

PROPOSED ABERDEENSHIRE LOCAL DEVELOPMENT PLAN 2020 RESPONSE FORM

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

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

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

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

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

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

Please email comments to ldp@aberdeenshire.gov.uk or send this form to reach us by 31 July 2020*.

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

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



ACCESSIBILITY

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

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

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


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

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

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

Tel: 01467 536230
Email: ldp@aberdeenshire.gov.uk
Web: www.aberdeenshire.gov.uk/ldp
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 31 July 2020 at the following address:

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

Email: ldp@aberdeenshire.gov.uk

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

YOUR DETAILS

Title:	Mrs
First Name:	Claire
Surname:	Coutts
Date:	29 July 2020
Postal Address:	Ryden LLP, [REDACTED]
Postcode:	[REDACTED]
Telephone Number:	[REDACTED]
Email:	[REDACTED]

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

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

If yes who are you representing?

Stewart Milne Homes

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

An acknowledgement will be sent to this address soon after the close of consultation.

YOUR COMMENTS

Please provide us with your comments below. We will summarise comments and in our analysis will consider every point that is made. Once we have done this we will write back to you with Aberdeenshire Council's views on the submissions made. We will publish your name as the author of the comment, but will not make your address public.

Modification that you wish to see (please make specific reference to the section of the Proposed Plan you wish to see modified if possible, for example Section 9, paragraph E1.1):

On behalf of Stewart Milne Homes, while support is given to the continued identification of CC1 in the Proposed Local Development Plan (Proposed Plan) for 10,000 sq m of retail space and leisure uses at Waterton, within the settlement statement for Ellon, it is argued that the site is more suitable for a mixed use development, comprising 150 homes, retail use and a riverside park.

It is therefore requested that the settlement statement for Ellon which is contained within the Formartine Settlement Plan is amended to identify the current CC1 as an opportunity site for a mixed use development, comprising 150 homes, retail use and a riverside park. This would require a modification to page 427 of Appendix 7c: Formartine Settlement Statement of the Proposed Plan to reflect the mix of uses at CC1.

It is also requested that the scale of residential development proposed for Cromleybank (OP1 in the Proposed Plan) is reduced, and 150 units transferred to the site at Waterton, or that housing on the CC1 site is allocated in addition to Cromleybank. Should the request to transfer 150 units from OP1 be approved, this will require modification of page 422 of the Formartine Settlement Statement in order to reflect the reduction in houses at OP1.

If that change is not favoured, it is requested that the allocated CC1 site remains allocated in the Local Development Plan for retail and leisure uses as identified in the Proposed Plan.

Reason for change:

Background

Two development bids were submitted to Aberdeenshire Council on 27th March 2018 (Appendix 1). The first promoted the site for a mixed use development comprising 150 homes, retail uses and a riverside park. This was accompanied by a masterplan document which considered this proposal in more detail. The second bid supported the continued allocation for retail and leisure uses on the site.

The Main Issues Report (MIR) was published in January 2019 which identified the mixed use development as FR031, while the retail use was identified as FR032. Planning Officer's identified the retail and leisure use (FR032) as a preferred option for development and subsequently carried this forward into their Draft Proposed Local Development Plan (DPLDP) which was published alongside the MIR.

Representations were submitted to the MIR on behalf of Stewart Milne Homes. This comprised three separate representations. The first objected to the failure to identify the site for a mixed use development (Appendix 2), the second supported the retention of the retail and leisure use, but only if a mixed use development was not accepted (Appendix 3) and the third (Appendix 4) objected to the continued identification of Cromleybank for the scale of development proposed. It was argued that it would be more appropriate to reduce the housing allocation on the OP1 site and transfer it to site FR031 to the north of Ellon.

This representation should therefore be read in conjunction with the initial bids submitted (Appendix 1) at the pre-MIR stage as well as the representations made to the MIR (Appendix 2, 3 and 4). Those representations made reference to general representations submitted on behalf of Stewart Milne Homes to the MIR in relation to housing land supply as well as a representation to the Strategic Development Plan. These are all contained in the appendices to these representations.

These documents demonstrate the capability of the site to accommodate a mixed use development which will address the housing land requirements set by the Strategic Development Plan.

Justification

At the outset, it is important to highlight concern at the failure of the Proposed Plan to allocate any new housing allocations within Ellon. All sites identified are carried forward from the 2017 Local Development Plan (2017 LDP) and it is argued that this demonstrates that the sites identified are not delivering the required units to meet the housing land requirements. This is exacerbated by the identification of large sites such as OP1 at Cromleybank.

The Cromleybank site was allocated in the 2012 Local Development Plan (2012 LDP) and it was expected that up to 745 units would be delivered in the period 2007 – 2016 with the remaining 235 units delivered in the period 2017 – 2023. The allocation was then carried forward into the 2017 LDP, with the same level of development anticipated in the same timescales. However, Appendix 5 of the 2017 LDP highlighted that 720 units were still to be built up to 2016. This suggested that some units had been delivered, however, the 2018 Housing Land Audit stated that no units had been delivered on the site as the remaining capacity at 1st January 2018 was the entire 980 allocation. Only 386 units were proposed to be built by 2025, with 594 units expected after 2025. This position is unchanged in the 2019 Housing Land Audit, albeit, the units are pushed back a year, with 594 units expected after 2026.

Scottish Planning Policy (SPP) at paragraph 119 requires that LDPs in city regions should allocate a range of sites which are effective or expected to become effective in the plan period to meet the housing land requirement of the Strategic Development Plan (SDP). In allocating sites, planning authorities should be **“confident that land can be brought forward for development within the plan period and that the range of sites allocated will enable the housing supply target to be met”**.

It is clearly demonstrated that the site at Cromleybank is not delivering the anticipated number of houses to meet the housing land requirements within the timeframe of both the 2012 and the 2017 LDP. Continuing to identify this site at the scale proposed, means the housing land requirements are not being met as required by SPP. It is understood that there are issues related to water supply in servicing the site at Cromleybank and there appears to be no firm commitment to construction commencing on site and therefore no confidence over its delivery.

It is not suggested that the site is removed from the LDP, however, the housing numbers allocated to the site are considered excessive. Reducing the housing numbers at Cromleybank and reallocating them to an alternative site in Ellon, in this case CC1, would be a more appropriate distribution of housing numbers in the settlement. Alternatively, housing land for 150 homes at Waterton could be identified in addition to the Cromleybank allocation. The land at Waterton is considered to be an appropriate site in Ellon for housing which has the backing of a developer. This demonstrates confidence in its delivery in the lifetime of the 2021 LDP as required by SPP.

The land at Waterton lies within the settlement boundary of Ellon, where the principle of development has already been acknowledged through its identification as site CC1 for retail and leisure uses. It is accepted that Ellon has the capacity to accommodate a retail park which is reinforced by the conclusion of the Town Centre Health Check (2015) (Appendix 5) and the proposal for a mixed use development on the CC1 site seeks to address the requirement for a retail park.

However, it is argued that it should be balanced with the introduction of housing to ensure a sustainable mixed use development can be delivered in the town. SPP introduces a presumption in favour of development that contributes to sustainable development. The mix of uses proposed would ensure a sustainable development is delivered, providing homes within close proximity to services and employment areas, with less reliance on the private car, in line with SPP.

The site is already identified for retail and leisure development, within the settlement boundary of Ellon and Planning Officers accept, through the assessment of the FR032 bid for retail and leisure uses, that the site is well related to public transport links. This is considered to be a sustainable location for the introduction of housing on the site and has advantages over the preferred OP1 site at Cromleybank as it is located immediately adjacent to the Ellon Park and Ride to the north east of the site.

A Transport Impact Assessment would be prepared at the planning application stage to address this mix of uses. This would also consider the impact of development on the A920 Riverside Road/B9005 and A90/A948 junctions as well as reflecting the current traffic conditions on the A90 at Ellon and within Ellon since the opening of the AWPR and Balmedie – Tippierty dualling schemes. It would also consider proposals for the A90 between Ellon and Peterhead/Fraserburgh as stated in the Proposed Plan and any contributions to mitigate this development would be provided in line with Circular 3/2012: Planning Obligations and Good Neighbour Agreements and the Council's own developer obligations guidance.

The statement accompanying the allocation of CC1 in the Proposed Plan raises concerns regarding the visual impact of development as well as the impact on the setting of the Category B Listed Building Boat of Fechil Croft. It is not accepted, that any development, whether retail or a mixed use development would weaken the sense of place and identity of the settlement. The trees along the boundaries of the site will be considered and further screening can be provided as appropriate in line with the requirements contained in the accompanying statement for site CC1.

The development bid contained a Development Strategy prepared by OPEN (contained in Appendix 1) which discussed the landscape character of the site in detail. It highlighted that while the site does not lie within any Special Landscape Area, it does have features that provide distinctive character. This includes the Ythan River to the south along with Waterton Castle remains and boathouse, woodland, stone wall field boundaries and Broomie's Burn to the west. It was recognised that these would be retained and protected to create an attractive landscape setting for

introduction of housing proposed. The development potential of the site has already been accepted through its current and proposed retail and leisure allocation and it is not accepted that a change to the mix of uses will impact on the landscape character of the site.

A landscape strategy has been considered for the mixed use development on the site. This included a range of areas of open space, including woodland, civic space, formal green space, parkland and allotments which would establish a strong sense of identity and protect the landscape setting of the area. Further to this, in response to Planning Officers comments at the MIR stage, OPEN prepared a landscape assessment of the site which was submitted with the MIR representation for the FR031 site (Appendix 2). This concluded that retail development (which has already been considered acceptable on the site) would result in a more notable effect on the landscape and townscape than the varied, lower height and finer grain of a mixed use development which is considered to be a better use of the site. A mixed use development, including housing would therefore create a more appropriately scaled development that responds to existing built character, resulting in a lower magnitude of landscape/townscape impact than the established retail and leisure allocation.

The Proposed Plan states that a Flood Risk Assessment will be required and buffer strips will be required adjacent to the watercourses which will need to allow sufficient space for the River Ythan to follow its natural course. This has been considered in the Development Strategy submitted with the development bid (Appendix 1) and is not an impediment to development. In fact, it will help create an appropriate landscape setting for the mix of uses considered appropriate for the site, allowing housing to be integrated with open space, allowing opportunities for access and recreation.

The Proposed Plan also raises concerns regarding waste water treatment and water supply. It is argued that the suitability of the site for development is already accepted in its identification for retail and leisure use in the 2017 LDP which has been carried forward into the Proposed Plan. Investigations in relation to waste water and water supply would be considered in full at the planning application stage, however, Scottish Water are committed to supporting planning and a growth project can be implemented, should the site be identified for housing in addition to the retail uses already accepted. This is not considered to be an impediment to development.

Finally, surface water flooding is identified as another constraint identified in the Proposed Plan, however, it is also acknowledged that this can be mitigated through SUDs or other means. Therefore, this is not a constraint to any development on the site, including housing. In any case, Fairhurst have investigated the surface water issue and conclude that it does not result in a constraint to development and appropriate measures are shown in the Development Strategy document.

In terms of the provision of housing on the site, Planning Officers identified at the MIR stage, that a mixed use development would constitute overdevelopment. This is not accepted. The site extends to approximately 16.3 hectares, with approximately 5ha identified for housing. At a rate of 30 dwellings per hectare, which was considered an appropriate density within the 2017 LDP, a total of 150 houses would be appropriate. This is lower than the Imagine Ellon study which proposed an appropriate density of 35 dwellings per hectare. Given the location of the site, within the settlement boundary, close to facilities and public transport routes, this is considered appropriate for this Strategic Growth Area and a range of densities would be provided across the site.

It was further considered that the site was not suitable for residential development due to the business land surrounding the site. As such, it was concluded that retail remained the most appropriate use. Again, this is not accepted. A mixed use development, with 150 houses in addition to the retail and leisure element, is a more logical and appropriate solution for the site rather than purely retail and leisure.

The southern and western sections of the site offer an attractive environment for housing, with access and attractive views over a proposed riverside park, while the eastern side is appropriate for retail/commercial uses given its proximity and visibility from the A90. The business land surrounding the site lies to the north only. Any housing would be located to the west of site CC1, adjacent to existing housing and separated from the business land by an appropriate buffer. As a result, there is no negative impact to the residential development proposed.

Further to this, it should be noted that planning permission in principle (Ref: APP/2017/1358) exists for a residential development to the north of Waterton House (provisionally suggesting the site as suitable for 10 houses). That site lies opposite the same business land and Aberdeenshire Council raised no concerns about neighbouring uses during that application process. As a result, the proximity to business land is not considered to be a constraint to the identification of this site for a mix of uses.

In summary, the Waterton site is an appropriate location for housing and creates a logical location for development which has already been accepted as suitable for retail and leisure uses by Planning Officers. It lies within the settlement boundary of Ellon, bound on two sides by development (including residential) and on the third by the A90. Development is therefore well related to the settlement, well contained by existing development and landscape features and would not extend the settlement boundary any further. The Ythan River to the south creates an opportunity for a high quality residential development with established landscape features. It is a sustainable location for housing land, next to the Park and Ride and providing a range of uses on site. It is under the control of a housing developer who is capable of delivering the site to meet demand.

CC1 is an appropriate site for the development of 150 houses; in the first instance as an alternative to 150 houses being developed on the Cromleybank site, otherwise as an additional site for the development of 150 houses. Stewart Milne Homes have demonstrated, through the bid and MIR process that this site is capable of a mixed use development, including housing. The delivery of housing at CC1 would ensure a range of locations for housing is identified in the settlement of Ellon, also in line with SPP.

Conclusion

Ellon has the capacity to accommodate a retail park and the proposals for a mixed use development on this site within the settlement boundary of Ellon seek to address this requirement. However, it is argued that the introduction of housing on this site would create a more logical, appropriate and sustainable development, rather than purely retail. The southern and western sections of the site offer an attractive environment for housing, with access and attractive views over a riverside park, while the eastern side is appropriate for the retail/commercial uses given its proximity and visibility from the A90.

This is a site that has already considered acceptable for retail and leisure development. The retail and leisure uses previously allocated would be retained along with an element of housing and would ensure a sustainable development is created, reducing the reliance on the private car by providing housing close to other services and employment areas, where there are good connections to public transport. A mixed used development would also have less of a landscape and visual impact than the proposed sole retail use of the site.

This site has the backing of a residential developer and is therefore deliverable in the short term, unlike the allocated OP1 at Cromleybank. This site has been zoned since 2012, but has not delivered any housing and the Housing Land Audit identifies that the majority of the allocation will not be delivered until after 2026, if at all. This is not ensuring an adequate supply of housing land, within Ellon, especially when relying on large sites whose ability to deliver housing is questionable.

Aberdeenshire Council must therefore bring forward additional sites to meet housing need. The 980 houses allocated to the OP1 Cromleybank site is considered excessive and there is a need

reduce the housing allocation on that site and identify additional residential allocations to ensure the housing land requirements are met in Ellon. The reduction of housing on OP1 and its identification on the CC1 site instead is considered to be a more effective way of ensuring housing is delivered in Ellon. Alternatively, the area of land at Waterton could be identified for housing in addition to the allocation at Cromleybank in order to provide a range of housing in the settlement.

Recommendation

Therefore, it is respectfully requested that site CC1 in the Aberdeenshire Local Development Plan is re-allocated in the Aberdeenshire Local Development Plan as an Opportunity Site for a mixed use development, including 150 houses and riverside park, in addition to the to the retail and leisure uses already considered acceptable on the site.

To facilitate this, the housing numbers on the OP1 site at Cromleybank should either be reduced by 150 houses and those units added to the CC1 site in Ellon. Alternatively, housing on the site at Waterton could be identified in addition to the Cromleybank allocation.

Failing that, the site should continue to be allocated for retail and leisure uses should these arguments not be accepted.

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:

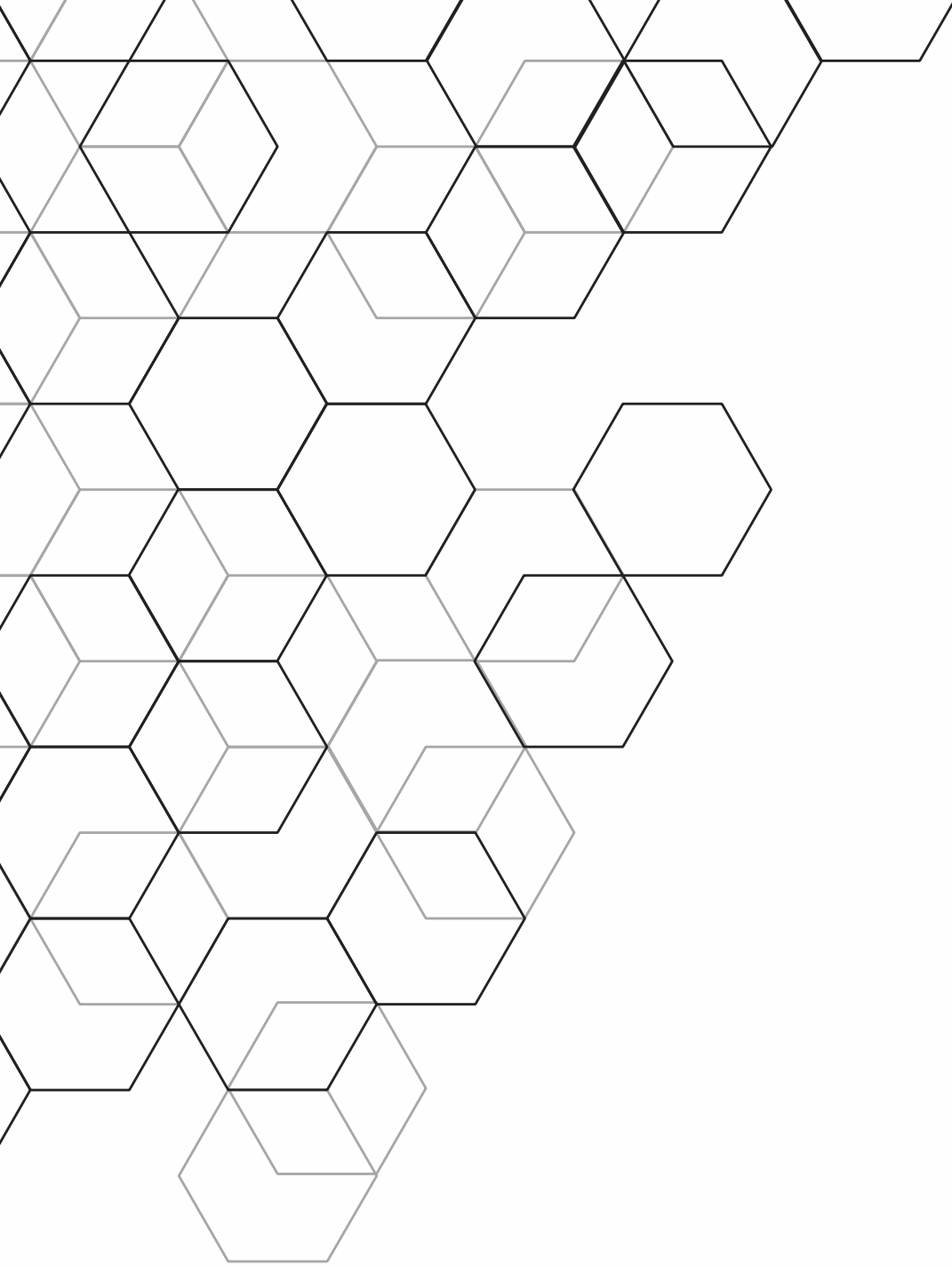
Aberdeenshire Council will only keep your personal data for as long as is needed. Aberdeenshire Council will retain your response and personal data for a retention period of 5 years from the date upon which it was collected. After 5 years Aberdeenshire Council will review whether it is necessary to continue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

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:	c/o Stewart Milne Homes
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)	Waterton, Ellon
Site address	Waterton. South of A920, Ellon
OS grid reference (if available)	NJ974305
Site area/size	16.3 ha
Current land use	Agricultural/open fields
Brownfield/greenfield	Greenfield
Please include an Ordnance Survey map (1:1250 or 1:2500 base for larger sites, e.g. over 2ha) showing the location and extent of the site, points of access, means of drainage etc.	

5. Ownership/Market Interest

Ownership (Please list the owners in question 3 above)	Sole owner
Is the site under option to a developer?	Yes
	Under option to Stewart Milne Homes
Is the site being marketed?	No

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
Are there any other legal factors that might prevent or restrict development? (e.g. ransom strips/issues with accessing the site etc.)	No

7. Planning History

Have you had any formal/informal pre-application discussions with the Planning Service and what was the response?	No
Previous planning applications	No previous planning applications on this site, but permission has been granted for a residential development within the grounds of Waterton House to the west of the site. This was given the ref: 2017/1358
Previous 'Call for sites' history. See Main Issues Report 2013 at www.aberdeenshire.gov.uk/ldp	FM030 – mixed use 10,000 sq m retail and employment FM031 – 200 houses and riverside park
Local Development Plan status www.aberdeenshire.gov.uk/ldp	Is the site currently allocated for any specific use in the existing LDP? Yes, identified as CCI for 10,000 square metre retail and leisure uses
	If yes, do you wish to change the site description and or allocation? Yes, mixed use development including residential, retail and riverside park.

8. Proposed Use

Proposed use		Mixed use including residential, retail and employment along with open space, landscaping, woodland, riverside park and linear park as well as play space, allotments and civic space.
Housing	Approx. no of units	5ha @ average of 30dpha = 150 units
	Proposed mix of house types	Number of: <ul style="list-style-type: none"> • Detached: See paper apart • Semi-detached: Mix of housing to be determined at detailed design stage • Flats: • Terrace: • Other (e.g. Bungalows):
		Number of: <ul style="list-style-type: none"> • 1 bedroom homes: See paper apart • 2 bedroom homes: Mix of sizes tbc • 3 bedroom homes: • 4 or more bedroom homes:
	Tenure (Delete as appropriate)	Private. Affordable housing.
	Affordable housing proportion	25%, or in line with developer obligations requirements at the time of development.
Employment	Business and offices	NA
	General industrial	NA
	Storage and distribution	NA
	Do you have a specific occupier for the site?	NA
Other	Proposed use (please specify) and floor space	3.5ha for retail and mixed uses
	Do you have a specific occupier for the site?	no
Is the area of each proposed use noted in the OS site plan?		Identified in the Development Capacity strategy submitted with the bid.

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	Phase 1 and 2
	6-10 years	Phase 3
	10+ years	
When would you expect the development to be finished? (please tick)	0-5 years	Phase 1 and 2
	6-10 years	Phase 3
	+ 10years	
Have discussions taken place with financiers? Will funding be in place to cover all the costs of development within these timescales	No	
	Finance will be available at the time of development	

Are there any other risk or threats (other than finance) to you delivering your proposed development	No

10. Natural Heritage

<p>Is the site located in or within 500m of a nature conservation site, or affect a protected species?</p> <p>Please tick any that apply and provide details.</p> <p>You can find details of these designations at:</p> <ul style="list-style-type: none"> • https://www.environment.gov.scot/ • EU priority habitats at http://gateway.snh.gov.uk/sitelink/index.jsp • UK or Local priority habitats at http://www.biodiversityscotland.gov.uk/advice-and-resources/habitat-definitions/priority/ • Local Nature Conservation Sites in the LDP's Supplementary Guidance No. 5 at www.aberdeenshire.gov.uk/ldp 	RAMSAR Site	No
	Special Area of Conservation	No
	Special Protection Area	No
	Priority habitat (Annex I)	No
	European Protected Species	No
	Other protected species	No
	Site of Special Scientific Interest	No
	National Nature Reserve	No
	Ancient Woodland	No
	Trees, hedgerows and woodland (including trees with a Tree Preservation Order)	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:		
See paper apart - No impact from proposed development		

Biodiversity enhancement

<p>Please state what benefits for biodiversity this proposal will bring (as per paragraph 194 in Scottish Planning Policy), http://www.gov.scot/Resource/0045/00453827.pdf) by ticking all that apply. Please provide details.</p> <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):	
	See paper apart and Development Capacity Study for full details.	
Development would incorporate a riverside parkland which will include native tree planting and nectar rich plant species. The mature wooded area will be retained to avoid fragmentation of that habitat.		

	Pockets of open space and planting throughout the site will also provide opportunities for biodiversity enhancement.
--	--

11. Historic environment

Historic environment enhancement		
Please state if there will be benefits for the historic environment.	Yes	
	If yes, please give details:	
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 See paper apart for full details. The remains of Waterton Castle are located on the site but there will be no impact on it and they will be incorporated into the proposed parkland.	

