



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 17 July 2020.

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



ACCESSIBILITY

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

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

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

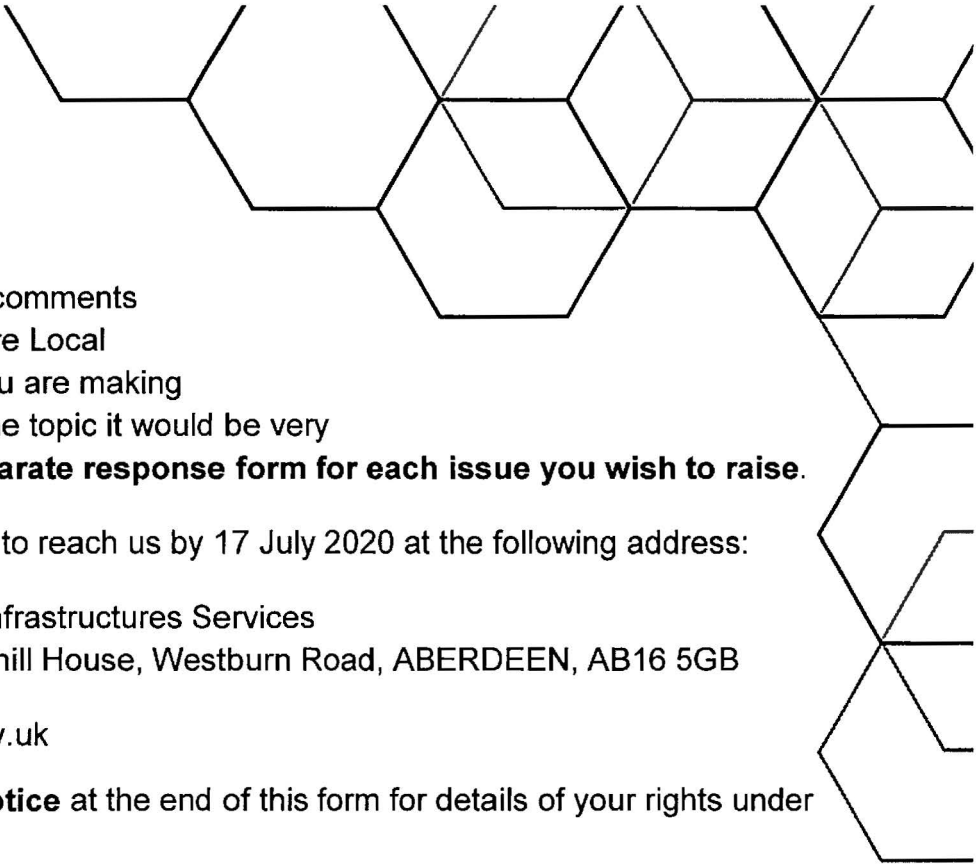
Jeśli potrzebowali będą Państwo informacji z niniejszego dokumentu w innym języku, pisanych dużą czcionką, w wersji łatwej do czytania, w alfabecie Braille'a lub w brytyjskim języku migowym, proszę o telefoniczny kontakt na numer 01467 536230.

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

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

Tel: 01467 536230
Email: ldp@aberdeenshire.gov.uk
Web: www.aberdeenshire.gov.uk/ldp
Follow us on Twitter @ShireLDP

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



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

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

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

Email: ldp@aberdeenshire.gov.uk

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:	Marianne
Surname:	Evans
Date:	15 July 2020
Postal Address:	Stewart Milne Homes, [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? Stewart Milne Homes

☒ 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):

Portlethen Settlement Statement:

Land at Schoolhill, Portlethen (Ref KN057) should be identified as an Opportunity site for approximately 400 homes, land for education use and local retail use.

