

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.

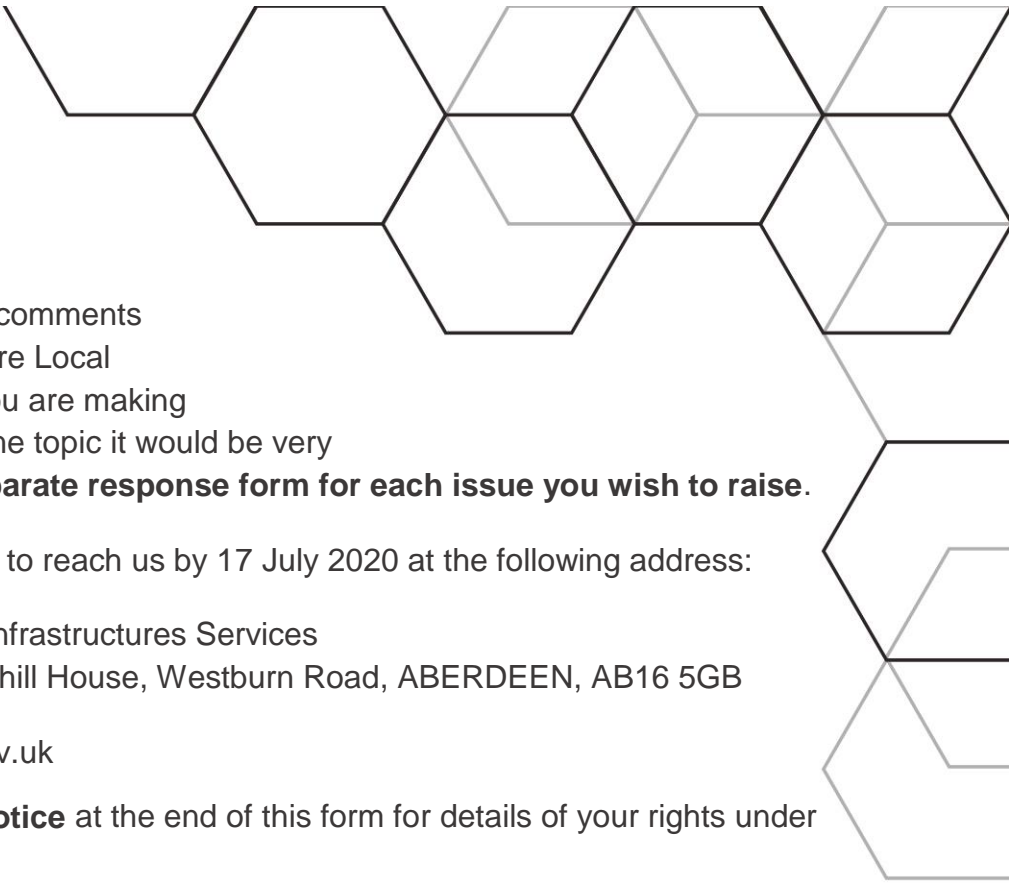
Jeśli potrzebowali będą Państwo informacji z niniejszego dokumentu w innym języku, pisanych dużą czcionką, w wersji łatwej do czytania, w alfabecie Braille'a lub w brytyjskim języku migowym, proszę o telefoniczny kontakt na numer 01467 536230.

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:	Mr
First Name:	Ian
Surname:	Scott
Date:	29 June 2020
Postal Address:	████████████████████
Postcode:	████████
Telephone Number:	██████████
Email:	██████████████████

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

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

If yes who are you representing? Stewart Milne Group

☐ 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):

Appendix 07e: Kincardine and Mearns Settlement Statements – Drumoak (pp654-656)

Allocation of Site Ref KN034, Site A, East of Drumoak (50 dwellings with associated infrastructure, open space and landscaping) in the Aberdeenshire Local Development Plan 2021, with the Drumoak settlement map also updated to reflect the boundaries of the allocation.

Reason for change:

On behalf of Stewart Milne Group, objection is taken to the failure of the Proposed Aberdeenshire Local Development (LDP) 2021 to identify Site Ref: KN034, Site A, East of Drumoak as an opportunity site for residential development. This representation should be considered in tandem with the Development Bid (Appendix 1) and the response to the Main Issues Report (MIR) (Appendix 2).

It is maintained that the site, or part of it, should be allocated for development in the first Plan Period with the balance reserved for future development following a mid-term review of the Plan. As indicated at MIR stage, if the Council maintains its concerns over the development of the northern portion of the site, i.e. the area beyond the tree belt, then it is proposed that the southern portion of the site be allocated over two phases with 50 homes allocated for development in the first plan period and the remaining 60 reserved for future development following mid-term review of the LDP.

The development bid proposed 178 homes across the whole of Site KN034. However, due to concerns raised by the Council over the northern portion of the site at MIR stage, it was accepted that the development could be reduced to 110 homes across two phases in the southern portion of the site. This proposition is noted within the Issues and Actions Paper. Council Officers considered the southern portion of the site to be well-connected to the settlement via School Brae but believed that the land to the north was more isolated and less accessible by road, as well as lacking a second emergency access.

As clarified at MIR stage, the scale of development proposed for the north of the site is such that it would not require an emergency access. Also, it is not accepted that the north of the site is isolated given that it lies immediately east of existing housing and is only separated from the remainder of the village by narrow belts of trees. This appears to have been conceded in the Issues and Actions Papers. Notwithstanding, if these concerns are maintained, then limiting the extent of development as described would be a viable compromise.

Overall, our client submitted three Development Bids at Drumoak. The proposed development of Site KN034 is part of a wider masterplan for the expansion of the village, which is appended to the Development Bid (Appendix 1). Therein, Site KN034 forms Site A. The two other Development Bids, being Site KN035 South of Drumoak and Site KN036 West of Drumoak, form Sites B and C respectively. All sites are proposed to be housing developments but Site C would contain some retail/commercial space. For clarity, separate representations have been submitted for each site.

As stated at MIR stage, all three sites are considered suitable for development, each carrying their own merits. At the Examination in Public into the extant 2017 LDP, when the sites were also promoted, the Reporter stated that the sites were “...*not without merit...*” and considered that all three sites could be developed without giving rise to unacceptable landscape setting and amenity impacts. Notwithstanding the Reporter’s findings, the Issues and Actions Paper maintains concerns over visual and landscape-related impacts.

The Issues and Actions Paper states, “*The general comments to counter the findings of the Main Issues Report do not necessarily facilitate solutions or overcome the constraints, and concern does remain in relation to the wider landscape impacts, and education and sewage capacity for developments of this scale.*”

This conclusion is disappointing and fails to take full account of our response to the MIR, or even the information provided in the Development Bids. These concerns and others expressed in the Issues and Actions Paper are addressed below, with a focus on matters related to Site KN034.

Like the MIR, the Issues and Actions Paper acknowledges that there is a demand for new housing in the Drumoak area and that this shall not likely be met by current supply. It is conceded that not all of the sites could be brought forward and delivered during the lifespan of the 2021 LDP given the size of the existing settlement. The three Development Bids and accompanying Masterplan do, however, clearly indicate that there is capacity to accommodate new housing development in the village. It is also reiterated that the limited housing supply is an acute issue in the area, particularly in respect of affordable housing which would be provided in accordance with the adopted affordable housing policies of the LDP. There is therefore an opportunity arising from the forthcoming LDP to capture this development capacity, thereby securing the planned long-term sustenance and, indeed, growth of Drumoak.

By contrast, it is contended that a no growth scenario is not an option given the aforementioned acute demand for new housing. Though an allocation for development has been made in Drumoak (Opportunity Site OP1 Drumoak, Land North of Sunnyside Farm) this is merely the final phase of another development project by our client that has been ongoing since allocation of that site in the 2012 LDP. It benefits from an extant planning permission and the final phase of development at Sunnyside Farm will deliver only 11 new homes.

The MIR more specifically highlighted that further development would be important to support the range of services available in the village and thereby maintain an overall sense of place. As a consequence, Officers stated a preference for the development of land to the South of Deevie Gardens, at Bid Site KN128 which was and is proposed to remain Protected Land in the LDP. Whilst the Bid proposed 35 homes, Officers considered that the site could possibly accommodate more. An objection to that proposition was submitted on behalf of our client (Appendix 3) at MIR stage, voicing a

number of concerns. Notwithstanding the fact the site has not been allocated for development in the Proposed LDP, Officers still stated a preference for further land allocation at Drumoak. As such there is clearly an understanding of the need for new local housing development. For this reason, it is also presumed that schooling and drainage capacities are sufficient; or, that any deficiencies therein can be addressed using developer contributions.

In any case, both Banchory Academy and Drumoak Primary School have spare capacity at 2022 and 2023 when development is likely to commence. The latest 2019-based school roll forecasts indicate that Drumoak Primary School has capacity for 155 pupils with a roll in 2019 of only 124 pupils. This is forecast to increase to 125 pupils at 2022 and 128 at 2023. Banchory Academy, with a capacity of 900 pupils, is forecast to increase from 813 pupils in 2019 to 874 in 2022 and 902 in 2023, though numbers are forecasted to continually decrease by almost 100 until the end of current forecasts at 2027 when 807 pupils are expected. There is therefore capacity in both primary and secondary schools to accommodate a phased development of housing in Drumoak.

Also, when responding to representations at MIR stage of the review that led to the 2017 LDP, the Council acknowledged that there was no suggestion these three sites at Drumoak could not be serviced and stated there were no overriding infrastructure concerns that could not be addressed subject to a planning application. No explanation for the Council's current change in position has been provided and it is maintained that these constraints should not therefore preclude the allocation of Site KN034 for development, nor Sites KN035 and/or KN036.

The MIR Site Assessment for Site KN034 accepted that the site is well-located in relation to the rest of the village and in close proximity to the primary school. Crossing the A93 has previously been perceived by the Council as an issue for the development of land to the south of the village. This issue could be easily addressed through the installation of a light-controlled pedestrian crossing on the A93 and/or further speed limit reductions. However, the potential for development to the north of the A93 on the same side of the road as the primary school, such as at Site KN034, arguably circumvents this issue. Site KN034 provides an ideal place for development as far as the provision of safe routes to school is concerned.

As regards development upon pipelines and within statutory clearance of overhead lines; this should not form the basis of opposition to the site's development. As advised in the Development Bid, the pipeline can be rerouted and, in any case, this would be addressed in detail with both the pipeline operator, [REDACTED], and the Health and Safety Executive (HSE). Indeed, those parties would be statutory consultees during the assessment of any application on the site, providing further opportunity for assessment of the issue. Also, the same pipeline was rerouted via the same process at Westhill by our client, to allow for development at Broadshade. It is noted that development allocations have also been made elsewhere in the pipeline corridor as part of the Proposed LDP, such as at Stonehaven.

In respect of overhead lines, the same principles and processes would apply and overhead lines of the type on site rarely preclude property development. For clarity, however, overhead lines only span the western boundary to the north of the tree belt. If that land were to be allocated, these lines could be rerouted or submerged underground prior to development, if that is deemed necessary by the operator or HSE, as often happens in the case of new development where overhead line are present.

Adverse visual and landscape-related impacts resulting from the development have been presented as a reason for opposing development of all three sites by the Council throughout the LDP review process. The Issues and Actions Paper, following on from the conclusions of the MIR, considers the proposals to be overdevelopment that would undermine the landscape character of the area and village setting. These concerns were strongly refuted in our response to consultation on the MIR (Appendix 2) and our view remains that the development would pose little discernible impact in those regards. The Development Bid and accompanying Masterplan are clear in showing that the development would be phased to ensure that an incremental pattern of growth takes place, and at a pace similar to the previous settlement growth, thereby appeasing concerns regarding overdevelopment and any related inherent visual impacts.

This is particularly true of Site KN034, especially if development were to only take place on land to the south of the tree belt, as there is no intention to undermine the integrity of the tree belt. For clarity, the tree belt is designated Ancient Woodland and though it was proposed to connect the north and south of the site via a link road through the tree belt, if the land to the north is not allocated for development then provision of said link road would not be necessary and the tree belt would remain fully intact.

