can be delivered on the back of that do-minimum strategy, the practicality of delivering significantly increased density on certain sites, and the relationship between that strategy, the SDP in its final form (having regard to Westhill potentially being in an SGA) when approved later in 2019 and national policy on delivering more housing and a range of housing more effectively.
- 4.3. Additional allocations, in appropriate locations, particularly in established locations within the AHMA such as Westhill are required to deliver the SDP's housing requirement. Bid site GR025 at Kinmundy presents such a deliverable opportunity.



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5. Conclusion

- 5.1. Westhill has an identified need for a diverse range of house types and tenures to meet market demand and the needs.
- 5.2. We consider bid site GR025 represents a measured, phased expansion of housing in Westhill to the east. There are no absolute constraints to development and the site is laid out in a manner that ensures it will relate to existing development and the wider settlement.
- 5.3. Having regard to the information set out in this response to the Main Issues Report, we respectfully request that the land at GR025 Kinmundy be supported in the Proposed LDP as a residential allocation for up to 120 homes.