Reason for change:

We object to the failure of Aberdeenshire Council to identify land at Schoolhill, Portlethen (Reference KN057) as an opportunity site for up to 400 homes, land for education use and local retail use. A design concept document (Appendix 1) has been prepared which demonstrates that this site can come forward as a stand alone site as an extension to the existing Hillside area of Portlethen. Technical studies submitted at "development bid" stage, whilst referencing a larger site demonstrates that there are no technical constraints to the delivery of KN057 on its own. The development of site will enhance the north western edge of Portlethen and provides a natural extension to Schoolhill Phase 1 which has been successfully developed. The indicative masterplan illustrates the proposed landscaping which would enhance the settlement's edge and also creates a variety of safe walking and cycling links which connect to the wider area.

It is unfortunate that the assessment of the site (Main Issues Report) has only been carried out by considering as site KN057 as part of a wider proposal for 1550 homes. As a result the impact of the development proposals is overstated. The impact of development on the Aberdeen Green Belt is overstated (Main Issues Report and Issues and Actions Paper – Kincardine and Mearns). Scottish Planning Policy (SPP) p.15 which identifies the role of a Green Belt advises:

"For most settlements, a green belt is not necessary as other policies can provide an appropriate basis for directing development to the right locations. However, where the planning authority considers it appropriate, the development plan may designate a green belt around a city or town to support the spatial strategy by:

- directing development to the most appropriate locations and supporting regeneration;
- protecting and enhancing the character, landscape setting and identity of the settlement; and
- protecting and providing access to open space".

In terms of these three criteria above, it is noted that the Council have historically supported the release of this site from the Green Belt and the 2008 Portlethen Corridor Capacity Study identified the land as a preferred option for development where coalescence would be prevented and that the AWPR would limit further expansion. The Reporter to the Examination of the 2016 Local Development Plan commented that "the site is relatively flat

and featureless” and that the AWPR “would assist in visually containing the development to some extent” (Reporters Report page 727). It is considered that these conclusions still remain valid and that the minimal impact on the Green Belt would be justified where the expansion of the settlement would be logical and appropriate. The development has the potential to enhance the identity of the settlement and create a location which would support both the new and existing residents of the Portlethen. The site is not open space; therefore, the development of the land will not prevent access to an area of public open space rather the development can create access links within the site to the surrounding area.

The impact on the Green Belt would be *de minimus* in the overall context of the Aberdeen Green Belt and would be justified for the development of a logical and appropriate site. The development as shown in the indicative masterplan will enhance the identity of Portlethen through providing a defined edge to the town. Portlethen is an appropriate location for development being situated within a Strategic Growth area where the majority of strategic allocations are anticipated. Indeed paragraph 3.11 of the Proposed Plan advises, “the area around Aberdeen City continues to be the powerhouse of economic activity in the region and so the land allocations made in settlements around Aberdeen City reflect this.” Now that the AWPR is built and operational this is confirmed.

The impact of the proposals on the Findon Junction are also overstated. Aberdeenshire Council advised at the MIR stage and the draft Proposed Plan that the Findon junction was overcapacity. Members requested that reference to this be removed in the Proposed Plan (Action and Issues Paper – Kincardine and Mearns) as it was unsubstantiated. Indeed, the assessment carried out by DBA shows the efficient operation of the roundabout. Should works be required, minor enhancements to the roundabout with the benefit of land owned by SMH could be implemented.

At MIR stage, officers suggested that surface water was an issue for the site “with no indication of where SUDs ponds would be provided.” The indicative masterplan shows locations for SUDs and surface water and as a result would not be a constraint to development. A further concern of officers was the suggestion that there is a raised lowland bog on site. An assessment of this was carried out in 2015 and was not deemed to be a constraint to development. This would be further assessed at planning application stage and does not compromise the zoning of the site. In terms of the capacity of Hillside Primary School, which was given as a reason not to zone the site (MIR), an extension to the school is currently being built and land is being reserved in the Proposed Plan for any future extension to the school. Developer contributions would be made to this as required. In addition, land has been reserved for education use as shown in the masterplan should it be required.