The assertion by Scottish Natural Heritage, that development on Site KN034 would likely incur significant adverse landscape/visual impacts due to the sloping nature of the site, is refuted in the strongest of terms. Any visit to the site would show that the land is only gently sloped from the A93 at the south boundary upwards to the north. The southern portion of the site is also effectively bound to the north and east by mature trees, which provide effective physical containment and would disrupt distant views of the proposed development. Also, the proposed housing would be no more conspicuous than the existing housing east of Sunnyside Drive in views from the south and west.

It continues to be recognised that the site forms a gateway into the village on the approach from Aberdeen, and this would be respected. Supplementary planting would be proposed in the shelter belt to the east to provide further containment to the development whilst also providing a gateway feature to the village. That shelter belt would also form a long-term defensible settlement boundary. Accordingly, our client does not accept the conclusion that development of the site would give rise to detrimental visual impacts or that it would undermine the setting of the village and wider landscape.

Though our client maintains that the whole of Site KN034 could be developed with minimal impact on the existing village, should the Council's concerns regarding the northern portion of the site prevail then only the southern portion of the site could be allocated for development in two phases to accommodate around 110 homes.

On the basis of all of the above, it is respectfully requested that Site KN034 be allocated in the proposed LDP 2021 for the development of 50 homes in the first Plan Period, with the balance of the site reserved for future development following a mid-term review of the LDP.

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:

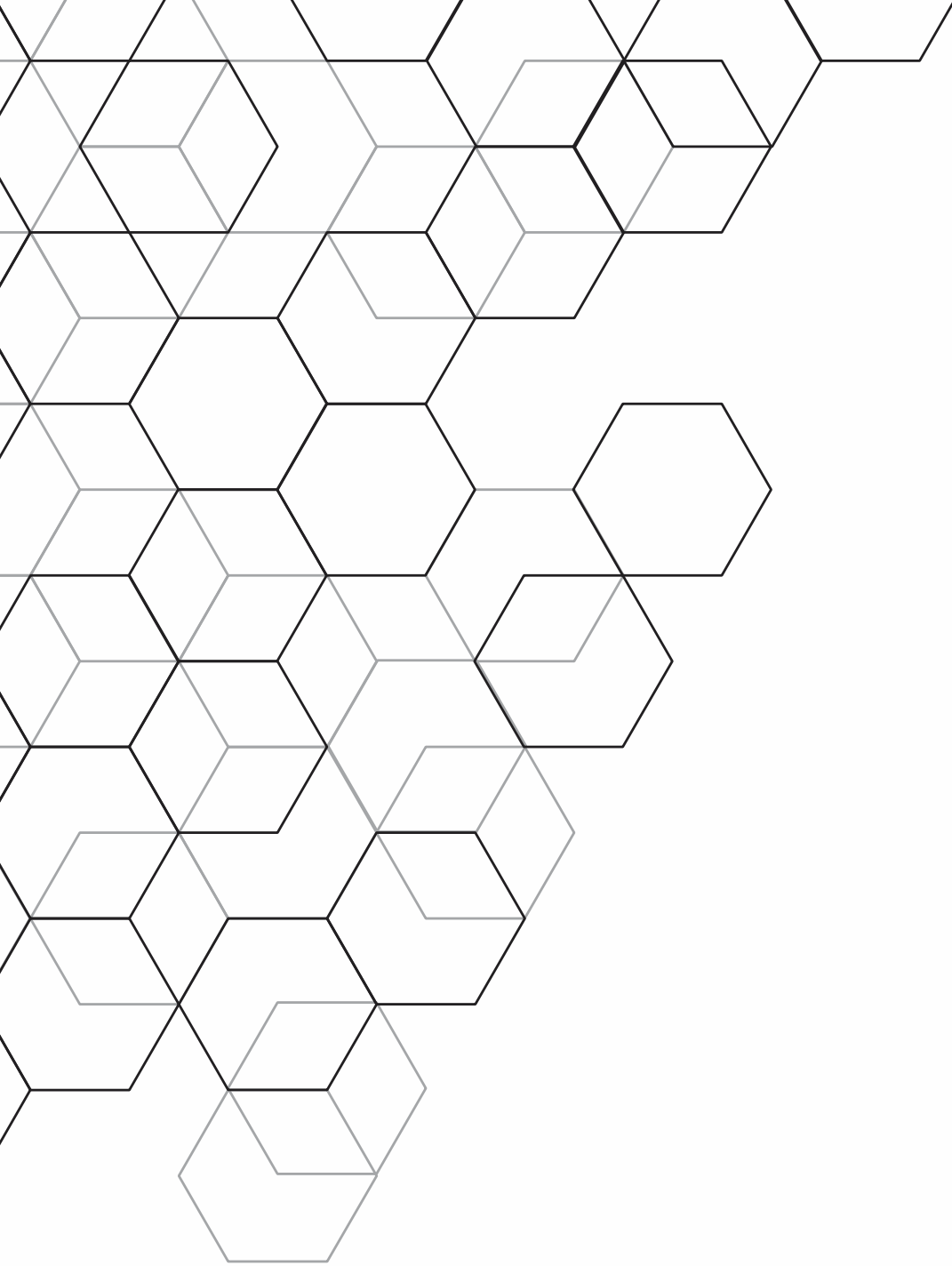
Aberdeenshire Council will only keep your personal data for as long as is needed. Aberdeenshire Council will retain your response and personal data for a retention period of 5 years from the date upon which it was collected. After 5 years Aberdeenshire Council will review whether it is necessary to continue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



Appendix 1

Local Development Plan 2021

Call for Sites Response Form



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

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

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

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

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

All forms must be submitted by 31 March 2018.

1. Your Details

Name	
Organisation (if applicable)	Ryden LLP
Address	
Telephone number	
Email address	
Do you wish to subscribe to our newsletter?	Yes

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

Name	
Organisation (if applicable)	Stewart Milne Homes
Address	
Telephone number	
Email address	

3. Other Owners

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

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

4. Site Details

Name of the site (Please use the LDP name if the site is already allocated)	East Drumoak (Site A).
Site address	Land lying immediately to the east of Drumoak.
OS grid reference (if available)	NO 795 995
Site area/size	14.56 hectares
Current land use	Agricultural
Brownfield/greenfield	Greenfield
Please include an Ordnance Survey map (1:1250 or 1:2500 base for larger sites, e.g. over 2ha) showing the location and extent of the site, points of access, means of drainage etc.	

5. Ownership/Market Interest

Ownership (Please list the owners in question 3 above)	
Is the site under option to a developer?	Yes The land is under option to a House Builder, Stewart Milne Homes.
Is the site being marketed?	No It is already under option to a House Builder.

6. Legal Issues

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

7. Planning History

Have you had any formal/informal pre-application discussions with the Planning Service and what was the response?	No The site has not been the subject of any pre-application discussions. The intention is to promote it through the appropriate Local Development Plan process.
Previous planning applications	There have been no previous planning applications on the site. However, it was promoted through the 2017 Local Development Plan.
Previous 'Call for sites' history. See Main Issues Report 2013 at www.aberdeenshire.gov.uk/ldp	Previous Bid Reference No. KM060. Please see details attached.
Local Development Plan status www.aberdeenshire.gov.uk/ldp	Is the site currently allocated for any specific use in the existing LDP? No If yes, do you wish to change the site description and or allocation? N/A

8. Proposed Use

Proposed use		Residential Development with associated access, infrastructure, public open space and landscaping.
Housing	Approx. no of units	178
	Proposed mix of house types	Number of: <ul style="list-style-type: none"> Detached: Semi-detached: Details attached Flats: Terrace: Other (e.g. Bungalows):
		Number of: <ul style="list-style-type: none"> 1 bedroom homes: 2 bedroom homes: Details attached 3 bedroom homes: 4 or more bedroom homes:
	Tenure (Delete as appropriate)	Private and Affordable Housing
	Affordable housing proportion	25% or such other proportion as agreed in accordance with Planning Policy requirements at the time of development.
Employment	Business and offices	N/A
	General industrial	N/A
	Storage and distribution	N/A
	Do you have a specific occupier for the site?	N/A
Other	Proposed use (please specify) and floor space	N/A
	Do you have a specific occupier for the site?	N/A
Is the area of each proposed use noted in the OS site plan?		N/A

9. Delivery Timescales

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

10. Natural Heritage

<p>Is the site located in or within 500m of a nature conservation site, or affect a protected species?</p> <p>Please tick any that apply and provide details.</p> <p>You can find details of these designations at:</p> <ul style="list-style-type: none"> • https://www.environment.gov.scot/ • EU priority habitats at http://gateway.snh.gov.uk/sitelink/index.jsp • UK or Local priority habitats at http://www.biodiversityscotland.gov.uk/advice-and-resources/habitat-definitions/priority/ • Local Nature Conservation Sites in the LDP's Supplementary Guidance No. 5 at www.aberdeenshire.gov.uk/ldp 	RAMSAR Site	No
	Special Area of Conservation	Yes
	Special Protection Area	No
	Priority habitat (Annex I)	No
	European Protected Species	No
	Other protected species	No
	Site of Special Scientific Interest	No
	National Nature Reserve	No
	Ancient Woodland	No
	Trees, hedgerows and woodland (including trees with a Tree Preservation Order)	Yes
	Priority habitat (UK or Local Biodiversity Action Plan)	No
	Local Nature Conservation Site	No
	Local Nature Reserve	No
If yes, please give details of how you plan to mitigate the impact of the proposed development: Please see details at Q19.		
Biodiversity enhancement		
<p>Please state what benefits for biodiversity this proposal will bring (as per paragraph 194 in Scottish Planning Policy), http://www.gov.scot/Resource/0045/00453827.pdf) by ticking all that apply. Please provide details.</p> <p>See Planning Advice 5/2015 on Opportunities for biodiversity enhancement at: www.aberdeenshire.gov.uk/media/19598/2015_05-opportunities-for-biodiversity-enhancement-in-new-development.pdf</p> <p>Advice is also available from Scottish Natural Heritage at: https://www.snh.scot/professional-advice/planning-and-development/natural-heritage-advice-planners-and-developers and http://www.nesbiodiversity.org.uk/.</p>	Restoration of habitats	
	Habitat creation in public open space	✓
	Avoids fragmentation or isolation of habitats	
	Provides bird/bat/insect boxes/Swift bricks (internal or external)	✓
	Native tree planting	✓
	Drystone wall	✓
	Living roofs	
	Ponds and soakaways	✓
	Habitat walls/fences	✓
	Wildflowers in verges	✓
	Use of nectar rich plant species	✓
	Buffer strips along watercourses	
	Show home demonstration area	
Other (please state):		
If yes, please provide details: Please see details at Q19.		

11. Historic environment

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

12. Landscape Impact

Is the site within a Special Landscape Area (SLA)? (You can find details in Supplementary Guidance 9 at www.aberdeenshire.gov.uk/ldp)	No If yes , please state which SLA your site is located within and provide details of how you plan to mitigate the impact of the proposed development: N/A
SLAs include the consideration of landscape character elements/features. The characteristics of landscapes are defined in the Landscape Character Assessments produced by Scottish Natural Heritage (see below) or have been identified as Special Landscape Areas of local importance. <ul style="list-style-type: none"> SNH: Landscape Character Assessments https://www.snh.scot/professional-advice/landscape-change/landscape-character-assessment SNH (1996) Cairngorms landscape assessment http://www.snh.org.uk/pdfs/publications/review/075.pdf SNH (1997) National programme of landscape character assessment: Banff and Buchan http://www.snh.org.uk/pdfs/publications/review/037.pdf SNH (1998) South and Central Aberdeenshire landscape character assessment 	If your site is not within an SLA , please use this space to describe the effects of the site's scale, location or design on key natural landscape elements/features, historic features or the composition or quality of the landscape character: Please see details at Q19.