12. Landscape Impact

Is the site within a Special Landscape Area (SLA)? (You can find details in Supplementary Guidance 9 at www.aberdeenshire.gov.uk/ldp)	No If yes , please state which SLA your site is located within and provide details of how you plan to mitigate the impact of the proposed development:
SLAs include the consideration of landscape character elements/features. The characteristics of landscapes are defined in the Landscape Character Assessments produced by Scottish Natural Heritage (see 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 	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: See paper apart and Development Capacity Study for details. The site does not lie in any SLA but it does provide features that provide a distinctive character. These will be retained and protected and an attractive landscape setting will be created. It should be acknowledged that the site is already

<ul style="list-style-type: none"> • SNH (1997) National programme of landscape character assessment: Banff and Buchan http://www.snh.org.uk/pdfs/publications/review/037.pdf • SNH (1998) South and Central Aberdeenshire landscape character assessment http://www.snh.org.uk/pdfs/publications/review/102.pdf 	allocated for development and a mix of uses will not impact on the area.
--	--

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)	River – No Surface Water – Yes, over a small area of the site, however, this will have no impact on any development
	If yes, please specify and explain how you intend to mitigate this risk: See paper apart for full details. A SUDs basin which will naturally control levels of surface water and in any case the area at risk of surface water flooding lies within land retained as open space.
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:
Could development of the site help alleviate any existing flooding problems in the area?	Yes Surface water flooding – A SUDs basin which will naturally control levels of surface water

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	It is understood that there is no current capacity
	Waste water	It is understood that there is no current capacity.
Has contact been made with Scottish Water?	No, but both water and drainage can be provided should the site be allocated for a mix of uses.	
Will your SUDS scheme include rain gardens? http://www.centalscotlandgreennetwork.org/campaigns/greener-gardens	This will be considered at the appropriate design stage.	
b. Education – housing proposals only		
Education capacity/constraints https://www.aberdeenshire.gov.uk/schools/parents-carers/school-info/school-roll-forecasts/	See paper apart. There is currently capacity available in the Primary and Secondary school.	

Has contact been made with the Local Authority's Education Department?	No
c. Transport	
If direct access is required onto a Trunk Road (A90 and A96), or the proposal will impact on traffic on a Trunk Road, has contact been made with Transport Scotland?	n/a
Has contact been made with the Local Authority's Transportation Service? They can be contacted at transportation.consultation@aberdeenshire.gov.uk	No, but they would have been consulted as part of the LDP process when the site was allocated.
Public transport	See paper apart. The A920 to the north of the site is a principal bus route with bus stops in the vicinity of the site. This makes the site extremely convenient for public transport access. The Park and Ride is also immediately adjacent the bid site.
Active travel (i.e. internal connectivity and links externally)	See paper apart The site is well located for access into Ellon with a riverside walk located to the south of the site along the River Ythan. The A920 benefits from footpath provision providing access to facilities on foot or cycle. Footpaths on the site would link to these existing connections.
d. Gas/Electricity/Heat/Broadband	
Has contact been made with the relevant utilities providers?	Gas: No
	Electricity: No
	Heat: No
	Broadband: No
Have any feasibility studies been undertaken to understand and inform capacity issues?	No
Is there capacity within the existing network(s) and a viable connection to the network(s)?	Utilities are available in the area and are not a 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)	The relevant technologies 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	Yes, through the provision of a riverside park, links to the riverside walkway and open space throughout the site.

existing green networks or providing onsite green infrastructure) You can find the boundary of existing green networks in the settlement profiles in the LDP	See paper apart for full details.
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, a significant amount of open space will be provided allowing for a range of uses. See paper apart for full details.
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/	No specific shortfalls identified in Ellon however, open space provision will be improved through the development. See paper apart
f. Resource use	
Will the site re-use existing structure(s) or recycle or recover existing on-site materials/resources?	No
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

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)	No
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	Yes
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	Yes

'Protected' open space in the LDP (i.e. P sites) www.aberdeenshire.gov.uk/ldp and choose from Appendix 8a to 8f	No
Rights of way/core paths/recreation uses	No
Topography (e.g. steep slopes)	No
Other	n/a
<p>See paper apart</p> <p>There are some overhead cables within the site, along one of the field boundaries. These can be buried or re-routed as part of any development. This is not considered a constraint to the development of the site.</p> <p>The site is identified as prime agricultural land, however, this classification only suggests that it is capable of being farmed for a range of uses. The site is already identified for development in the LDP and therefore the Council has accepted that the classification is not an impediment to development.</p>	

16. Proximity to facilities

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

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:
	If not yet, please detail how you will do so in the future: See paper apart

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>
---	---

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

Ellon is a key settlement in the Aberdeen to Peterhead Strategic Growth Area, Energetica and the Aberdeen Housing Market Area and is an important location to deliver housing and employment land. The current allocation for retail uses proves that it is a suitable location for development, however, it is considered that the provision of a mixed use development instead of purely retail would be even more attractive.

The backing of the developer and their continued promotion of the site demonstrates their commitment to the deliverability of the site for a mix of uses in the next Local Development Plan. The developer is confident that there is residual value following development of the site and the provision of the necessary infrastructure. The infrastructure constraints have been considered and Stewart Milne Homes are confident that they can be addressed and do not impose an impediment to development.

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.)

Development Capacity Study

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.

ABERDEENSHIRE LOCAL DEVELOPMENT PLAN 2021 CALL FOR SITES

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

WATERTON, ELLON (Mixed Use)

Stewart Milne Homes are part of the Stewart Milne Group, founded in 1975. They have grown to become one of the UK's leading privately owned housebuilders and have a commitment to enterprise and innovation meshed with traditional value for quality product and services and currently have sites in central Scotland, Tayside, North West England as well as Grampian.

The site at Waterton, sits to the east of Ellon and is identified in the map below. It extends to approximately 16.3 hectares (40.6 acres) and lies within the settlement boundary of Ellon. The site is bounded to the north by the A920, with the Tesco superstore and Balmacassie Business Park beyond this. The Ellon Park and Ride terminus lies immediately to the north east of the site. To the east of lies the A90, with the River Ythan forming the southern boundary. To the west sits the residential development at Waterton Meadows and Waterton House and a recently consented residential development to the north. Access to the site would be taken from the A920 immediately north of the site.



Q7. Planning History

The site is identified in the Aberdeenshire Local Development Plan as CC1 for 10,000 sq m retail and leisure uses. The settlement statement for Ellon states that “this is a new allocation. Development of the site should seek to take access via the A920 (Castle Road) with pedestrian and active travel links also. Connectivity to the neighbouring Park and Ride facility will be required to ensure a range of travel routes to the site can be accommodated. Landscaping should be employed to reduce unnecessary visual impact of the development on the rest of the settlement and surrounding countryside. A flood risk assessment may be required”.

Prior to this, the site was promoted for both retail and residential uses through the Local Development Plan process. In the Main Issues Report, these were identified as FM030 (retail) and FM031 (residential).

It is proposed that this site would be more appropriate for a mixed use development of up to 150 homes, retail uses and a riverside park.

Q8. Proposed Use

It is proposed that the site is identified for a mixed use development and has the capacity to deliver around 150 houses in addition to retail. It is considered that a mixed use development is a more logical and appropriate solution to the site rather than purely retail. The southern and western sections of the site offer an attractive environment for housing, with access and attractive views over a riverside park, while the eastern side is appropriate for retail/commercial uses given its proximity and visibility from the A90.

The residential element would include a mix of 2-5 bedroom properties, including detached, semi-detached and terraced houses. An exact mix would be provided in due course taking account of the prevailing market conditions and affordable housing requirements. The retail/mixed use element would be an attractor and employment generator to the area, as well as providing facilities and services for new and existing residents. This would include food and non-food retail, with potential for a café/restaurant uses.

A mix of uses would ensure a sustainable development is delivered, providing homes within close proximity to services and employment areas, with less reliance on the private car. The site has the potential to deliver 150 units and can be delivered in phases.

Q9. Delivery Timescales

As the site is currently identified for retail uses, it is considered that the retail element could be delivered in the immediate to short term. The residential element could commence as soon as planning consent is issued. The developer is committed to submitting a planning application as soon as practicable after the site is allocated in the Local Development Plan. A mixed use development, with the incorporation of housing is considered to be a better use of the site, with the need for additional housing to be identified to compensate for other housing allocations not delivering an appropriate supply of housing land.

It is anticipated that the residential element would be delivered in 3 phases of 50 units each. The total 150 houses could be delivered in 5-10 years.

Q10. Natural Heritage

Nature Woodland – located to east of the site across the A90 from Waterton. This also extends to the south of the site beyond the River Ythan. Both areas lie outwith the site boundaries. There will be no impact on these areas, given that they lie outwith the site boundary and there are areas of landscaping/open space between these areas and built development.

Biodiversity enhancement – Whilst the site itself contains open fields and currently has limited habitat value, there are numerous opportunities for biodiversity enhancement through the development of the site.

Woodland along the eastern boundary to the A90 will be supplemented with native tree planting to provide a strong woodland buffer. Trees would be managed with an environmental and habitat bias ensuring appropriate regeneration of the woodland, together with the enhancement of the biodiversity value of the site.

The immediate boundaries of the River Ythan and Broomies Burn to the south and west make for an area rich in wildlife. Development of the site will respect this attractive and sensitive setting and will enhance biodiversity and habitat creation through the creation of a riverside park to the south opening up the pedestrian walk along the banks of the Ythan. This area will be designed to work with an area

of the existing stone walling, slopes and Waterton Castle ruin. The key aim will be ecological improvement and will provide opportunities for formal play and as an educational resource.

A central linear park is also proposed which would link directly to the riverside park. This would be more formal in nature, creating a transition between the river and the entrance to the site. It will separate the retail and residential areas of the site and improve opportunities for biodiversity enhancement through planting.

Boulevard tree planting is proposed along the length of the northern edge of the site, connecting with perpendicular woodland buffers on the western and eastern edges of the site and the street trees lining the primary street which meet the linear central park, creating a green spine in the middle of the site. These fingers of green running north-south connect with the riverside park and walk along the Ythan which will create a continuous green network around and through the site, again enhancing biodiversity.

Local open space will be distributed throughout the area, generally associated with existing landscape features, at key junctions linking spaces and improving opportunities for habitat creation. Finally, the creation of residential gardens provides a further opportunity for habitat creation and biodiversity enhancement.

Q11. Historic Environment

Waterton Castle remains lie to the south of the site. Although these do not show up in any historic environment asset searches, the proposal will protect this feature. It will be contained within the area identified as a riverside park and therefore, will not be affected by any built development. The proposals will also incorporate the boat house in any design of this area.

Q12. Landscape Impact

The local landscape has been analysed as part of the Development Capacity Study. The site does not lie within any area of landscape significance, but it does contain features that provide a distinctive character. This includes, the Ythan River to the south, along with Waterton Castle remains and boathouse; woodland, stone wall field boundaries east-west across the site to the north and southern portion; and Broomie's Burn to the west. It should be acknowledged that the site is already identified for development in the Local Development Plan. In any case, the proposals for the site incorporate, protect and enhance these features, providing a development in an established landscape setting.

Q13. Flood Risk

SEPA's Indicative Flood Map provides predictive guidance on the possible extent of functional floodplain (1 in 200 year flood event). It shows that there is no risk of flooding from the River Ythan, or coastal flooding. There is some surface water risk, however, this is to the south of the site where the riverside park is proposed. Again, it should be acknowledged that the site is already identified for development in the Local Development Plan and any development of this site will provide a SUDs basin which will naturally control levels of surface water.



Q14. Infrastructure

- a. **Water/Drainage** - New foul and surface water sewers will be provided to service the development and these will be located within the new roads and areas of open space where necessary. The site is allocated for retail development and it is considered that capacity is taken into account for this.

A search of Scottish Water's asset capacity plans indicate that there is limited capacity for further residential development, however, the necessary treatment works would be upgraded should the site be identified for development. This is not considered to be a constraint on development of the site.

- b. **Education** – there are three primary schools (Auchterellon, Meiklemill and Ellon Primary) and one secondary school (Ellon Academy) in Ellon. Meiklemill and Ellon Primary are located approximately 2km from the site, however, a school bus service is provided to cater for local resident's outwith walking distance. The 2017 based School Roll Forecasts indicate that Ellon Primary School would be operating at 90% capacity by 2022. Meiklemill Primary School is forecast to be operating at 86% of capacity by 2022. Capacity is therefore available to support development.
- c. **Transport** – The site has excellent transport links, being located immediately adjacent to the A90 between Aberdeen and Peterhead and the A920 local road which provides access into Ellon town centre. A Traffic Assessment has not been carried out for this specific site at this stage and this would be prepared as part of a planning application in due course. It is anticipated that there is capacity in the transport network and the development of this site would have minimal traffic impact.

Public Transport – The site is also located immediately adjacent to the Ellon Park and Ride facility to the north east of the site. This connects Aberdeen with Ellon 7 days a week, at approximate 15 minute intervals between 7am and 11.45pm. A reduced service operates on a Sunday. An additional 18 regular bus services travel through Ellon connecting it with the wider area, including Balmedie, Newburgh, Cruden Bay, Mintlaw, Fraserburgh, Inverurie,

Peterhead and Dyce. The A920 to the north of the site is a principal bus route with bus stops in the vicinity of the site. This makes the site extremely convenient for public transport access.

Active Travel – The site is well located for access into Ellon with a riverside walk located to the south of the site along the River Ythan. The proposals will extend this into the site, providing opportunities for pedestrian and cycle access. The A920 benefits from footpath provision providing access to facilities on foot or cycle. This includes access to the Tesco superstore to the north as well as the Meadows Sports Complex and a range of business and employment areas nearby. The proposals are therefore well located to encourage active travel to and from the site.

- d. **Renewable Energy** – 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.
- e. **Public Open Space** – the proposal will provide the opportunity to enhance the green space network, both for the site and the wider area through the provision of a riverside park, linear park, civic space, allotments and additional woodland planting as well as green links through the site. These will provide links from the site to the wider area.

The site will meet the open space standards as set out in Appendix 2 of the Aberdeenshire Parks and Open Space Strategy. Significantly more than 40% of the site is retained as open space and there are opportunities for a range of uses within that open space.

The open space audit highlights that Ellon has a good spread of greenspace which is reasonably well linked. There are no specific open space requirements in the area, but the development of this site will enhance provision of open space and ensure it is well linked and enhances biodiversity in the settlement.

Q15. Other Potential Constraints

Overhead cables – there are some overhead cables within the site, along one of the field boundaries. These can be buried or re-routed as part of any development. This is not considered a constraint to the development of the site.

Agricultural Land - The site is identified as prime agricultural land, however, this classification only suggests that it is capable of being farmed for a range of uses. The site is already identified for development in the LDP and thus Aberdeenshire Council have accepted this classification is not an impediment to development.

Topography – The site lies at a slightly lower level than the A920 to the north and slopes gradually to the south-west to the River Ythan. The highest point lies to the north-east corner, adjacent to the Park and Ride terminus. Land to the south adjacent the River Ythan is more steeply sloping towards the River, however, this area is to be utilised as a riverside park so does not cause an impediment to development. In fact, this sloping land, provides character to the site.

Q17. Community Engagement

No public consultation has taken place in relation to a planning application, however, the public will have been aware of the proposals through the Local Development Plan process and had the opportunity to comment through that.

Should the site be favoured for a mix of uses instead of solely retail uses in the Main Issues Report, public consultation would follow. Consultation would also take place with the Community Council and local councillors as part of this process.

Q18. Residual Value and Deliverability

Ellon is a key settlement in the Aberdeen to Peterhead Strategic Growth Area, Energetica and the Aberdeen Housing Market Area and is an important location to deliver housing and employment land.

The current allocation for retail uses proves that it is a suitable location for development, however, it is considered that the provision of a mixed use development instead of purely retail would be even more attractive as demonstrated by the Development Capacity Study. The development of this site would provide a sustainable, mixed use development and meet the demand for housing and other facilities in Ellon. It is anticipated that the accessible, attractive location of this site, close to a mix of uses, would be a popular location for development.

The backing of the developer and their continued promotion of the site demonstrates their commitment to the deliverability of the site in the next Local Development Plan. The developer is confident that there is residual value following development of the site and the provision of the necessary infrastructure. The infrastructure constraints have been considered and Stewart Milne Homes are confident that they can be addressed and do not impose an impediment to development.



Waterton Farm, Ellon

Development Strategy - Response to Aberdeenshire Local Development Plan

March 2018





Location: Ellon Context

Situated 16 miles to the north of Aberdeen, Ellon is a main settlement within Aberdeenshire and the main service and employment centre within the Formartine area. Originally a small market town nestled in the Ythan river valley, it has expanded rapidly since the 1970s as a satellite of Aberdeen to a population of almost 10,000 and continues to experience pressure for growth.

Ellon is set within a mainly agricultural landscape characterised by field patterns and pockets of woodland. The settlement is contained to the east by the A90.

The River Ythan sits low in the landscape and runs south-eastwards through the town before flowing into the North Sea near Newburgh. The river is visually prominent from the A90 which crosses it to the east of the settlement and from the B9005 which runs directly to the town centre. The river is a most attractive feature and key to the setting of Ellon.

The site is situated immediately north of the river on sloping ground rising to the A920. It is bounded immediately to the east by the A90 and to the north by the A920 and is therefore in a prime location for development.

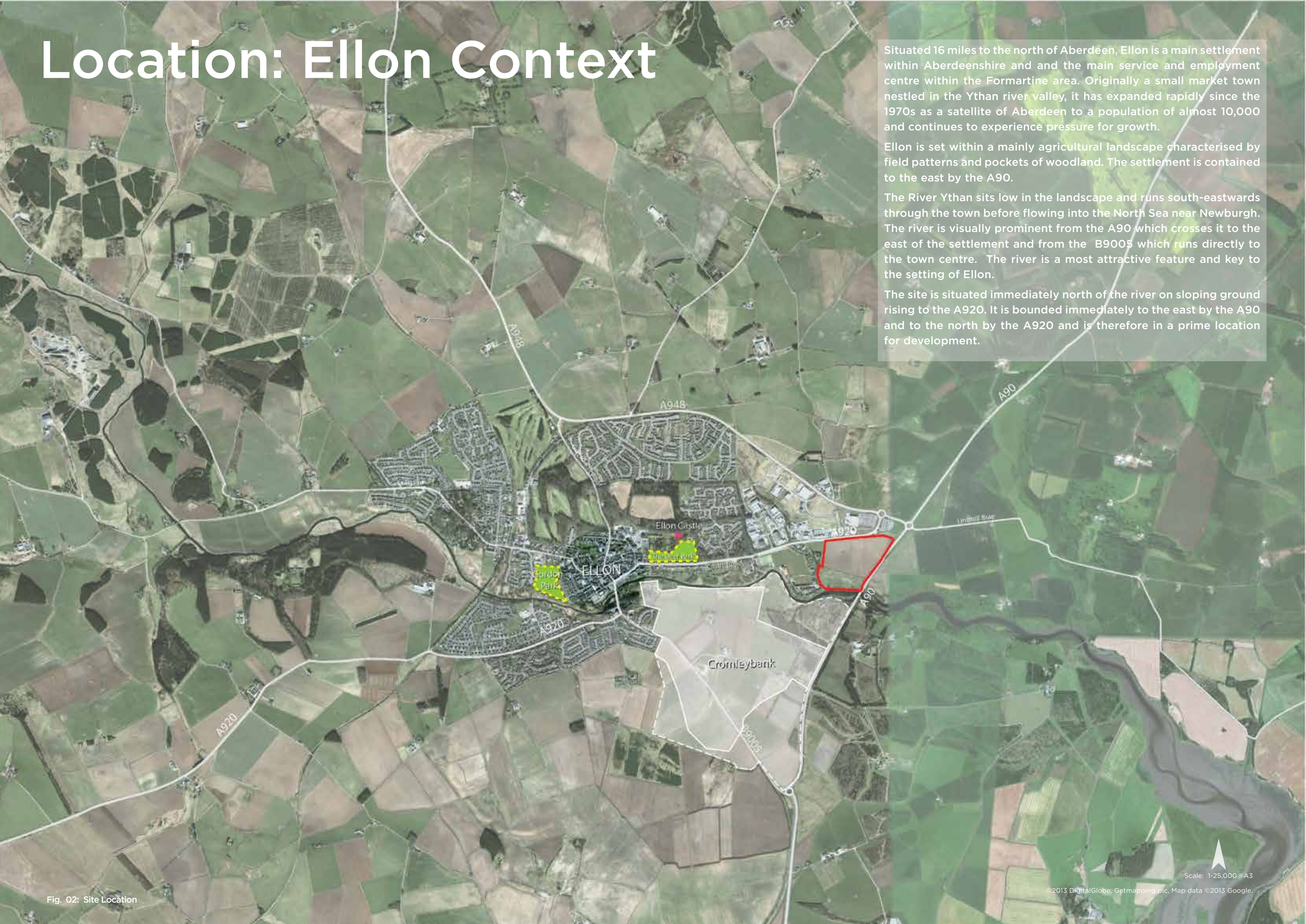


Fig. 02: Site Location

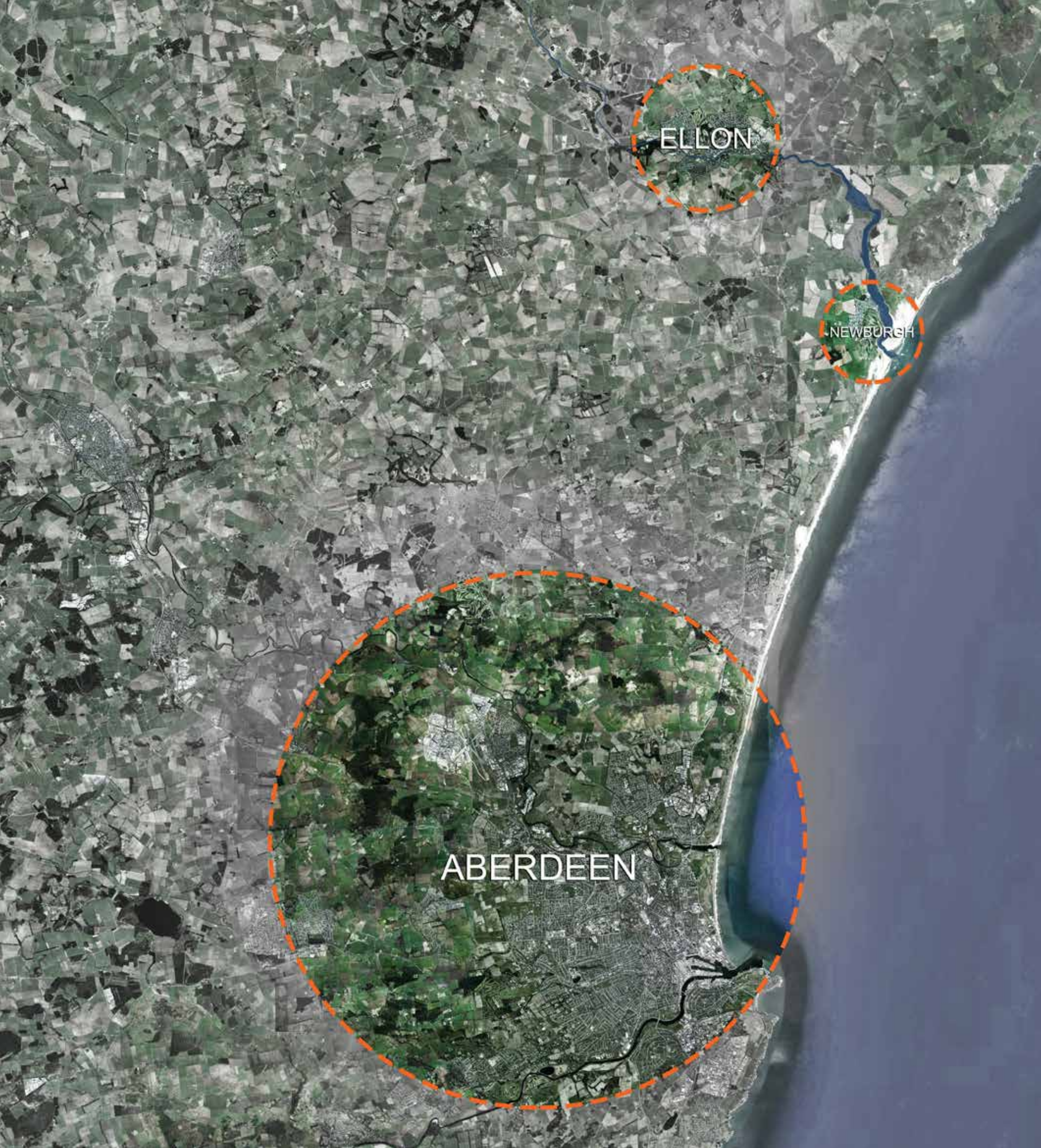


Scale: 1:25,000@A3

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Contents

1.	Introduction	6
1.1	Purpose of document	6
1.2	Planning Context	6
1.3	Site	6
2.	The Site	8
2.1	Existing features	8
2.2	Site character	8
2.3	Historical growth	10
2.4	Urban context	12
2.5	Flood risk	13
2.6	Ecology	13
2.7	Topography	14
2.8	Views	14
2.9	Access and Connectivity	24
3.	The Opportunity & Vision	26
3.1	Site opportunities/constraints	26
3.2	Site potential & vision	26
4.	Design Approach	28
4.1	Site concept	28
5.	Spatial strategy	30
5.1	Development framework	30
5.2	Land use and density strategy	32
5.3	Landscape strategy	34
5.4	Connectivity strategy	36
6.	Vision summary	38
6.1	Potential benefits to Ellon	38
6.2	A desirable location to live, visit and work	39
6.3	An attractive entrance to Ellon	40
6.4	Central linear park	41



1. Introduction

1.1 Purpose of document

The purpose of this document is to demonstrate the effectiveness of land at Waterton Farm, Ellon as an attractive site for mixed use development, that includes residential use. It has been prepared by Optimised Environments Limited, 'OPEN' on behalf of Stewart Milne Homes Ltd.