Stewart Milne Homes and Homes for Scotland have submitted representations arguing the need for more housing land to be identified through the Local Development Plan. In addition, Aberdeenshire Council themselves have at Infrastructure Services Committee on 3 October 2019 (Appendix 2) advised Councils that due to the lack of sites proposed to be taken forward in Portlethen, 85% of new sites in the Strategic Growth Area would be removed and other sites may have to be included. A shortfall of at least 300 homes therefore exists in this corridor. This site at Schoolhill is effective and can be delivered in the short term and should be identified as an opportunity site for up to 400 homes, land for local retail and education uses accordingly.



CONTENTS



1.0

Introduction

1.1 Background

1.2 Site Location

1.3 Site Analysis

1.4 Masterplan Evolution

2.0

Phase 2

2.1 Masterplan Concept Development for Phase 2

2.2 Phase 2 Layout

2.3 Phase 2 Neighbourhood Centre

2.4 Phase 2 Aerial View

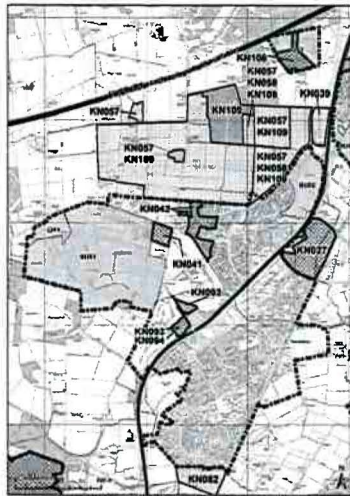
1.0 INTRODUCTION

1.1 BACKGROUND

Stewart Milne Homes have submitted representations to the Aberdeenshire Local Development Plan seeking release of their wider masterplan area (146ha) from the Green Belt for a mixed use development including residential (approx. 1550 units), open space, education, retail and associated infrastructure (inc. land for a health centre).

Through the LDP 2021 Call for Sites Stewart Milne Homes submitted representations for both the wider masterplan site (ref: KN058) and for a smaller 27ha site (KN057) which seeks a land allocation for mixed use development including residential (approx. 400 units), open space, education, retail, and associated infrastructure (inc. land for a health centre).

This document relates to the design and concept evolution of the KN057 site which has taken into account comments received from the council through the Call for Sites process and further supports the promotion of the KN057 site through the Local Development Plan process and illustrates that the site is appropriate in terms of release from the Green Belt.



Extract from MIR settlement strategy.

KEY

— Schoolhill Phase 2 Site Boundary



Site Location

1.0 INTRODUCTION

1.2 SITE LOCATION

PHASE 2 (RED LINE BOUNDARY)
Keppie have carried out a capacity study to illustrate how this initial development will tie into the revised strategic masterplan concept.

KEY
 Schoolhill Phase 2 Site Boundary



Site Location

1.0 INTRODUCTION

1.3 SITE ANALYSIS

The diagram opposite gives an overview of the site analysis undertaken.

TOPOGRAPHY

The site falls generally from west to east. The sloping site presents many opportunities for long distance views.

