

# PROPOSED ABERDEENSHIRE LOCAL DEVELOPMENT PLAN 2020 RESPONSE FORM

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

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

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

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

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

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

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

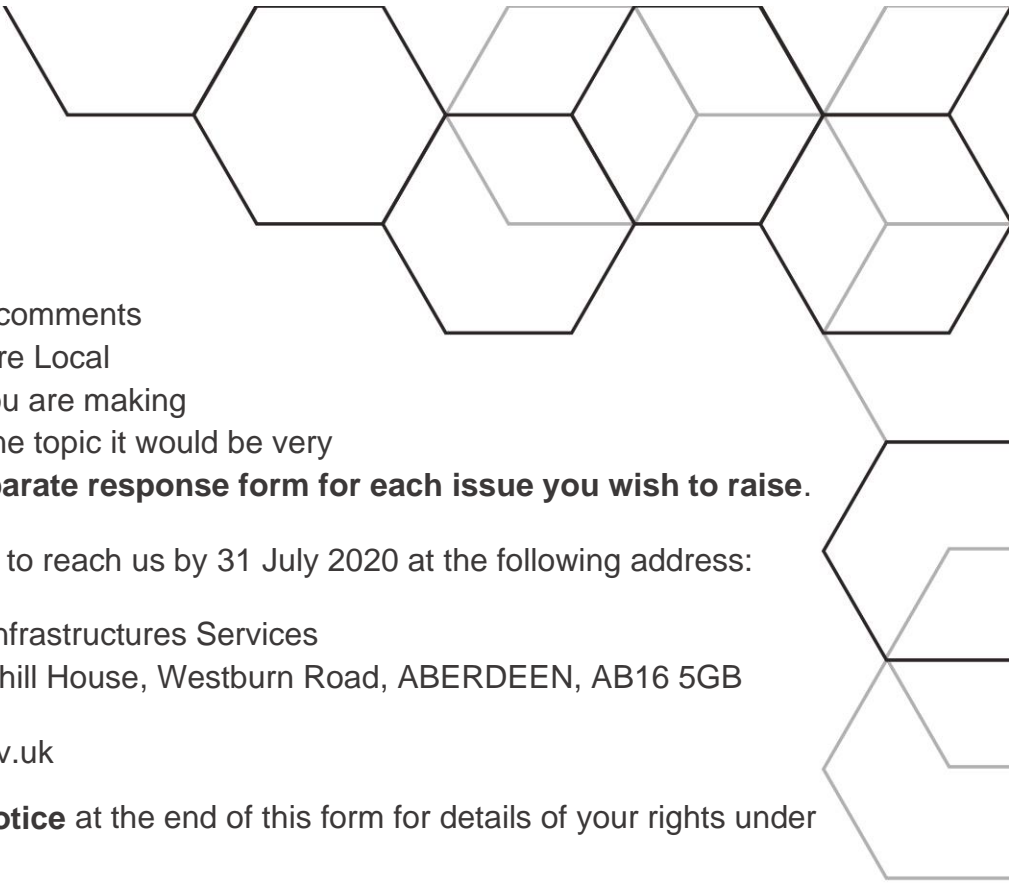
Jeśli potrzebowali będą Państwo informacji z niniejszego dokumentu w innym języku, pisanych dużą czcionką, w wersji łatwej do czytania, w alfabecie Braille'a lub w brytyjskim języku migowym, proszę o telefoniczny kontakt na numer 01467 536230.

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

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

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

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



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

Please email or send the form to reach us by 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](mailto:ldp@aberdeenshire.gov.uk)

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

## YOUR DETAILS

Title:	Mr
First Name:	Stuart
Surname:	Salter
Date:	31 <sup>st</sup> July 2020
Postal Address:	Geddes Consulting, [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?

X 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):

Modify Appendix 6 *Housing Land Allocations*.

Delete Table 1 *Summary of Housing Land Allocations*.

Insert new Table 1 *Summary of Housing Land Allocations* as follows:

<b>Area</b>	<b>Allowance</b>	<b>New Allocations</b>	<b>Surplus/Shortfall</b>
Aberdeenshire part of the Aberdeen HMA	3,065	2,613	-452
Rural HMA	2,042	919	-1,123
<b>Aberdeenshire</b>	<b>5,107</b>	<b>3,532</b>	<b>-1,575</b>

## Reason for change:

This representation is made on behalf of Dandara Limited (Dandara).

The evidence presented in the supporting *Housing Land Supply Statement* identifies issues regarding the methodology adopted by Aberdeenshire Council (the Council) to demonstrate whether the Proposed LDP has allocated enough housing land to meet the statutory policy requirements of the modified Aberdeen City & Shire Strategic Development Plan (SDP).

The development strategy set out in Aberdeenshire Proposed Local Development Plan (LDP) and supporting Appendix 6 *Housing Land Allocations* does not provide extrapolated programming of the housing land supply to be built out to 2032, as required by the modified SDP and Scottish Planning Policy (SPP). As a result, there is a shortfall in the housing land supply required to meet the Housing Allowances in full of the modified SDP.

As recommended at the SDP Examination, only by adopting the extrapolated method for all additional housing allocations can the Council be confident that land can be brought forward for development by 2032, and that the range of new sites allocated alongside the existing effective supply will maintain a housing land supply.

The Housing Land Supply Statement confirms that the Council is required to:

- Adopt the extrapolated method to programme all new allocations;
- Identify how the difference between adopted LDP capacity and Housing Land Audit 2019 capacity impacts on the Housing Allowances;
- Adopt the extrapolated method to programme extensions and increased densities to existing sites set out in the Housing Land Audit 2019; and
- Exclude constrained sites as they have already been discussed at the SDP Examination and agreed in the Housing Land Audit 2019.

Adopting the evidence set out in the *Housing Land Supply Statement*, Table 1 *Summary of Housing Land Allocations* should be modified as follows:

Area	Allowance	New Allocations	Surplus/Shortfall
Aberdeenshire part of the Aberdeen HMA	3,065	2,613	-452
Rural HMA	2,042	919	-1,123
<b>Aberdeenshire</b>	<b>5,107</b>	<b>3,532</b>	<b>-1,575</b>

Dandara recommends that the Proposed LDP will required to allocate a further 1,575 additional homes prior to submission for Examination, 452 new homes in Aberdeen HMA and 1,123 new homes in Rural HMA as a minimum.

Should these additional effective housing land allocations not be identified, the housing land supply policies will not be considered up to date at the point of adoption in accord with SPP (paragraph 125).

**Privacy Notice**

# LOCAL DEVELOPMENT PLAN PUBLIC COMMENT

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

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

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

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

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

**Your information is:**

Being collected by Aberdeenshire Council	X
--	---

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

Personal Data	
Legal Obligations	X

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

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

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

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

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

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

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

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

Not applicable.