The document forms a supporting statement to accompany Stewart Milne's bid for consideration within the next Aberdeenshire Local Development Plan (LDP 2021) for the period 2021 to 2031. It aims to demonstrate the effectiveness of land at Waterton Farm, Ellon to accommodate approximately 200 homes and other mixed uses.

This document is visionary in nature and intends to display the character and quality that could potentially be achieved at Waterton Farm through appraisal of the site and its environs. Indeed it aims to highlight the opportunities that exist to enhance aspects of Ellon, including the contribution that it can make towards an attractive entrance to the town, improved accessibility and open space provision.

A master planning approach has been taken, which considers the site in a comprehensive and holistic way, emphasising setting and context, need, landscape capacity, design quality, and sustainability as the key factors which can achieve this objective. This work aims to demonstrate the qualities of this site and what it can offer to Ellon by utilising its location and features to their very best effect.

1.2 Planning Context

The town is a key service centre within the Formartine area and is located within the Aberdeen Housing Market Area, Ellon to Blackdog Strategic Growth Area and at the heart of the Energetica corridor.

The Aberdeenshire Local Development Plan 2017 sets out planning objectives for settlements within the Formartine area as follows:

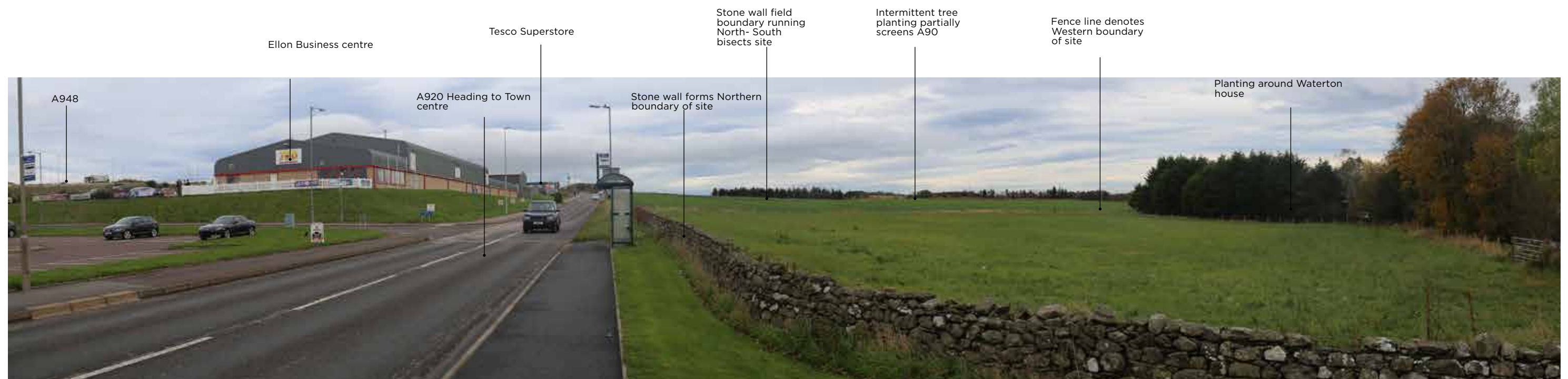
- Enhance the settlements role as a sub-regional service centre and support existing services;
- Meet the need for new housing in the Strategic Growth Area;
- Sustain existing services;
- Provide opportunity for employment in the Strategic Growth Area and the Energetica Corridor; and
- Support community facilities, including health provision.

1.3 Site

The Waterton Farm site is highlighted on the location plan opposite. It extends to approximately 16.3 hectares (40.6 acres) and lies immediately adjacent to the eastern settlement boundary of Ellon, adjoining the Meadows sports complex, the BUS1 site at Balmacassie business park and Ellon Park and Ride terminus.

The site is in agricultural use and consists primarily of south facing fields, sloping from the A920 down to the Ythan River which runs along the south of the site. The A920 bounds the site to the north and leads directly in to the centre of Ellon. It is a poor arrival at the town as shown in the photo below, with a Tesco garage and superstore and the industrial area immediately north of the site, the only buildings lining the road. The Ellon Park and Ride terminus is directly accessible to the north-east of the site offering easy and frequent transport connections to the wider area.

The A90 forms the site's south-eastern boundary - partly in cut and partly at grade. Waterton House and the residential development at Waterton Meadows lie to the west, both of which are screened by a belt of mature trees.



The current arrival at Ellon from the east

This context does not set a proper scene for the attractive, bustling town to follow.



Knockothie Cres

Industrial Estate

Ellon business park

TESCO SUPERSTORE

Ellon Park and Ride
Terminus

Lintmill Brae

A90
To Peterhead and Fraserburgh

Knockothie Hill

The Deer Park

Castle road

WATERTON FARM

The meadows
Sports centre

Braes of Waterton
RIVER YTHAN

A90 crosses
the river Ythan

Ladymire
Equestrian Centre

Housing with large south
Facing gardens
Close to and addressing
the river

Cromleybank Farm

A90
To Dundee and Edinburgh

Scale: 1:6000@A3

Fig. 03: Access and Connectivity
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1.4 Potential uses and site impact

Recent recommendations from the Planning Authority have highlighted the site with commercial potential. It undoubtedly has the capacity to offer larger scale retail and associated uses, however it is also of a setting and nature that it could provide residential development, strongly influenced by its south facing situation and riverside proximity. It could also provide a very desirable place to live in Ellon, while creating, arguably, a more fitting entrance setting to this important edge of the town. The following pages of images aim to demonstrate that a mixed-use development on the site, including residential would be preferable and beneficial to Ellon rather than solely large scale retail.

Examples of large scale retail development



Huddersfield



Swansea



Inverness



Dundee



The Forge Retail Park Glasgow

A mixed use development on the site would create a very different environment both architecturally and socially from the purely non food retail parks shown on the previous page. By their very nature large retail units are shed like structures which can do very little to respond their surrounding and context and are usually dominated by car paking. In a strategic location on approach to the town and with its beautiful riverside setting, the Waterton Farm site deserves a context driven solution from which the whole town could benefit. The images below show some mixed use schemes along with other potential uses and illustrate the richness and vibrancy of place that can be created through mixed use development.



Potential for a landmark building such as a hotel



Opportunity for large scale retail to work in a mixed use setting



Brewdog pub in Brazil - local potential for attractor and employment



Mixed use - retail under flats at Lawley



Family pub - destination



Housing working with riverside setting



Mixed use development at Lawley Square



Mixed use - housing and offices at Stoneywood Estate, Aberdeen



2. The Site

2.1 Existing features

There are a number of elements within and in the immediate vicinity of the site that combine to give a distinctive character and offer opportunities to create a unique sense of place. These features are:

- The Ythan river;
- The boat house;
- Waterton Castle remains;
- Woodland;
- Distinctive stone field boundaries running east-west across the site;
- Topography; and
- Broomie's Burn.

2.2 Site character

The site offers somewhat of a surprise - containing 2 distinct character areas within its confines. A stone wall field boundary running east - west across the site defines these 2 areas. The northern half of the site consists of open, south facing fields currently visually dominated by the Tesco superstore sitting at higher level behind it. The north eastern section of the site is level with the A90 and as such has increased noise levels in this area.

By contrast, the south western section of the site - about a third of the total area - offers a tranquil setting influenced by lower ground levels, woodland and the riverside edge. This area is completely unseen from the A920 to the north, however the boat house and some existing housing can be glimpsed from the A90 while crossing the bridge indicating an attractive and attractive riverside edge.



River & boat house from the A90



Castle plaque



informal allotments



Broomies Burn



Stone walling



Waterton Castle ruin



Waterton House



Northern section of the site viewed from the west

This area benefits from excellent connections to main routes and public transport, and consists of flatter, open ground.



Southern section of the site viewed from the west

Existing housing next to the site benefits from the idyllic riverside setting



Southern section of the site viewed from the west

The south of the site benefits from an attractive and interesting landscape setting and is much more peaceful than the north of the site



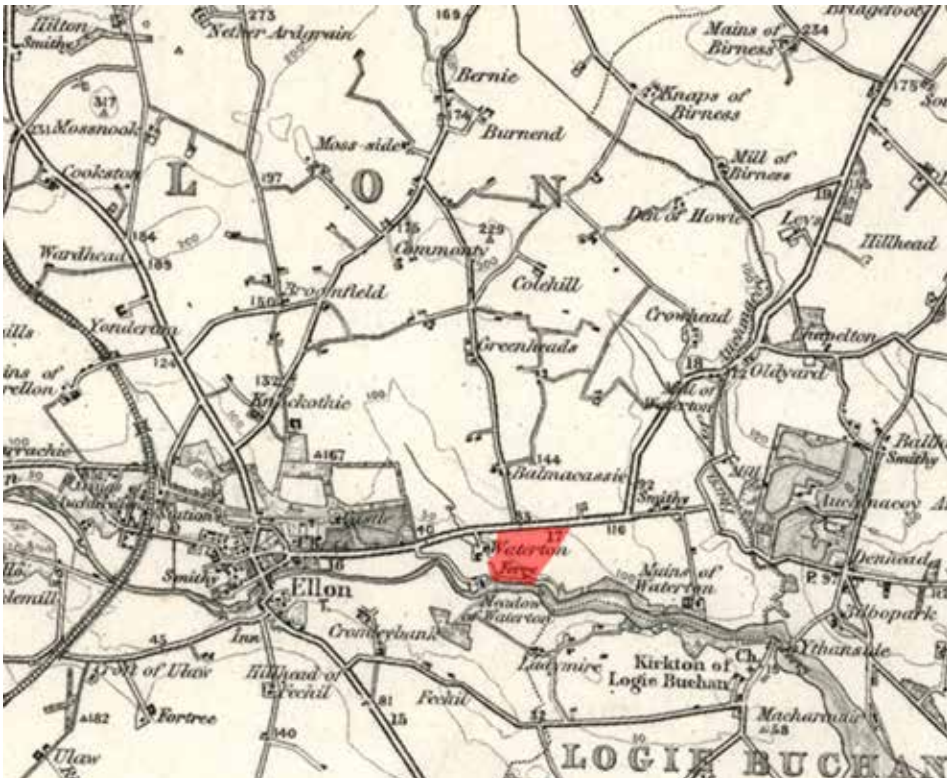
Fig. 04: Site Features
©2013 DigitalGlobe, Getmapping plc, Map data ©2013 Google.

2.3 Historical growth

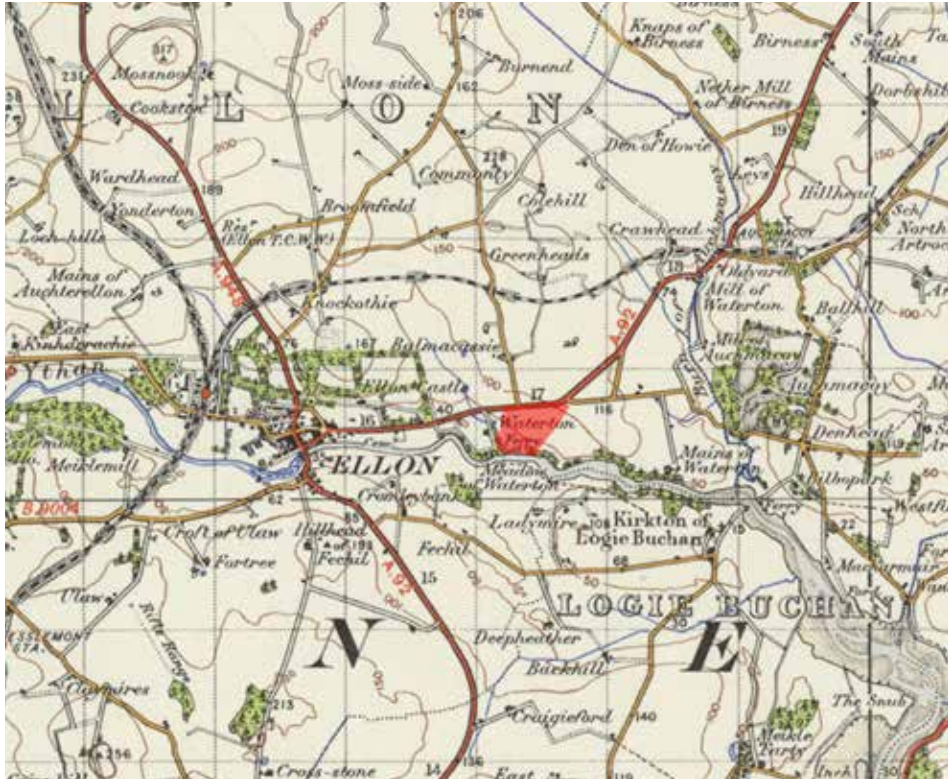
Ellon's lengthy history is attributed to the fact that it was the only settlement north of Aberdeen suitable for fording the Ythan Estuary. The construction of 'Auld Brig' in 1793, which spanned the Ythan River, facilitated Ellon's growth and prominence as a market town. Ellon's position as an agricultural centre continued into the 1960's and 1970's. However the closure of the mart and the mechanisation of farming resulted in an economic decline. Fortunately, this coincided with the emergence of the oil and gas industry, which has resulted in Ellon's transformation from a traditional market town to a commuter town for Aberdeen. The photograph opposite shows the prominence and importance of the River Ythan in the setting to Ellon. It also clearly shows alignment of the A920 and the importance of it as a gateway to the town.



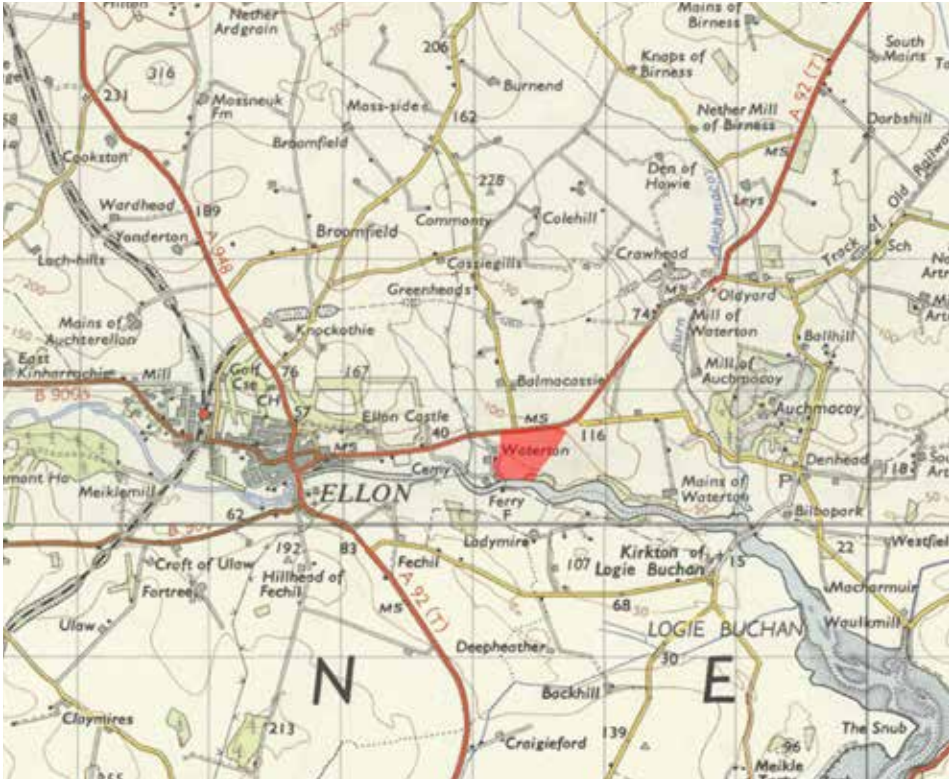
1747-1752



1885-1900



1945-1948



1955-1961



1982-1905

Scanned image from west of east part of Ellon

RAF National Survey (Air photography), 1944-50.

SC1021461 copyright RCHAMS



2.4 Urban context

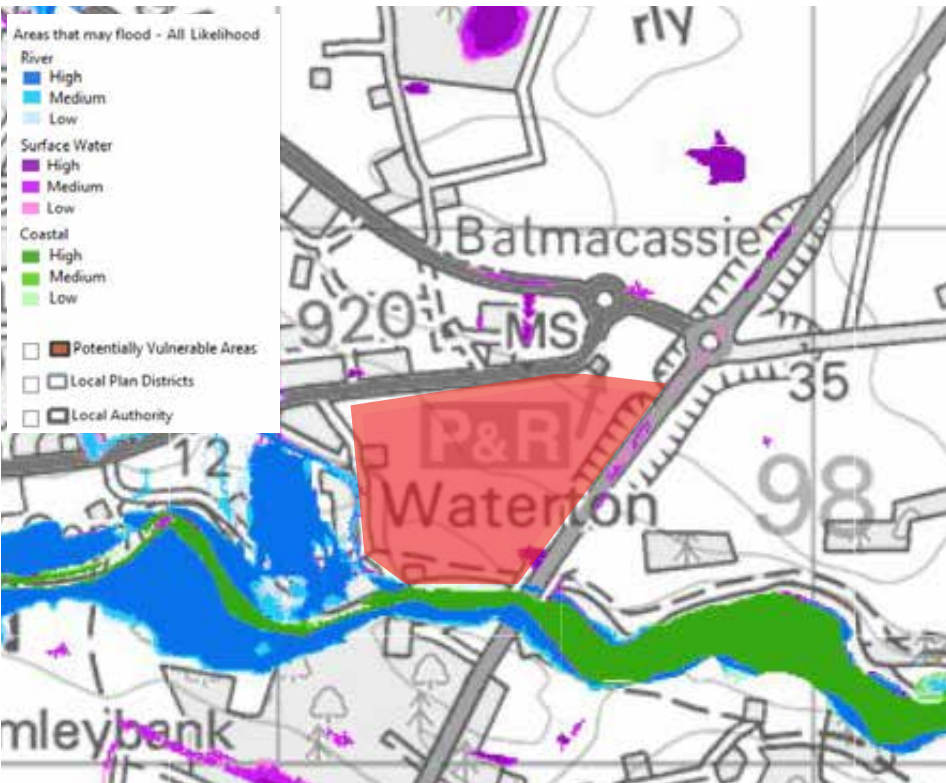
The town has experienced two distinct periods of growth, with a range of larger Victorian villas set in wooded gardens located on the main roads radiating away from the town square. Stone walling is widely used and there is a formality to the arrangement of the buildings. Much of the recent housing development has been larger-scale modern estates, along with supporting large-scale employment opportunities.



2.5 Flood risk

SEPA's Indicative River and Coastal Flood Map 2013, shown below, confirms that the site is not at risk of flooding from the Ythan.

A field drain runs along the western boundary to the Ythan and in times of heavy rainfall this may breach its banks. The indicative layout described in this document has been designed to ensure that development would not be built at this location. Any development would be planned in accordance with the results of a 1:200 year flood risk assessment, in order to determine areas at risk and mitigation measures required.



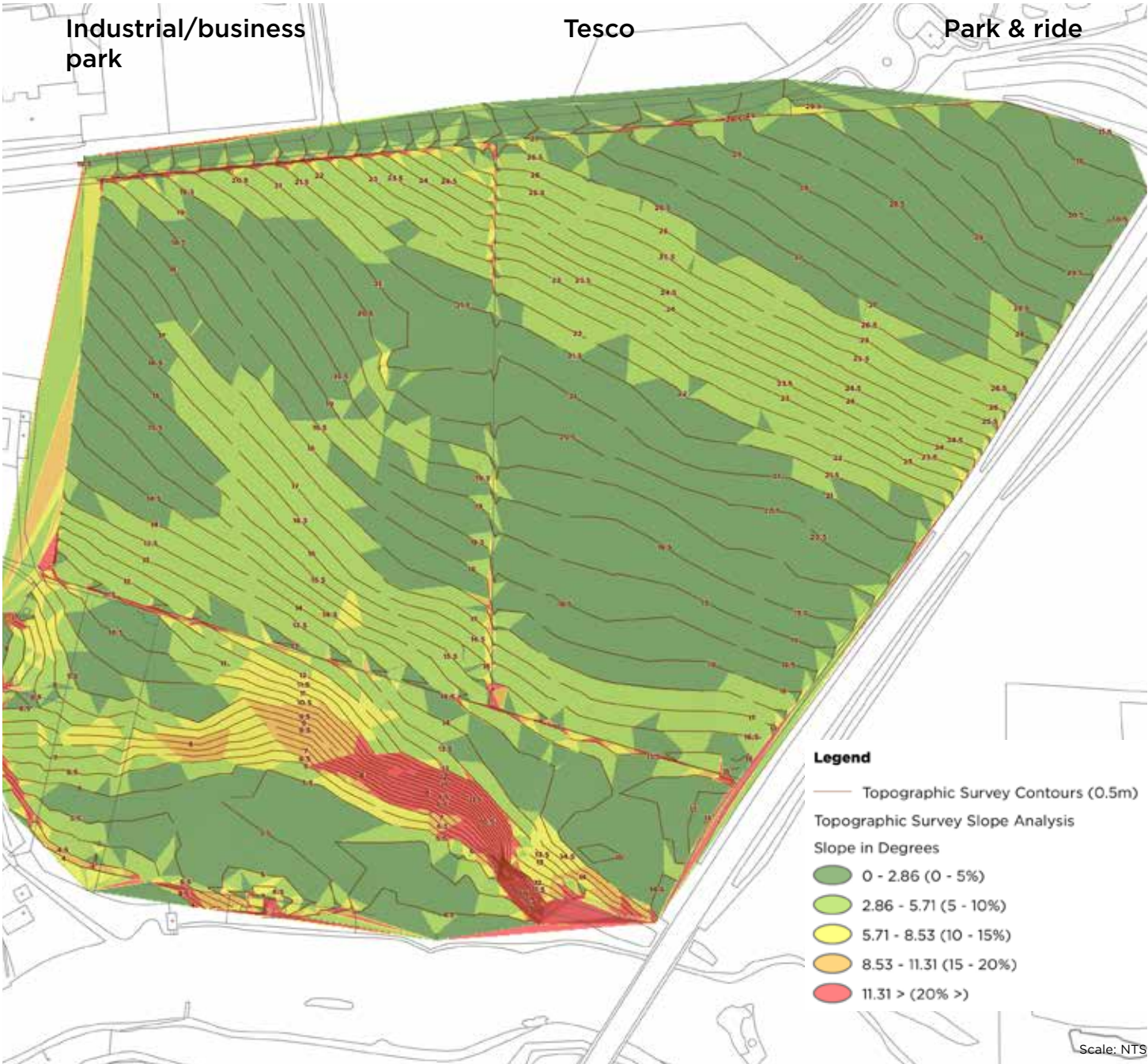
2.6 Ecology

Whilst the site itself consists of open fields and will likely have limited habitat value in the main body of it, the immediate boundaries of the River Ythan and Broomies Burn to the south and west make for an area rich in wildlife. Development of the site should respect this attractive and sensitive setting with appropriate uses adjacent to these areas that will enhance biodiversity and habitat creation.