DRAINAGE

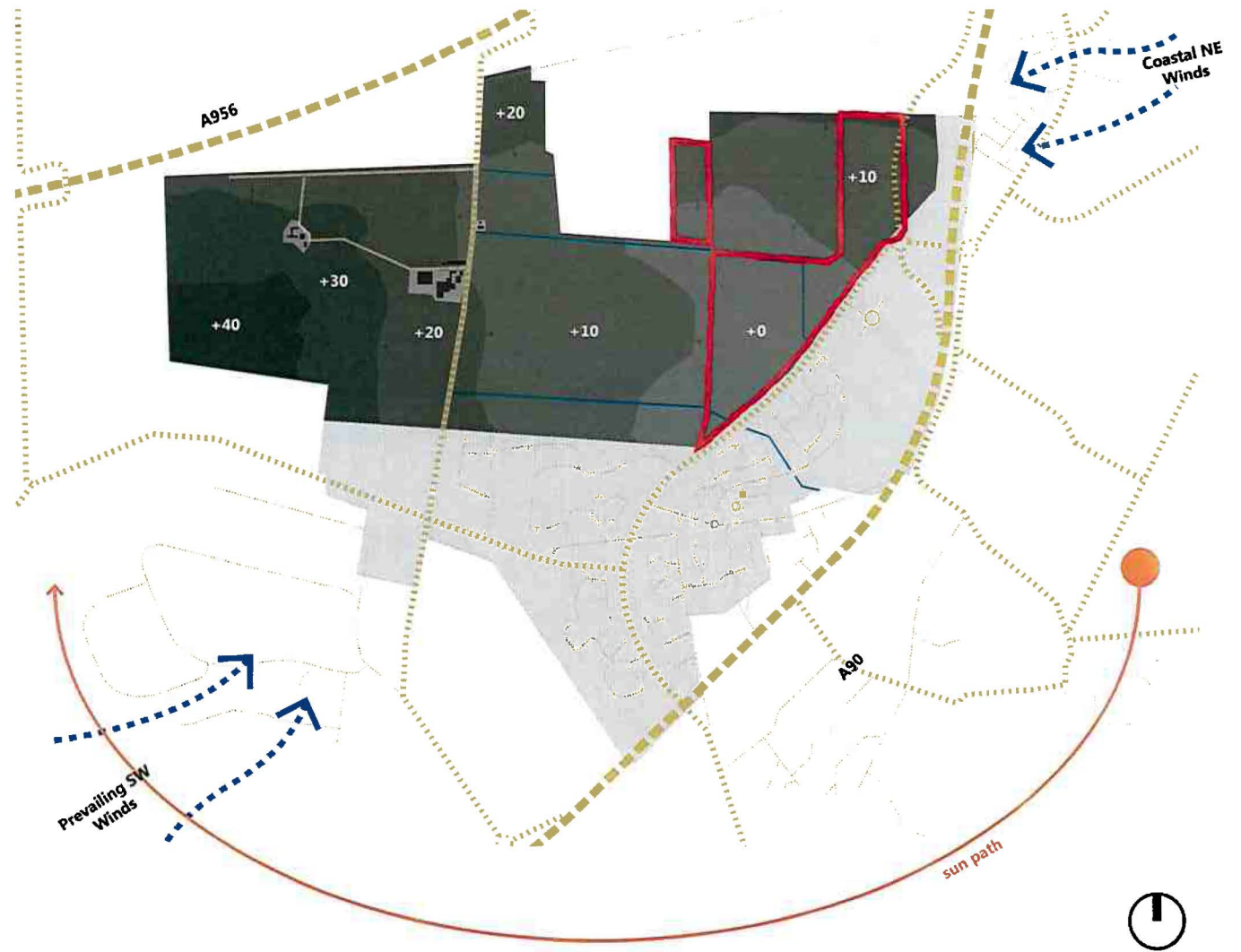
The site has raised causeways with parallel drainage ditches.

BUILDINGS

There are a small collection of existing buildings outwith phase 2 site boundary. These consist of small residences and agricultural buildings.

KEY

- Primary Road
- Secondary Road
- Tertiary Road
- Drainage Ditches
- Schoolhill Phase 2 Site Boundary



Site Analysis Diagram

The first part of the paper describes the data and the methods used to estimate the parameters of the model. The second part presents the results of the estimation, and the third part discusses the implications of the findings.