<http://www.snh.org.uk/pdfs/publications/review/102.pdf>

13. Flood Risk

Is any part of the site identified as being at risk of river or surface water flooding within SEPA flood maps, and/or has any part of the site previously flooded? (You can view the SEPA flood maps at http://map.sepa.org.uk/floodmap/map.htm)	No If yes, please specify and explain how you intend to mitigate this risk: N/A
Could development on the site result in additional flood risk elsewhere?	No If yes, please specify and explain how you intend to mitigate or avoid this risk: N/A
Could development of the site help alleviate any existing flooding problems in the area?	No If yes, please provide details: N/A

14. Infrastructure

a. Water / Drainage		
Is there water/waste water capacity for the proposed development (based on Scottish Water asset capacity search tool http://www.scottishwater.co.uk/business/Connections/Connecting-your-property/Asset-Capacity-Search)?	Water	Yes
	Waste water	Yes
Has contact been made with Scottish Water?	Yes If yes, please give details of outcome: Both water and drainage can be provided should the site be allocated and planning permission granted.	
Will your SUDS scheme include rain gardens? http://www.centuralscotlandgreennetwork.org/campaigns/greener-gardens	Yes Please specify: Dependent on topography and ground conditions.	
b. Education – housing proposals only		
Education capacity/constraints https://www.aberdeenshire.gov.uk/schools/parents-carers/school-info/school-roll-forecasts/	Capacity will be available for a phased development post 2021. Please see details at Q19.	
Has contact been made with the Local Authority's Education Department?	No If yes, please give details of outcome: N/A	
c. Transport		
If direct access is required onto a Trunk Road (A90 and A96), or the proposal will impact on traffic on a Trunk Road, has contact been made with Transport Scotland?	N/A	
Has contact been made with the Local Authority's Transportation Service? They can be contacted at transportation.consultation@aberdeenshire.gov.uk	No If yes, please give details of outcome: N/A	

Public transport	Please provide details of how the site is or could be served by public transport: Please see details at Q19.
Active travel (i.e. internal connectivity and links externally)	Please provide details of how the site can or could be accessed by walking and cycling: Please see details at Q19.
d. Gas/Electricity/Heat/Broadband	
Has contact been made with the relevant utilities providers?	Gas: Yes If yes, please give details of outcome(s): Network connection available. Please see details at Q19.
	Electricity: Yes If yes, please give details of outcome(s): Network connection available. Please see details at Q19.
	Heat: No If yes, please give details of outcome(s): N/A
	Broadband: Yes If yes, please give details of outcome(s): Network connection available. Please see details at Q19.
Have any feasibility studies been undertaken to understand and inform capacity issues?	No Please specify: N/A
Is there capacity within the existing network(s) and a viable connection to the network(s)?	Yes Please specify: Utilities are available adjacent to the site and there is no constraint to development.
Will renewable energy be installed and used on the site? For example, heat pump (air, ground or water), biomass, hydro, solar (photovoltaic (electricity) or thermal), or a wind turbine (freestanding/integrated into the building)	Appropriate technologies available at the time will be used to deliver reduced energy consumption and heat generation.
e. Public open space	
Will the site provide the opportunity to enhance the green network? (These are the linked areas of open space in settlements, which can be enhanced through amalgamating existing green networks or providing onsite green infrastructure) You can find the boundary of existing green networks in the settlement profiles in the LDP	Yes Please specify: Please see details at Q19.
Will the site meet the open space standards, as set out in Appendix 2 in the Aberdeenshire Parks and Open Spaces Strategy? https://www.aberdeenshire.gov.uk/media/6077/approvedpandospacesstrategy.pdf	Yes Please specify: Please see details at Q19.

Will the site deliver any of the shortfalls identified in the Open Space Audit for specific settlements? https://www.aberdeenshire.gov.uk/communities-and-events/parks-and-open-spaces/open-space-strategy-audit/	Not applicable Please specify: Drumoak already benefits from a good range of open space which will be enhanced by the proposed development.
f. Resource use	
Will the site re-use existing structure(s) or recycle or recover existing on-site materials/resources?	Yes If yes, please specify: Existing top soil and sub soils will be re-used as appropriate within the site.
Will the site have a direct impact on the water environment and result in the need for watercourse crossings, large scale abstraction and/or culverting of a watercourse?	No If yes, please provide details: NA

15. Other potential constraints

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

Aberdeen Green Belt https://www.aberdeenshire.gov.uk/media/20555/appendix-3-boundaries-of-the-greenbelt.pdf	No
Carbon-rich soils and peatland http://www.snh.gov.uk/planning-and-development/advice-for-planners-and-developers/soils-and-development/cpp/	No
Coastal Zone https://www.aberdeenshire.gov.uk/media/20176/4-the-coastal-zone.pdf	No
Contaminated land	No
Ground instability	No
Hazardous site/HSE exclusion zone (You can find the boundary of these zones in Planning Advice 1/2017 Pipeline and Hazardous Development Consultation Zones at https://www.aberdeenshire.gov.uk/planning/plans-and-policies/planning-advice/ and advice at http://www.hse.gov.uk/landuseplanning/developers.htm)	Yes. Falls within pipeline consultation zone. Please see details at Q19.
Minerals – safeguarded or area of search https://www.aberdeenshire.gov.uk/ldpmedia/6_Area_of_search_and_safeguard_for_minerals.pdf	No
Overhead lines or underground cables	No
Physical access into the site due to topography or geography	No
Prime agricultural land (grades 1, 2 and 3.1) on all or part of the site. http://map.environment.gov.scot/Soil_maps/?layer=6	No
‘Protected’ open space in the LDP (i.e. P sites) www.aberdeenshire.gov.uk/ldp and choose from Appendix 8a to 8f	Yes. Please see details at Q19.
Rights of way/core paths/recreation uses	No
Topography (e.g. steep slopes)	No
Other	No
If you have identified any of the potential constraints above, please use this space to identify how you will mitigate this in order to achieve a viable development: Please see details at Q19.	

16. Proximity to facilities

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

17. Community engagement

Has the local community been given the opportunity to influence/partake in the design and specification of the development proposal?	Not yet
	If yes, please specify the way it was carried out and how it influenced your proposals: N/A
	If not yet, please detail how you will do so in the future: Public Exhibition and Meetings with Community Council.

18. Residual value and deliverability

Please confirm that you have considered the 'residual value' of your site and you are confident that the site is viable when infrastructure and all other costs, such as constraints and mitigation are taken into account.	<p>I have considered the likely 'residual value' of the site, as described above, and fully expect the site to be viable:</p> <p>Please tick: <input checked="" type="checkbox"/></p>
<p>If you have any further information to help demonstrate the deliverability of your proposal, please provide details.</p> <p>Stewart Milne Homes, having taken an option on the land, and the landowners are confident that there is residual value following development of the site and the provision of the necessary infrastructure. The infrastructure constraints have been considered, including the pipeline constraint, and Stewart Milne Homes are confident that they can be addressed and do not impose an impediment to development.</p> <p>Stewart Milne Homes, having completed a number of developments in Drumoak, are familiar with the market in the area. From those earlier developments it is also clear that there is continuing demand for development in Drumoak. This was accepted by the Reporter in his conclusions on the Local Development Plan 2017.</p>	

19. Other information

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

FURTHER DETAILS IN RESPONSE TO SPECIFIC QUESTIONS RAISED IN THE BID FORM

Introduction

This Development Bid is submitted in response to a call for sites by Aberdeenshire Council to be considered for inclusion within the Aberdeenshire Local Development Plan 2021. The land which is the subject of the Development Bid is owned by [REDACTED] and is under option to Stewart Milne Homes. This Bid is submitted on their behalf.

The landowners, [REDACTED], own and farm a substantial area of land in and around the settlement of Drumoak. Both are resident in the area maintaining a long history of family ties with the village. Over time they have released land for both private and public sector residential development. This has included a partnership housing scheme in the centre of the village and private residential development completed by Stewart Milne Homes to the east and north of the village. The landowners have also made land available over time to Aberdeenshire Council at no cost for the provision of community facilities. This has included land for the provision of a church hall, the provision of a bowling green and associated facilities in the centre of the village, and the provision of a school play area. More recently, land was acquired from them by the Council for provision of the new primary school in Drumoak.

Stewart Milne Homes are part of the Stewart Milne Group, founded in 1975. Since that time the Group has grown to become one of the UK's leading privately owned housebuilders. The company have a commitment to enterprise and innovation meshed with traditional value for quality services. The Group are currently building homes across the North East of Scotland, Tayside, the Central Belt and the North West of England.

The detail contained herein requires to be read in conjunction with the above responses. It expands, where necessary, on the response to each of the questions set out above specifically where further detail is sought. A Strategic Masterplan has also been prepared to accompany the Bid and requires to be referred to in conjunction with this and the Response Form.

Q4. Site Details

The development proposals for Drumoak have evolved following a detailed analysis of the land within and around the village and its capacity to accommodate further development. A number of sites have been identified that are considered capable of accommodating development. This Development Bid relates to Site A lying to the east of Drumoak. Located to the north east of the village, on the main approach from Aberdeen, it abuts the settlement along its western boundary whilst the northern boundary takes the form of an existing field boundary. Similarly, the eastern boundaries follow existing field and woodland boundaries. The eastern most boundary is formed by an existing shelter belt running north-south from the A93 which provides containment to the area.

The site, which extends to 14.56 hectares (36 acres), is sub-divided by a woodland sheltered belt which runs east-west roughly sub-dividing the site into one thirds, two thirds. The land enjoys a south facing aspect rising from the 30m contour adjacent to the A93 to the 95m contour at the north western corner of the site. The fields are currently in agricultural use and have been used for arable production in recent years.

The full extent of the site is highlighted on the Ordnance survey map attached at Appendix 1. A Strategic Masterplan attached at Appendix 2 provides further detail.

Cont./

Q5. Ownership/Market Interest

The site is owned by [REDACTED] who both reside in Drumoak. They have a long relationship with Stewart Milne Homes and they are aware, and fully supportive of, the submission of this Development Bid. Stewart Milne Homes have a long term option on the land.

Q6. Legal Issues

All of the land which is the subject of the Development Bid is owned by [REDACTED]. There are no 'ransoms' which would restrict access from the A93 and Stewart Milne Homes control a second access to the site from their previous development immediately to the west.

Q7. Planning History

The land was promoted through the 2017 Local Development Plan process. It was allocated the reference KM060 (Drumoak East). Both the Main Issues Report and the Proposed Plan recognised the need and demand for housing in Drumoak. Further, in responding to the MIR representations, Aberdeenshire Council acknowledged that there was no suggestion that any of the proposed sites could not be serviced. They advised that **"...there are no issues associated with infrastructure that cannot be addressed at the time of a planning application"**. Both the MIR and Proposed Plan acknowledged that Drumoak benefits from a good range of services and that was reinforced by the recent substantial investment in a new primary school.

These views were echoed by the Reporter at the Examination in Public into the Plan. The Reporter considered that the sites promoted by Stewart Milne Homes in Drumoak were **"...not without merit"** and considered that all three sites could, in the main, be developed without giving rise to unacceptable impacts upon the landscape and setting of the village.

Q8. Proposed Use

The site is proposed for residential development comprising mainstream and affordable housing. The accompanying Masterplan considers the site capable of accommodating approximately 170 homes delivered over a number of phases. Of that overall number 25%, or such other proportion as required in accordance with planning policy at the time of development, will be provided as affordable housing.

The development will comprise a mix of detached, semi-detached and terraced properties ranging from 2-5 bedroom. Exact details of the mix can only be provided at the planning application stage having regard to prevailing market conditions and demand at that time.

Q9. Delivery Timescales

The site is considered capable of delivery within the first 5 years of the Local Development Plan with completion in the second period.

It is envisaged that the site will be developed in four phases, as set out in the accompanying Masterplan. Phases 1 and 2 develop the area lying between the A93 and the existing shelter belt to the north. Phases 3 and 4 involve development of the land to the north of the shelter belt.

Q10. Natural Heritage

The site is not affected by any natural heritage or nature conservation interests. The southern boundary of the site lies within 500m of the River Dee Special Area of Conservation. SEPA in commenting on the Bid Submissions to the previous Local Development Plan advised that a buffer strip would be required as well as a Drainage Impact Assessment. Both would be provided as part of any development proposals and ensure that there was no adverse impact on the Special Area of Conservation.