The retention period for the data is:

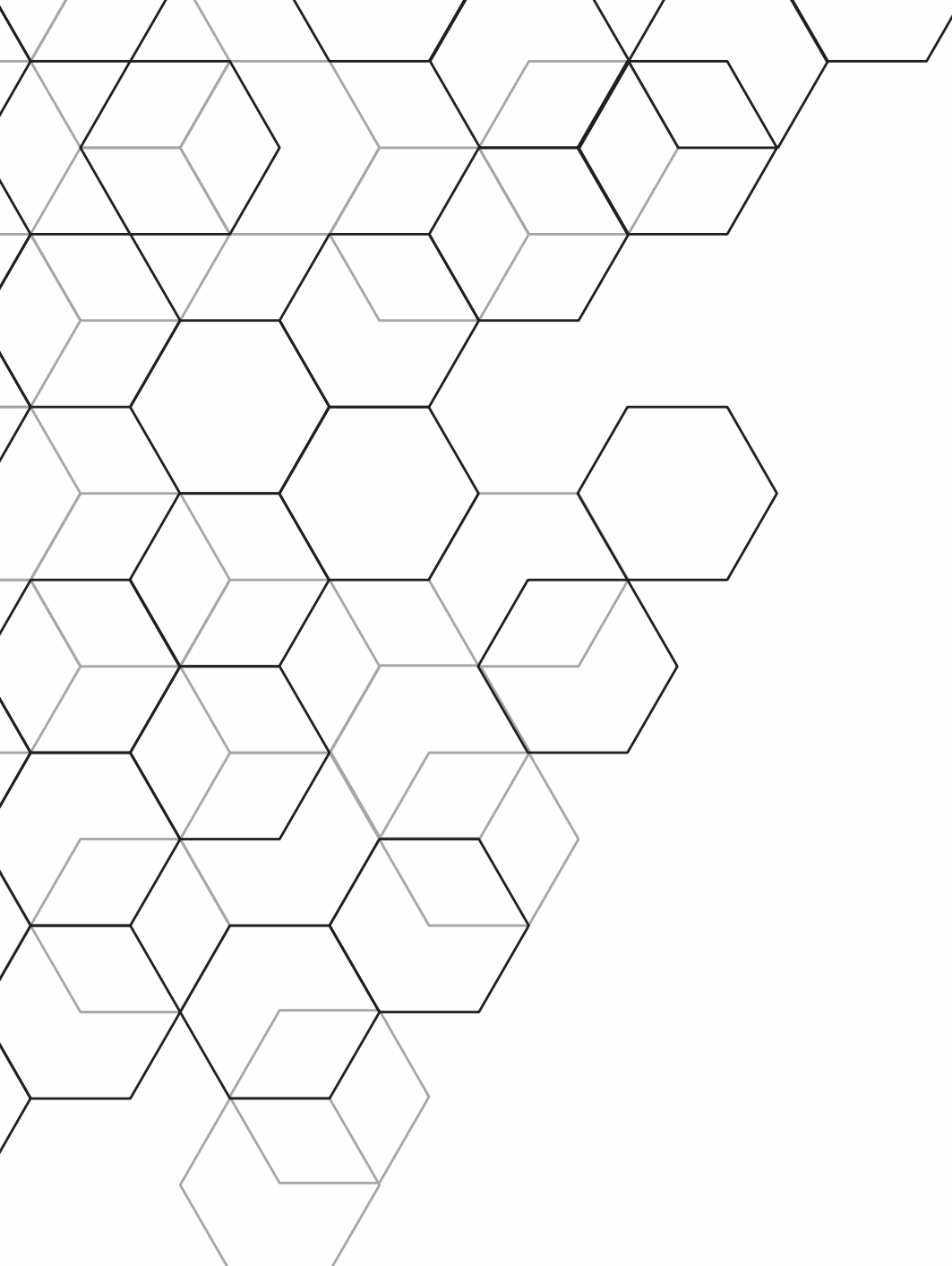
Aberdeenshire Council will only keep your personal data for as long as is needed. Aberdeenshire Council will retain your response and personal data for a retention period of 5 years from the date upon which it was collected. After 5 years Aberdeenshire Council will review whether it is necessary to continue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

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

Not applicable.

Please note that you have the following rights:

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

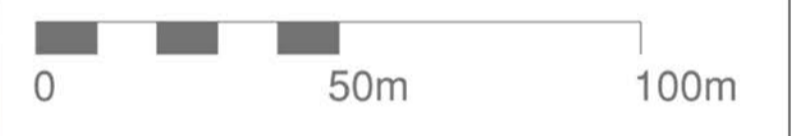






**Notes**

This drawing and the copyright remain the property of © Allied Services Ltd. It may not be copied, altered or used without their written permission. All dimensions must be checked on site. Any discrepancies should be notified to the Architects. Only written dimensions shall be followed. This drawing MUST be read with other Architectural and Engineers drawings and the specification.




Rev.	Date	Description
a	July20	layout adjusted

**City South  
Aberdeen**

Drawing Title  
**Overall site plan**



Status	
File Ref.	
Scale	1:2500@ A3 1:1250@A1
Date	June18
Drawn	
Drwg. No.	CITYS_APS_01
Rev.	a



**Notes**  
 This drawing and the copyright remain the property of Allied Services Ltd. It may not be copied, altered or used without their written permission. All dimensions must be checked on site. Any discrepancies should be notified to the Architects. Only written dimensions shall be followed. This drawing MUST be read with other Architectural and Engineers drawings and the specification.

- two bed apt @ 63m<sup>2</sup> Block A
- one bed apt @ 47m<sup>2</sup> Block B

- 9no Yew
- 10no Maple
- 9no Hazel
- 13no Alder
- 4no Poplar
- 38no Ash3
- 25no Ash2

108no Houses  
 40no Apts



Rev.	Date	Description
a	July20	layout adjusted

**City South**

Drawing Title  
**Residential sketch layout**



Status	
File Ref.	
Scale	1:1000@ A3 1:500@A1
Date	June18
Drawn	
Drwg. No.	CityS_APS_02
Rev.	a

## North of Hillside Road, Portlethen Education Note



### Background

- 1.1 Aberdeenshire Council (the Council) is currently consulting on Stage 2 of the emerging *Local Development Plan 2021* plan process. Stage 2 of this process is the Aberdeenshire Proposed Local Development Plan (LDP).
- 1.2 This Education Note (the Note) relates to an area of land located to the *North of Hillside Road, Portlethen*. The site forms part of a wider area of land proposed to be safeguarded for *business uses* under designation *BUS2*.
- 1.3 The undeveloped part of this designation (approximately 6.5 hectares) is being promoted to the Proposed LDP as an allocation for residential use. The site is expected to have capacity for around 150 homes.
- 1.4 This Note provides a high level assessment of the availability of education infrastructure to support the allocation of this site as residential use.

### Primary Schooling

- 1.5 The site is currently situated within the non-denominational primary school catchment of Hillside Primary School. The School is situated on the western boundary of Hillside, on Newlands Drive. The School is situated approximately 0.75 miles west from the centre of site.
- 1.6 Hillside Primary School opened in 2016. The school roll for the last four years, as reported by the Council to Scottish Government, is set out in the following table:

Year	2016	2017	2018	2019
Roll	173	310	366	419

Source: Scottish Government's *Pupil Census* data set (2016 to 2019)

- 1.7 It is understood that the School currently has 13 classrooms available for teaching, with a Planning Capacity for 372 pupils. The Council has also recently approved proposals to extend the School by a further four classrooms and additional GP Area (Planning Ref: APP/2019/1283). The extension will increase the capacity of the School to a Planning Capacity of 509 pupils. The extension was due to open for August 2020; however, it is unclear if this will still happen due to COVID-19.
- 1.8 The Council publishes its *School Roll Forecasts* annually, which takes into account programmed housing in the latest Housing Land Audit. The Council's forecast for Hillside Primary School for 2019, based on the 2019 Housing Land Audit. Where the school roll is in excess of the capacity of the School (as extended), this is shown in red in the following table:

School	Capacity	2019	2020	2021	2022	2023	2024	2025	2026	2027	Current Capacity%	% Capacity 2024
Hillside	372	419	480	503	528	541	545	544	521	484	113%	147%

Source: Aberdeenshire *School Roll Forecasts 2019*

- 1.9 The Council expect that the capacity of the School (as extended) will be breached in the 2022/23 School Year. However, the School roll will fall below capacity again from the 2027/28 School Year. It is not clear what mitigation, if any, the Council propose to accommodate this temporary peak in the school roll.