Previous Masterplan

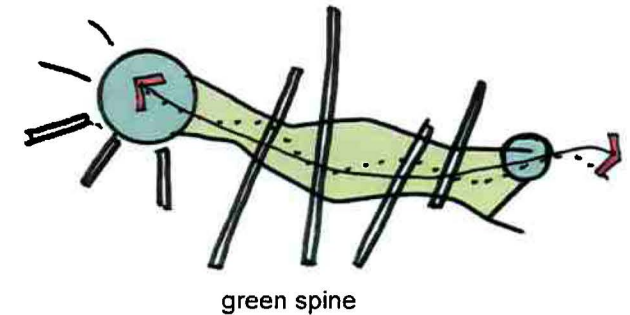
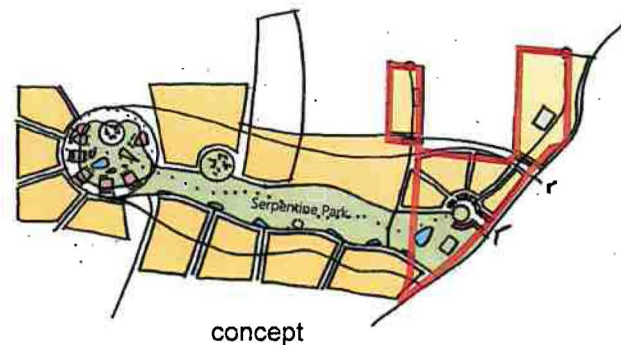
2.0 PHASE 2

2.1 MASTERPLAN CONCEPT DEVELOPMENT FOR PHASE 2

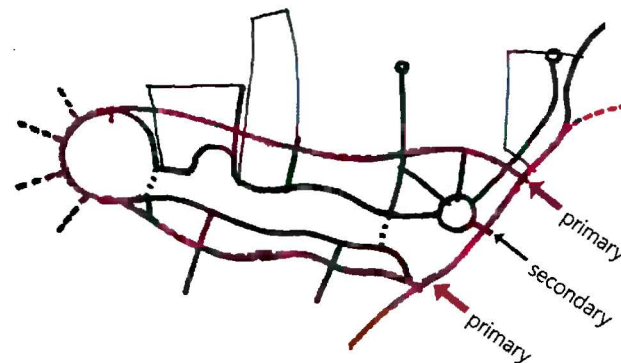
While we are focused on Phase 2, the following masterplan diagrams have been developed to illustrate how Phase 2 can be developed independently and also as a key part of any future masterplan development strategy.

The masterplan concept is centred around the creation of an organic, flowing central green space that links the neighbourhoods, open spaces and variety of building types together.

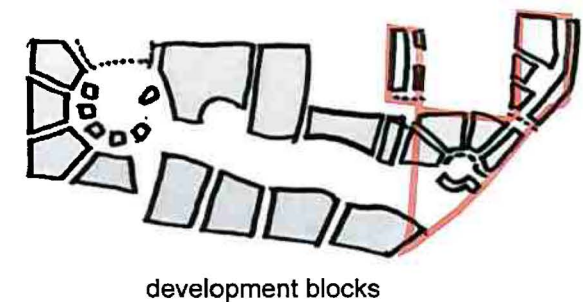
Arriving firstly into a dense 'town' centre, meandering routes then lead through a unique landscaped park which offers distribution routes into the variety of residential zones (meadowlands, waterways, woodlands, neighbourhood centre).



The green central spine unites the overall masterplan and acts as a way-finding and orientation device for pedestrian and vehicle routes. The neighbourhood centre in the east is linked to the new destination park in the western commercial area through this 'serpentine park' which offers a variety of landscaped spaces within.



The masterplan concept has evolved to incorporate a clear hierarchy of vehicular and pedestrian routes through the site.



Defined development blocks incorporate active frontages to primary circulation routes, creating a safe and welcoming environment which benefits from passive supervision.

2.0 PHASE 2

2.2 PHASE 2 LAYOUT

The KN057 site extends to 27ha to the west of Cookston Road. The site is bounded on the east and south by existing built developments including residential, business and commercial uses. The concept proposal includes approx. 400 residential units, with a mix of 2, 3, 4 and 5 bed detached, semi-detached, terraced and flatted properties which will compliment the existing residential development to the south and east. The flatted properties are proposed above the commercial space which will create an active and vibrant community atmosphere.