Cont./

The integrity of the existing shelter belts to the east and west of the proposed site, as well as the woodland strip to the north will be respected. The Masterplan envisages the enhancement of those areas and their integration with development to provide shelter, public open space and footpath linkages in and around the development.

The land is presently in agricultural use and development of the site provides an opportunity to enhance bio-diversity. This would be through landscaping works associated with the proposed development providing connectivity between the existing areas of woodland habitat.

Q11. Historic Environment

There are no Listed buildings or Scheduled Monuments within or adjacent to the site. Drumoak does not lie within a Conservation Area and there are no known archaeological interests in the area around Drumoak.

Drumoak Church, which occupies an elevated position to the north west of the site is a Category B Listed building. However, intervening development and woodland shelter belts ensure that development of the proposal site does not impact on the setting of the Church.

Q12. Landscape Impact

A Landscape Analysis has been carried out to inform the Strategic Masterplan. The site is not located within any of the Special Landscape Areas identified in the Local Development Plan nor does it lie within any Area of Landscape Significance.

A strong landscape framework is provided by the shelter belts to the east and west of the site whilst the woodland belt which crosses the site from east to west provides containment to development and disrupts distant views of the site.

The site forms a gateway into the village on the approach from Aberdeen. This will be respected and the shelter belt to the east strengthened and expanded to provide containment to the development whilst providing a gateway feature to the village. It will also form a long term defensible boundary.

Q13. Flood Risk

SEPA's indicative flood map, a copy of which is included within the Strategic Masterplan at Appendix 2 confirms that the site is not at risk of flooding.

Q14. Infrastructure

Stewart Milne Homes have undertaken a number of residential developments within Drumoak in recent years and are familiar with the availability of infrastructure within the village. They have been in regular contact with Scottish Water and can confirm that both water and drainage can be provided should the site be allocated for development and planning permission granted. Provision is made within the Masterplan for SUDS and consideration will be given to the use of rain gardens depending upon the layout and orientation of gardens and ground conditions.

Drumoak benefits from a new primary school with a nominal capacity of between 121 and 145 pupils. The current school roll is 110 pupils and is forecast to increase to 125 pupils at 2021 before falling again to 121 at 2022. Capacity, therefore, exists to allow the phased development of the site. Secondary education is provided at Banchory Academy which has a capacity of 900 pupils. The forecast capacity at 2022 based on the 2017 school roll forecasts is 883 pupils. Any constraints in primary or secondary education can be addressed by developer contributions.

The site enjoys frontage to the A93 from which primary access can be obtained. There are no visibility constraints and the proposed development would provide the opportunity to relocate the speed limit to the east. A secondary access to the site, controlled by Stewart Milne Homes, can be provided through the existing housing at School Brae.

Cont./

The entire site falls within 400m of the A93 where public transport services are available. These provide regular services east to Aberdeen and west to Banchory and beyond. Pedestrian routes will connect to bus stop provision on the A93 and also linkages to the existing facilities within the village. Cycle connections will also be provided to the A93.

The Deeside Way lies within easy reach of the site providing walkers and cyclists with a segregated cycle and footpath route from Aberdeen to Ballater.

Gas, electricity and broadband services are all available within the existing village. Adequate capacity is available to provide connections to the proposed development.

Stewart Milne Homes, in common with the majority of housebuilders, advocate a fabric first approach to ensure energy conservation and thus minimise carbon footprint. Appropriate technologies available at the time will also be considered as a means to deliver reduced energy consumption and heat generation.

In terms of open space provision, Aberdeenshire Council's Open Space Audit acknowledges that Drumoak already benefits from a good range of open space. This will be enhanced by the proposed development which meets the open space standards set by the extant Local Development Plan and Aberdeenshire Parks & Open Spaces Strategy.

The existing shelter belts to the east, west, and north form part of the green network encompassing the proposed site. The shelter belts will be enhanced with additional connectivity being provided through the site to open spaces and play areas within the site thereby extending the green network in the area. The existing shelter belt to the west of the site is identified in the extant Local Development Plan as a protected area and will be retained and enhanced.

There are no existing structures within the site requiring demolition to accommodate development. Existing top and sub-soils within the site will be reused and cut and fill will be such as to ensure that no materials require to be exported from the site.

Q15. Other Potential Constraints

The only constraint to development of the site is an existing high pressure national grid transmission gas pipeline which bisects the site from north to south, as shown on the attached Masterplan. The entire site falls within the pipeline consultation zone.

However, the pipeline is not an impediment to development. It is capable of being realigned. This is an issue that can be addressed in detail with the pipeline operators and the Health & Safety Executive and does not prevent the principle of development being established. Indeed, the same pipeline was diverted in Westhill, by Stewart Milne Homes, which allowed the Broadshade development to proceed.

A medium pressure gas main also crosses the southern portion of the site from east to west. This can be accommodated within the layout of the development, as has occurred throughout the remainder of Drumoak.

As highlighted above, the shelter belt to the east of the site between it and the existing built up area is identified in the extant Local Development Plan as a protected area. Other than a necessary road crossing this will be retained and enhanced to provide open space and footpath connectivity throughout the development.

Q16. Proximity to Facilities

Drumoak enjoys a range of facilities and services. It currently benefits from a Post Office, Bowling Club, Church, and Primary School, which opened in 2016. All are within 400m of the proposal site. A shop, located less than 1km from the site at Park, was closed for a period, but is due to reopen in the near future. Also, to the east within 1.5km of the proposal site, connected by the cycle route, lies the Mains of Drum Garden Centre, Coffee Shop and Restaurant.

Cont./

A range of formal and informal open spaces of varying size are located nearby. This includes a Public Park to the west of the village, including a playing field and The Glebe Park, which sits on the northern bank of the River Dee and provides a second playing field for the village.

The Irvine Arms Public House in the centre of the village closed a number of years ago and has planning permission for redevelopment to flatted residential use. Extant planning permission exists for a replacement Pub and Owners' Accommodation immediately to the west of the village.

The village and the site is well served by regular public transport services which run between Aberdeen and Banchory along the A93.

Q17. Community Engagement

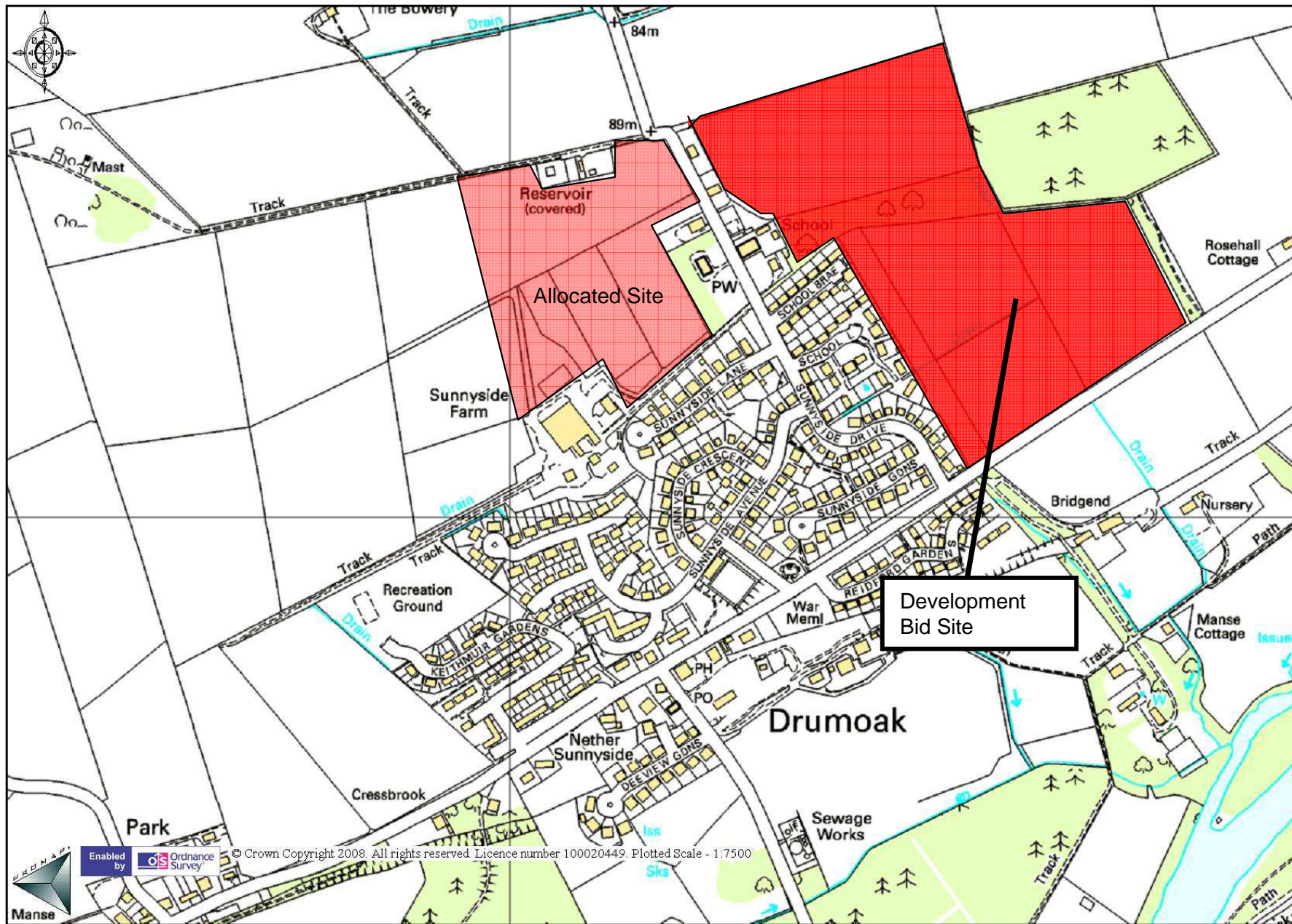
To date, there has been no community engagement held in relation to this Bid. Stewart Milne Homes recognise the importance and benefits that can be gained from public engagement and are committed to undertaking public consultation in respect of the development proposals. Should the site be preferred for development through the Main Issues Report, Stewart Milne Homes would intend to meet with the Community Council to explain their proposals and to hold a Public Consultation event. This would take the form of an exhibition of the indicative proposals in the form of a drop-in session in the Village Hall. This would allow the public to make informed comment at the Main Issues Report stage and prior to publication of the proposed Plan.

Please tick to confirm your agreement to the following statement:



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

Stewart Milne Homes – East Drumoak Development Bid Site



DRUMOAK

Village Expansion March 2018



Introduction

Drumoak is situated on the northern bank of the River Dee just 13 miles from Aberdeen city centre and serves as a commuter village. The village has been expanding steadily over the past 20 years with many new build houses built on what was previously agricultural land.

Housing typologies / styles and their relationship to the road vary extensively along the length of the A93 through Drumoak providing a rich mix of different character pockets as can be seen on the photos below.



Drumoak has a post office, bowling club, church and Primary School which opened in 2016. It enjoys a range of open spaces of varying sizes including the public park and Glebe park on the northern bank of the river Dee which is home to a well used playing field.

This document sets out the initial findings and analysis of 3 pockets of land in Drumoak and goes on to propose a viable future vision for each whilst considering the existing character/context of the village and ensuring both opportunities and constraints are considered from an early stage. A sketch proposal has been illustrated to facilitate early discussions with Aberdeenshire Council. Detailed future studies would be required to progress the initial concepts and design approach detailed in this document and will be progressed as the Local Development Plan is prepared.

1.1 The Development Sites

The proposed development sites have been split into 3 which wrap around the existing settlement of Drumoak and which are highlighted on the aerial view below. Each site will be analysed individually in this document and each provides an opportunity to create a unique sense of place and identity whilst positively enhancing and contributing to the village of Drumoak. The document as a whole shows how Drumoak can be developed through a master planned and coordinated approach over a number of years. This would help provide certainty for the community.

Site A: extends to approximately 36 acres and lies to the east of the settlement boundary of Drumoak. The site is in agricultural use and slopes southwards providing a significant boundary edge to the A93 where it currently contributes little to the arrival point of the village from Aberdeen.