2.7 Topography

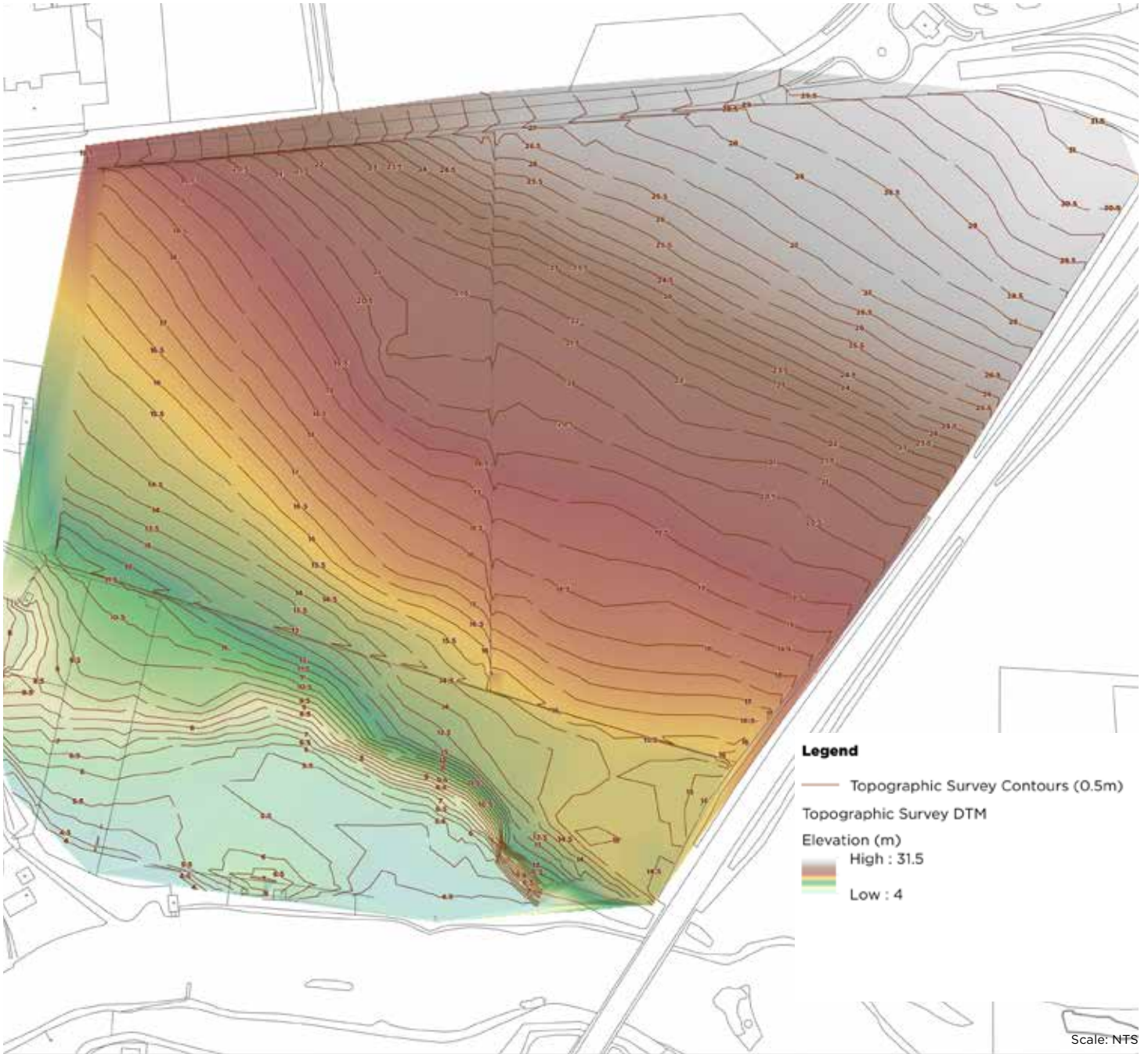
The site lies at a slightly lower level than the A920 to the north and slopes gradually to the south-west to the River Ythan. The highest point of the site is the north-east corner, adjacent to the Park and Ride terminus, which lies at 40m above sea level; the River Ythan at the south of the site lies slightly above sea level. Beyond the site to the north, the land rises with the Tesco supermarket sitting at an elevated position, and along with the adjacent industrial/business park, dominates the entrance to Ellon along this route.



Landform Analysis

2.8 Views

The following pages of photos record the character of the site from its boundary edges and also of the immediate urban context.



Site Elevation



Fig. 05: Photograph viewpoints
©2013 DigitalGlobe, Getmapping plc, Map data ©2013 Google.



1. Panoramic view over site from the north-east



2. View looking west over site



3. Panoramic view over site from the eastern edge

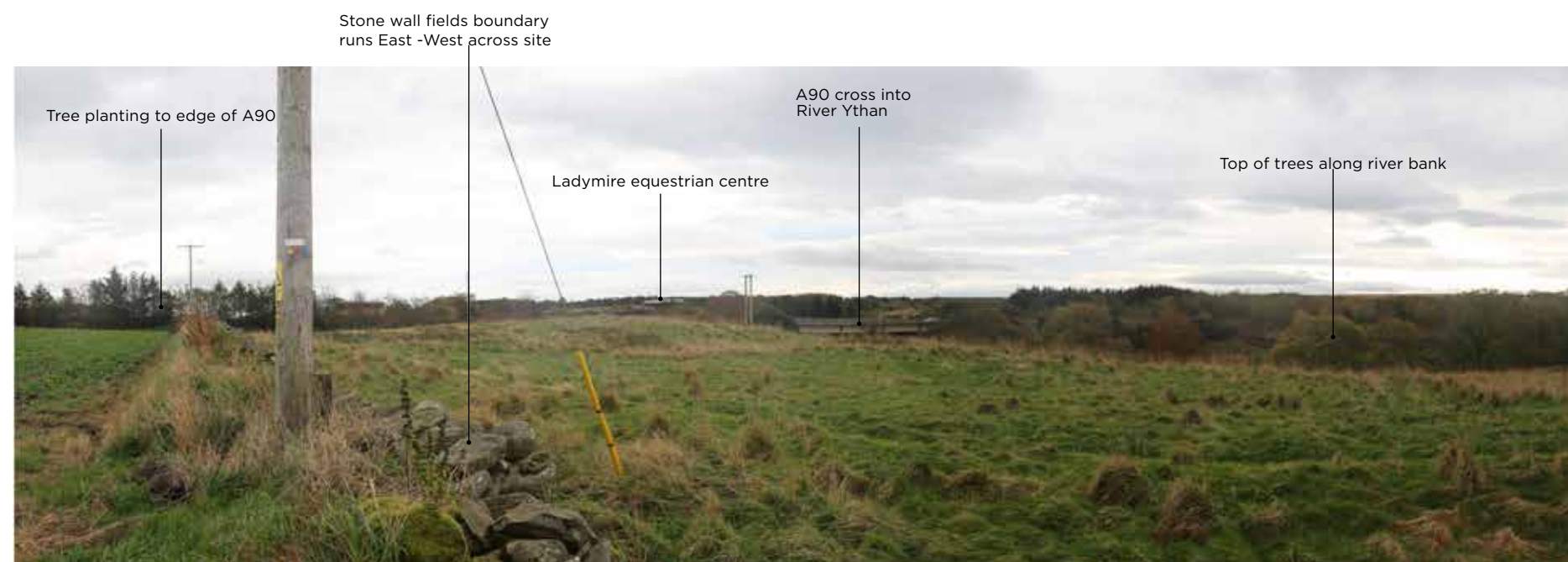
At this point the level of the site starts to fall below the A90. The Southern portion of the site is not visible from this point.



4. View looking north-west



5. View looking to northern edge of site.



6. View looking south-eastern edge of site.

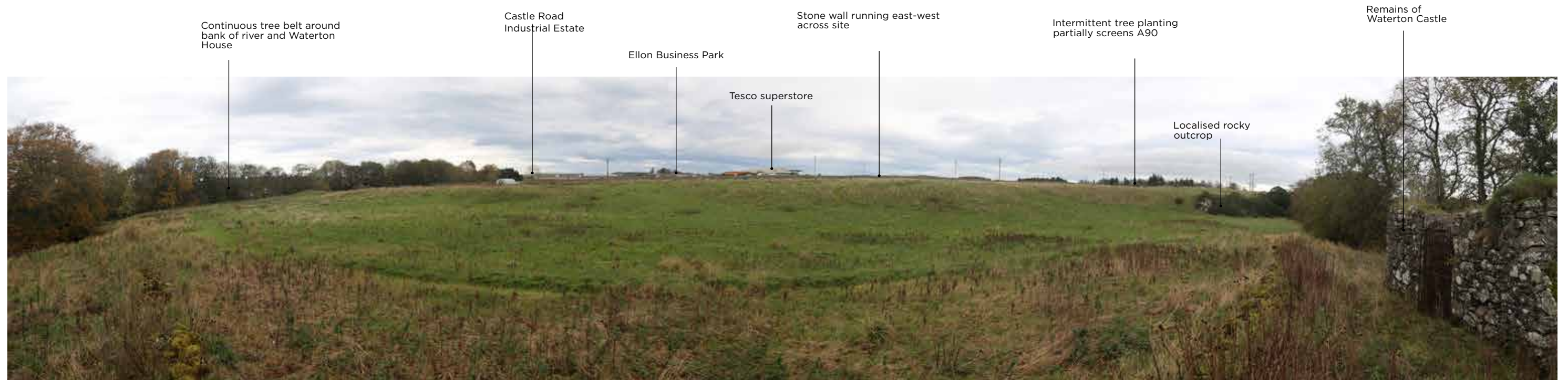


7. Panoramic view from south-east of site.



8. View looking south-west from south of site.

The lower level of the site at this point mean views are contained.



9. View from Waterton Castle looking north.



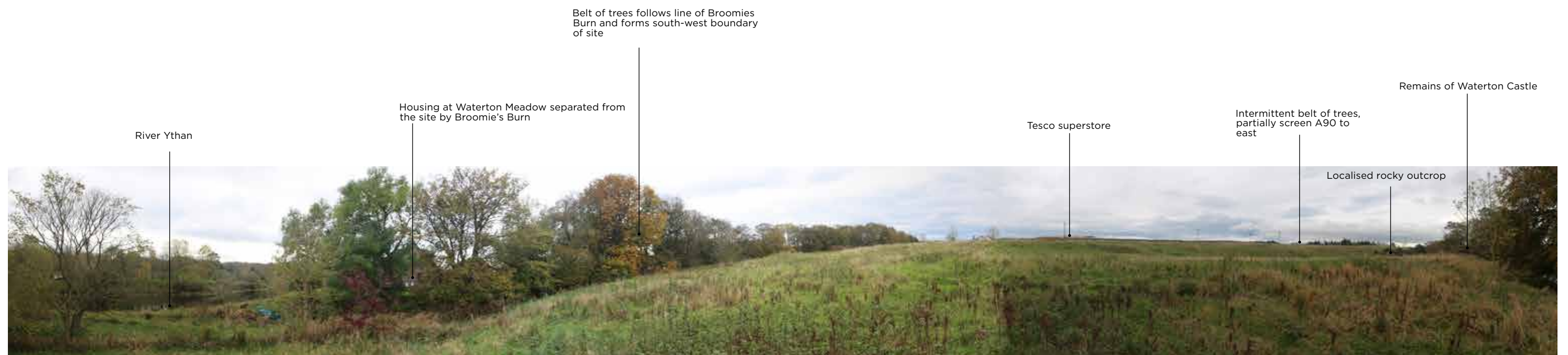
10. View from boathouse on the banks of the River Ythan to the south of the site looking east.



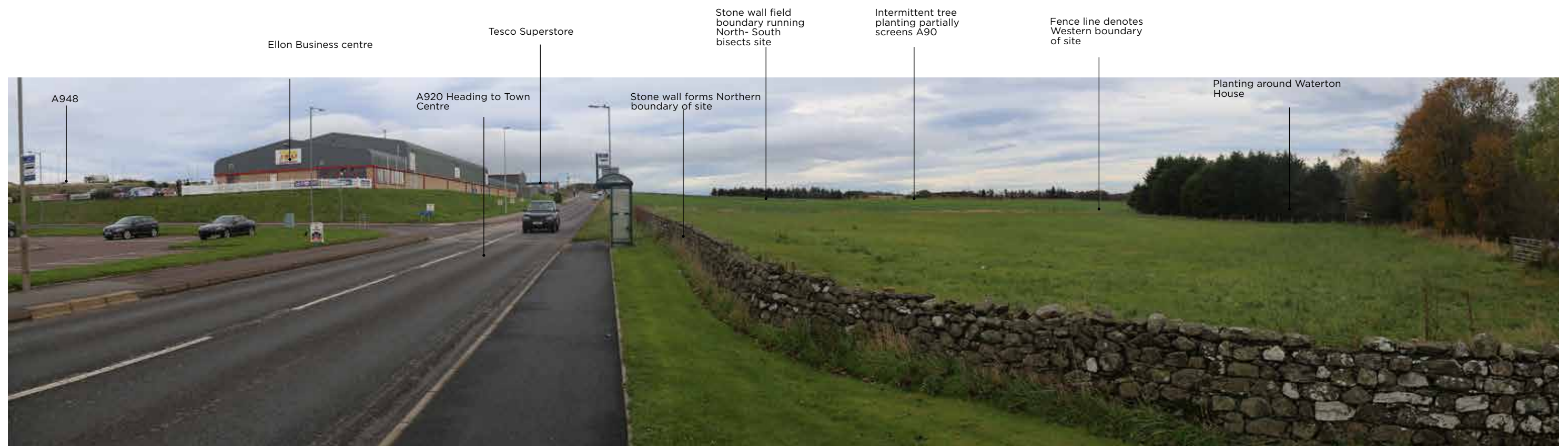
11. View of eastern edge of site.



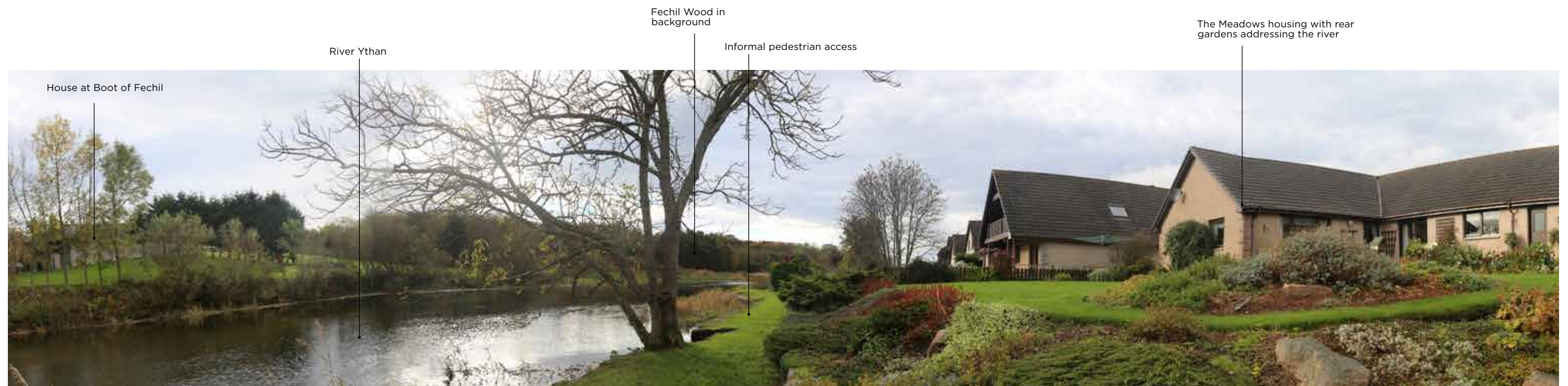
12. View from south-west of site looking north-east.



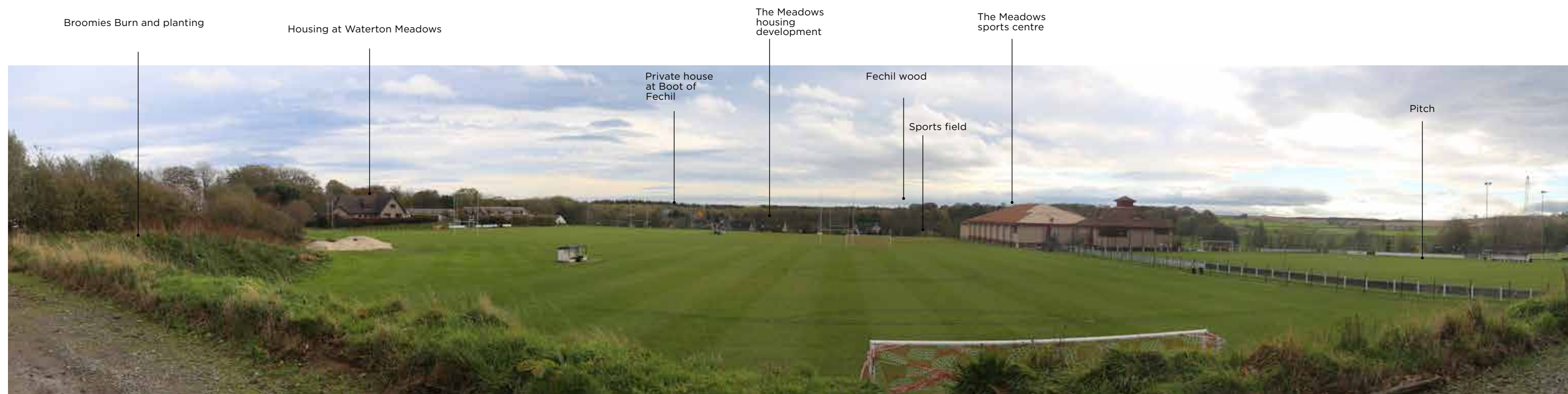
13. View from south-west Corner of site looking north-west.



14. View from A920 at the north-west corner of the site.



15. View looking West along river Ythan from The Meadows housing/ Immediately south-west of site.



16. View from A920 looking south.

Although the site lies just beyond Waterton Meadows, is not visible at this point; screened by the tree belt around s Burn and the higher ground levels in this area. The Meadows sports centre has many facilities and clubs, including football and rugby pitches, an astroturf pitch for hockey, a gym, and a multi-use sports hall. The Meadows is also home to the Ellon United football team, the Ellon RFC and the Ellon HC.

2.9 Access and Connectivity

Previous assessments of this site by Aberdeenshire Council have identified that there is “excellent connectivity by road, cycle, foot and public transport”, as well as being well-related to the town.

Pedestrian/cyclist

The site is well-located for access into Ellon and conveniently located to access the facilities to the east of the town on foot or cycle. The Tesco supermarket lies to the immediate north of the site, with the Meadows Sports complex approximately 400m to the west of the site.

The site abuts the park and ride terminus to the north-east and Ellon Business Centre and Balmacassie Commercial Park are located approximately 350m to the north of the site (identified in the extant ALDP as sites BUS and OP4 for 9ha employment development), to the west of Tesco. A riverside walk runs along the banks of the River Ythan to the south of the site and provides an active travel network for pedestrians and cyclists through to the town centre.

-

Public transport

The site is ideally located to take advantage of the Ellon Park and Ride facility, which directly abuts the north-eastern corner of the site and connects between Ellon and Aberdeen 7 days per week, at approximate 15 minute intervals from approximately 07.00 – 23.45, with a reduced service on Sundays.

In addition, Ellon is a transport hub with over 18 regular bus routes running between Aberdeen and the wider area, including Balmedie, Newburgh, Cruden Bay, Mintlaw, Fraserburgh, Inverurie, Peterhead, Dyce and many more. The A920 is a principal bus route and bus stops within the vicinity of the site include the Park and Ride terminus and along the A920 in the vicinity of Tesco and the Meadows Sports complex.

Road network

The site is extremely well connected to the main road network with A90 literally bounding its eastern edge. Aberdeen City Centre can be reached in approximately thirty minutes by road from Ellon. Peterhead, to the north, is a 25 minute drive, and the business centres at Bridge of Don and Dyce are within close proximity, as is the University of Aberdeen.





Legend

- Walking routes
- Vehicular routes
- Crossing points
- Site boundary
- Bus stops

Fig. 06: Access and Connectivity
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3. The Opportunity & Vision

3.1 Site opportunities/constraints

The key physical opportunities/constraints which influence the site are:

- Proximity to the A90;
- Topography;
- Noise;
- Views;
- Distinctive stone wall field boundaries;
- Proximity to the River Ythan and also Broomies Burn;
- Mature trees along southern and western boundaries; and
- The setting of Waterton Castle remains (C listed) and the boat house.

Future development at Cromleybank and the additional vehicular connection across the river, and employment land at site BUS will also influence any development at Waterton.

3.2 Site potential & vision

A vision sketch has been produced in response to the site opportunities and constraints and establishes the capacity of the site to accommodate a distinctive mix of uses. The design approach and initial sketches are illustrated on the following pages.

The physical characteristics and boundaries of the site are such that a mixed use proposal would be a logical development solution. The southern and western sections of the site offer an attractive environment for housing whilst the eastern side, adjacent the A90 is a natural location for retail/commercial uses.

A mixed use scheme at Waterton could readily offer several benefits to the immediate locale and to the town as follows:

- The chance to create an attractive gateway and entrance approach into Ellon from the east along the A920;
- Improved settlement edge design to the east adjacent the A90;
- Sustainable growth - maximising site potential and utilising the excellent existing infrastructure and public transport network effectively;
- Creation of a distinctive neighbourhood shaped by existing landscape features;
- Greater housing choice;
- Support of existing local facilities and creation of new ones;
- Enhancement of the existing green network and connections;
- Attractive riverside parkland to the south of the site and central park offering considerable recreational benefits; and
- As the site is currently comprised of agricultural fields, ecological benefits could be gained from further tree planting, green-space planting, domestic gardens and allotments providing opportunities for enhanced biodiversity.

The vision for Waterton is of a desirable location and destination offering a riverside setting with excellent connections to the city and other areas. Local facilities within walkable distances, coupled with a range of housing typologies in a characterful setting, will create a vibrant and distinctive neighbourhood.



Views from immediately outwith site at south-west and then approaching the town centre

The informal path link could continue into the Waterton site linking pedestrians directly into the town along the river edge.



View from north-east of site looking west along the A920 towards Ellon town centre

This view demonstrates the need and opportunity for a considered and attractive arrival at the town.



View from south-east of site looking west along the southern edge of the site

This view demonstrates the potential for an accessible riverside parkland. There are opportunities for this park to link from the existing path network as shown in the photos at the top of the page.



Fig. 07: Vision site layout

3.3 Design approach & concept

The character of the Waterton site is defined by its landscape features and is naturally split into distinct areas. These features coupled with the opportunities identified in the previous section lead to a simple and logical concept for the site.

Four principle elements are located on the site:

1. **Landscaped northern boundary creating attractive entrance to Ellon;**
2. **Riverside park on southern edge - defined by the stone wall field boundary and topography;**
3. **Area for residential use to the west of the site; and**
4. **Area for retail to the east.**

These elements are linked by and arranged around a central, more formal park at the heart of the site creating a legible site structure and sense of place.

The key aspects of the concept are illustrated in the diagrams opposite, identifying the main principles that underly the initial development framework.





Fig. 08: Concept Diagram

4. Spatial strategy

4.1 Development framework

This section of the workbook sets out an initial development framework, demonstrating how development at Waterton could be structured. The framework is illustrated opposite and the structuring principles for the spatial strategy are defined in the following text.

Landscape features

The site has a number of specific features which contribute to character, visual containment and landscape interest; these elements should be retained and integrated within development proposals.

These features include the remains of Waterton Castle, stone walling running along the northern boundary and east to west in the southern half of the site, and existing trees. The change in topography from the gentle slopes in the northern section to the steep slope and rocky outcrop towards the river is a distinctive and attractive feature to be utilised.

Additionally, access to the existing riverside walkway should be promoted and be accessible to new residents, visitors and the existing population by providing clear routes from within the site to existing connections on the boundary edge.

Landform and orientation

The site is on a south-west facing gentle slope offering ideal conditions for development to maximise passive solar gain and for the creation of interesting streets and spaces without the need for extensive earth works. The overriding strategy for the design of the development is to work in harmony with the natural topography and take advantage of the opportunities it affords in terms of aspect and orientation. Working with landform and features will drive design. This will ensure best fit for appropriate uses and that Waterton retains and maximises its existing qualities to create a distinctive character and provide a unique sense of place.

Connections and integration

Key connections have been shown to:

- Promote pedestrian connection to the park and ride terminus at the north-east of the site;
- Promote pedestrian connections to existing bus stops;
- Promote pedestrian connections to the the river;
- Promote integration with surrounding community;
- Ensure development overlooks and addresses open space;
- Provide a variety of connections to the existing network wherever reasonable in order to maximise the permeability of the site; and
- Develop a clear street hierarchy and a permeable block structure.

Views

Development blocks have been laid out to respond to the contours of the site and ensure that several key views are created. For example the primary street is aligned to terminate with with a view of Waterton Castle ruin. Arranging streets and buildings to filter views, terminate vistas and pass through sub spaces will help create both a legible, attractive and interesting place.