A new primary school is proposed within the KN057 site which will assist with any potential education capacity issues and together with the commercial and residential uses will create a 'core' to the development area which can be utilised by both the existing and proposed community.

Active lifestyles are encouraged through the use of safe and attractive walking and cycling routes throughout the site between the different neighbourhood and commercial/educational zones.

Hard and soft landscaping together with the water feature (SUDS) will help to create distinctive zones within the development site which harmoniously interact with one another to create a sense of place fitting to the Portlethen area.

The KN057 (phase 2) site is not dependant upon the development of the wider KN058 site and, as the indicative layouts in this document demonstrate, the KN057 (phase 2) site can be integrated into the existing landscape and create an extension to the northern portion of Portlethen.



- KEY
- Phase 2
 - Residential Zone
 - Primary School
 - Commercial with Residential Above
 - Tree Edge Planting
 - Variety of Soft Landscape Planting



PHASE 2 LAYOUT

2.0 PHASE 2

2.3 PHASE 2 NEIGHBOURHOOD CENTRE

1. Greater emphasis on the central green spine running through the development as a unifying and dynamic, way-finding element.
2. Creation of a more organic masterplan geometry which encourages movement and improves the natural flow across the site.
3. Creation of a local neighbourhood centre as a unique character location and focus for the overall development.
4. Potential to create defined character areas which respond to local context (meadowslands, waterways, woodlands, neighbourhood centre, business park).
5. Create active frontages in residential neighbourhoods to encourage passive supervision and attractive street edges.
6. Phase 2 will deliver circa 400 homes of a mix of tenure between detached, terraced and flatted properties, comprising 2,3,4 and 5 bedroom properties.



KEY

- Phase 2
- Residential Zone
- Primary School
- Commercial with Residential Above
- Water Feature Linking To Culvert
- Tree Edge Planting
- Variety of Soft Landscape Planting



PHASE 2 - ZONE C (NEIGHBOURHOOD CENTRE)

2.0 PHASE 2

2.4 AERIAL VIEW





REPORT TO INFRASTRUCTURE SERVICES COMMITTEE – 3 OCTOBER 2019

ABERDEENSHIRE PROPOSED LOCAL DEVELOPMENT PLAN 2021 - CONSIDERATION OF MAIN ISSUES REPORT SUBMISSIONS

1 Reason for Report / Summary

- 1.1 To resolve outstanding inconsistencies arising from the consideration by Area Committees of the Main Issues Report Issues and Actions Papers.

2 Recommendations

The Committee is recommended to:

- 2.1 Consider the views of Area Committees on the content and substance of the policies, settlements and proposals following evaluation of the 'Issues and Actions' of the Main Issues Report, for inclusion in the Proposed Local Development Plan; and**
- 2.2 Recommend to Aberdeenshire Council the outcomes of the Area Committee Meetings held between 20 August and 17 September 2019, having discussed and resolved the inconsistencies identified by Officers.**

3 Purpose and Decision Making Route

- 3.1 The preparation of a Local Development Plan is a statutory process with authority delegated to Aberdeenshire Council to submit a "Proposed Local Development Plan" to Scottish Ministers for examination. This represents the settled view of the Council as to the form and content of the Local Development Plan 2021.
- 3.2 Discussion has taken place with Area Committees on the development and analysis of the Main Issues Report (MIR). The MIR is a statutory precursor to a Proposed Local Development Plan. This has included informing the issues, informally evaluating the bids and discussing the content of the MIR during 2018 culminating in the overall consideration and approval to publish by Infrastructure Services Committee on 29 November 2018. Publication of the MIR was on 14 January 2019. Accompanying the Report was the Interim Environmental Report for the Strategic Environmental Assessment, a Habitats Regulations Appraisal Record, and a Strategic Flood Risk Appraisal. These documents were subject to a full and comprehensive public consultation.
- 3.3 Area Committees met between August and September 2019 to consider "Issues and Action" evaluations of the 1085 responses received. Officers have assessed where inconsistencies with national policy, conflicts between the views of Area Committees, or the legality of actions. The purpose of this Report is to resolve these issues to inform the final content of the Proposed Local

Development Plan to be presented to Aberdeenshire Council on 21 November 2019.