- 1.10 Schoolhill (Site Ref: OP1) is the only site identified for allocation in the Proposed LDP within the existing catchment area of Hillside Primary School. It has an expected capacity for 175 homes.
- 1.11 It is noted that the Council do not consider that Hillside Primary School can be extended further. As part of the planning application for Schoolhill, the Council is 'minded to grant' the permission subject to the completion of a catchment area review to re-zone Schoolhill to either Portlethen or Fishermoss Primary Schools.
- 1.12 It is understood that the Council is in the process of undertaking the consultation on this review, which was approved for consultation by the Education & Children's Services Committee in January 2020. As part of the Committee Report, the following projections were included showing the projected impact of Schoolhill (including two rates of development) in addition to existing programmed development:

Hillside PS	2020	2021	2022	2023	2024	2024	2025	2026
Capacity	509	509	509	509	509	509	509	509
Build Out Rate 1	486	520	554	575	588	593	571	528
Build Out Rate 2	492	537	580	596	593	583	551	505

Fishermoss PS	2020	2021	2022	2023	2024	2024	2025	2026
Capacity	358	358	358	358	358	358	358	358
Build Out Rate 1	257	274	280	291	305	310	317	304
Build Out Rate 2	262	287	300	307	310	302	302	286

Portlethen PS	2020	2021	2022	2023	2024	2024	2025	2026
Capacity	434	434	342	342	342	342	342	342
Build Out Rate 1	262	258	249	254	261	260	255	240
Build Out Rate 2	268	275	274	275	267	250	236	216

Source: Hillside School Rezoning Exercise Committee Report (January 2020)

- 1.13 The above Council forecasts demonstrate there is sufficient capacity within either Fishermoss or Portlethen Primary Schools to accommodate pupils from Schoolhill. At the peak of the forecast, there would be spare capacity for 48 pupils in 2024/25 in Fishermoss Primary School or 75 pupils in 2024/25 in Portlethen Primary School. By 2026/27, there is expected to be 72 pupil places available in Fishermoss Primary School or 126 pupil places in Portlethen Primary School.
- 1.14 The Council's methodology and assumptions for its *School Roll Forecasts* are not known. This includes the Council's Child per House Ratios (CHRs). For this purpose of this Note, a CHR of 0.3 for primary schooling is adopted as a reasonable basis. 150 homes would be expected to produce around 45 primary pupils. The actual number of pupils in primary schools at one time will depend on the rate of programming and pupil transitioning through a school.
- 1.15 The Council's forecasts highlight that there would be capacity at either Fishermoss or Portlethen Primary Schools to accommodate pupils from the site without further mitigation. As Portlethen Primary School is closest to the site (approximately 0.8 miles south of the site), it would likely be most efficient to rezone the site to this school.
- 1.16 Further investigation is also required to establish the longer-term projected school roll at Hillside Primary School to establish whether there would be capacity at the School to accommodate the site from 2027/28 and beyond. Phasing restrictions on the rate of development could also be considered to control the expected number of pupils in primary schools at one time.

- 1.17 It is not considered that primary school capacity is an insurmountable barrier to the allocation of this site for residential development.

### Secondary Schooling

- 1.18 The site is within the non-denominational secondary school catchment of Portlethen Academy. The School is situated on Bruntland Road, approximately 1.3 miles south west from the centre of site.

- 1.19 The school roll for the last five years, as reported by the Council to Scottish Government, is set out in the following table:

Year	2015	2016	2017	2018	2019
Roll	750	776	813	817	834

Source: Scottish Government's *Pupil Census* data set (2016 to 2019)

- 1.20 The school roll has been steadily increasing for the last five years. The reported capacity of the School is 970 pupil places. In 2019/20 the School was operating at 86% occupancy with remaining capacity for an additional 136 pupils.

- 1.21 The Council's forecast for Portlethen Academy for 2019, based on the 2019 Housing Land Audit. Where the school roll is in excess of the capacity of the School (as extended), this is shown in red in the following table:

School	Capacity	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	Current Capacity%
Portlethen Academy	970	817	835	836	879	925	974	1001	1009	992	1001	86%

Source: Aberdeenshire *School Roll Forecasts 2019*

- 1.22 The Council expect that the capacity of the School will be breached in the 2023/24 School Year, before reaching a peak of 1,009 pupils in the 2025/26 School Year. After which, the school roll is expected to slightly decline.

- 1.23 The Proposed LDP *Settlement Statement* for Portlethen states that ...*All residential development may be required to contribute to the provision of additional capacity at Portlethen Academy.*

- 1.24 The Council do not appear to currently have any formal proposals to extend or alter the School to provide additional capacity. The Council state that they will monitor the school roll in combination with ongoing development. The Council, however, expect that additional capacity can be provided at the School or alternative options are available to mitigate the projected roll.

- 1.25 Applying a CHR of 0.2 for secondary schooling, the site would generate around 30 secondary pupils. The actual number of pupils in secondary schools at one time will depend on the rate of programming and pupil transitioning through a school. The actual number requiring accommodation is likely to be less than 30 pupils.

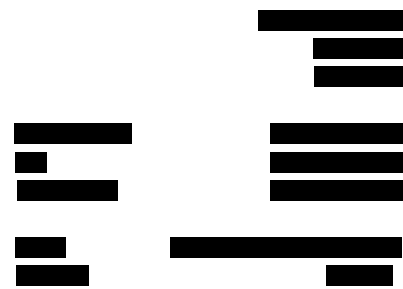
- 1.26 Given that the Council's position is that solutions are available to provide additional secondary school capacity in the catchment, the additional pupils generated from the site will have a minor impact on the scale of any mitigation required in the context of a secondary school. It is not considered that secondary school capacity is an insurmountable barrier to the allocation of this site for residential development.

### Conclusion

- 1.27 The Council's *School Roll Forecasts 2019* and rezoning paper for Schoolhill (Site Ref: OP1) confirm that there is capacity within the local area to accommodate primary pupils from the site is a catchment area review is undertaken. There may also be capacity at the existing catchment

primary school (Hillside Primary School) from 2027/28 onwards, which requires further investigation.

- 1.28 The Council expect that additional secondary school capacity can be provided for the local area, if required, to accommodate pupils from new development. The allocation of the site would have a small additional impact on Portlethen Academy, which should be accommodated within any mitigation solution.
- 1.29 It is not considered that education capacity is an insurmountable barrier to the allocation of this site for residential development in the emerging LDP. Where necessary, Dandara will make financial contributions towards additional education capacity in accord with the tests of Circular 3/2012.



31 July 2020

Dear [REDACTED]

**EMPLOYMENT LAND CITY SOUTH**

As you are aware we have been joint marketing agents for your Office Park at City South since 2013. Early in this period we secured [REDACTED] as an anchor tenant for their global HQ which we all considered a great success at the time. However, both the local and global economy have changed significantly since 2014, and this has reduced demand for employment land at this location, with virtually no interest in offices over the last 3 to 5 years. This is evidenced by the speculatively developed offices that were built in 2014 still being vacant. Out of 33,000 sq. ft. only 8,000 sq. ft. has been let to date with both lettings requiring significant incentives.