Views west and east along the River Ythan will be enjoyed from the south of the site and the parkland should be designed to maximise and enhance this experience.

Spatial experience

Development blocks have been arranged to ensure that an interesting spatial experience is created. Core spaces, civic spaces and a hierarchy of different streets will create a varied and legible urban form. This basic structure can then be further articulated by additional requirements and guidance such as building height, landmarks and building typology as design progresses.

The northern section of the site which currently consists of open fields has been arranged with a formal nature. This is derived from the main aim here to create an attractive entrance to the town from the east. Buildings should respond positively to the A920 establishing a proper sense of arrival and welcome. Direct frontage access is not possible, so buildings are arranged to sit back behind a boulevard of trees whilst accessed from a single sided street within the site. This arrangement exists within the town and sets the tone for what will follow.

The main entrance to the site arrives at a small civic space where visitors and residents orientate themselves to head east towards the mixed use/retail element or west to the residential area. A view will also be had of the park to the south alerting people to the fact there is something different beyond and the primary street will continue directly to the space. The spatial experience here is of a more formal landscape park around which development pivots. This could provide play space, seating and perhaps art work. The park extends south into the less formal, more natural riverside park, creating a green lung from the river right through the centre of the site to the A920.

The southern part of the site drops to a lower level and with the woodland edge and riverside setting has a tranquil, more intimate character compared to the north of the site. The remains of Waterton Castle and the beautiful surprise of the boat house on the river banks, provide an instant attractive setting and will make for a space that will appeal to all ages.

A civic space leads from the development to the Park and Ride terminus. This will provide breathing space within the retail element - perhaps providing a spill out area for a cafe. It will also create a welcome to those arriving at the site from the Park and Ride.

The following pages briefly describe and illustrate the framework under three main headings:

- Access and connectivity;
- Landscape framework strategy; and
- Development block structure.



Legend



Development Framework Blocks



Proposed Woodland



Civic Space



Formal green space



Parkland



Allotments

Fig. 09: Development Framework

4.2 Land use and density strategy

General land use and density principles

The suggested proposal is that the Waterton site would suit a mixed use development comprising a mix of residential and retail/non food retail.

Development would aim to meet the current Aberdeen City and Shire Structure Plan target of 30 dwellings per hectare or above, as an average across the site and respond to the 'Imagine Ellon' study which proposed a development density of 35 dwellings per hectare (dpha), with 10% developed at 10dpha; reflecting the increasing need to develop land in a sustainable manner. Individually not all development blocks will meet these numbers 30 - some will be higher and others lower in recognition of the character of the site and response to the surrounding context.

The diagram on the opposite page shows an initial approach to land use and density for discussion and future testing purposes. Analysis and conceptual consideration of the site suggests an approximate total developable area of 9.3 hectares. Around 5 hectares is indicated for residential use.

Opportunities for mixed use/retail provision

Within the development framework an area of 3.5 ha is shown on the east of the site for food and non food retail. This will be an attractor and employment generator to the area, in addition to providing facilities for new and existing residents. Proximity to the A90 provides opportunities for a landmark building particularly in the north-east corner. The amount of retail provision actually provided will be dependant upon market research and discussion with the local authority.

The main body of the retail element is in the north-east of the site with locations suggested for mixed uses on the south-east around the park and towards the river. Locations have also been indicated for uses such as a cafe or restaurant at the top of the linear park which could readily take advantage of the open space, views and south-west orientation. Flats on the upper floor would also enjoy the same benefits.

Approach to residential density

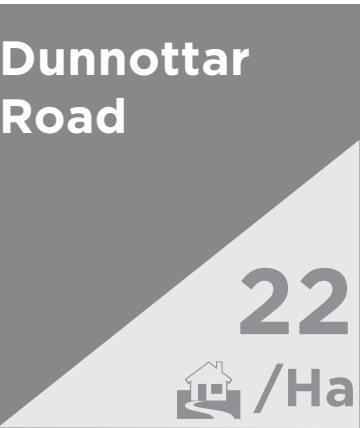
Residential densities should respond to existing topography and utilise layouts which avoid requirement for significant earth-modelling/platforming. Densities will generally fall across the site with higher densities to the north-east on less constrained ground, closer to the public transport network and retail facilities including the existing Tesco to the north. Densities will lower towards the south and west of the site, particularly near the riverside park and Broomie's Burn where larger plots are shown. A range of housing types and tenures will ensure that uniform densities are avoided and that a varied urban form is created.

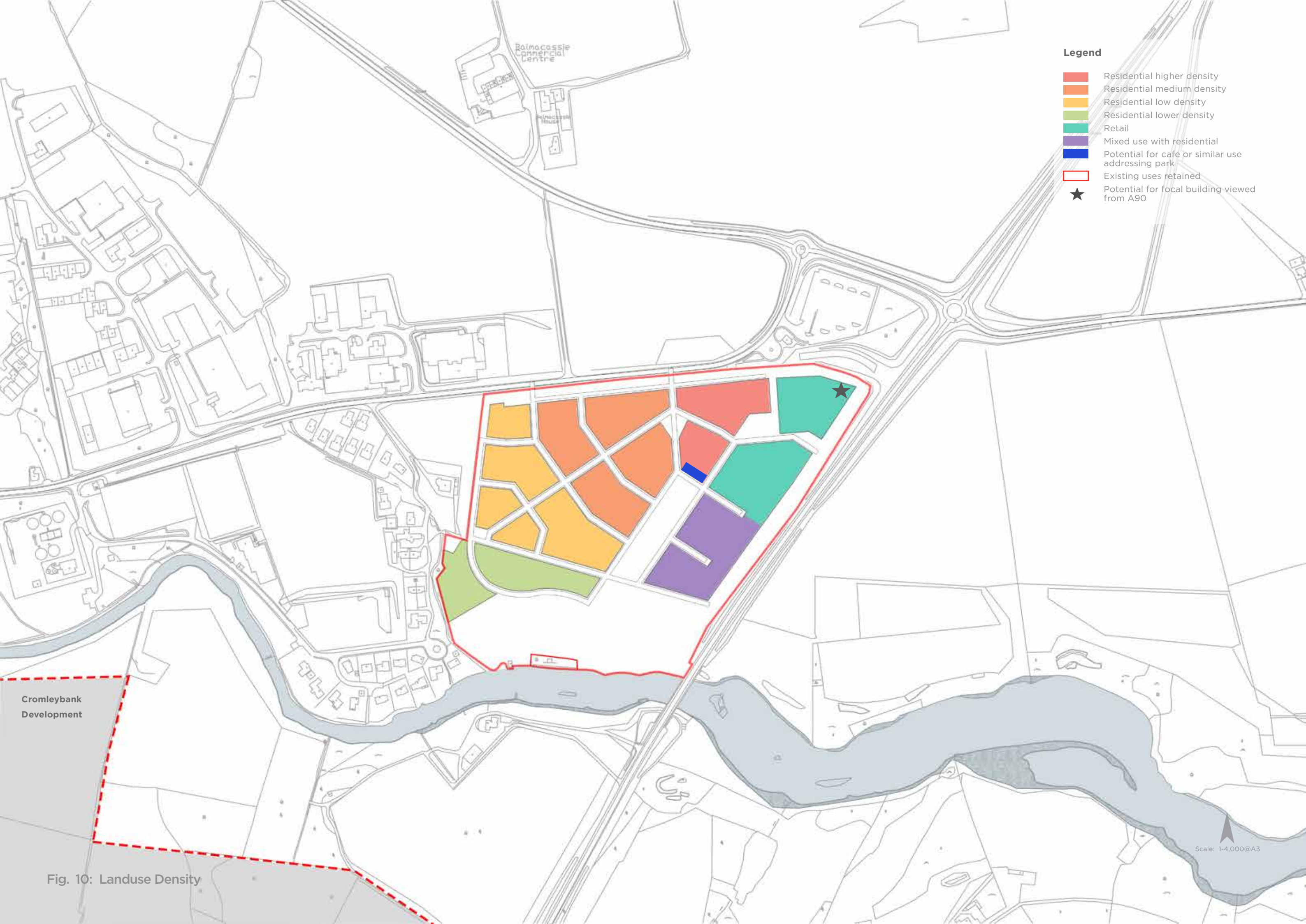
Appropriate density

Given the location and character of the site, a wide range of residential densities will be used to further test the capacity of the site. These range from very low density, town edge conditions of around 25 units per hectare up to higher density 'urban' character where perimeter blocks of flats might be appropriate adjacent to the retail and the A90.

The density of development surrounding the site has been analysed to ascertain appropriate density in this area. As shown below The Meadows development immediately west across Broomie's Burn is 10 units per hectare and to the north at Dunnottar Road adjacent Tesco it is 22 units per hectare.

Precedent images/density





Legend

- Residential higher density
- Residential medium density
- Residential low density
- Residential lower density
- Retail
- Mixed use with residential
- Potential for cafe or similar use addressing park
- Existing uses retained
- Potential for focal building viewed from A90

Cromleybank
Development

Fig. 10: Landuse Density

Scale: 1-4,000@A3

4.3 Landscape strategy

Well designed public open space helps establish a strong sense of identity, creates opportunities for social interaction and promotes healthy active lifestyles. This section briefly describes how and where this could be provided at Waterton and aims to give a flavour of the character that could be achieved through precedent imagery. The types of landscape spaces are defined and described below.

Local open space

Local space is distributed throughout the framework area and generally associated with existing landscape features, at key junctions or other linking spaces which support pedestrian and cycle movements.

Woodland areas

The existing woodland areas provide a backdrop to the edges of development creating a setting and sense of place. The trees along the eastern boundary to the A90 will be supplemented to provide a strong woodland buffer to this noisy edge. Trees would be managed with an environmental and habitat bias, ensuring appropriate regeneration of the woodland together with public safety.

Core public space

Core spaces are formed as a direct response to the existing landscape and are strategic resources fulfilling recreation, hydrology and ecological functions. These spaces are predominantly soft and should be designed so that they are addressed by development, providing passive surveillance. There are two core spaces proposed on the site:

1. A **riverside park** is proposed to the south of the site opening up the pedestrian walk along the banks of the Ythan and will become a destination along this route. The park will open up the riverside views to the housing along the southern extent of the residential areas. This space will be designed to work with an area of the existing stone walling, the steep slopes and rocky outcrop and Waterton Castle ruin. It should also consider incorporation of the boat house in the design. A key aim of this space will be ecological improvement and it could provide opportunities for formal and imaginative play and as an educational resource.
2. A central **linear park** links directly to the riverside park and is more formal in nature, creating a transition between the river and the entrance to the site from the A920. This park will be multi-functional responding to residential and retail on either side, perhaps containing more formal play and seating. Parking space may also be integrated around its perimeter as appropriate.

The careful design of these spaces will be essential to creating character at Waterton. They should be well integrated with the street and path network, linking the development together and creating a cohesive community.

Civic space

Civic spaces are located within the development structure at key nodal points and gateways and have been formed in conjunction with proposed land uses and existing site features. These spaces may be a combination of hard and soft landscape as appropriate.

Allotments

An area of the site to the west is currently used informally for allotments. The development framework makes provision for allotments in the south west of the site adjacent to Broomies Burn. This is an ideal location which relates well to the riverside park and housing.

Play space

Open and green spaces for play will be integrated, with elements of children's play being accommodated at the outset of each phased development. The detailed design of the spaces should embody the principles of education, adventure play, and interpretation of the natural environment.

Connecting green networks

Boulevard tree planting runs the length of the northern edge of the site, connecting with perpendicular woodland buffers on the western and eastern boundaries of the site and the street trees lining the primary street which meet the linear central park, creating a green spine in the middle of the site. These fingers of green running north-south connect with the riverside park and walkway along the Ythan river creating a continuous green network around and through the site, and into the town centre.





Fig. 11: Landscape Framework

4.4 Connectivity strategy

The access and connectivity strategy aims to allow pedestrians and cyclists to move through the site and beyond using a permeable network of paths. Waterton should be a sustainable extension to Ellon where people can live, work and visit without relying heavily on private transport - within a walkable neighbourhood. The indicative layout of the site maximises the connectivity between residential areas and the open space, with pedestrian linkages throughout the site and through to the main road and services to the north, the Park & Ride site to the north-east and the riverside walkway to the south.

Access to Aberdeen is supported by efficient public transport allowing residents and workers to benefit from an easy commute to the city and the wider area.

Access

Entry to the site comes primarily from the north off the A920. Two vehicular access points are provided and two pedestrian connections - one directly to the park & ride to the north-east and the other on the west side leading to the existing bus stop.

Pedestrians

The pedestrian network is designed to actively encourage walking as a viable option and also as a recreational pursuit. Pedestrian links should be developed to meet the needs of the new community, existing residents and visitors in terms of connecting to existing key destinations and amenities such as local shops, the Meadows sports complex, other employment, and the proposed facilities of the parks and retail/commercial offer.

Pathways, pavements and shared surfaces all combine to create the pedestrian network, and where possible they are closely linked with areas of stone walling and trees to create pleasant walking experiences. The site connects well with the existing core path network running immediately along the northern boundary and links to the west across Broomies Burn. A bridge connection across Broomies Burn where it meets the Ythan would continue the riverside walk from the town centre straight into the riverside park at the south of the site.

Cyclists

Cyclists will be generally accommodated on the street network (on road). Connections to the main network will provide the new community with fast and easy access to the local and wider urban context. Those visiting the site will find cycling a viable and attractive option.

Public transport

The route of current public transport provision in the area is illustrated on the plan opposite. All development is within 400m of existing bus stops with frequent services connecting the site to the town centre, Aberdeen and the wider area including Balmedie, Newburgh, Cruden Bay, Mintlaw, Fraserburgh, Inverurie, Peterhead, Dyce and many more. Pedestrian connectivity to bus stops should be considered as a priority.



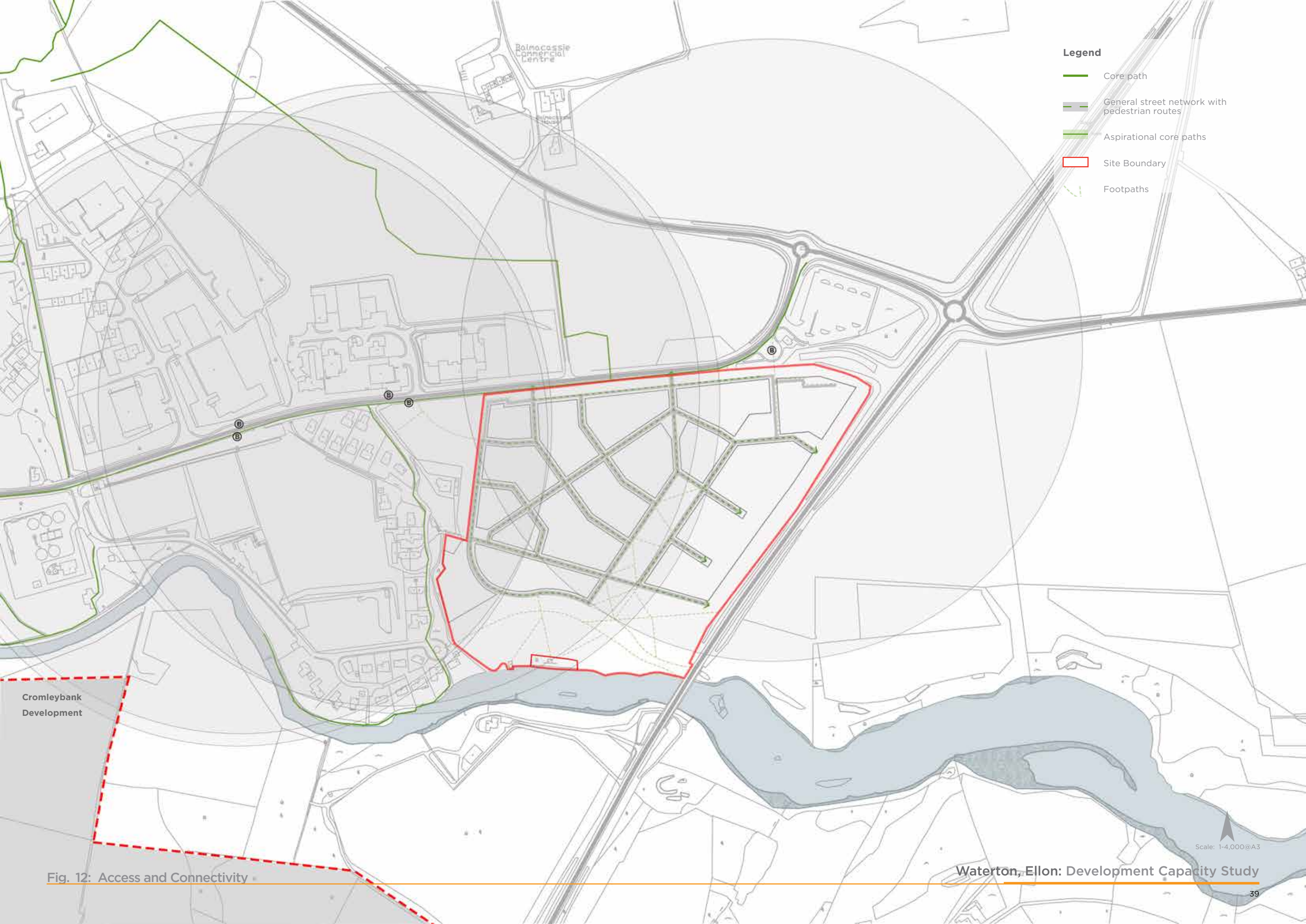


Fig. 12: Access and Connectivity

5. Vision summary

5.1 Potential benefits to Ellon

The Waterton site is in a key location, ideally situated to take advantage of excellent transport connections whilst offering an enviable riverside location.

The vision presented throughout this workbook is to make the most of the intrinsic site qualities, utilising them to establish a neighbourhood that is vibrant and rich in character.

In summary the potential benefits to Ellon by creating a mixed use development at the Waterton site are as follows:

- **Creation of an attractive entrance and proper gateway to Ellon from the east;**
- **A more attractive eastern settlement edge;**
- **A chance to celebrate the river;**
- **Opportunities for enhanced biodiversity;**
- **A different housing offer and the opportunity to help fulfill housing demand; and**
- **Creation of a destination and a further attractor to the town.**

The following sketch illustrations aim to give a flavour of the type of place Waterton could become.

5.2 A desirable location to live, visit and work

This illustration below demonstrates the potential character of the site in its entirety; showing how it could respond to and enhance its surrounding context, creating a gateway to Ellon.



5.3 A vibrant mixed use development

The sketch below illustrates the potential character of a mixed use development. A mixed use scheme would ensure site potential is maximised with uses responding to context. Different uses will make for a more vibrant area activated by various activities throughout the day.



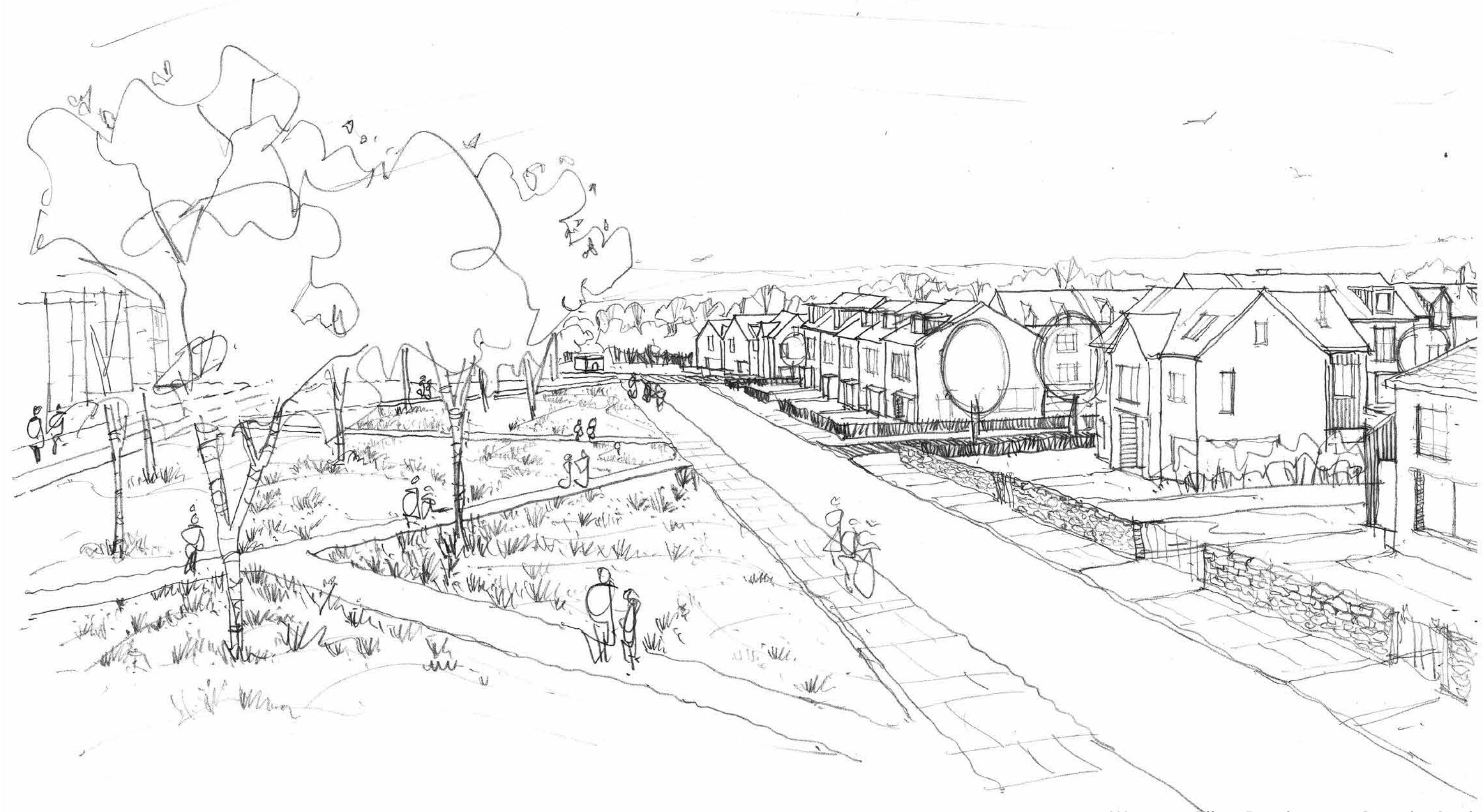
5.4 An attractive entrance/gateway to Ellon

The town is in desperate need of a proper entrance arrival from the east. This sketch aims to demonstrate how this could be simply achieved by a formal row of housing fronting the A920 with attractive boulevard tree planting enhancing the existing stone walling.



5.5 Central linear park

Creation of a formal linear park located centrally on the site would establish a continuous green corridor through the site, linking with the riverside park to the south and the boulevard lining the A920 to the north. It would also provide a natural, attractive and functional break point between the residential areas and retail element. The sketch below demonstrates how the linear park could connect with the riverside park and celebrate existing features such as Waterton castle ruin by using them as focal points.



Potential layout in wider Ellon Context





Fig. 13: Concept site layout in wider context
©2013 DigitalGlobe, Getmapping plc, Map data ©2013 Google.

Scale: 1:25,000@A3

Waterton, Ellon: Development Capacity Study

optimised environments ltd.

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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:	c/o Stewart Milne Homes
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)	CCI Ellon
Site address	Waterton. South of A920, Ellon
OS grid reference (if available)	NJ974305
Site area/size	16.3 ha
Current land use	Agricultural/open fields
Brownfield/greenfield	Greenfield
Please include an Ordnance Survey map (1:1250 or 1:2500 base for larger sites, e.g. over 2ha) showing the location and extent of the site, points of access, means of drainage etc.	