Site B: extends to approximately 25 acres and sits between the existing settlement of Drumoak and the River Dee. The site is in agricultural use and has an undulating topography.

Site C: is the largest of the development sites in Drumoak at approximately 97 acres and is bounded to the east & south by the existing settlement of Drumoak and to the north and west by open fields. This south facing site is in agricultural use and slopes down towards the A93.



Development Site A

Existing Features

The site is naturally split into an upper and lower section by a woodland belt which gives immediate character and a sense of establishment to the site.



This mature zone of trees provides a ready made woodland /amenity space for local residents and provides a habitat for local wildlife which can be further enhanced. An existing footway leads from the wooded area through to Sunnyside Drive providing excellent pedestrian access from the site to Drumoak Primary School.



A planted buffer zone running along the western boundary, shields neighbouring rear elevations from view on approach to the village. This zone could be utilised as established open space and provide a valuable pedestrian route through the development site, connecting to the woodland belt.

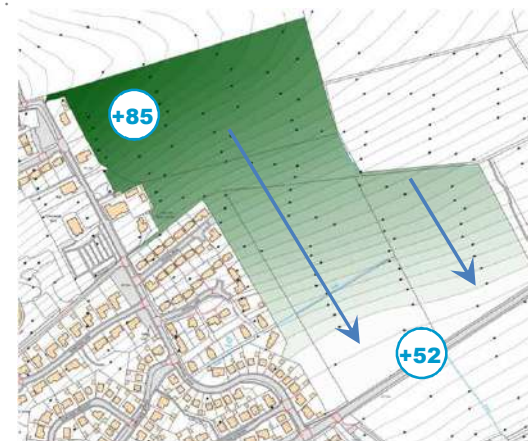
Flood Risk

SEPA's indicative Flood Map below confirms that the site is not at risk of flooding from the River Dee.



Topography

The land generally slopes from North to south from a high point of 85m to approximately 52m where the site boundary meets the A93. This follows a similar topography to the rest of Drumoak which has been successfully developed, with the highest approved development to date being at approx. +100m



Views

The photos on the following page record the existing character of the site.

Access and Connectivity

The site sits to the eastern boundary of Drumoak village. Drumoak Primary School and other local amenities are all within a 10 minute walk. The Deeside Way is also within easy reach providing walkers and cyclists with a path spanning from Aberdeen to Ballater. The site is extremely well connected with the A93 running through Drumoak with a number of bus stops distributed along the main street.

Aberdeen city centre can be reached within 25minutes by car and Banchory is a 5 minute drive away. The 201 & 202 Stagecoach buses provide frequent services into Aberdeen and Banchory.



Utilities

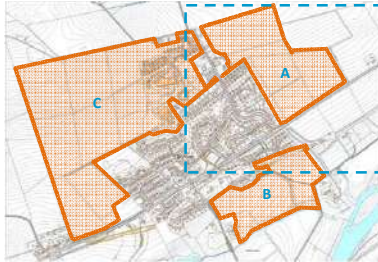
The following utility information was sourced from an external consultant to inform the initial design concept :

- BT OPENREACH Layout 1 of 2 (Telecom)
- BT OPENREACH Layout 2 of 2 (Telecom)
- SSE Electric 1 of 2 (scale 1-1250)
- SSE Electric 2 of 2 (scale 1-1250)
- SSE Electric (scale 1-10000)
- SGN Gas 1 of 2
- SGN Gas 2 of 2

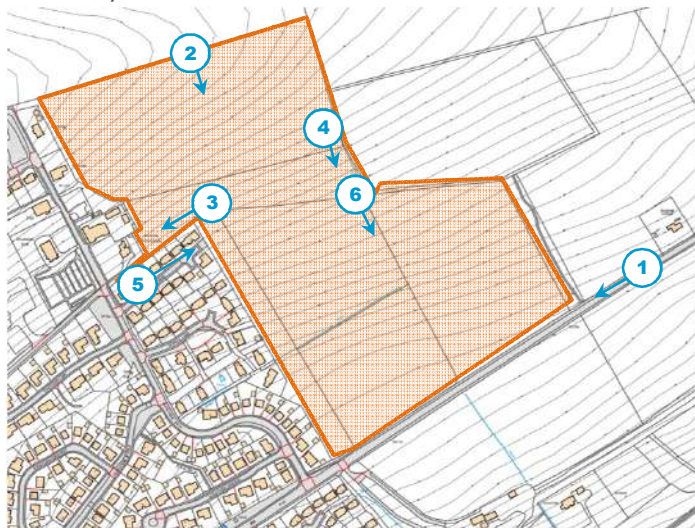
Records obtained from the National Grid confirm that a High Pressure National Transmission Gas Pipeline crosses the site from North to South, (see following diagram for approximate route). An intermediate Gas main is also located in the lower section of the site and crosses it from West to East. Neither provide a constraint as both can be diverted / incorporated into the proposals for the site.

- Water & Wastewater Plan

Development Site A Site Appraisal



Location Key



1. Village approach from Aberdeen with development site to North of the A93



2. View looking south from the top part of the site



3. View of tree belt and properties on the western boundary



4. Cut through, through woodland belt



5. Site access through School Brae Road



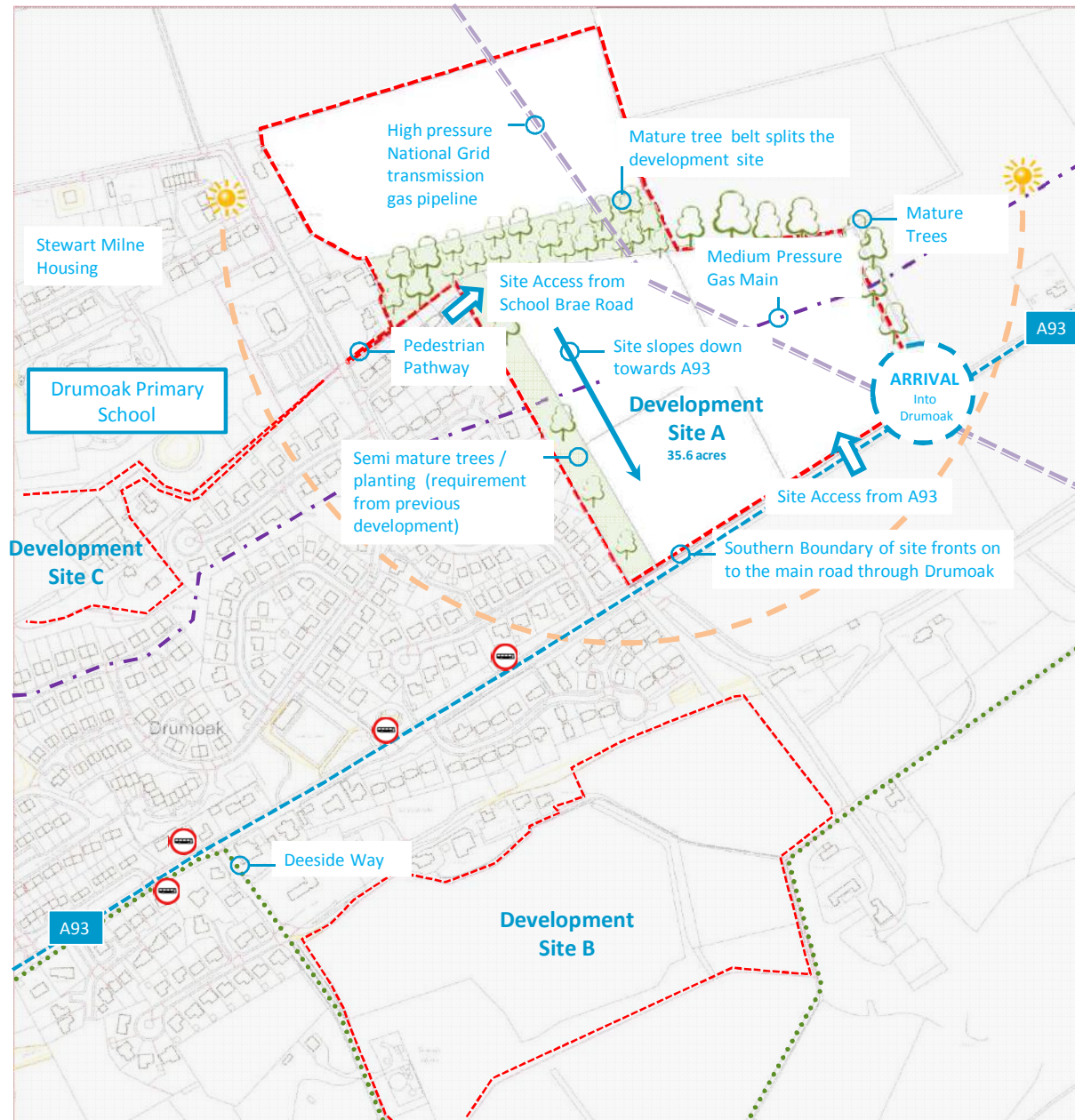
6. Panoramic view of the Southern portion of development site A with open views to hills beyond

Development Site A

Site Opportunities / Constraints

The key opportunities/constraints which influence site A are:

- Topography
- Location at arrival point to Village
- Orientation
- Proximity to A93 provides the opportunity to create a sense of arrival not only to the site but to the Village of Drumoak from the Aberdeen approach. Effective use of frontages will enhance the route along the A93 and use of traditional housing typologies will help to integrate this development into the existing village.
- Dry stone wall field Boundaries
- Views
- Mature trees along Eastern Boundary
- Existing landscaping features, mature woodland and planted buffer zone contribute to the character and identity to the site.
- High Pressure Gas Main – which can be diverted and incorporated into design
- Medium Pressure Gas Main – which can be diverted and incorporated into design
- Access point through adjacent residential area will help to integrate the site into the existing village and provides an excellent link to the Primary school. This provides a welcoming entry point into the heart of development Site A.
- Excellent proximity to Drumoak Primary School and other community facilities including Drumoak Church
- South Facing orientation
- Pedestrian links – proximity to Deeside Way



Development Site A

Vision Site Layout



01 Landscaped area with SUDs Basin & pedestrian bridge/culvert link into site will provide a sense of arrival into Drumoak

02 Site Access

03 Important link providing access through an existing residential area of Drumoak

04 Back drop of mature trees enhances the open space / play ground

05 Maintain and utilise planted strip backing on to neighbouring development by incorporating a footpath

06 Retain and promote Woodland area by incorporating footpath links connecting key areas within the site and beyond. The woodland area will enhance the visual appearance of the development whilst creating a sense of establishment.

07 Road hierarchy helps create streets, lanes, avenues etc to enrich the character of the neighbourhood and to aid navigation around the site.

08 Incorporate shared surface areas and squares to promote pedestrian friendly routes and to keep car speeds down.

09 Pedestrian route through to Sunnyside Drive

10 Drumoak Primary School

11 Drumoak Church

12 A93

13 War Memorial

14 Bowling Club

15 Public Park

16 Diverted high pressure gas mains –requires a 12m exclusion zone which helps to create a strong landscaped edge to the village on to which a number of properties face

Development Site A

Phasing of Development

Development site A has the potential to deliver some where in the region of **178 homes**. The diagram below illustrates how we anticipate this being delivered.



Development Site B

Existing Features

In contrast to the open nature of Sites A & C, development site B is enclosed by a perimeter of dense woodland to the east, west and south and has a more intimate character. The northern boundary of the site backs on to a road which provides access to Dee Valley Caravans (commercial backdrop) and which terminates with a cluster of residential properties which overlook the site.



A pathway which connects a number of existing houses with the Deeside Way crosses the development site. This path runs part way along the ditch and down into the River Dee and could form the basis of an area of open space.



Flood Risk

Although development site B is within close proximity of the River Dee, SEPA's indicative Flood Map below confirms that the site is not at risk of flooding from the River Dee. Considered positioning of the SUDs Basin will add an additional buffer zone between the River Dee and any proposed housing.