The reason for this fall in demand is well documented. The local economy of Aberdeen and Aberdeenshire is heavily dependent on the success of the energy industry. This is an industry that underwent dramatic change in 2014 when the oil price fell from \$110+ per barrel to \$27 in 2016. This has made delivering new employment areas more challenging. There is also a record high supply of existing stock.

During 2018 and 2019 we started to see a slight improvement in the local economy as confidence within the industry improved. This resulted in improved demand, albeit primarily from smaller less mature businesses. Unfortunately, the returning confidence seen in 2019 was short lived as the local market has once again seen a significant downturn caused by the global COVID-19 pandemic and a further collapse in oil prices due to a price war between Saudi Arabia and Russia. To be clear, even before recent events the out of town office market was very weak with virtually no demand to the south of Aberdeen, this will only be made worse by the pandemic as further redundancies are inevitable and the office sector will undergo substantial change as working from home increases.

In my opinion new out of town office developments will not be viable at this location and we do not expect to see increased demand for office space or for employment land in the medium term. In reality demand is weak, and supply is at a record high with many existing buildings in more central locations able to offer very competitive terms.

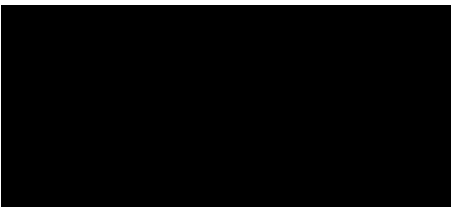
I am aware Aberdeenshire Council have been supportive of alternative uses on the site. The development of starter units has been relatively successful however there is no great depth to this market as it is targeted towards start-up business.

Wider problems within the retail and leisure sector are again well documented and whilst securing [REDACTED] (who will provide a petrol filling station and drive thru' restaurants) will be a great addition we have not seen further demand in this sector, and of course Portlethen already has an established retail park.

The above summary serves to demonstrate that the demand for employment land in Aberdeenshire, and indeed Aberdeen, is very low and we would expect it to remain this way for the medium to long term as the region tries to realign itself and recover from both the oil price drop and pandemic.

I appreciate that this is disappointing however, it is felt that it is best to be open and manage expectations. I am happy to discuss this further with you.

Yours sincerely



[REDACTED]  
Managing Director – Aberdeen



---

**Aberdeenshire Proposed Local Development Plan  
Housing Land Supply Statement**

---

Prepared by:



[w] [www.geddesconsulting.com](http://www.geddesconsulting.com)

## Document Control and Approval

Status	Prepared	Approved	Date
Final	[REDACTED]	[REDACTED]	30 <sup>th</sup> July 2020

z:\projects\0136 - dandara homes/sites\north of hillside road, portlethen\housing land supply statement - aberdeenshire.doc

---

## Contents

---

<b>1.0</b>	<b>Introduction</b>	<b>1</b>
<b>2.0</b>	<b>Aberdeen City &amp; Shire Strategic Development Plan</b>	<b>2</b>
<b>3.0</b>	<b>Aberdeenshire Proposed Local Development Plan</b>	<b>4</b>
<b>4.0</b>	<b>Conclusion</b>	<b>9</b>

---

## 1.0 Introduction

---

- 1.1. This Housing Land Supply Statement (the Statement) is prepared to provide a response to matters set out in the Aberdeenshire Proposed Local Development Plan (LDP).
- 1.2. This Statement identifies issues regarding the methodology adopted by Aberdeenshire Council (the Council) to demonstrate whether the Proposed LDP has allocated enough housing land to meet the statutory policy requirements of the modified Aberdeen City & Shire Strategic Development Plan (SDP).
- 1.3. This Statement examines the methodology and assumptions adopted by the Council in the Proposed LDP 2 and supporting Appendix 6 *Housing Land Allocations*.
- 1.4. The Council's proposed development strategy does not meet the requirements set out by the modified SDP and Scottish Planning Policy (SPP).
- 1.5. The evidence set out in this Statement establishes that the development strategy set out in Proposed LDP and supporting Appendix 6 does not provide extrapolated programming of the housing land supply to be built out to 2032, as required by the modified SDP and SPP.
- 1.6. This Statement confirms that there is a shortfall in the housing land supply required to meet the Housing Allowances in full of the modified SDP. It is expected that the proposed development strategy will not maintain a five year effective housing land supply at all times.
- 1.7. As a result, additional effective housing land allocations will be required prior to the submission the Proposed LDP to Examination.
- 1.8. Should these additional effective housing land allocations not be identified, the housing land supply policies will not be considered up to date at the point of adoption in accord with SPP (paragraph 125).

## 2.0 Aberdeen City & Shire Strategic Development Plan

- 2.1. The Examination of the Aberdeen City & Shire SDP concluded on 17<sup>th</sup> January 2020. The Examination Report, with suggested modifications, was subsequently submitted to the Scottish Ministers for approval. At this time, the modified SDP is yet to be approved.
- 2.2. For Issue 14 *Our Communities - Additional Housing Allocations*, the Examination Reporter concluded that the Housing Allowances set out in Table 3 *Local Development Plan Housing Allowances* should be modified as follows:

Area	2020 - 2023
Aberdeen HMA	8,172
Rural HMA	2,042
Aberdeen City	5,107
Aberdeenshire	5,107

- 2.3. The modified SDP confirms that the emerging LDPs are required to allocate a minimum of 8,172 additional homes to be delivered by 2032 in the Aberdeen Housing Market Area (HMA) and a minimum of 2,042 additional homes to be delivered by 2032 in the Rural HMA.
- 2.4. For the local authority areas, both Aberdeen City and Aberdeenshire are required to allocate a minimum of 5,107 additional homes to be delivered by 2032.
- 2.5. The Examination Reporter's conclusion was based on the evidence presented in the Housing Land Audit 2019, published in July 2019. The Strategic Development Planning Authority confirmed to the Reporter that:
- ...the "use of the housing land audit 2019 will give the local development plans the benefit of consulting on the most recently published housing land audit. If the subject of effective land supply and housing allowances for the period 2020-2032 has been considered and settled during the examination of the proposed strategic development plan, then both proposed local development plans can benefit from this settled position during public consultation. Given that the local development plans would commence public consultation in early 2020 they would give an accurate picture of the housing land supply"* (Issue 14, paragraph 21)
- 2.6. Homes for Scotland and others with developer interests also supported the use of the Housing Land Audit 2019 as it would provide *...a degree of added confidence for local authorities and developers alike in what to expect from subsequent local development plans* (Issue 14, paragraph 22).
- 2.7. Therefore, those sites already included in the Housing Land Audit 2019 and their programming assumptions have been taken into account to derive the Housing Allowances in the modified SDP.
- 2.8. Regarding the assumptions to adopt in assessing the appropriate programming from sites in the Housing Land Audit 2019, the Examination Reporter concluded that:

*The approach used by Homes for Scotland where the programming of sites is extrapolated beyond the period stated in the housing land audit is well-evidenced with tables showing each*

*site in each authority and market housing area. There will be instances where sites perform better and some which deliver less than the extrapolated method shows but it reasonably carries forward the last known (and agreed) programme of delivery on each site into the future. Therefore, I consider that it can be effectively used to predict the amount of the established supply that is considered to become effective during the periods 2027 to 2032 and 2033 to 2040 (Issue 14, paragraph 26).*

- 2.9. For both Aberdeen City and Aberdeenshire, the programming of the additional allocations should be in accord with the extrapolated method to demonstrate whether the Housing Allowances will be met by 2032 in each LDP.