5. Ownership/Market Interest

Ownership (Please list the owners in question 3 above)	Sole owner
Is the site under option to a developer?	Yes
	Under option to Stewart Milne Homes
Is the site being marketed?	No

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
Are there any other legal factors that might prevent or restrict development? (e.g. ransom strips/issues with accessing the site etc.)	No

7. Planning History

Have you had any formal/informal pre-application discussions with the Planning Service and what was the response?	No
Previous planning applications	N/A
Previous 'Call for sites' history. See Main Issues Report 2013 at www.aberdeenshire.gov.uk/ldp	FM030 – mixed use 10,000 sq m retail and employment FM031 – 200 houses and riverside park
Local Development Plan status www.aberdeenshire.gov.uk/ldp	Is the site currently allocated for any specific use in the existing LDP? Yes, identified as CCI for 10,000 square metre retail and leisure uses
	If yes, do you wish to change the site description and or allocation? No, retain retail allocation

8. Proposed Use

Proposed use		As existing allocation -10,000m2 retail and leisure uses
Housing	Approx. no of units	N/A
	Proposed mix of house types	Number of: • Detached: N/A • Semi-detached: • Flats: • Terrace: • Other (e.g. Bungalows): Number of: • 1 bedroom homes: N/A • 2 bedroom homes: • 3 bedroom homes: • 4 or more bedroom homes:
	Tenure (Delete as appropriate)	N/A
	Affordable housing proportion	N/A
Employment	Business and offices	NA
	General industrial	NA
	Storage and distribution	NA
	Do you have a specific occupier for the site?	NA
Other	Proposed use (please specify) and floor space	10,000 m2 retail and leisure uses
	Do you have a specific occupier for the site?	no
Is the area of each proposed use noted in the OS site plan?		No, as per Local Development Plan allocation

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	
	Finance will be available at the time of development	
Are there any other risk or threats (other than finance) to you delivering your proposed development	No	

10. Natural Heritage

<p>Is the site located in or within 500m of a nature conservation site, or affect a protected species?</p> <p>Please tick any that apply and provide details.</p> <p>You can find details of these designations at:</p> <ul style="list-style-type: none"> • https://www.environment.gov.scot/ • EU priority habitats at http://gateway.snh.gov.uk/sitelink/index.jsp • UK or Local priority habitats at http://www.biodiversityscotland.gov.uk/advice-and-resources/habitat-definitions/priority/ • Local Nature Conservation Sites in the LDP's Supplementary Guidance No. 5 at www.aberdeenshire.gov.uk/ldp 	RAMSAR Site	No
	Special Area of Conservation	No
	Special Protection Area	No
	Priority habitat (Annex I)	No
	European Protected Species	No
	Other protected species	No
	Site of Special Scientific Interest	No
	National Nature Reserve	No
	Ancient Woodland	No
	Trees, hedgerows and woodland (including trees with a Tree Preservation Order)	Yes
	Priority habitat (UK or Local Biodiversity Action Plan)	No
	Local Nature Conservation Site	No
	Local Nature Reserve	No
	<p>If yes, please give details of how you plan to mitigate the impact of the proposed development:</p> <p>See paper apart - No impact from proposed development</p>	
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):	
	<p>Development of the site for retail uses would enhance biodiversity through increased landscaping. The mature wooded area will be retained and enhanced, protecting and improving biodiversity on the site. Pockets of open space and planting throughout the site will also enhance the area.</p>	

11. Historic environment

Historic environment enhancement		
Please state if there will be benefits for the historic environment.	Yes	
	If yes, please give details:	
<p>Does the site contain/is within/can affect any of the following historic environment assets? Please tick any that apply and provide details.</p> <p>You can find details of these designations at:</p> <ul style="list-style-type: none"> http://historicscotland.maps.arcgis.com/apps/Viewer/index.html?appid=18d2608ac1284066ba3927312710d16d http://portal.historicenvironment.scot/ https://online.aberdeenshire.gov.uk/smrpub/master/default.aspx?Authority=Aberdeenshire 	Scheduled Monument or their setting	No
	Locally important archaeological site held on the Sites and Monuments Record	No
	Listed Building and/or their setting	No
	Conservation Area (e.g. will it result in the demolition of any buildings)	No
	Inventory Gardens and Designed Landscapes	No
	Inventory Historic Battlefields	No
	The remains of Waterton Castle are located to the south of the site. Although it is not identified in any historic environment searches, it will be protected and incorporated into the riverside parkland proposed to the south of the site. It will not be affected by any development.	

12. Landscape Impact

<p>Is the site within a Special Landscape Area (SLA)?</p> <p>(You can find details in Supplementary Guidance 9 at www.aberdeenshire.gov.uk/ldp)</p>	<p>No</p> <p>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:</p>
<p>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.</p> <ul style="list-style-type: none"> SNH: Landscape Character Assessments https://www.snh.scot/professional-advice/landscape-change/landscape-character-assessment SNH (1996) Cairngorms landscape assessment http://www.snh.org.uk/pdfs/publications/review/075.pdf SNH (1997) National programme of landscape character assessment: Banff and Buchan http://www.snh.org.uk/pdfs/publications/review/037.pdf 	<p>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:</p> <p>The site does not lie within any area of landscape significance, but it does contain features which provide a distinctive character. This includes the Ythan River to the south, woodland, stone wall field boundaries and Broomie's Burn to the west. The proposals incorporate, protect and enhance these features to create an established and attractive landscape setting for the retail development. Landscaping will be employed to reduce unnecessary visual impact of the development on the rest of the settlement and surrounding countryside.</p>

<ul style="list-style-type: none"> SNH (1998) South and Central Aberdeenshire landscape character assessment 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)	Yes If yes, please specify and explain how you intend to mitigate this risk: There is some surface water flood risk to the south east of the site. However, this will not impact on the retail development. SUDs incorporated into the development will control surface water.
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:
Could development of the site help alleviate any existing flooding problems in the area?	Yes The use of SUDs will help reduce surface water flooding.

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?	No	
Will your SUDS scheme include rain gardens? http://www.centalscotlandgreennetwork.org/campaigns/greener-gardens	NA	
b. Education – housing proposals only		
Education capacity/constraints https://www.aberdeenshire.gov.uk/schools/parents-carers/school-info/school-roll-forecasts/	NA	
Has contact been made with the Local Authority's Education Department?	NA	
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?	NA	
Has contact been made with the Local Authority's Transportation Service?	The Council's Transportation Service will have been consulted as part of the LDP process when the site was allocated.	

They can be contacted at transportation.consultation@aberdeenshire.gov.uk	
Public transport	The site is located immediately south of the Park and Ride terminus. There are also bus stops located along the A920 to the north of the site. The site is therefore well located in relation to public transport services.
Active travel (i.e. internal connectivity and links externally)	The layout of the site would maximise the connectivity between the development with pedestrian linkage throughout the site and through to the main road and services to the north, the Park and Ride site to the north-east and the riverside walkway along the Ythan to the south.
d. Gas/Electricity/Heat/Broadband	
Has contact been made with the relevant utilities providers?	Gas: No
	Electricity: No
	Heat: No
	Broadband: No
Have any feasibility studies been undertaken to understand and inform capacity issues?	No
Is there capacity within the existing network(s) and a viable connection to the network(s)?	Utilities are available in the area and are not a 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)	The relevant technologies 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. The development of the site will enhance the green space network with links to the existing Riverside walkway to the south. Open space throughout the site will be linked by appropriate footpaths and roadside footways.
Will the site meet the open space standards, as set out in Appendix 2 in the Aberdeenshire Parks and Open Spaces Strategy? https://www.aberdeenshire.gov.uk/media/6077/approvedpandospacesstrategy.pdf	Yes, the site will provide of open space in line with policy requirements.

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/	No specific shortfalls are identified in Ellon, however, the site will improve the open space provision in the settlement.
f. Resource use	
Will the site re-use existing structure(s) or recycle or recover existing on-site materials/resources?	No
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

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)	No
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	Yes
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	Yes
‘Protected’ open space in the LDP (i.e. P sites) www.aberdeenshire.gov.uk/ldp and choose from Appendix 8a to 8f	No
Rights of way/core paths/recreation uses	No
Topography (e.g. steep slopes)	No
Other	Not applicable
There are some overhead cables within the site, along one of the field boundaries. These can be buried or re-routed as part of any development. This is not considered a constraint to the development of the site.	

The site is identified as prime agricultural land, however, this classification only suggests that it is capable of being farmed for a range of uses. The site is already identified for development in the LDP and therefore the Council has accepted the classification is not an impediment to development.

16. Proximity to facilities

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

17. Community engagement

Has the local community been given the opportunity to influence/partake in the design and specification of the development proposal?	The local community would have been aware of the proposals through the LDP process. No consultation has taken place on any detailed proposals.
	If yes, please specify the way it was carried out and how it influenced your proposals:
	If not yet, please detail how you will do so in the future: Any future planning application will include appropriate consultation with the local community.

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

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.)

Ellon has the capacity to accommodate a retail park reinforced by the conclusion of the Town Centre Health Check (2011) that the existing town centre is well provided by service companies rather than retailers. This deficit will leak outwith the settlement unless it is addressed. The allocation of the CCI site sought to address the requirement for this retail park. It is well placed to accommodate a 10,000sqm retail development due to its location immediately adjacent to the Park and Ride terminus, Tesco superstore, Balmacassie Business Park, the Meadows sports complex and residential development to the west. This location therefore establishes a retail and connectivity hub. A separate bid is submitted for a mixed use proposed, however, should that not be favoured, Stewart Milne Homes request that the allocated retail use is protected going forward.

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.

Appendix 2 – MIR Representation – Mixed Use

For internal use only

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Aberdeenshire Local Development Plan 2021: Main Issues Report 2019

Main Issues Report Response Form

Important Information: Please Read

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

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

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

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

All comments received will be carefully assessed and will be used to inform the preparation of the Proposed Aberdeenshire Local Development Plan. There will be a further opportunity to comment on the Proposed Plan when it is published in December 2019.

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

Doing things digitally is our preference. Tick the box if you are not happy to receive correspondence via email:

☐

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

☒

Fair processing notice

Please tick to confirm your agreement to the following statements:

☒

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

I also agree that following the end of the consultation, i.e. after 8 April 2019, my name and respondent identification number (provided to you by Aberdeenshire Council on receipt of your submission) can be published alongside a copy of my completed response on the Main Issues Report website (contact details and information that is deemed commercially sensitive will not be made available to the public).

The data controller for this information is Aberdeenshire Council. The data on the form will be used to inform a public debate of the issues and choices presented in the Main Issues Report of the Aberdeenshire Local Development Plan 2021. It will inform the content of the Proposed Aberdeenshire Local Development Plan.

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

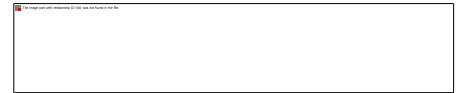
Your Data, Your Rights

You have got legal rights about the way Aberdeenshire Council handles and uses your data, which include the right to ask for a copy of it, and to ask us to stop doing something with your data.

If you are unhappy with the way that Aberdeenshire Council or the Joint Data Controllers have processed your personal data then you do have the right to complain to the Information Commissioner's Officer, but you should raise the issue with the Data Protection Officers first. The Data Protection Officers can be contacted by writing to:

- [REDACTED], Data Protection Officer, Aberdeenshire Council, Business Services, Town House, 34 Low Street, Banff, AB45 1AY

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



Which document(s) are you committing on?	Main Issues Report	<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 on behalf of Stewart Milne Homes in relation to **Site Ref: FR031 – Site South of A920, Waterton, Ellon (mixed use including 150 homes)**

On behalf of Stewart Milne Homes, objection is made to the failure of the Main Issues Report (MIR) to identify bid site FR031 as an Officer's preference for a mixed use development, including 150 homes, retail and a riverside park. Objection is therefore also made to the failure of the Draft Proposed Local Development Plan (DPLDP) to identify this site for a mixed use development on the existing CC1 site, which lies within the settlement boundary of Ellon.

This representation requires to be read in conjunction with Stewart Milne Homes' general representation submitted to the MIR and with their representation to the Strategic Development Plan, both at the MIR stage (Appendix 1) and Proposed Plan (Appendix 2) in particular, the housing supply targets and the housing land requirement. It also requires to be considered in the context of the Development Bid submitted at the pre-MIR stage. It is respectfully requested that this site should be allocated for a mixed use development, including 150 homes, in the Proposed Aberdeenshire Local Development Plan. The bid and representation demonstrates the capability of the site to accommodate this development to address the housing requirements set by the Strategic Development Plan.

At the outset, it is important to highlight concern at the failure of the MIR to provide any clarity on the scale of housing land release to be accommodated in Ellon and other settlements in order to satisfy the housing allowances set by the proposed Strategic Development Plan. No new housing allocations are made within Ellon and all sites contained within the DPLDP are carried forward from the 2017 Local Development Plan. Only one new future opportunity (FOP1) for housing is identified, to the north of Ellon, outwith the settlement boundary. This extends to 16.59 hectares. The Main Issues Report states that this is suitable for 150 homes. We submit that bid site FR031 is more suitable to accommodate these homes.

The Main Issues Report makes a number of statements to which we wish to respond.

“Part of the proposed site is allocated as CC1 in the LDP 2017 and the bid includes an additional 150 houses”

Ellon has the capacity to accommodate a retail park reinforced by the conclusion of the Town Centre Health Check (2011) that the existing town centre is well provided by service companies rather than retailers. This deficit will leak outwith the settlement unless it is addressed.

All of the site is allocated as CC1 and therefore the principle of development on this site is accepted. The proposal seeks to address the requirement for a retail park, but balance this with the introduction housing to ensure a sustainable mixed use development.

“A Transport Impact Assessment would be required and contributions to improvement of the north A90(T) may be sought”

The site is already identified for development, within the settlement boundary of Ellon. Officers accept, through the assessment of the FR032 bid for retail and leisure uses, that the site is well related to public transport links. This is considered to be a sustainable location for the introduction of housing on the site and has advantages over the preferred OP1 site at Cromleybank and the Future Opportunity site as it is located immediately adjacent to the Ellon Park and Ride to the north east of the site.

A Transport Impact Assessment would be prepared at the planning application stage to address this mix of uses and any contributions to mitigate this development would be provided in line with Circular 3/2012: Planning Obligations and Good Neighbour Agreements and the Council's own developer obligations guidance.

“Waste water and water supply is a constraint. Scottish Water has not been contacted by the applicant”

The suitability of the site for development is already accepted in its identification for retail use in the 2017 Local Development Plan which has been carried forward into the DPLDP. Investigations in relation to waste water and water supply would be considered in full at the planning application stage, however, Scottish Water are committed to supporting planning and a growth project can be implemented, should the site be identified for housing in addition to the retail uses already accepted. This is not considered to be an impediment to development.

“Surface water flooding is another constraint, which can be mitigated through SUDs or other means”

Planning Officers acknowledge that surface water flooding can be mitigated. Therefore, this is not a constraint to development of housing on the site as accepted by Aberdeenshire Council in the allocation of OP1 at Cromleybank which has similar issues. In any case, Fairhurst have investigated the surface water issue and conclude that it does not result in a constraint to development and appropriate measures are shown in the Development Strategy document.

“The development would have a negative effect on the landscape character and the proposed site is considered an overdevelopment”

The development bid submitted discussed the landscape character of any development on the site and while the site does not lie within any Special Landscape Area, it does have features that provide distinctive character. This includes the Ythan River to the south along with Waterton Castle remains and boathouse, woodland, stone wall field boundaries and Broomie's Burn to the west. However, these would be retained and protected to create an attractive landscape setting for the housing proposed. The development potential of the site has already been accepted through its current and proposed retail allocation and a change to the mix of uses will not impact on the landscape character of the site.

OPEN prepared a Development Strategy which was submitted with the development bid which considered a landscape strategy for the site. This included a range of areas of open space, including woodland, civic space, formal green space, parkland and allotments which would establish a strong sense of identity and protect the landscape setting of the area.

Further to this, in response to Officers comments, OPEN have prepared a landscape assessment of the site which is submitted with this representation (Appendix 3). This concludes that, retail development (which has already been considered acceptable on the site) would result in a higher magnitude of change for key landscape and visual receptors. This includes the larger scale height and massing and individual footprint of buildings created by retail development resulting in a more notable effect on the landscape and townscape than the varied, lower height and finer grain of a mixed use development proposed through bid ref: FR031. FR031 would therefore create a more appropriately scaled development that responds to existing built character, resulting in a lower magnitude of landscape/townscape impact than the established proposed allocation for retail development.

It is not accepted that the site would constitute overdevelopment. The site extends to approximately 16.3 hectares, with approximately 5ha identified for housing. At a rate of 30 dwellings per hectare, which was considered an appropriate density within the 2017 Local Development Plan, a total of 150 houses would be appropriate. This is lower than the Imagine Ellon study which proposed an appropriate density of 35 dwellings per hectare. Given the location of the site, within the settlement boundary, close to facilities and public transport routes, this is considered appropriate and a range of densities would be provided across the site.

Although the Main Issues Report suggests a revised density of 25 dwellings per hectare, this has not yet been agreed. The current 30 dwellings per hectare contained in the approved Strategic Development Plan is carried forward into the Proposed Strategic Development Plan, which suggests that this density guidance is not changing. The 150 houses proposed across the site is therefore considered suitable for this accessible site that lies within a Strategic Growth Area.

“The site is not considered suitable for residential development due to the business land surrounding the site. Retail remains the most appropriate use”

This is not accepted. It is considered that a mixed use development, with 150 houses in addition to the retail element, is a more logical and appropriate solution for the site rather than purely retail. The southern and western sections of the site offer an attractive environment for housing, with access and attractive views over a proposed riverside park, while the eastern side is appropriate for retail/commercial uses given its proximity and visibility from the A90. This mix of uses would ensure a sustainable development is delivered, providing homes within close proximity to services and employment areas, with less reliance on the private car, which is encouraged in Scottish Planning Policy (SPP).

The business land surrounding the site lies to the north only. Any housing would be located to the west of the bid site, adjacent to existing housing and separated from the business land by an appropriate buffer. As a result, there is no negative impact to the residential development proposed. It should be noted that planning permission in principle (Ref: APP/2017/1358) exists for a residential development to the north of Waterton House (provisionally suggesting the site as suitable for 10 houses). That site lies opposite the same business land and Aberdeenshire Council raised no concerns about neighbouring uses during that application process. As a result, the proximity to business land is not considered to be a constraint to the identification of this site for a mix of uses.

The Main Issues Report identifies site FR092 to the north of Ellon as a reserved site for 150 houses. This is carried forward into the DPLDP as FOP1, suitable for future housing. It is argued that this site is not suitable for the housing proposed and the FR031 site should be identified in its place. Officers accept that FR092 lies beyond the A948 which acts as a physical boundary for the settlement and that site FR092/FOP1 could create a gated community which would be isolated from the rest of Ellon and be an unnatural extension to the settlement.

The identification of the FR031 site is in a much more appropriate location for housing and creates a logical location for development which has already been accepted by Officers. It lies within the settlement boundary, bound on two sides by development and on the third by the A90. Development is therefore well related to the settlement, well contained by existing development and landscape features and would not extend the settlement boundary any further. The Ythan River to the south creates an opportunity for a high quality residential development with established landscape features which would not be possible on the FR092 site at Cassiegills.

Officers recommend that the FR092 site should be reserved for consideration at a later date in the event that other, better placed allocations cannot be effectively delivered. Site FR031 has the capacity to accommodate the houses proposed on the FR092 site and should therefore be identified prior to site FR092 as it is a more logical and sustainable location for housing land, next to the Park and Ride and providing a range of uses on site. It is under the control of a housing developer who is capable of delivering the site to meet demand.

Conclusion

Ellon has the capacity to accommodate a retail park and the proposals under bid ref: FR031 seek to address this requirement. However, it is argued that the introduction of housing on this site would create a more logical, appropriate and sustainable development, rather than purely retail. The southern and western sections of the site offer an attractive environment for housing, with access and attractive views over a riverside park, while the eastern side is appropriate for the retail/commercial uses given its proximity and visibility from the A90.

This is a logical location for housing on a site that is already considered acceptable for development. The retail uses previously allocated would be retained along with an element of housing and would ensure a sustainable development is created, reducing the reliance on the private car by providing housing close to other services and employment areas, where there are good connections to public transport. A mixed used development would also have less of a landscape and visual impact than the proposed sole retail use of the site.



This is a more appropriate location for a mixed use development, within the settlement boundary, than the Officers preferred FR092/FOP1 site which they accept is isolated and an unnatural extension to Ellon. It is also considered to be deliverable in the short term, unlike the preferred OP1 site at Cromleybank.

Therefore, it is respectfully requested that site CC1 in the DPLDP is re-allocated in the Proposed Local Development Plan to include the mix of uses proposed in bid FR031, thereby allocating 150 houses in addition to the to the retail uses already considered acceptable on the site. Failing that, it should be identified as Strategic Reserve Land for future development for which the proposed Strategic Development Plan requires provision.

Strategic Development Plan Review

Main Issues Report Consultation **12th March - 21st May 2018**

The Aberdeen City and Shire Strategic Development Planning Authority are currently reviewing the Strategic Development Plan for the area. Our Development Plan Scheme outlines a timetable for the review of the Plan, and also identifies where there are opportunities to participate. It is available to view at:

<http://www.aberdeencityandshire-sdpa.gov.uk/DevelopmentPlan/DevelopmentPlanSchemes.aspx>

The **Main Issues Report** is the first formal stage in the review process – it describes and invites discussion on options for future policies, as well as employment and housing land targets for the next Plan. No settled view on the content of the next Strategic Development Plan has yet been reached, making the Main Issues Report the key stage for public consultation. Giving us your views will help to shape the future strategy for development and the policies by which future planning applications are determined.

You can view a copy of the Main Issues Report on our website at:

<http://www.aberdeencityandshire-sdpa.gov.uk/CurrentWork/CurrentConsultations.aspx>

Copies are also available to view at all Council Offices and Libraries within the Strategic Development Plan Area.

A series of accompanying documents, including an Interim Environmental Report, Monitoring Statement, Housing Needs and Demand Assessment and Interim Cumulative Transport Appraisal can also be viewed on our website (by following the above link).

How to Respond

The Main Issues Report contains a series of issues and questions on which we would like to hear your views. Please use this form to respond to these, or any other issues raised by the Main Issues Report or any other accompanying documents.

Consultation Responses must be received by 12pm on Monday 21st May 2018

You can make your views heard in a number of ways:

- **By Post - please return a completed version of this form to:**
Aberdeen City and Shire Strategic Development Planning Authority, Woodhill House, Westburn Road, Aberdeen, AB16 5GB
- **By Email - please return a completed version of this form to:**
team@aberdeencityandshire-sdpa.gov.uk
If you choose to fill out our online Word form, please be aware that you must download the form and save any changes before submission.

Letters and emails which do not make use of this form will also be accepted, however please make sure include your name, address, telephone number and email address (if applicable), as well as the details of anyone you are representing, if you would like us to be able to contact you with any queries on your submission.

Using your Personal Information

Information you supply to the Strategic Development Planning Authority (SDPA) by responding to this consultation will be used to prepare the next Strategic Development Plan for the area. The SDPA will not share the personal information provided in response to this consultation with other parties or organisations. The SDPA will not disclose any contact information about you to any organisation or person unless it is authorised or required to do so by law.

The SDPA Officers may use your contact details to contact you about the comments you have made. Your name and organisation may be published alongside your comments but contact details will not be made public. If you chose not to provide a name or contact details, your comments will still be valid but we will not be able to contact you in the future.

For further information on how your information is used, how the SDPA maintain the security of your information, and your rights to access information the SDPA holds about you, please contact: [REDACTED], Acting Team Leader, Strategic Development Planning Authority, Woodhill House, Westburn Road, Aberdeen, AB16 5GB.

Contact Details

Name (Mr/Mrs/Miss/Ms)	
Organisation (if relevant)	Ryden LLP
Address	
Postcode	
Telephone	
Email	

Please tick this box if you wish further correspondence to be directed to this address:

☒

If you are completing this form on behalf of an organisation, group or landowner, please provide their details below.

Name (Mr/Mrs/Miss/Ms)	
Organisation (if relevant)	Stewart Milne Homes Ltd
Address	
Postcode	
Telephone	c/o Agent
Email	c/o Agent

If you wish to be added to the SDPA distribution list to be kept informed of our progress in producing the next SDP, please tick this box and provide the email you to be added to our database (if different from above):

☒

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Email

Your Views

Please use a separate box for each issue/question you wish to respond to. If you wish to continue on a separate sheet, please attach to the paper copy or email.