Topography

Development site B generally falls from north to south whilst undulating across its length. The low point of the site is in the south eastern corner.



Views

The photos on the following page record the character of the site.

Access and Connectivity

The site sits to the eastern boundary of Drumoak village. Drumoak Primary School and other local amenities are all within a 10 minute walk. The Deeside Way is also within easy reach providing walkers and cyclists with a path spanning from Aberdeen to Ballater. The site is extremely well connected with the A93 running through Drumoak with a number of bus stops distributed along the main street. The 201 & 202 Stagecoach buses provide frequent services into Aberdeen and out to Banchory. Aberdeen city centre can be reached within 25 minutes by car and Banchory is a 5 minute drive away.

Utilities

The following utility information was sourced from an external consultant to inform the initial design concept :

- BT OPENREACH Layout 1 of 2 (Telecom)
- BT OPENREACH Layout 2 of 2 (Telecom)

Overhead cables are present at the site entrance, these will be diverted / buried to improve the visual impact of the approach to site.

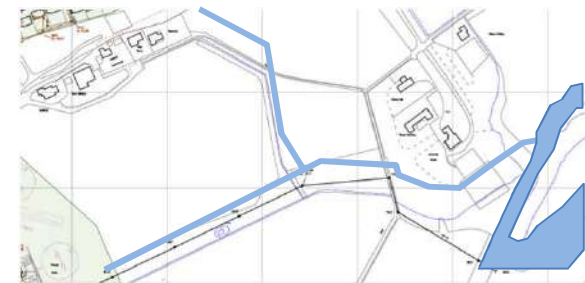
- SSE Electric 1 of 2 (scale 1-1250)
- SSE Electric 2 of 2 (scale 1-1250)
- SSE Electric (scale 1-10000)

- SGN Gas 1 of 2
- SGN Gas 2 of 2

No gas pipes are recorded on development site B.

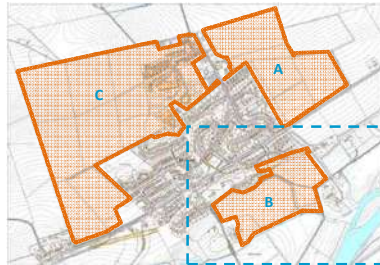
- Water & Wastewater Plan

The water plan shows a drain/ditch crossing the site from North to south.



Development Site B

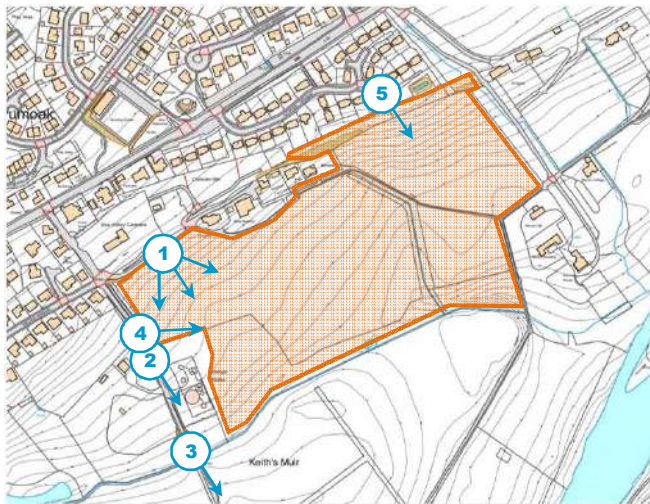
Site Appraisal



Location Key



1. Panoramic view of development site B



2. Beautiful approach road to site



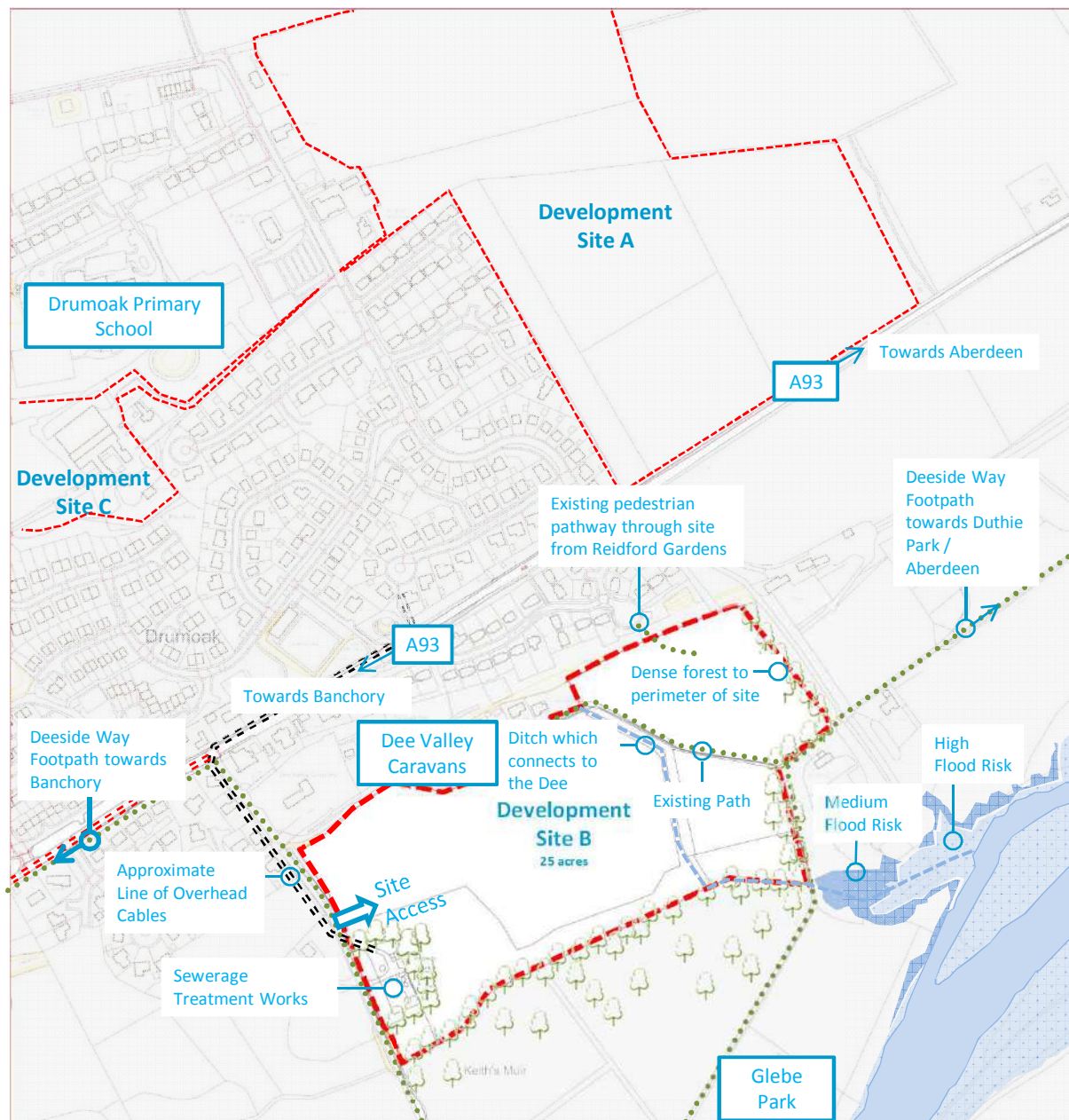
3. Deeside Way running along road side



4. Overhead cables which will be diverted / buried to improve quality of site entrance



5. Pedestrian access and path through site from Reidford Gardens



Development Site B

Site Opportunities / Constraints

The key opportunities/constraints which influence site B are:

- Topography
- Proximity to A93
- Mature woodland setting
- Site Access
- Pedestrian links – existing path passes through site
- Proximity to Deeside Way
- Proximity to River Dee
- Sewerage Treatment Works
- Proximity to Glebe Park playing field which is popular with the local residents
- Overhead Cables
- Ditch

Development Site B

Vision Site Layout



01 Primary access to site with a secondary access point **01a** to be provided if required

02 Sewerage Treatment works heavily screened by mature trees

03 Housing fronting on to open space & feature landscaping create sense of arrival.

04 Hierarchy of roads – lanes bridge gaps across open space to signify pedestrian priority and add character to the development

05 Open space incorporates ditch which could be enhanced with bridge links and landscaping – this ditch will connect to the SUDs Basin at the lowest point on the site

06 SUDs Basin

07 Existing Pedestrian link through from Reidford Gardens to the Deeside Way retained

08 Deeside Way

09 River Dee

10 Dee Valley Caravans

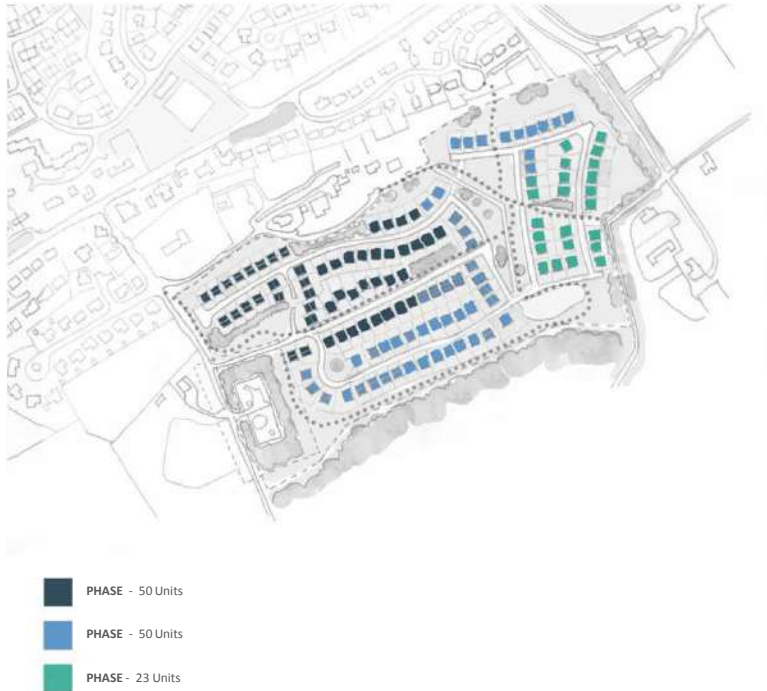
11 A93

12 Strong Landscaped boundary protecting the setting of the Manse (listed building)

Development Site B

Phasing of Development

Development site B has the potential to deliver some where in the region of **123 homes**. The diagram below illustrates how we anticipate this being delivered.



Development Site C

Existing Features

The open fields of development site C sit on a sloping south facing site. This site runs parallel to the existing village of Drumoak, the character of which is somewhat generated by occupying this type of topography. The elevated position at the top of the site benefits from open views to the surrounding countryside and hills.



Two beautiful trees which stand alone in the expanse of open fields should be integrated into the development proposals and could provide instant maturity to a new square. They can be seen from various view points around the perimeter of the site and contribute to the character of the area. The photo below shows the landmark trees as seen from Sunnyside Avenue.



The site also has elements of dry stone walling which contribute to the character of the site and if possible should be retained in the development proposals.

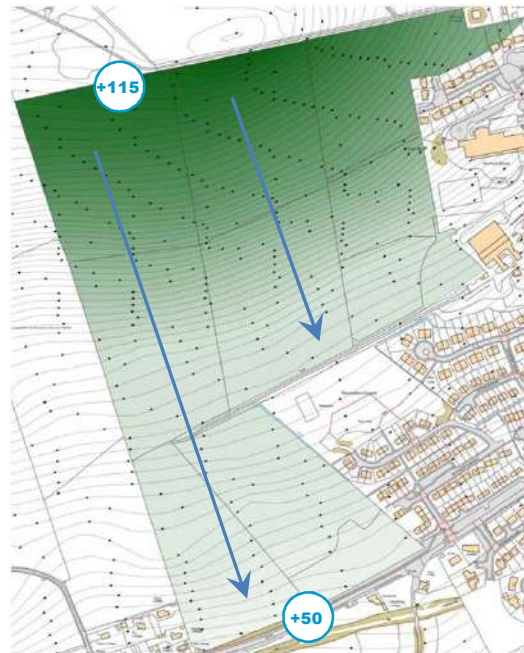
Flood Risk

SEPA's indicative Flood Map below confirms that the site is not at risk of flooding from the River Dee.