## 3.0 Aberdeenshire Proposed Local Development Plan

- 3.1. The Aberdeenshire Proposed LDP sets out in Section 5 *The Spatial Strategy* that sufficient land is required to maintain a housing supply over the period 2020 to the end of 2032
- 3.2. Table 1 *Strategic Development Plan Housing and Employment Land Figures* identifies the following Housing Allowances for Aberdeenshire:

Area	2020 - 2023
Aberdeenshire part of the Aberdeen HMA	3,065
Rural HMA	2,042
<b>Aberdeenshire</b>	<b>5,107</b>

- 3.3. The Proposed LDP is required to allocate a minimum of 3,065 additional homes to be delivered by 2032 in the Aberdeenshire part of the Aberdeen HMA and a minimum of 2,042 additional homes to be delivered by 2032 in the Rural HMA.
- 3.4. In order to achieve these Housing Allowances, the Proposed LDP confirms that:
- We need to be confident that land can be brought forward for development within the Plan period, and that the range of new sites allocated alongside the existing effective supply will maintain a housing land supply that is sufficient (paragraph 5.4).*
- 3.5. The sites that the Council has allocated are set out in Appendix 6 *Housing Land Allocations*. Table 1 *Summary of Housing Land Allocations* gives an overview of the housing land supply that contributes to the Housing Allowances for the period from 2020 to 2032.
- 3.6. According to Table 1, the Council considers that Housing Allowances will be met as follows:

Area	Allowance	New Allocations	Surplus/Shortfall
Aberdeenshire part of the Aberdeen HMA	3,065	3,145	+80
Rural HMA	2,042	2,619	+577
<b>Aberdeenshire</b>	<b>5,107</b>	<b>5,764</b>	<b>+657</b>

- 3.7. The Council considers that the additional homes allocated in Appendix 6 will result in a surplus of 80 homes in the Aberdeenshire part of the Aberdeen HMA and a surplus of 577 homes in the Rural HMA.
- 3.8. The additional homes allocated are made up of the following:
- New allocations which were not in the Aberdeenshire Local Development Plan 2017;
  - Where there is a difference in the allocated indicative site total and the Housing Land Audit total;
  - Extensions to existing sites or increased densities on existing effective sites resulting in an increase in numbers; and
  - Existing constrained sites where a bid has been submitted indicating that they will come forward within the Plan period.

3.9. Those additional homes are identified in Table 2 *Housing Allocations in the Aberdeen Housing Market Area* and Table 3 *Housing Allocations in the Rural Housing Market Area*.

**New allocations which were not in the Aberdeenshire Local Development Plan 2017**

3.10. Table 2 identifies following scale of new allocations by settlement for the Aberdeen HMA:

Area	New Allocations
Formartine	1,089
Garioch	386
Kincardine and Mearns	390
Marr	120
<b>Total Aberdeen HMA</b>	<b>1,985</b>

3.11. In total, the Proposed LDP anticipates that an additional 1,985 homes from new allocations will deliver by 2032 in the Aberdeen HMA.

3.12. Table 3 identifies the following scale of new allocations by settlement for the Rural HMA:

Area	New Allocations
Banff and Buchan	200
Buchan	188
Fortamine	249
Garioch	12
Kincardine and Mearns	93
Marr	125
<b>Total Rural HMA</b>	<b>867</b>

3.13. In total, the Proposed LDP anticipates that an additional 867 homes from new allocations will deliver by 2032 in the Rural HMA.

3.14. However, there is no evidence to support this position for either HMA.

3.15. As concluded by the Examination Reporter, the Proposed LDP is required to adopt the extrapolated method.

3.16. The Proposed LDP is anticipated to be adopted in 2021. Lead in times to secure a decision notice for these sites will take around two years. That means that no new allocation will commence construction until 2023 at the earliest.

3.17. The new allocation *Land Southwest of Pitmedden* (OP2 Pitmedden) has a capacity of 219 homes. The Housing Land Audit 2019 identifies two sites in Pitmedden. The largest, *Land at Bonnyton Farm* (Ref: F/PM/H/011), has a build rate of around 20 homes per annum.

3.18. If this represents the anticipated build rate in Pitmedden, *Land Southwest of Pitmedden* (OP2 Pitmedden) would be over an 11 year period. Therefore, the site would complete by 2034 at the earliest, not 2032 as stated by the Council.

3.19. The Council needs to clarify how the extrapolated method will affect matters.



**Difference in the allocated site total and the Housing Land Audit total**

- 3.20. Neither Table 2 or Table 3 is clear on which sites have different allocated site totals (adopted LDP) and to the Housing Land Audit 2019 total and the subsequent impact on meeting the Housing Allowances by 2032.
- 3.21. The Housing Land Audit 2019 was adopted for the SDP Examination and any differences in capacities should have been addressed to derive the Housing Allowances.
- 3.22. However, the Council needs to clarify how the difference in totals affect matters.

**Extensions to existing sites or increased densities on existing effective sites**

- 3.23. Table 2 identifies following additional homes due to extensions or increased densities by settlement for the Aberdeen HMA:

Area	Increased No
Formartine	126
Garioch	628
Kincardine and Mearns	167
Marr	7
<b>Total Aberdeen HMA</b>	<b>928</b>

- 3.24. In total, the Proposed LDP anticipates that an additional 928 homes due to extensions or increased densities will deliver by 2032 in the Aberdeen HMA.

- 3.25. Table 3 identifies the following additional homes due to extensions or increased densities by settlement for the Rural HMA:

Area	Increased No
Banff and Buchan	6
Buchan	26
Fortamine	0
Garioch	0
Kincardine and Mearns	14
Marr	6
<b>Total Rural HMA</b>	<b>52</b>

- 3.26. In total, the Proposed LDP anticipates that an additional 52 homes due to extensions or increased densities will deliver by 2032 in the Rural HMA.

- 3.27. However, there is no evidence to support this position for either HMA.

- 3.28. As concluded by the Examination Reporter, the Proposed LDP is required to adopt the extrapolated method.

- 3.29. The sites identified form part of the effective housing land supply in the Housing Land Audit 2019. The programming set out needs to be taken into account in concluding whether the increased number of homes (either through extension or density) will be delivered by 2032.

- 3.30. The extension to *Kintore East* (OP11 Kintore) has a capacity of 400 homes. The Housing Land Audit 2019 identifies that *Kintore East* (Ref: G/KT/H/028) with a capacity of 600 homes and a build rate of 30 homes in 2021 followed by 60 homes per annum thereafter.

- 3.31. By 2026, the Housing Land Audit 2019 anticipates that 330 homes will be built with a remaining 270 homes. If those 270 homes are extrapolated at 60 homes per annum, they would be built over a 5 year period i.e. by 2031. The extension of an additional 400 homes would only contribute a maximum of 120 homes by 2032, leaving a remaining 280 post 2032.
- 3.32. Similar conclusions that the extension will not be built by 2032 will apply to *Caskieben* (OP1 Blackburn) and there may be others. The Council needs to clarify how the programming will impact matters.
- 3.33. Accordingly, the number of additional homes through the allocation of extensions or increased densities needs to be adjusted by a minimum of 300 homes resulting in the following:

Area	Increased No
Formartine	126
Garioch	328 (-300)
Kincardine and Mearns	167
Marr	7
<b>Total Aberdeen HMA</b>	<b>628</b>

- 3.34. In total, the Proposed LDP anticipates that an additional 628 homes due to extensions or increased densities will deliver by 2032 in the Aberdeen HMA.