4 Discussion

- 4.1 A summary of the Area Committee meetings are presented at **Appendix 1**. Minutes are available on the Committee pages at <http://committees.aberdeenshire.gov.uk/>. From these Minutes the following issues have been identified that may require further consideration. A summary of extracts from the Issues and Actions papers is provided at **Appendix 2** to allow the Committee to review the issues that were raised in the public consultation, although this should not be seen as precluding Area Committees consideration of any other issues.

4.2 Kincardine and Mearns Committee

At the Kincardine and Mearns Area Committee meeting held on 20 and 21 August 2019, the following issues require to be resolved:

Issue 1

Concern was expressed regarding the proposed indicative higher density of new development sites. A lower density would result in additional development allocations coming forward and promote low density development (Issue 8 Shaping Homes and Housing, Recommendation 1).

Officer Response

This statement is not agreed as it would be misleading to allocate sites for the numbers of houses proposed by landowners and developers when experience indicates that significantly higher densities are frequently sought. As an indicative density the use of 25 homes per hectare represents a good approximation for the density of development. This density takes into account the need for 25% of the site to be affordable homes and up to 40% of the site being identified as open space.

Issue 2

At Kirkton of Maryculter six sites in the countryside were supported (Issue 136 Kirkton of Maryculter, bids KN008 to KN012).

Officer Response

These sites represent proposals that are contrary to the current and emerging policy on rural development in the Aberdeen Housing Market Area and the Green Belt. It is considered that this allocation marks a precedent that could undermine the policies on rural development by giving support to rural development in places that cannot otherwise be justified and are contrary to the principles of sustainable development.

Issue 3

At Portlethen a site for 300 homes was removed from consideration for inclusion in the Proposed Local Development Plan (bid site KN027). At Marywell a further site for 52 homes was removed (bid KN029) (Issue 145 Portlethen, bid KN027 and Issue 140, bid KN029).

Officer Response

These two sites represent a significant proportion of all the new allocations being made in the Plan for the Aberdeen to Stonehaven Strategic Growth Area. This removes approximately 85% of the “new” housing allocations within the Strategic Growth Area, thus placing reliance on existing allocations. The relatively small additions made elsewhere to the wider Aberdeen Housing Market Area housing allowances may not be able to cope with this loss. One or other of the two sites may need to be reintroduced should housing land supply in the Aberdeen Housing Market Area fall below the Strategic Development Plan requirement.

Issue 4

At Woodlands of Durris a current and half-completed site recommended for inclusion in the Local Development Plan 2017 was removed. (Issue 151 Woodlands of Durris, bid KN074).

Officer Response

This site should be reintroduced to the Proposed Local Development Plan as an existing commitment (OP1). It is part of an existing marketable allocation to which road access has been provided. The developer could apply for consent, and make a start on site development, at any time on the basis of the existing Local Development Plan. Removal of the site provides no clarity for the local community.

4.3 Banff and Buchan Area Committee

At Banff and Buchan Area Committee meeting on 27 August 2019 only one major issue was raised that requires to be resolved:

Issue 5

The extent of the coastal zone should be reviewed before publication to something more meaningful, and the priority given to this policy reduced (Issue 7, Recommendation 4).

Officer Response

It is the intention of the Planning and Environment Service to review the coastal zone for the Local Development Plan beyond 2021. This would be at an appropriate time in the process of which Members will be made aware. It is considered that the existing boundary and the weight given to it should be maintained.

4.4 Garioch Area Committee

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.