Topography

The development site has a distinct topography sloping from north to south. The gradient is at its steepest in the upper middle portion of the site but can still accommodate development subject to careful landscaping. The layout proposal sees the majority of housing running from East to West in response to the contours of the site.



Views

The photos on the following page record the character of the site.

Access and Connectivity

The site sits to the western boundary of Drumoak village. Drumoak Primary School and other local amenities are all within a 10 minute walk. The Deeside Way is also within easy reach providing walkers and cyclists with a path spanning from Aberdeen to Ballater. The site is extremely well connected with the A93 running through Drumoak with a number of bus stops distributed along the main street. The 201 & 202 Stagecoach buses provide frequent services into Aberdeen and out to Banchory. Aberdeen city centre can be reached within 25 minutes by car and Banchory is a 5 minute drive away.

Utilities

The following utility information was sourced from an external consultant to inform the initial design concept :

- BT OPENREACH Layout 1 of 2 (Telecom)
- BT OPENREACH Layout 2 of 2 (Telecom)

- SSE Electric 1 of 2 (scale 1-1250)
- SSE Electric 2 of 2 (scale 1-1250)
- SSE Electric (scale 1-10000)

Overhead cables are present on the site, these will be diverted / buried as required.

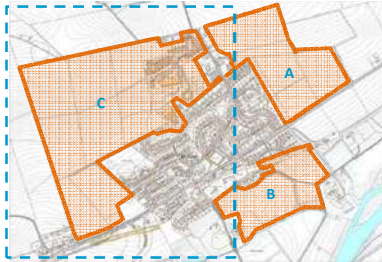
- SGN Gas 1 of 2
- SGN Gas 2 of 2

- Water & Wastewater Plan

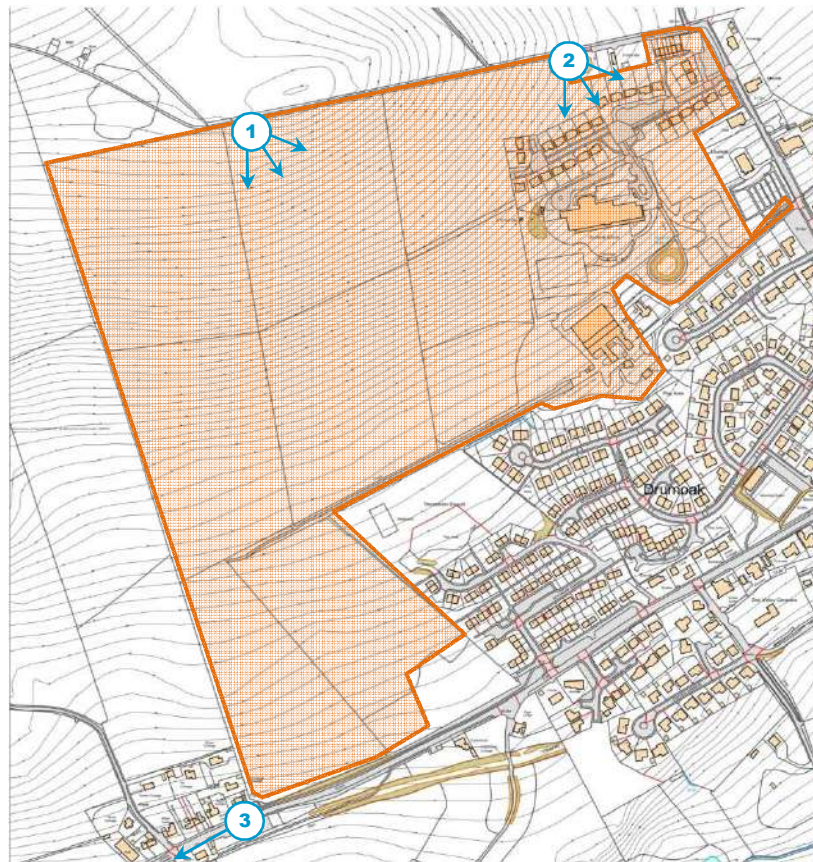
Records obtained from the National Grid confirm that a High Pressure National Transmission Gas Pipeline crosses the site from North to South, see following diagram for approximate route. An intermediate Gas main is also located in the lower section of the site and crosses it from West to East. Neither provide a constraint as both can be diverted / incorporated into the proposals for the site.

Development Site C

Site Appraisal



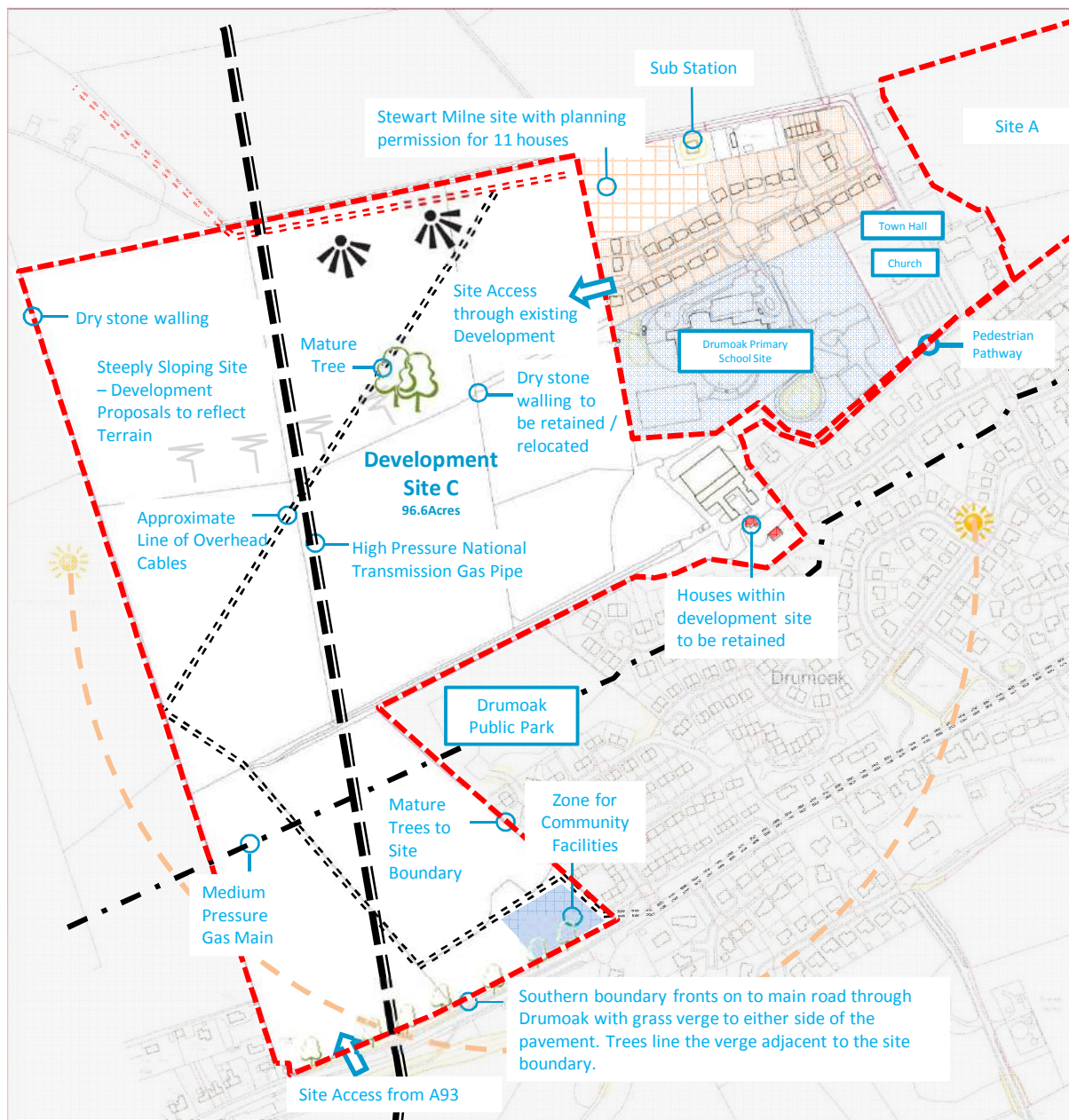
1. Panoramic View from the highest point of the site



2. Panoramic view from the top of the reservoir showing the Sub Station to the East & the existing Stewart Milne Development to the South



3. Street scene of existing village



Development Site C

Site Opportunities / Constraints

The key opportunities/constraints which influence site C are:

- Topography
- Development of this size should incorporate community facilities
- Effective use of frontages will enhance the route along the A93 and use of traditional housing typologies will help to integrate this development into the existing village.
- Access point through adjacent residential area will help to integrate the site into the existing village and provides an excellent link to the Primary school.
- Proximity to Drumoak Primary School
- Pedestrian links – proximity to Deeside Way
- Proximity to River Dee
- South Facing, sloping site enjoying excellent views
- Existing buildings adjacent to Sunnyside Farm to be retained
- Existing mature tree gives character and a strong sense of identity to the site and should be incorporated into the layout design if possible

Development Site C

Vision Site Layout



- 01 Two proposed access points from A93
- 02 Access to north of site through existing housing development
- 03 Area zoned for commercial / retail opportunities with street frontage on to A93 and outlook on to landscaped SUDs area
- 04 SUDs within landscaped open space fronting onto A93 with pedestrian links through to play park and community / retail provision
- 05 Existing boundary conditions provide banking and landscaping which provide natural screening to rear elevations in this area
- 06 Varied housing typologies along the length of the A93 as it passes through Drumoak – as you approach the village from Banchory houses have small front gardens - gates within the low level walled boundary provide access on to the foot path. Parking is kept to the rear.
- 07 Green corridor cascades through the middle of the development connecting key open spaces & providing a safe route to Drumoak School
- 08 Existing mature trees retained (natural asset of the site) , these landmark trees will help to give the site a strong sense of identity – retention or relocation of dry stone walling will also add instant character to the development
- 09 Green / open space associated with the existing play park extended down to meet the main route through the village to increase accessibility
- 10 Housing typology to match adjacent properties with parking to the rear
- 11 Medium Voltage Gas Cable accommodated within layout – 6m exclusion zone accommodated within the development layout
- 12 Diverted high pressure gas main – 12m exclusion zone which helps to create a strong edge to the village
- 13 Existing play park
- 14 House sits within 3m of the pavement increasing variety along the main route through the village
- 15 Rear elevations set back behind mature hedging
- 16 Land which could be used to extend the School Site (if required)
- 17 Drumoak Primary School
- 18 Stewart Milne has planning permission for 11 houses in this zone
- 19 Completed Stewart Milne Housing
- 20 Housing follows natural contours of the site
- 21 View point

Development Site C

Phasing of Development

Development site C has the potential to deliver some where in the region of **345 homes**. The diagram below illustrates how we anticipate this being delivered.

Development of middle pocket to include landscaped corridor as an extension to the existing park



Development connects into the neighbouring housing development providing a link to access Drumoak Primary School.

Development provides a continuous frontage along the A93 as you enter the village from Banchory. Landscaping and pedestrian links to the park to be established.

Development Sites A, B & C

Future Vision for Drumoak



Appendix 2

Aberdeenshire Local Development Plan 2021: Main Issues Report 2019

Main Issues Report Response Form

Important Information: Please Read

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

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

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

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

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Name	[REDACTED]
Organisation (optional)	Ryden LLP
On behalf of (if relevant)	Stewart Milne Homes
Address	[REDACTED]
Postcode	[REDACTED]
Telephone (optional)	[REDACTED]
E-mail (optional)	[REDACTED]

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

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Please tick to confirm your agreement to the following statements:

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

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

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

Your comments

Representations to the Main Issues Report on behalf of Stewart Milne Homes in relation to Site Ref: KN034, Site A, East of Drumoak.