#### Existing constrained sites

- 3.35. Table 2 identifies following scale of constrained sites by settlement for the Aberdeen HMA:

Area	New Allocations
Formartine	100
Garioch	82
Kincardine and Mearns	0
Marr	40
<b>Total Aberdeen HMA</b>	<b>222</b>

- 3.36. In total, the Proposed LDP anticipates that an additional 222 homes from constrained sites will deliver by 2032 in the Aberdeen HMA.

- 3.37. Table 3 identifies the following scale of constrained sites by settlement for the Rural HMA:

Area	New Allocations
Banff and Buchan	700
Buchan	177
Fortamine	442
Garioch	10
Kincardine and Mearns	176
Marr	186
<b>Total Rural HMA</b>	<b>1,691</b>

- 3.38. In total, the Proposed LDP anticipates that an additional 1,691 homes from constrained sites will deliver by 2032 in the Rural HMA.

- 3.39. The basis for the Council deciding that the constrained sites coming forward is due to the representations made to the Aberdeenshire Main Issues Report (MIR).
- 3.40. The Aberdeenshire MIR concluded in April 2019. The Housing Land Audit 2019 was published in July 2019. Therefore, the Housing Land Audit 2019 presents the Council's up to date position on constrained sites.
- 3.41. Further, the SDP Examination Reporter agreed that those sites already included in the Housing Land Audit 2019 and their programming assumptions have been taken into account to derive the Housing Allowances in the modified SDP.
- 3.42. Accordingly, no programming from constrained sites included in the Housing land Audit 2019 should be counted as additional homes to address the Housing Allowances.

## 4.0 Conclusion

- 4.1. The Proposed LDP has included no evidence to support the programming assumptions set out in Appendix 6 to demonstrate that the Housing Allowances will be met by 2032.
- 4.2. Only by adopting the extrapolated method for all additional housing allocations can the Council be *...confident that land can be brought forward for development within the Plan period, and that the range of new sites allocated alongside the existing effective supply will maintain a housing land supply that is sufficient.*
- 4.3. This Statement confirms that the Council is required to:
- Adopt the extrapolated method to programme all new allocations;
  - Identify how the difference between adopted LDP capacity and Housing Land Audit 2019 capacity impacts on the Housing Allowances;
  - Adopt the extrapolated method to programme extensions and increased densities to existing sites set out in the Housing Land Audit 2019; and
  - Exclude constrained sites as they have already been discussed at the SDP Examination and agreed in the Housing Land Audit 2019.
- 4.4. Adopting the evidence in this Statement, the following outcomes are derived:

Area	Allowance	New Allocations	Surplus/Shortfall
Aberdeenshire part of the Aberdeen HMA	3,065	2,613	-452
Rural HMA	2,042	919	-1,123
<b>Aberdeenshire</b>	<b>5,107</b>	<b>3,532</b>	<b>-1,575</b>

- 4.5. The Proposed LDP will required to allocate a further 1,575 additional homes prior to submission for Examination, 452 new homes in Aberdeen HMA and 1,123 new homes in Rural HMA as a minimum.
- 4.6. Should these additional effective housing land allocations not be identified, the housing land supply policies will not be considered up to date at the point of adoption in accord with SPP (paragraph 125).

## North of Hillside Road, Portlethen Site Assessment Review



### Background

- 1.1 Aberdeenshire Council (the Council) is currently consulting on Stage 2 of the emerging *Local Development Plan 2021* plan process. Stage 2 of this process is the Aberdeenshire Proposed Local Development Plan (LDP).
- 1.2 This *Site Assessment Review* (SAR) relates to an area of land located to the *North of Hillside Road, Portlethen* (the site). The site forms part of a wider area of land proposed to be safeguarded for *business uses* under designation *BUS2*.
- 1.3 The total area of land designated under *BUS2* is approximately 16 hectares. The designation is subdivided by an existing watercourse which splits the site into two (a northern part and a southern part). This SAR relates to the southern area of land which totals approximately 6.5 hectares.
- 1.4 The northern part of the land designated under *BUS2* accounts for the remaining 10 hectares of land. This part of the *BUS2* designation has been partially developed for business / employment use. This existing development is known as *Office Park at City South*.
- 1.5 The purpose of this SAR is to support the allocation of the undeveloped part of this designation (approximately 6.5 hectares) for residential use.

### Local Development Plan 2021

- 1.6 The Proposed LDP will replace the adopted LDP (2017). The Council's latest *Development Plan Scheme* (May 2020) anticipates that the *Local Development Plan 2021* will be adopted by 31<sup>st</sup> December 2021.
- 1.7 The Proposed LDP *...will direct decision-making on all land-use planning issues and planning applications in Aberdeenshire*. The Proposed LDP on the *...national vision...* and four planning outcomes as set out within the National Planning Framework (NPF) and Scottish Planning Policy (SPP). These four outcomes are as follows:

**Outcome 1: A successful, sustainable place** – supporting sustainable economic growth and regeneration, and the creation of well-designed, sustainable places.

**Outcome 2: A low carbon place** – reducing our carbon emissions and adapting to climate change.

**Outcome 3: A natural, resilient place** – helping to protect and enhance our natural and cultural assets and facilitating their sustainable use.

**Outcome 4: A more connected place** – supporting better transport and digital connectivity

- 1.8 The Proposed LDP *...encourages high-quality development that accords with this vision and the outcomes that the Scottish Government supports*. Development land allocations must *...deliver successful, sustainable, low-carbon, better connected and resilient places, linked by accessible and natural spaces*.
- 1.9 The site *North of Hillside Road, Portlethen* is identified within Appendix 7E *Settlement Statements Kincardine and Mearns*. The site forms part of a wider designation titled *BUS 2*. This designation proposed safeguards the site for business use.
- 1.10 The proposed designation of the site is reflective of the site's existing designation within the adopted LDP. Appendix 8E *Settlement Statements Kincardine & Mearns* of the Adopted LDP

safeguards the site for employment use. The Proposed LDP therefore considers the site to be suitable for development.

- 1.11 The *vision* for Portlethen, (page 724 of Appendix 7E) states that ...*there is strong development pressure for both residential as well as employment uses ...in Portlethen.* The *Portlethen Keymap* (page 730 of Appendix 7E) identifies several allocations for employment use. Only one site (OP1 *Schoolhill*) is allocated for residential development.
- 1.12 The Council has carried out detailed site assessments of all sites submitted (*Bids*) during the *Call for Site* and *Main Issues Report* stages of the emerging LDP. An assessment of existing sites identified within the adopted LDP has also been undertaken. These assessments are set out within the *Strategic Environmental Assessment* which supports the Proposed LDP.
- 1.13 This representation examines the site's development potential (for residential development) with regard to the Council's defined SEA requirements.
- 1.14 The site will be developed for 148 homes (108 houses and 40 apartments) as shown in Dwg. CITYS-APS-02 *Residential Sketch Layout*.