Main Issue / Question Number:	1. Do you agree with the updated Vision as set out in the Preferred Option?
<p>The vision contained within the extant Strategic Development Plan is on the whole, worthy of retention, albeit with a number of minor tweaks as proposed within the MIR which promote industry diversification and resilience, in recognition of the challenges the North East has experienced through the recent Oil and Gas restructuring. My client is comfortable that the vision ties in with the Regional Economic Strategy and favours the preferred option, rather than proceeding with no change at all. In light of our ever changing environment, opting for the latter could be present a degree of short-sightedness when planning for a period spanning the next 20 – 25 years.</p> <p>One minor suggestion would be to slightly amend the second bullet point within the vision to read “<i>the unique qualities of our built and natural environment</i>”, in recognition of the significant contribution that the housebuilding industry makes in shaping the places we live, work and do business, as well as the high quality natural environment we benefit from across the City and Shire Region.</p>	

Main Issue / Question Number:	2. Do you agree with the Preferred Option that the existing spatial strategy, in general terms, remains fit for purpose and should be carried forward?
<p>The Spatial Strategy generally remains appropriate, and my client agrees with the overarching approach, to focus investment in areas of growth to ensure the maximum return on that investment in terms of direct and indirect jobs and economic prosperity. The MIR highlights widespread support for the spatial strategy for almost a decade, however, there remains a strong concern within the development industry that a continued focus on significant residential development within the Rural Housing Market, especially within the Strategic Growth Areas (SGAs) will continue to see more limited demand, which presents issues for maintaining an effective land supply.</p> <p>This is to the disadvantage of thriving and growing communities such as Westhill and Banchory which currently lie outwith an identified SGA. There must be a degree of flexibility to allow development in areas where there is a proven demand. My client notes the proposed alternative option to identify a modest extra site in the next LDP in recognition of delivery problems being experienced in Huntly, but would request that such flexibility is transferred to all areas, both those which are mentioned in the MIR and those which are not (Portlethen to Laurencekirk southern SGA) to assist in delivering growth.</p>	

In particular, my client considers a continued avoidance of recognising Westhill as a SGA as a significant barrier to sustainable growth, given its proximity to the City and the role it has played in recent years in the provision of housing and employment land. Westhill has been an area of sustained growth and economic performance, surrounded by Strategic Growth Areas yet somehow falling within an area of local growth. A review of Housing Land Audits from previous years indicates some 400 completions in Westhill since 2012, demonstrating strong demand for housing in the settlement. The draft 2018 Audit identifies only 13 new homes will be completed between now and 2020, with nothing programmed thereafter. This further demonstrates that the town continues to be ignored and this situation needs to be appropriately addressed.

Whilst it is recognised that the A944 corridor does not enjoy a rail link with Aberdeen this has not hindered its development, nor the contribution it makes to the North East economy. It benefits from excellent road links with the City, public transport and park & ride facilities, which will be further strengthened by the completion of the AWPR, serving as a crucial link to all of the Strategic Growth Areas. Westhill will benefit from a direct dual carriageway link with the AWPR and the delivery of a major junction in proximity to the existing settlement boundary. Accordingly, both the AWPR and Westhill should be identified as falling within a SGA and benefit from specific housing and employment allocations. Aberdeen City Council's recent decision to relocate Aberdeen Football Club's new stadium complex and training facilities to the Kingsford site on the outskirts of Westhill, further reinforces the town's capacity for strategic growth. Westhill must be the focus for more than just local growth over the course of the SDP plan period.

The introductory paragraph of the MIR highlights the next SDP will set a framework for development in the City and Shire for the next 20 – 25 years. To suggest that existing infrastructure challenges would make it "too risky" to identify the west of Aberdeen for strategic growth is not acceptable. The SDP needs to be much more proactive. My client believes that the SDP should set a clear direction for growth to the west of Aberdeen through the identification of land, both for early delivery and Strategic Reserve Land, which will benefit from the new AWPR and also form the basis of strategies geared toward resolving any existing infrastructure issues.

The employment areas located in Westhill harness a unique and highly skilled workforce, recognised as the largest concentrations of subsea engineering expertise in the world. This cannot continue to be ignored, especially as we are emerging from a restructuring within the Oil and Gas sector over the past number of years. The SDP should seek to capture this expertise and send out a message of confidence through formal recognition of Westhill as an area for planned future growth.

Main Issue / Question Number:	3. Do you agree with the Preferred Option that the new plan should protect the junctions of the Aberdeen Western Peripheral Route from inappropriate speculative development?
<p>My client clearly recognises the long overdue benefits associated with the completion and operation of the AWPR when it opens later this year. Given its purpose is to facilitate the free flow of traffic and ease historic congestion within the confines of the city, it is accepted that this should not be compromised through inappropriate development. However, my client also recognises the potential this new major transport corridor will have in unlocking a number of sites for well-planned development that would benefit from close proximity to key junctions and the sustainable transportation benefits it will offer.</p> <p>The SDP should aim to strike a balance between the proposed and preferred MIR options, in recognition that the route offers some potential for growth. The suggested wording of the preferred option suggests that “any development proposals” near the AWPR junctions should come through the LDP process. This however would be overly restrictive to the detriment of well-planned development proposals. It would therefore be more appropriate to suggest that any “Major” development proposals should be restricted to the LDP process, allowing for smaller scale speculative applications, which could be considered on their own merits.</p>	

Main Issue / Question Number:	4. Do you agree that the Preferred Option for the new plan should focus on the towns of Banff, Macduff, Fraserburgh and Peterhead for regeneration
<p>My client disagrees that the new SDP should solely focus its regeneration priorities on these four towns alone. Regeneration should be viewed as a priority throughout the SDP region, setting out strategies for injecting life and economic activity into many rural communities which have experienced neglect and decline over the years.</p> <p>Aberdeen City Centre must also remain a focus for regeneration. Whilst the MIR briefly highlights the ongoing work as part of the City Centre Masterplan, my client feels that the importance of the City Centre Masterplan needs to be strongly emphasised within the SDP and it too should be included as a “hotspot” for regeneration activity. My client would note that whilst every effort should be made to regenerate brownfield sites, this should not be to the detriment of greenfield housing release.</p>	

Main Issue / Question Number:	5. Do you agree that we should present an optimistic view of future economic growth in the new plan?
<p>Stewart Milne Homes strongly believes that an optimistic view of future economic growth and resilience should underpin the new plans aims and aspirations. Additionally, the Plan should provide sufficient flexibility to facilitate significantly more levels of growth than has recently experienced in the previous few years as a result of a fall in global oil price. The plan period is for the next 20 -25 years, and the city region must remain competitive on a global stage, attracting inward investment and promoting innovation and growth across all sectors to meet economic diversification expectations by 2040, in the face of a global shift away from a reliance on fossil fuels. The SDP cannot, therefore, be viewed as planning for decline.</p> <p>My client is part of a working group represented by a number of Housebuilders across the north East and HFS. They commissioned Aberdeen and Grampian Chamber of Commerce to prepare economic research. The Regional Context paper (Appendix 1) highlights significant improvements and signs of growth, as the region emerges from the challenges experienced in previous years as a result of the restricting within the oil and gas sector. It notes that economic activity levels are high, with the 2018 UK powerhouse study indicating that Aberdeen ranked second in terms of growth in Q3 of 2017, with a 2% increase in GVA, which is predicted to grow again by a further 1.24% in 2018. This evidence further demonstrates the SDP should provide an optimistic view of future economic growth.</p>	

Main Issue / Question Number:	6. Do you agree with the Preferred Option that the new plan should delay releasing safeguarded employment land until after 2030 and look at improving existing employment areas for future use?
<p>In recognition of the existing levels of employment land and the buoyant supply of both office and industrial floor space across the City and Shire, my client is in broad agreement that the employment land currently identified as Strategic Reserve (2027 – 2035) continues to be safeguarded for release post 2030. My client strongly agrees with the MIR's suggestion of a detailed review of existing employment sites, particularly more historic stock and vacant land to ensure they are fit for purpose.</p> <p>The only exception to the above would be Westhill where more limited land is available and should there should therefore be an opportunity for further release as part of residential-led, sustainable mixed use development.</p> <p>In that respect, the new SDP should recognise that a degree of pragmatism and flexibility is required when considering alternative new uses on those sites. Supported should be given to proposals which may not fit neatly into the more traditional employment Use Classes 4, 5 and 6, as per existing LDP requirements relating to allocated employment land across the City and Shire. This would ease existing restrictions on vacant/disused sites which have little prospect of securing new occupiers for traditional employment uses, and look to diversify these areas for appropriate alternative uses, which could provide equal employment opportunities in leisure, retail and tourism sectors. These sites may also prove suitable for residential developments or local authority-led affordable housing schemes.</p>	

Main Issue / Question Number:	8. Is there anything more that the planning system should do to support sustainable economic growth?
<p>The SDP should explicitly acknowledge the positive relationship between home building and sustainable economic growth. The home building industry generates significant social and economic benefits through the delivery of new homes, both direct and indirect benefits.</p> <p>Homes for Scotland published research in November 2015 which demonstrated the social benefits of Home Building in Scotland. To support sustainable economic growth in the north east, the SDP must plan for growth, and plan to meet the housing need and demand identified in the HNDA, providing for a range of sizes and locations of new housing sites across the city region to allow the delivery of new homes which will support growth.</p>	

Main Issue / Question Number:	10. Do you agree that the housing supply target should be based on a composite scenario rather than directly on any of the three scenarios identified in the Housing Need and Demand Assessment?
<p>My client has serious reservations in relation to the proposed Housing Supply Target (HST) identified within the MIR. There appears to be very little evidence or justification provided in respect of how the figures have been arrived at, which conflicts with the requirements of SPP Paragraph 115, which requires “compelling evidence” to back up the HST. Additionally, the proposed Allowances do not appear to correlate with the proposed Housing Land Requirement. There needs to be further clarity provided on this.</p> <p>The proposed “composite” growth scenario bears no relation to any the actual scenarios contained within the HNDA. It is based on past/recent trends to try and justify an unambitious growth plan for the period 2016 – 2030. This is not recognised best practice. Why set the target for the next five years with one that reflects completion levels achieved in 2016 (1,950 homes a year)? The North East was in the midst of a period of uncertainty created by a global drop in the price of oil, when house completions would naturally have reflected lower numbers than previous years. We are now emerging from that period of uncertainty and there are positive signs of stability and optimism returning to the market. Continued growth in the economy is predicted as sentiment in the Aberdeen oil and gas industry improves and the price of oil has currently stabilised at around \$78 a barrel. This confidence will have a positive knock-on effect on the housebuilding industry, therefore my client believes the Housing Supply Targets should be set to reflect a more optimistic growth plan.</p> <p>A primary concern is that the current SDP sets clear aspirations to be building 3000 homes per annum by the year 2020, yet the MIR suggests a target of only 2,100 - 2,200 homes per year in the period 2020 – 2030. This is significantly short of existing aspirations, therefore the MIR housing section appears to be planning for decline. Given the main thrust of the next SDP plans for growth and prosperity for the region, my client believes that setting the HST at the suggested MIR levels sends out a negative message. Such low targets impact on the Housing</p>	

Land Requirement (HLR), thus creating unnecessarily conservative Housing Land Allowances beyond what is considered to be the Existing Effective Supply as identified within table 6 of the MIR, particularly in the 2016 – 2030 period. My client feels a total allowance of 5,500 homes within this period demonstrates a lack of ambition for future growth and continues to rely heavily on an established land supply, laden with strategic sites which have failed to deliver at their projected rates over the previous 5 years. Indeed, the MIR highlights a shortfall of 2,769 from the SDP requirement between 2011 and 2016. The requirement for these homes has not gone away, and requires to be carried forward into the HLR within the next Plan.

My client believes that the SDP should adopt the suggested alternative MIR option, and utilise the high growth scenario contained within the Housing Needs and Demand Assessment (HNDA). This proposes house building levels closer to the 3,000 homes per annum target as contained within the current SDP. In turn, this would boost the Housing Land Requirement for the region over next SDP period, and create more ambitious Housing Allowances as a result, bolstering market confidence and ensuring sustained growth. This approach would coincide with positive signs of continued economic growth for the region, as set out within AGCC's Regional Context Paper (Appendix 1). It highlights some £8.9 billion worth of investment in committed infrastructure projects across the region, therefore the SDP must take a more proactive approach to planning for a growing population.

Additionally, the next SDP's proposed date of approval is 2020, the first period of the Plan should therefore be 2016-2032 in accordance with SPP paragraph 118 which states the amount and broad locations of land should be identified in local development plans to meet the housing requirement up to year 12 from the expected year of approval. The plan periods within the MIR do not reflect this. My client therefore suggests that the plan periods are formalised into two periods 2016-2032 and 2033-2040. This is a small change which would provide closer alignment with SPP.

My client proposes an amendment to MIR Table 1: Proposed Housing Supply Targets which is based on a HST that corresponds with HNDA scenario (Scenario 3), and adjusts the plan periods to include the first 12 year period (2016 -2032), and the remaining 8 years as the second period (2033-2040).

**Amended Table 1:
Proposed Housing Supply Targets**

	2016-2032	2033-2040
Aberdeen Housing Market Area	37,060	17,400
Rural Housing Market Area	10,268	4,032
Total	47,328	21,432
Split as follows:		
Aberdeen City Council	23,664	10,716
Aberdeenshire Council	23,664	10,716

Main Issue / Question Number:	11. Do you agree that we should assume continued funding for affordable housing at 2020/2021 levels from the Scottish Government for the whole of the next plan period?
<p>Given the Scottish Government's commitment to the delivery of affordable housing, it appears sensible that the MIR preferred option assumes funding levels remain similar to the agreed 2020/2021 levels over the course of the next plan period. Stewart Milne Homes would however stress that appropriate land needs to be allocated to ensure the continued delivery of affordable housing as new mainstream housing developments come forward. My client welcomes the MIR's statement that there will no plans to increase the 25% obligation for affordable housing. Instead the focus should be on securing flexible and alternative delivery mechanisms such as Council-led partnership initiatives to deliver fully affordable development sites. Whilst 25% delivery is the current requirement for all sites in the City and Shire, recognition of viability implications on some sites need to be considered to ensure their ultimate delivery is not compromised.</p> <p>Similarly, the Aberdeen City Centre Masterplan has an objective to create a "living city for everyone" and aims to add some 3,000 new residents to the city over the next 25 years. The MIR touches on this briefly under its section on regeneration, however in order to unlock city centre sites and bring forward new housing proposals to meet these ambitious demands, a degree of flexibility must be provided. City Centre brownfield sites will often experience more constraints and extraordinary development costs, therefore a relaxation in current affordable housing requirements would serve as a strong incentive for delivery of new housing in the City Centre.</p>	

Main Issue / Question Number:	12. Do you agree that significant generosity should be included in the early years of the plan but, for the later periods, no generosity should be added? This would be subject to review in future plans.
<p>In general, my client agrees that there should be significant generosity included within the Housing Land Requirement (HLR) in the early years of the plan and would encourage the proposed application of 20% generosity. However this generosity should be extended across the entire plan period, not just the early years. As highlighted in response to question 10 above, the Housing Land Requirement is deemed to be too conservative, based on the HST set out within the MIR. Adopting out a more ambitious growth plan, by increasing the supply target to reflect HNDA scenario 3, would provide a greater HLR. This could also present an opportunity for the generosity to be reduced to a slightly lower rate across the entire plan period, rather than the MIR's suggestion of restricting it to the initial 2016 -2030 period only, which conflicts with SPP paragraph 116 requirements.</p> <p>It is important to appreciate the reasoning behind the generosity margin. Over the lifecycle of a plan, some land may not come forward for development at the rate anticipated. This has large allocations in the City and Shire such as Chapleton of Elrick and Cromleybank at Ellon, which are not delivering at the rates anticipated in the LDPs. Therefore, a flexibility margin in</p>	

the form of 'generosity' is important to ensure that a generous supply of land is allocated in LDPs, informed by SDP allowances. This generous supply of land will ensure that enough homes can be delivered across the life of the Plan to meet the need and demand for new homes identified in the HNDA.

Accordingly, my client proposes an amendment to MIR Table 4: Proposed Housing Land Requirements allowing for 20% generosity extending over the plan period to 2040,

HFS Amended Table 4: Proposed Housing Land Requirements			
	2016-2032	2033-2040	TOTAL
Aberdeen Housing Market Area	44,472	20,880	65,352
Rural Housing Market Area	12,322	4,838	17,160
Total	56,794	25,718	82,512
Split as follows:			
Aberdeen City Council	28,397	12,859	41,256
Aberdeenshire Council	28,397	12,859	41,256

Main Issue / Question Number:

13. Do you agree that our Preferred Option should allow Local Development Plans to make some further housing allowances?

Stewart Milne Homes agree strongly that additional housing allocations are required beyond existing LDP allocations to ensure a healthy land supply is maintained at all times. However, my client has concerns over the proposed allowances as they do not appear to correlate with the Housing Land Requirement when deducted from the Existing Effective Housing Land Supply. Further clarity on the figures needs provided. Notwithstanding, an allowance of only 5,500 homes up to 2030 is much too low and as highlighted in response to Question 10 above on the Housing Supply Target, the MIR figures do not appear to be planning for growth.

Additionally, at the time of publication of the MIR, the 2017 Audit had been agreed and was publicly available and should therefore have formed the evidence base for the MIR. The 2018 audit is likely to be agreed prior to the publishing of the Proposed MIR and my client would request that this forms the basis of establishing the Effective Housing Land Supply and proposed allowances.

In recognition of the previous shortfall of 2,769 homes in the period 2011 to 2016 from the SDP requirement, as well as existing SDP's aspirations to move toward building 3,000 homes per annum by 2020, a more ambitious Housing Supply Target must be set, more in line with Scenario 3 within the HNDA. Based on the revised HST and HLR proposed in modified Tables 3 & 4 above, my client proposes a further modification to MIR Table 6: Proposed Allowances as a result of adopting a more ambitious HST based on HNDA scenario 3. As illustrated, this provides a much more ambitious plan for growth than the 5,500 quoted within the MIR in the

initial plan period. In turn, this would allow City and shire LDPs to allocate further sites, with a focus on areas which have proven market demand and are deliverable to ensure a healthy land supply going forward. In that regard, my client must also express disappointment that the allowances only look at the overall numbers and high level splits rather than breaking it down further into SGAs. To ensure no marketability or potential infrastructure constraints exist, this should really have been presented within the MIR for discussion, rather than Proposed SDP stage which is really too late.

HFS Amended Table 6:
Proposed Allowances
(land to be identified beyond the 2016 effective supply)

	2016-2032	2033-2040	TOTAL
Aberdeen Housing Market Area	16,576	17,423	33,999
Rural Housing Market Area	3,907	3,562	7,469
Total	20,483	20,985	41,468

Main Issue / Question Number:

14. Do you agree that any new greenfield allocations should preferably be under 100 houses in size?

My client recognises that both Councils have a desire to see existing LDP allocations delivered, however these should not serve as an impediment to new sites coming forward. Whilst there should be a strong focus on delivery, restricting all new greenfield allocations to below 100 homes, is not perceived to be the best way to ensure delivery of sites. Accordingly, a range of sites of various sizes, providing variety and choice in areas where there is proven market demand should be the preferred option. There would be a concern that allocating too many smaller scale sites could present the same infrastructure requirements as a smaller number of strategic allocations, which can achieve the required economies of scale to deliver the infrastructure requirements. An over-reliance on small sites could lead to future viability issues.

Main Issue / Question Number:	16. Do you agree that the next Strategic Development Plan should continue to identify regionally significant long-term transport projects and cumulative transport interventions?
<p>My client is in broad agreement that the SDP is an appropriate document to identify strategic-term transport projects and cumulative interventions, however the MIR falls short in providing clarity on timescales and responsibilities for the delivery of these key pieces of infrastructure.</p> <p>Too often in the past, there has been an overreliance on the development industry to fund these projects. The previous STF was effectively a development tax and served to add a further financial burden on the housebuilding industry, often leading to exorbitant costs being placed on sites over and above standard developer obligations, thus resulting in viability issues. The STF has since been quashed by the Supreme Court, who deemed it to be unlawful. We therefore remain in a state of limbo, with identified projects yet to be delivered, stymieing further development in those areas and a lack of detail within the MIR on how investment in those projects will be made.</p>	

Proposed Aberdeen City & Shire Strategic Development Plan Representation Form

Please use this form to make comments on the Proposed Aberdeen City & Shire Strategic Development Plan, ensuring that your comments relate to a specific issue in either the Proposed Plan, Proposed Action Programme or Strategic Environmental Assessment Environmental Report. Please include the relevant paragraph(s) and use a separate form for each issue you wish to raise.

The period for representations will run between Monday 8 October - Monday 17 December 2018

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

What is your preferred method of communication: Email

What document are you commenting on?	Proposed Strategic Development Plan <input checked="" type="checkbox"/>		
	Proposed Action Programme <input type="checkbox"/>		
	Strategic Environmental Assessment Environmental Report <input type="checkbox"/>		
Issue	4. Our Communities	Paragraph(s)	Section 4

What would you like to say about the issue?

(if you would like to write more than the box allows then please attach this form to any additional papers)

Stewart Milne Homes (SMH) are generally supportive of the objective to ensure new development meets the needs of the whole community, both now and in the future, and make the city region a more attractive and sustainable place for residents and businesses to remain, grow, and relocate to. However, in order to realise this there must be an abundant supply of housing land in locations where people wish to live, close to employment opportunities and infrastructure. It is recognised that these communities should be mixed in terms of type and size of homes, as well as tenure and cost, as set out in paragraph 4.7 of the proposed Plan, which reinforces the requirements of SPP to create sustainable, mixed communities. However, in reality the range and size of house types will be determined by the market and Local Development Plans should avoid being over-prescriptive in this regard.

Affordable Homes

SMH welcomes the clarity provided within the Proposed SDP under the section on 'Our Communities' which advises that the target will be for housing to meet the needs of the whole community, through the provision of appropriate levels of affordable housing at "*generally no more than 25%*". This aligns with the benchmark figure set by Scottish Planning Policy (SPP) in its quest to ensure the delivery of sustainable, mixed communities and SMH welcomes clarification in the Proposed SDP that this level will remain unchanged across the City and Shire. As highlighted by SMH at MIR stage, there will be instances where viability implications ultimately determine the level of affordable housing which can be sought from a site, without compromising its overall deliverability.

In recognition that some 75% of affordable housing is delivered by the development industry through Section 75 Legal Agreements and the anticipated decrease in Scottish Government funding post 2021, SMH would stress that appropriate land needs to be allocated to ensure the continued delivery of affordable housing as new mainstream housing developments come forward.

SMH would reiterate their comments made in their representations at MIR stage, that the provision of affordable homes should not be the sole responsibility of the housebuilding industry. Council-led partnership initiatives and alternative mechanisms to deliver affordable housing at scale must also continue to play their role in meeting demands and targets. The final bullet point on Page 27 of the Proposed Plan is therefore welcomed, which identifies that both Councils will consider "*innovative ways to ensure the delivery of affordable housing in order to address identified need*".

Density Targets

SMH is generally content with the Proposed SDP Target for sites larger than one hectare to provide no less than 30 dwellings per hectare in SGAs, which has been rolled forward from the Targets set within the extant SDP. However, setting a higher target of 50 homes per hectare across the Aberdeen City SGA could present some issues. Whilst this may be appropriate in some higher density, inner city locations, it may not be appropriate or indeed achievable for every site. The focus should be on the creation of sustainable mixed communities, however high density development in excess of 50 units per hectare is unlikely to provide a range and mix of family homes. SMH would object to any strict application of a 50 units per hectare requirement being rolled out across the Aberdeen City SGA.

Housing Need and Demand

With regard to delivering new homes across the Region, SMH appreciates that there has been significant discussion on this matter between the Strategic Development Planning Authority, Homes for Scotland and a number of housebuilders (including Stewart Milne Homes) who had submitted their concerns at MIR stage. We therefore welcome the adjustments made to the Plan periods within the Proposed SDP from those presented at MIR Stage. In line with SPP Paragraph 118, these now identify the amount and broad locations of land which should be allocated in local development plans to meet the housing land requirement up to year 12 from the expected year of plan approval (2020-2032), as well as beyond year 12 and up to year 20 (2033-2040).

SMH also tentatively welcomes the SDPA's decision to rightly move away from the 'composite' growth scenario as previously set out as the preferred option within the MIR, which lacked sufficient evidence to justify the suggested Housing Supply Target (HST), Housing Land Requirement (HLR) and related Allowances. Notwithstanding, SMH do not agree with the use of the Modified Principal Growth Scenario, details of which are set out below.

SMH support the 20% generosity applied to the Housing Supply Target (HST) in the plan period (up to 2032), in line with Paragraph 116 of SPP. It is noted that it is proposed to reduce this to 10% in the second plan period (2033-2040), however SMH would seek the 20% generosity to be extended across all plan periods to ensure the SDP maintains an ambitious plan for growth and a generous supply of land for housing is provided as per SPP, paragraph 116. It should also be made mandatory for LDPs to make provision for Strategic Reserves for the period 2033 to 2040. Further comment on this is provided below.