On behalf of Stewart Milne Homes, objection is taken to the failure of the Main Issues Report (MIR) to identify Site Ref: KN034, Site A, East of Drumoak for residential development in the proposed Local Development Plan (LDP) 2021. The site, or part of it, should be preferred for development in the first Plan period with the balance reserved for future development following a mid-term review of the LDP. This representation requires to be considered in the context of the Development Bid submitted at the pre-MIR stage and having regard to the objection submitted in respect of Site Ref: KN128, Land South of Deevie Gardens, Drumoak, identified as an Officer's preference in the MIR.

The MIR Settlement Statement acknowledges that Drumoak is an area of high demand for housing and recognises that development has occurred to both the north and south of the A93. It further recognises the range of services available within the village and the importance of sustaining those services to maintain the overall sense of place in the village. It concludes that further development could be supported in an effort to sustain local services and identifies, as an Officer's preference, land to the South of Deevie Gardens for the development of 49 homes. The Development Bid submitted for that site, KN128, sought the development of 35 homes, but Officers consider it capable of accommodating a higher density of development. In identifying the site for development it must, therefore, be assumed that sufficient capacity in primary and secondary education, as well as drainage provision, is available to accommodate at least 49 homes. Consequently, it is important to consider this representation in respect of Site KN034 in that context.

Stewart Milne Homes submitted three Development Bids in respect of land under their control in and around Drumoak. Those Bids related to this site Ref: KN034, Site A East of Drumoak; Site KN035, Site B, South of Drumoak; and, Site KN036, Site C, West of Drumoak. The latter included an element of retail and commercial use as well as residential. A Strategic Masterplan submitted with each of the Bids provided indicative phasing for each of the sites. It is considered that all of the sites are capable of development, with each having their own merits. This was acknowledged by the Reporter following the Examination in Public into the 2017 Local Development Plan through which the sites were also promoted. He considered that the sites in Drumoak were **"...not without merit"** and considered that all three sites could, in the main, be developed without giving rise to unacceptable impacts upon the landscape and setting of the village.

It is recognised, given the size of the existing settlement, that not all of the sites could be brought forward through the emerging LDP 2021. However, the Development Bids submitted for each of the sites, along with the accompanying Strategic Masterplan, demonstrate the capacity of Drumoak to accommodate long term strategic growth. The LDP 2021 provides an opportunity to secure the planned long term growth of the settlement through the selection of a preferred site for development in the initial Plan period with land reserved for future development following a mid-term review of the LDP. The balance would remain for longer term development. Ultimately, it is for the LDP process to determine the direction of that growth facilitated by the Development Bids submitted.

The MIR assessment of Site KN035 accepts that it is well located in relation to the settlement and in close proximity to the primary school. It also sits to the north of the A93 on the same side as the primary school. Crossing the A93 has previously been perceived by the Council as an issue for the development of land to the south, albeit this issue could be addressed through the installation of a light controlled pedestrian crossing on the A93. Notwithstanding, should it remain a concern to the Council options are available for development to the north of the A93 on the same side of the road as the primary school.

The MIR Site Assessment highlights that a national grid transmission pipeline crosses the site and refers to Scottish Planning Policy, which advises that allocations should avoid risk. The presence of the pipeline, however, is not a reason to oppose development on this site. As advised in the Development Bid, the pipeline is capable of being realigned. This is an issue that can be addressed in detail with the pipeline operators and the Health & Safety Executive and does not prevent the principle of development being established. Indeed, the same pipeline was diverted in Westhill, by Stewart Milne Homes, allowing the Broadshade development to proceed. Furthermore, other sites, which lie within pipeline corridors, for example in Stonehaven, have been identified as Officer's preference for development.

It is not accepted, as contended in the MIR, that the proposal would have a significant impact on the local landscape and setting of the settlement thus resulting in over-development. The Development Bid, and accompanying Strategic Masterplan, was clear as regards the potential for phasing the development which would, in effect, address any concerns regarding over-development and ensure that the site was developed as part of the planned growth of Drumoak and at a pace similar to the previous incremental growth of the settlement. That phasing, allowed for the development of the site in tranches of 50 units, which reflect Officers' own preference for development in Drumoak.

As regards the landscape and setting, a strong landscape framework is provided by the shelter belts to the east and west of the site whilst the woodland belt, which crosses the site from east to west, provides containment to development and disrupts distant views of the site. The Development Bid and Strategic Masterplan recognised that the site forms a gateway into the village on the approach from Aberdeen. It advised that this would be respected and the shelter belt to the east strengthened and expanded to provide containment to the development whilst providing a gateway feature to the village. That shelter belt to the east will also form a long term defensible boundary to the settlement. The containment afforded to the site by the existing shelter belts to the north and east is clearly evident from the settlement plan contained within the MIR and within the draft Proposed Local Development Plan.

Whilst the Site Assessment acknowledges that the southern section of the site connects well to the settlement with linkages via School Brae, it advises that the northern part of the site feels slightly isolated due to the lack of road connections and no second emergency access. However, the scale of development proposed in that area would not require an emergency access. Furthermore, the northern portion of the site is relatively secluded, screened by the existing tree belt which forms its southern boundary. Also, there is existing housing to the west and the northern limit of Drumoak, which is defined by that development to the west, would not be breached by the development of the northern portion of this site. Notwithstanding, should the Council have concerns regarding the development of the northern portion of the site, the extent of development could be restricted, limiting it to the land to the south of the tree belt. This would allow for the development of around 110 homes with 50 allocated in the first Plan period and the balance of the site reserved for development following a mid-term review of the LDP. This approach is entirely within the gift of the Council in allocating sites for development through the emerging LDP.

The proximity of Drum Castle and the potential impact on its setting is also highlighted as an issue by the MIR. The castle and its designed landscape are some distance to the north of the proposal site and are not inter-visible due to topography and existing landscape features. The impact is therefore likely to be negligible. Nevertheless, were the Council minded to exclude the northern portion of the site there would be no impact whatsoever on the setting of the castle as the southern portion of the site sits at a lower level and is entirely contained by the existing tree belts to the north and east.

Education and drainage capacities are highlighted as further issues which are considered to limit the development potential of the site. However, there are no grounds for discounting the development of this site on the basis of those constraints when the MIR identifies an Officer's preference to the south west of Drumoak for 49 homes. It is clear, therefore, that there is capacity to accommodate that scale of development within the settlement.

It is evident from the above that Bid Site KN034 is capable of accommodating a phased development to allow for the planned growth of Drumoak at a pace consistent with previous growth and timed to ensure sufficient capacities in education and drainage provision. Unlike the Officer's preferred site, KN128, it does not fall within an area protected from development by the extant LDP 2017.

The proposal site is contained within a strong landscaped framework with shelter belts to the east and north. As such, there would be minimal impact on the setting of Drumoak through the development of this site. Should the Council's concerns regarding the northern portion of the site prevail this could be excluded with only the southern portion of the site allocated for development in two phases to accommodate around 110 homes.

On the basis of all of the above it is respectfully requested that Site KN034 be allocated in the proposed LDP 2021 for the development of 50 homes with the balance of the site reserved for future development following a mid-term review of the Plan.

Appendix 3

Aberdeenshire Local Development Plan 2021: Main Issues Report 2019

Main Issues Report Response Form

Important Information: Please Read

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

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

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Name	[REDACTED]
Organisation (optional)	Ryden LLP
On behalf of (if relevant)	Stewart Milne Homes
Address	[REDACTED]
Postcode	[REDACTED]
Telephone (optional)	[REDACTED]
E-mail (optional)	[REDACTED]

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

Your comments

Representations to the Main Issues Report on behalf of Stewart Milne Homes relative to Site Ref: KN128, Land South of Deevie Gardens, Drumoak.

On behalf of Stewart Milne Homes, objection is taken to the identification of Site Ref: KN128, Land South of Deevie Gardens, Drumoak within the Main Issues Report (MIR) as an Officer's preference for the development of 49 homes to be included in the Proposed Local Development Plan (LDP) 2021. This objection requires to be considered in the context of the representations and Development Bid submitted on behalf of Stewart Milne Homes in respect of Site KN035, Site B, South of Drumoak. It is contended that that site should be preferred for development ahead of Site KN128 for the reasons set out below.

The Development Bid submitted in respect of Site KN128 proposed the erection of 35 homes. This comprised a range of detached and semi-detached properties, including a number of self-build housing plots. In assessing the Development Bid, Officers considered the density proposed for the site to be too low and proposed increasing this by 14 units to 49 homes. This increases the size of the development by 40%. Whilst it is acknowledged that there will always be flexibility in the capacity of a site and that the exact number of units can only be determined through detailed design, it is contended that given the constraints on the site it should not have been preferred for development never mind for 49 homes. Indeed, the only area free of constraint would be incapable of accommodating the 35 units sought through the Development Bid.

One of the key constraints impacting on the site is the fact that around 70% of the site is designated as a protected area within the extant LDP 2017. This was not acknowledged in the Development Bid submission, nor has it been highlighted in the assessment of the site within the MIR. The Settlement Statement for Drumoak as contained within the extant Plan identifies it as Area P4, 'Protected Land', to conserve the woodland setting and the recreational area as amenities for the village. The P4 designation encompasses the woodland to the west and south of the site, but also the southern two fields of the site itself; one containing a pond to the south west of the site and the other containing an area of native woodland to the south east of the site opposite the waste water treatment works.

Protected land is afforded protection through Policy PR1, 'Protecting Important Resources' of the extant LDP 2017. Policy advises that the Council will not approve developments that have a negative effect on important environmental resources associated with the water environment, important mineral deposits, prime agricultural land, peat and other carbon rich soils, open space, and important trees and woodland. The supporting text advises that development will not normally be permitted on areas of open space, including outdoor sports facilities, unless the new use is ancillary to the use as open space. It goes on to advise that important areas of open space are identified as "protected land" within the Settlement Statement. It advises the "exceptionally" the development of essential community infrastructure may be allowed if it will not result in a deficit of open space of the type affected within the settlement or prejudice the continuity of a green network. Similarly, development resulting in the loss of, or serious damage to, trees and woodlands of significant ecological, recreational, historical, landscape or shelter value will not normally be permitted. In the circumstances, therefore, the development proposed would be contrary to the Policies of the extant LDP 2017.

To compound matters, the site also falls within the Dee Valley Special Landscape Area. Again, this has not been recognised in either the Development Bid or the MIR assessment of the site. Whilst this in itself need not preclude development, when taken with the protected land designation covering 70% of the site there can be no justification for the release of this site for development.

In proposing an increase in the capacity of the site, Officers appear to have had little regard to their own assessment of the site as contained within the MIR. It highlights the need for a **“wider buffer strip”** to the west of the site which will reduce the land available for development. Wide buffer strips will also be required along the southern boundary of the site where an existing water course leads to the River Dee Special Area of Conservation. A cordon sanitaire will also be required around the waste water treatment works which will again restrict development in proximity to that and again reduce the capacity of the site to accommodate development.

In respect of the waste water treatment works the assessment notes that the proposal would **“...not compromise the ability to expand the waste water treatment works”**. This may indeed be the case. However, unlike the Bid site (KN035) to the west, it cannot make provision for future expansion of the waste water treatment works. Consequently, were the site to be allocated in the proposed LDP 2021 there is no guarantee that the development could be delivered. The Bid itself acknowledges that a further upgrade to the treatment works may be required to accommodate the development proposed.

Furthermore, unlike Site KN035, it is not in the hands of a housebuilder. As such, this may result in delay to the delivery of the site by the time it is marketed and a developer secured. Site KN035 on the other hand is in the hands of a housebuilder and is capable of early development. Deliverability is a key consideration of Scottish Planning Policy and a preference should be afforded to those sites that are clearly more deliverable.

There are also significantly fewer constraints impacting on Site KN035. It does not lie within a protected area, nor is any woodland adversely impacted by its proposed development.

On the basis of all of the above it is respectfully requested that Site KN128, land South of Deevie Gardens is not carried forward into the Proposed LDP 2021 as an allocated site for housing. Instead, Site KN035, Site B, South of Drumoak should be allocated for the phased release of housing with an initial release of 50 units with the balance of the site reserved for future development following a mid-term review of the LDP.