**Site Assessment**

- 1.15 The Council has undertaken a *Strategic Environmental Assessment* of all new proposed site allocations and alternative bid sites. The Council has also assessed all existing sites within the adopted LDP.
- 1.16 All these sites have been assessed against the following 10 SEA Topics:
  - Air quality;
  - Water quality;
  - Climatic factors;
  - Soil;
  - Biodiversity (flora and fauna);
  - Landscape;
  - Material assets;
  - Population;
  - Human Health; and
  - Cultural Heritage.
- 1.17 Table 8.5.2 *Environmental Assessment Questions for Bids (allocated and unallocated)* of Appendix 8.5 *Assessment Methodology* sets out the methodology for assessing ...*allocations, other sites and alternatives.*
- 1.18 Table 8.5.2 breaks down the 10 SEA Topics into a list of 21 criteria. Each of the sites assessed by the Council were assessed against each of these criteria. The assessment by the Council determined whether each site would have the following outcome against the 10 SEA Topics.

--	Significant Negative Effects
-	Negative Effects
0/?	Neutral/Unknown Effects
+	Positive Effects
++	Significant Positive Effects

- 1.19 Appendix 8.7 *Assessment of the Proposed Plan Sites and Alternatives* provides a summary for the Council's assessment of all sites submitted (*Bids*) as part of the *Call for Sites and Main Issues Report* stages of the emerging LDP.
- 1.20 The assessment for the site area designated under BUS2 is on page 595 of the *Strategic Environmental Assessment* within Table 8.7.5 *Assessment of the Proposed Plan Sites and Alternatives*. The Council's scoring is based on the designation of the site for business uses. The Council's assessment is also based on full designation of the 16 hectares of land safeguarded under BUS2 for employment / business use.
- 1.21 The Council's scoring for the site is also based on the implementation of indicative mitigation measures. Table 1.2 *Proposed mitigation measures* of the *Strategic Environment Assessment* sets out non-site specific mitigation measures that the Council will seek to implement as part of a development proposal.
- 1.22 The Council's assessment of the area designated under BUS2 does not identify what mitigations measures the Council has considered. Rather, the following commentary is provided:
- There is a potential for flooding and impact on water quality. A FRA may be required, and buffers trips should be required adjacent to waterbodies. Site is served by a bus route, and improved active travel links to Hillside will make this area more accessible without a car.*
- 1.23 The site subject of this representation (*North of Hillside Road, Portlethen*) has therefore not been considered for residential development. Nor has the Council's assessment taken account of mitigation measures that will be delivered as part of a proposal.
- 1.24 Therefore, a revised assessment of *North of Hillside Road, Portlethen* against the 21 criteria identifies within Table 8.5.2 of the *Strategic Environmental Assessment* has been undertaken.
- 1.25 This revised Site Assessment takes account of the indicative proposal for the delivery of 148 homes.
- 1.26 The revised Site Assessment takes into account the indicative proposal as set out within Dwg. CITYS-APS-02 *Residential Sketch Layout* submitted in support of this representation. This includes the provision of a landscape buffer along the western, northern and southern boundaries of the site. It also includes for the provision of an area of open space and green space within the eastern part of the site.
- 1.27 The indicative proposal also incorporates two points of access into the site from Mossie Avenue, located along the western boundary of the site. This will provide suitable access arrangements into the site. The site will also benefit from the existing bus stops located along Mossie Avenue.
- 1.28 The explanation and justification for the revised assessment against each of the 10 SEA topics (and associated 21 criteria) is provided in Appendix 1 *Revised Site Assessment (against SEA Objectives)* of this Assessment.
- 1.29 This revised Site Assessment concludes that the proposal for residential development on the site can be considered favourably by the Council for the following reasons:
- The proposal is located on within an area of land that the Council considers to be suitable for development. The proposal will deliver 40 affordable homes. This is 25% of the total number of homes proposed and is in accord with Council guidance.

- The proposal is an example of sustainable development. The site is served by an existing bus route which runs along Mossie Avenue. The proposal is also adjacent to existing employment and business uses within *Office Park at City South*. This will encourage active travel outwith the site.
- The development of the site will provide areas of accessible open space, greenspace and recreational provision. The area of open space to be delivered is 40% of the total site area. This equates to 2.6 hectares of open space and is in accord with Council guidance. The proposal will incorporate a SuDS strategy which will include the discharge of surface water at greenfield rates. This will prevent increased flooding as a result of climate change.

## **Conclusion**

- 1.30 The Council's Site Assessment (against SEA objectives) has been reviewed as part of this Assessment in order to assist the Council in its consideration of the site and proposal at *North of Hillside Road, Portlethen*.
- 1.31 As noted above, this revised assessment is based on a proposal for residential development on 6.5 hectares of the site safeguarded under for business use under BUS2.
- 1.32 The examination of the Council's Site Assessment concludes that this site can be evaluated favourably for residential development. This revised assessment has been undertaken against the indicative proposal submitted in support of this representation.
- 1.33 Consideration of the Council's shortfall in additional housing land allocations and over supply of land designated for employment / business use has also been undertaken.
- 1.34 Based on the findings of the revised assessment (Appendix 1), the site *North of Hillside Road, Portlethen* a sustainable development proposal.
- 1.35 The Proposed LDP states that it seeks to promote Aberdeenshire as an ...*area with a high quality of life and distinctive places, and where new developments are designed as effectively as possible to improve this and help deliver sustainable, low carbon places* (paragraph 3.13).
- 1.36 The development of *North of Hillside Road, Portlethen* will contribute to this objective.
- 1.37 There are no planning or environmental reasons why *North of Hillside Road, Portlethen* should not be allocated for housing in the Proposed LDP.



## Appendix 1 Revised Site Assessment (against SEA Objectives)

Site Name	Promoter	Air	Water	Climatic Factors	Soil	Biodiversity	Landscape	Material Assets	Population	Human Health	Cultural Heritage
North of Hillside Road, Portlethen (Council's Scoring)	Dandara	0	0	0/-	0	0/+	0	+/-	0	+/0	0
North of Hillside Road, Portlethen (Revised Scoring)	Dandara	0	0	0	0	0/+	0	0	+	+	0

### Scoring Justification for North of Hillside Road against SEA Topics (including 21 criteria)

Air	Water	Climatic Factors	Soil	Biodiversity	Landscape	Material Assets	Population	Human Health	Cultural Heritage
<p><b>Impact on Air Quality?</b></p> <p>There are no Air Quality Management Areas (AQMA) in Aberdeenshire.</p> <p>Table 8.5.2 <i>Environmental Assessment Questions for Bids (allocated and unallocated)</i> advises that proposals for between 50 – 499 homes will lead to a decrease in air quality if they will increase traffic flow through several settlements within Aberdeenshire.</p> <p>Portlethen is not listed as one of these settlements.</p> <p>The proposal is also located with close proximity to local services and facilities.</p> <p>Hillside Primary School is located approximately 1km south west of the site.</p> <p>Portlethen Primary School is located approximately 1.6km to the south of the site.</p> <p>Asda Supermarket is as also located approximately 1.4km from the site.</p> <p>The proposal also benefits from existing public transport routes within walking distance of the site (less than 100m from centre of site).</p> <p>This proximity to existing facilities and public transport will reduce the reliance on private modes of transport. This will reduce vehicle emissions and the impact of the development on air quality.</p>	<p><b>Impact on water quality through pollution and/or abstraction?</b></p> <p>There will be two levels of SuDS treatment before surface water is discharged from the site. This will protect any nearby water bodies (including the watercourse along the northern boundary of the site). It will also ensure that there is no degradation of the existing water quality.</p> <p><b>Does the proposal have a physical impact on existing watercourses?</b></p> <p>An existing watercourse runs along the northern boundary of the site.</p> <p>A future planning application will be supported by a Flood Risk Assessment. This will assess the impact of the development on the existing watercourse.</p> <p>The indicative proposal includes for the provision of a landscape buffer along the northern boundary of the site.</p> <p>The development of the site will ensure that a proposal does not have a physical impact on existing watercourses.</p> <p><b>Can the proposal connect to a public sewerage system</b></p> <p>The development will connect to the existing public sewerage system.</p> <p>A future planning application will be supported by a Drainage Impact Assessment. This will determine whether there is existing capacity within the existing public</p>	<p><b>Vulnerability to the effects of climate change?</b></p> <p>A review of SEPA's online interactive flood mapping tool confirms that the site is at <i>high risk</i> of fluvial flooding.</p> <p>This source of flooding occurs from the existing watercourse which runs along the northern boundary of the site.</p> <p>A Flood Risk Assessment will be prepared in support of a future planning application. This will assess the risk of flooding to the site and identify any necessary mitigation measures to prevent flooding on the site.</p> <p>The proposal will incorporate a SuDS strategy which will ensure that all surface water discharge is a greenfield rates in accord with SEPA guidance.</p> <p>The indicative proposal submitted as part of this representation proposes the construction of two SuDS ponds in the north eastern corner of the site.</p> <p>The provision of suitable mitigation will ensure that the site is not vulnerable to the effects of climate change.</p> <p><b>Impact of transport on CO2 emissions?</b></p> <p>The proposal is located with close proximity to local services and facilities.</p> <p>Hillside Primary School is located approximately 1km south west of the site. Asda Supermarket is as also located approximately</p>	<p><b>Impact on agricultural land?</b></p> <p>The site is classified as category 3.2 on the National scale land capability for agricultural mapping tool. The site is therefore not prime agricultural land.</p> <p>The site is not currently in agricultural use. The site is also currently allocated for development.</p> <p>The development of the site will not have any impact on agricultural land.</p> <p><b>Impact on soil quality during the construction phase?</b></p> <p>A Construction Environmental Management Plan (CEMP) will be put in place during the construction of the proposal. This will establish preventative measures to ensure there is no adverse impact on soil quality during the construction phase.</p> <p><b>Impact on contaminated land?</b></p> <p>The site is not anticipated to contain any contaminated land.</p> <p>A Phase 1 Site Investigation will be undertaken in support of a future planning application. This will determine whether there is any contaminated land available on the site.</p> <p>If any contaminated land is discovered, an appropriate Remediation Strategy will be prepared to ensure that there is no adverse impact as a result of the development.</p>	<p><b>Impact on Nature Conservation Sites?</b></p> <p>A review of SNH's online mapping tool <i>Site Link</i> confirms that there are no European or National designated biodiversity sites within the site.</p> <p>A future planning application will be supported by a Phase 1 Habitat Survey. This Habitat Survey will determine the presence of any protected species on the site.</p> <p>Given the site is bound by existing development to the north and south, with the A92 to the east, it is unlikely that any protected species will be present within the site.</p> <p>The development of the site will have no impact on nature conservation sites,</p>	<p><b>Impact on landscape quality?</b></p> <p>The site is located adjacent to existing development. Existing residential development is located to the south and north, with commercial development (Office Park at City South) to the north.</p> <p>The indicative proposal includes for the provision of 2.6 hectares of open space. These areas of open space will incorporate landscaping (including tree planting) that will improve the physical appearance of the site.</p> <p>The development of the site will therefore improve the existing landscape quality of the site.</p> <p><b>Impact on a Special Landscape Area?</b></p> <p>The site is not located within a Special Landscape Area. The proposal will have no impact upon landscape quality.</p> <p><b>Impact on Aberdeen Green belt?</b></p> <p>The site is designated as being safeguarded for development (employment use) within the adopted LDP.</p> <p>The site is also proposed to be safeguarded for business use within the proposed LDP.</p> <p>The development of the site will have no impact on the Aberdeen Green Belt.</p>	<p><b>Impact on fixed assets</b></p> <p>The indicative proposal includes for the provision of 40 affordable homes. This in accord with the Council's requirement for housing developments to provide 25% affordable homes.</p> <p>The development of the site will a significant positive impact with regard to the provision of affordable housing in Portlethen.</p> <p>An Education Note has been prepared in support of this representation. It is not considered that education capacity is an insurmountable barrier to the allocation of this site for residential development in the emerging LDP. Where necessary, Dandara will make financial contributions towards additional education capacity in accord with the tests of Circular 3/2012.</p> <p><b>Impact on vacant and derelict land?</b></p> <p>The site is not located on vacant or derelict land. The site is safeguarded for employment use within the adopted LDP. The site is also proposed to be safeguarded for business use within the proposed LDP.</p> <p>The development of the site will have no impact on vacant or derelict land.</p>	<p><b>Impact on the supply of housing land for an ageing population?</b></p> <p>The indicative proposals include for the delivery of a range of house types (ranging from two-bed to five-bed houses) as well as one-bed and two-bed apartments.</p> <p>The smaller homes will be attractive to first-time buyers and individuals looking to downsize from larger properties.</p> <p>The development of the site will provide a mix of house which will provide a range of housing choice for the population.</p> <p>The development of the site will cater for all sectors of housing need and demand, having a positive impact upon the population.</p>	<p><b>Impact on access to open space and active travel routes?</b></p> <p>The indicative proposal includes for the provision of 2.6 hectares of open space. This is 40% of the total site area, in accord with Council guidance.</p> <p>The indicative proposal includes for the provision of footpaths that will link the areas of open space. These areas of open space will be available to existing residents of Portlethen.</p> <p>The development of the site will therefore have a positive effect on human health.</p> <p><b>Impact on safety?</b></p> <p>The site is not located within a hazardous development or Health and Safety Executive consultation zone.</p> <p>Residents of the proposed development will therefore not be at risk from hazardous developments.</p> <p>The development of the site will have no impact on safety.</p>	<p><b>Impact on cultural heritage designations and listed buildings?</b></p> <p>A review of Historic Environment Scotland's online mapping tool <i>Pastmap</i> confirms that there are no cultural heritage designations located on, or in close proximity to the site.</p> <p>The development of the site will therefore have no impact upon cultural heritage designations or listed buildings.</p> <p><b>Impact on archaeological sites?</b></p> <p>There are no known archaeological sites located on or adjacent to the site.</p> <p>The development of the site will therefore have no impact on archaeological sites.</p>

	sewerage system.	<p>1.4km from the site.</p> <p>The proposal also benefits from existing public transport routes within walking distance of the site (less than 100m from centre of site).</p> <p>This proximity to existing facilities and public transport will reduce the reliance on private modes of transport. This will reduce vehicle emissions and the impact of development related transport on CO2 emissions.</p>	<p><b>Is it brownfield or greenfield land?</b></p> <p>The site is not brownfield land.</p> <p>The site is allocated for development with the adopted LDP and the Proposed LDP.</p> <p><b>Impact on carbon rich soils?</b></p> <p>A review of the online mapping tool Scotland's soils confirms the site does not contain carbon rich soils.</p> <p>The site comprises mineral soils with no peatland vegetation.</p> <p>The development of the site will have no impact on carbon rich soils.</p>						
--	------------------	--	---	--	--	--	--	--	--