Paragraph 4.16 of the Proposed SDP identifies that the Housing Allowances derived from the HLR will now be split proportionately on the basis of 80% directed to the Aberdeen Housing Market Area (AHMA) and 20% to the Rural Housing Market Area (RHMA). This is supported by SMH, who strongly agrees that the balance must be heavily weighted toward the AHMA, to support sustainable communities, secure positive

placemaking and make the most efficient use of infrastructure and resources. However, in recognition of the consistently low completion rates in the Rural Housing Market Area and recognition within Paragraph 6.7 of the Housing Methodology Paper that 40% of completions within the RHMA between 2006 – 2016 came from unallocated sites (in comparison to 25% in the AHMA), my client would query whether increasing the allowances within the more marketable AHMA to 85% and reducing those in the RHMA to 15% would be a more appropriate split. Additionally, it is apparent from Tables 1, 2 and 3 that the split for the period 2016 - 2019 appears to be 75%/25%, with no reasoning provided. This should be amended to include a consistent split between all three plan periods.

SMH believe that the modified version of the Principle Growth Scenario presented within the Proposed SDP and supporting Housing Methodology Paper, would result in unambitious aspirations for growth across the next SDP Plan period. Whilst the Proposed SDP is now slightly better aligned with the Principal Growth scenario as set out within the HNDA, from that proposed under the previous 'composite' scenario at MIR stage, further assessment of the Proposed SDP's use of a Modified Principal Growth Scenario appears to be flawed.

All three growth scenarios contained within the HNDA give a declining Supply Target in the later years. The SDPA has attempted to reverse this through the creation of a "Modified Principal Growth Scenario", providing a rising HST through the Plan periods. Disappointingly however, it is apparent from our assessment of the Modified Principal Scenario, that it actually provides more conservative growth aspirations for the period up to 2032 from those that would be achieved utilising the standard Principal Scenario as contained within the HNDA. Paragraph 4.10 of the Proposed SDP is therefore misleading, as it suggests the Housing Supply Target has been informed by the Principle Scenario from the HNDA, but fails to mention that in fact it presents a negatively modified version of this.

The supporting Housing Methodology Paper, which informs the Proposed SDP suggests that the HST for both the Principal and Modified Principal Scenarios result in 43,420 homes up to the period 2035. Whilst that may be true, assessment of the annual HST figures across the 2016 – 2032 plan period actually demonstrates a shortfall of some 1,084 new homes between the Proposed SDP's Modified Principal Scenario and the Principal Scenario contained within HNDA. The HST deficit in this initial plan period would only catch up through enhanced supply post-2032, however there is no certainty over this as it would fall to strategic reserve, which will be subject to review as part of future Local Development Plans.

SMH thereby object to the proposed use of the Modified Principal Growth Scenario on the basis that it departs from the Principal Growth Scenario as contained within the HNDA and further reduces the aspirations for the delivery of new homes across the lifetime of the emerging SDP and subsequent LDPs. Paragraph 115 of SPP requires the HST to be "supported by compelling evidence", however SMH do not

consider that the Methodology Paper provides sufficient explanation for adopting the Modified Principle Scenario and the apparent implications this would cause for the period up to 2032.

The Housing Methodology Paper cites the pace and scale of delivery experienced through historic completion rates and concern regarding the ability of the housebuilding industry to deliver higher targets, as one of the main reasons for adopting the modified Principal Growth Scenario. It states that since 2009, completion rates have only once surpassed 2,000 homes in 2015. The 2018 Housing Land Audit (HLA) Audit has now been agreed and published. My client would request that this forms the basis of establishing the Effective Housing Land Supply as it forms the most up-to-date evidence base at the time of writing. The 2018 HLA also demonstrates that the 2,000 homes figure was again surpassed in 2017, with 2,059 new homes completed that year. This brings the average number of completions across the last 5 years to 2,005 homes per annum.

One must also appreciate the background and circumstances behind these trends. Since 2012, the Housing Land Supply across the North East has been dominated by large scale, strategic sites, a fact recognised by Paragraph 4.15 the proposed SDP. These sites have taken a substantial length of time to come to fruition due to complex Development Framework / Masterplanning exercises as well as significant infrastructure requirements, and delivery of these sites has really only come on stream in the last few years. Furthermore, since late 2014 the Region has experienced a period of economic uncertainty due to the downturn in the Oil and Gas sector. Accordingly, if the housebuilding industry is able to achieve an average exceeding 2,000 completions per annum in such difficult circumstances, undoubtedly the industry can achieve significantly higher completion rates going forward, as the region emerges into a period of economic recovery and accelerated delivery is being experienced on key strategic sites. If the Plan is to be aspirational and allocate sufficient land for housing, efforts must be made to ensure that there is an adequate supply of land.

As per my client's submissions made to the MIR, Stewart Milne Homes wish to see the adoption of the High Growth Scenario as detailed within the HNDA. The extant SDP sets clear aspirations to move toward building 3000 homes per year by 2020, therefore setting the HST at an average of 1,950 homes in the period 2016 – 2019 and 2,200 homes per annum between 2020 – 2032 lacks ambition and contradicts the wider growth aspirations for the regional economy. It will also send out as message that the next SDP is planning for decline, which is unacceptable to SMH. The evidence set out in the preceding paragraphs with regard to recent trends in completion rates, further compounds my client's concerns with the HST and HLR contained within the Modified Principal Growth Scenario. The High Migration Scenario therefore presents the only option within any of the HNDA scenarios that gives my client comfort in relation to achieving sufficient growth, through an ambitious HST, HLR and sufficiently generous additional allowances, thereby

creating a healthy supply of housing land and the optimum conditions to achieve accelerated housing delivery and growth within the industry.

Paragraph 4.20 of the Proposed SDP stipulates that Local Development Plans “may” choose to make provision for additional strategic reserves for housing for the period 2033-2040 in accordance with Table 3. However, it goes on to highlight that this is not a requirement. Such ambiguity could result in an inconsistent approach across the City and Shire and it is contended that there should be an obligation on both Councils to identify strategic reserves for housing over that period. This would provide some indication of the direction of growth, providing certainty for communities and the development industry.

SMH have been working closely with Homes for Scotland (HFS) in respect of their concerns over the delivery of new homes contained within the Proposed SDP. HFS share these concerns over the proposed use of the Modified Principal Scenario and have prepared updated Tables 1, 2 and 3 of the Proposed SDP to reflect the HST, HLR and Allowances on the basis of utilising the High Growth Scenario and 85%/15% split in favour of the AHMA. These tables are attached as Appendix 1.

What change would you like to see made?

(if you would like to write more than the box allows then please attach this form to any additional papers)

In view of the preceding arguments, my client would request the following modifications to the Proposed SDP:

Paragraph 4.16 should be adjusted to read, *"In order to support sustainable communities, the best use of infrastructure, and increased levels of housing delivery, these allocations are divided on an **85% / 15%** basis between the Aberdeen Housing Market Area and the Rural Housing Market Area respectively".*

In calculating the Housing Supply Target, the Modified Principal Growth Scenario should be substituted for the High Growth Scenario and the figures within Table 1 on page 29 of Proposed SDP should be updated in line with HFS Table 1 (Appendix 1). A 20% generosity should then be applied to the High Growth Scenario HST across all three plan periods to give the HLR. Table 2 on Page 29 of the Plan should be updated to reflect Table 2 prepared by HFS (Appendix 1). This will ensure more ambitious allowances to be identified within Table 3 on Page 30 of the Plan, which should be updated to reflect Table 3 prepared by HFS as attached at Appendix 1. The initial sentence within Paragraph 4.10 should be amended to read, *"Table 1 illustrates the Housing Supply Target for the City Region, as informed by the **High Migration Growth Scenario** from the Housing Needs and Demand Assessment 2017."*

Finally, Paragraph 4.20 should be adjusted to read, *"In order to provide communities and the development industry a degree of certainty over the long term future growth of the Region, Local Development Plans should make provision for additional Strategic Reserves for housing for the period 2033 to 2040 in line with Table 3."*

Please return the completed form and any additional papers:

- **By Post :**
Aberdeen City and Shire Strategic Development Planning Authority, Woodhill House, Westburn Road, Aberdeen, AB16 5GB
- **By Email :** team@aberdeencityandshire-sdpa.gov.uk

If you wish to fill out a Word form, please be aware that you must email the above address for a copy of the form. Please save any changes before submission.

Please ensure all representations are with us by midnight Monday 17 December 2018.

Thank you. For more information, please visit www.aberdeencityandshire-sdpa.gov.uk or contact the Strategic Development Planning Authority on 01467 539734.

Privacy Notice

Why does the SDPA need your information?

As part of the review of the Strategic Development Plan, the Strategic Development Planning Authority (SDPA) is obliged by the Town and Country Planning (Scotland) Act 1997 and Town and Country Planning (Development Planning) (Scotland) Regulations 2008 to consult on a Proposed Strategic Development Plan and Proposed Action Programme. The Environmental Assessment (Scotland) Act also requires us to consult on a Strategic Environmental Assessment Environmental Report.

If you choose to respond to the consultation on any of the above documents, or the associated documents which support them, then you must submit your name and address in order to ensure that your representation can be considered valid. This is because we are required by the legislation noted above to contact you in relation to your response.

By submitting a response to the consultation you understand that the SDPA will use the information contained in your response, including your personal data, as part of the review of the Aberdeen City and Shire Strategic Development Plan. This will include consultation on the Proposed Plan (including any subsequent Proposed Plan as Modified), but also the Examination of the Proposed Plan and its eventual approval.

Any personal information that you provide in response to this consultation will be jointly held by both Aberdeen City Council and Aberdeenshire Council on behalf of the SDPA. Aberdeen City Council and Aberdeenshire Council will therefore be the Joint Data Controllers for your information. This is because the SDPA is a partnership organisation made up of both Councils.

Following the end of the consultation, i.e. after 17 December 2018, your name and respondent identification number (provided to you by the SDPA on receipt of your submission) will be published alongside a copy of your completed response on the SDPA website.

Your name, respondent identification number and a copy of your response will be retained on the SDPA website until a decision on the approval of the Proposed Strategic Development Plan has been made by Scottish Ministers. This decision is currently expected sometime in 2019. Once a decision on the Proposed Plan is made by Scottish Ministers, your name, respondent identification number and response will be removed from the SDPA website.

Other personal contact details associated with your response; such as postal address, telephone number and / or e-mail address will not be made public, although we will share this information with Scottish Ministers and the Scottish Government's Planning and Environmental Appeals Division (DPEA). We are obliged under the Town and Country Planning (Development Planning) (Scotland)

Regulations 2008 to issue a copy of all unresolved issues to Scottish Ministers / the DPEA when submitting the Proposed Plan for Examination in Public. Scottish Ministers / the DPEA then have a statutory requirement to contact respondents via The Town and Country Planning (Scotland) Act 1997, which again makes it necessary for us to provide your response and preferred method of contact to them. Should the DPEA request further information from you then they may subsequently publish that information on the DPEA website.

The SDPA will only keep your personal data for as long as is needed. The SDPA 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 the SDPA will review whether it is necessary to continue to retain your information for a longer period.

Your Data, Your Rights

You've got legal rights about the way the SDPA handles and uses your data, which include the right to ask for a copy of it, and to ask us to stop doing something with your data.

If you are unhappy with the way that the SDPA or the Joint Data Controllers have processed your personal data then you do have the right to complain to the Information Commissioner's Officer, but you should raise the issue with the Data Protection Officers first. The Data Protection Officers can be contacted by writing to:

- [REDACTED], Data Protection Officer, Aberdeen City Council, Legal and Democratic Services, Level 1 South, Marischal College, Aberdeen, AB10 1AU.
- [REDACTED], Data Protection Officer, Aberdeenshire Council, Business Services, Town House, 34 Low Street, Banff, AB45 1AY

APPENDIX 1

**Table 1:
Housing Supply Targets – High Migration Scenario**

Table 1: Housing Supply Target by Housing Market Area, Local Authority and Tenure Mix											
		2016-2019			2020-2032			2033-2040			2016-2040
		Affordable	Market	Total	Affordable	Market	Total	Affordable	Market	Total	Global Total
Aberdeen Housing Market Area		3,438	6,386	9,824	10,652	19,781	30,433	6,263	11,631	17,894	58,152
Rural Housing Market Area		607	1,127	1,734	1,880	3,491	5,371	1,105	2,053	3,158	10,262
Aberdeen City Council		2,023	3,756	5,779	6,266	11,636	17,902	3,684	6,842	10,526	34,207
Aberdeenshire Council		2,023	3,756	5,779	6,266	11,636	17,902	3,684	6,842	10,526	34,207
Aberdeen City and Shire	Total	4,045	7,513	11,558	12,531	23,273	35,804	7,368	13,684	21,052	68,414

[85%/15% split between AHMA /RHMA]

Note – components may not sum to totals due to rounding.

**Table 2:
Housing Land Requirements – High Migration Scenario**

Table 2: Housing Land Requirements by Housing Market Area, Local Authority and Tenure Mix											
		2016-2019			2020-2032			2033-2040			2016-2040
		Affordable	Market	Total	Affordable	Market	Total	Affordable	Market	Total	Global Total
Aberdeen Housing Market Area		4,127	7,664	11,790	12,782	23,738	36,520	7,516	13,957	21,473	69,782
Rural Housing Market Area		728	1,353	2,081	2,256	4,189	6,445	1,326	2,463	3,789	12,315
Aberdeen City Council		2,428	4,507	6,935	7,519	13,963	21,482	4,421	8,210	12,631	41,048
Aberdeenshire Council		2,428	4,507	6,935	7,519	13,963	21,482	4,421	8,210	12,631	41,048
Aberdeen City and Shire	Total	4,854	9,016	13,870	15,037	27,928	42,965	8,842	16,421	25,262	82,097

[85%/15% split between AHMA /RHMA, 20% Generosity allowance throughout]

Note – components may not sum to totals due to rounding.

**Table 3:
Housing Allowances – High Migration Scenario**

Table 3. <u>High Migration</u> Scenario based on an 85% Aberdeen Housing Market Area/15% Rural Housing Market Area split								
	5 Year Effective* 2016	Post 5 Year Effective* 2016	Total Effective Land Supply	Allowances 2020-2032	Allowances 2033-2035	Allowances 2036-2040	Total Allowances	
Aberdeen Housing Market Area	10,083	18,125	28,708	22,799	6,942	11,833	41,574	
Rural Housing Market Area	3,143	3,822	7,047	1,801	1,315	2,233	5,349	
Aberdeenshire Part of AHMA				10,499				
Aberdeen City Council	6,210	11,228	17,438	12,300	4,129	7,033	23,462	
Aberdeenshire Council	7,016	10,719	17,735	12,300	4,129	7,033	23,462	
Aberdeen City and Shire	Total	13,226	21,947	35,173	24,600	8,257	14,066	46,923

85%/15% split between AHMA /RHMA

Note – components may not sum to totals due to rounding. Allowances will not include sites of less than 5 homes.

*Taken from Aberdeen City and Shire Housing Land Audit 2016

29 July 2020

REF:Waterton_L&V_Comments.docx

WATERTON – Site FR031

Landscape and Visual Comments.

These comments relate to the potential differences between a proposal for large scale retail units (CC1) or (FR031) mixed use development where a large allocation of residential is integrated into retail. The comments make use of specific landscape and visual criteria to draw out the key differences between the development proposals for the Waterton site (CC1 and FR031) and to highlight where these differences may influence potential landscape and visual effects. The L&V comments and potential for effects identified are derived from a brief site visit to the area resulting in a limited and preliminary appraisal of key aspects of an assumed development typology based on the indicative information currently available.

The site lies at the eastern edges of the Ellon settlement and lies entirely within the Coastal Agricultural Plain LCA (17) as defined and described in Scotland's digital map-based national character assessment (published in 2019). The River Ythan forms the southern boundary, the A90, associated embankments and roadside vegetation forms the eastern boundary, Castle Road, the park and ride form the boundary to the north and the residential area at Waterton Meadows (and the consented development for 10 units at FR084) edges the site to the west (along with the Broomies Burn corridor and riparian vegetation).

L&V Criteria		L&V Comments
Sensitivity of landscape / townscape	Value	Unaffected by development type
	Susceptibility	Although the built development of CC1 and FR031 is of a similar overall development footprint (allowing for the open space in the southern part of FR031), the landscape / townscape is more susceptible to the possibility of larger scale (height and massing) and individual footprints of buildings that the CC1 opportunity represents than the varied but often lower height and finer grain development presented as FR031.
Potential landscape / townscape magnitude of change		<p>The commercial warehousing to the north of Castle Road has a strong presence within the context of the site. A clear advantage of the sloping ground on which it is located is that only the southern units are noticeable from Castle Road limiting the overall effect on surrounding character. CC1 would likely create a similarly commercial and warehoused built character to the south of Castle Road which would transform Castle Road into a 'through road' between large scale commercially scaled units.</p> <p>FR031 would continue the residential character established against Castle Road at Waterton Meadows and further committed to in FR084.</p> <p>Whilst both CC1 and FR031 would affect the current open character of the site area, FR031 would create a more appropriately scaled development that responds to existing built character and so would result in lower magnitude of landscape / townscape effect than CC1.</p>
Sensitivity of visual receptors	Value	Unaffected by development type
	Susceptibility	Both developments have the potential to influence existing views from key visual receptors, including – neighbouring residential properties, users of Castle Rd, A90 &

		<p>B9005 roads, visitors to the supermarket, users of the park and ride, walkers along core paths and River Ythan.</p> <p>Whilst there would be differences in the potential scale of development in these options, visual susceptibility for the key visual receptors identified is considered to be broadly similar for both development types. This is due to the nature of visual receptors (the occupation or activity which they are engaged in) and the principal visual characteristics (features that define existing views), which would be affected by both developments.</p>
Potential visual magnitude of change		<p>In terms of visual effects on nearby residential areas, higher magnitudes would be experienced at Waterton Meadows where views to the east are less obscured by the riparian vegetation of Broomies Burn or at the north eastern edges of this area where proposed (FR084) properties are proposed on the boundary of the site area. The effects experienced by these residential receptors would likely result in a greater level of magnitude for CC1 than for FR031. This difference in magnitude could be of sufficient variance that for existing Waterton Meadows properties a significant effect may result from CC1 but not for FR031 (depending on final details of any proposed development). In terms of visual effects on surrounding routes the larger scale and massing of retail warehousing would be more visually intrusive than FR031 when travelling north on the A90 (particularly from the Ythan crossing). The larger buildings of CC1 would tend to draw attention in the glimpsed views available northbound on the B9005. Distant views south from Castle Road are likely to be partly obscured by FR031 but fully obscured by CC1.</p>
Conclusions		<p>In terms of landscape and visual effects, it is considered that both developments would likely lead to localised significant effects within the immediate area surrounding the site. However, the development type proposed as CC1 would result in a generally higher magnitude of change for key L&V receptors as a result of the following differences identified in this preliminary appraisal:</p> <ul style="list-style-type: none"> the larger scale (height and massing) and individual footprints of buildings that the CC1 opportunity represents would create a more notable effect on the landscape and townscape character of the area than the varied but often lower height and finer grain development presented as FR031. Whilst both CC1 and FR031 would affect the current open character of the site area, FR031 would create a more appropriately scaled development that responds to existing built character and so would result in lower magnitude of landscape / townscape effect than CC1. Visual effects are generally expected to be of a higher magnitude for CC1 than for FR031. This difference in magnitude could be of sufficient variance that for existing Waterton Meadows properties a potentially significant effect may result from CC1 but not for FR031 (depending on final details of any proposed development).

Appendix 3 – MIR Representation – Retail

Aberdeenshire Local Development Plan 2021: Main Issues Report 2019

Main Issues Report Response Form

Important Information: Please Read

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

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

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

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

All comments received will be carefully assessed and will be used to inform the preparation of the Proposed Aberdeenshire Local Development Plan. There will be a further opportunity to comment on the Proposed Plan when it is published in December 2019.

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



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I also agree that following the end of the consultation, i.e. after 8 April 2019, my name and respondent identification number (provided to you by Aberdeenshire Council on receipt of your submission) can be published alongside a copy of my completed response on the Main Issues Report website (contact details and information that is deemed commercially sensitive will not be made available to the public).

The data controller for this information is Aberdeenshire Council. The data on the form will be used to inform a public debate of the issues and choices presented in the Main Issues Report of the Aberdeenshire Local Development Plan 2021. It will inform the content of the Proposed Aberdeenshire Local Development Plan.

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- [REDACTED], Data Protection Officer, Aberdeenshire Council, Business Services, Town House, 34 Low Street, Banff, AB45 1AY

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

Which document(s) are you committing on?	Main Issues Report	<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 on behalf of Stewart Milne Homes in relation to Site Ref: FR032 – Site CC1, Waterton

On behalf of Stewart Milne Homes, support is given to the continued identification of site FR032 for retail (Class 1) and Leisure Facilities (Class 11) within the Main Issues Report (MIR). However, it is argued that this site is more suitable for a mixed use development. This representation should be read in conjunction with the objection prepared for bid ref FR031 which proposed a mixed use development comprising 150 homes, retail use and a riverside park. If that bid is not favoured, Stewart Milne Homes request that the allocated CC1 site is protected in the Proposed Local Development Plan for retail uses proposed.

The Main Issues Report raises some issues to which we wish to respond

“The proposed site is allocated as CC1 in the Local Development Plan 2017 and the proposal fits in with the requirements for the site”

Ellon has the capacity to accommodate a retail park reinforced by the conclusion of the Town Centre Health Check (2011) that the existing town centre is well provided by service companies rather than retailers. This deficit will leak outwith the settlement unless it is addressed. The CC1 proposal seeks to address this requirement for a retail park and is well located immediately adjacent to existing development and establishes a retail and connectivity hub. This is welcomed, however, it is considered appropriate to also introduce an element of housing on the site to support the retail and leisure uses proposed, to create a sustainable mixed use development, with less visual impact on the landscape as concluded in OPEN's landscape assessment of the site which is submitted with this representation (Appendix 1).

“The site is located within the A920 and A90 corridors, therefore, traffic measures and access feasibility must be assessed and contributions to improvement of the north A90(T) may be sought”

Traffic measures and access feasibility would be assessed at the planning application stage and any contributions to mitigate this development would be provided in line with Circular 3/2012: Planning Obligations and Good Neighbour Agreements and the Council's own developer obligations guidance.

“The trees along the boundaries of the site will require consideration and development has the potential to impact protected species on the site (otters and badgers)”

The development bid submitted prior to the MIR publication acknowledged that the mature wooded area would be retained. Any development would consider the trees along the boundaries and the appropriate habitat surveys would be completed to assess the potential impact on otters and badgers. The proposals will include opportunities for habitat retention and enhancement, which will improve biodiversity on the site. This site has long been allocated in the Local Development Plan and this is not considered to be an impediment to development.

“Buffer strips will be required beside the watercourses”

Again, the development bid submitted recognises the proximity of the Ythan River and Broomie's Burn. Any development will incorporate, protect and enhance these features to create an established and attractive landscape setting for the site.

“There is good public transport links”

This is acknowledged and supported and demonstrates the suitability of the site for a range of uses.

“There are concerns regarding waste water treatment and water supply. Surface water flooding is another constraint that can be mitigated through SUDs or other means. These will need to be overcome prior to development taking place”

Planning Officers acknowledge that surface water flooding can be mitigated and this is not an impediment to development. In terms of waste water treatment and water supply, it is understood that capacity can be made available and details of this would be fully investigated and mitigated during any planning application process.

Conclusion

Ellon has the capacity to accommodate a retail park and the proposals under bid ref: FR032 seeks to address this requirement. Although this is welcomed, it is considered appropriate to also introduce an element of housing on the site to support the mix of uses proposed which has less visual impact on the landscape than a purely retail development. This is considered in further detail in the representation to the FR031 bid. However, should that not be supported, support is given to the continued identification of this site for retail and leisure uses within the MIR and its subsequent continued allocation within the Proposed LDP as CC1 for retail and leisure uses.

29 July 2020

REF:Waterton_L&V_Comments.docx

WATERTON – Site FR031

Landscape and Visual Comments.

These comments relate to the potential differences between a proposal for large scale retail units (CC1) or (FR031) mixed use development where a large allocation of residential is integrated into retail. The comments make use of specific landscape and visual criteria to draw out the key differences between the development proposals for the Waterton site (CC1 and FR031) and to highlight where these differences may influence potential landscape and visual effects. The L&V comments and potential for effects identified are derived from a brief site visit to the area resulting in a limited and preliminary appraisal of key aspects of an assumed development typology based on the indicative information currently available.

The site lies at the eastern edges of the Ellon settlement and lies entirely within the Coastal Agricultural Plain LCA (17) as defined and described in Scotland's digital map-based national character assessment (published in 2019). The River Ythan forms the southern boundary, the A90, associated embankments and roadside vegetation forms the eastern boundary, Castle Road, the park and ride form the boundary to the north and the residential area at Waterton Meadows (and the consented development for 10 units at FR084) edges the site to the west (along with the Broomies Burn corridor and riparian vegetation).

L&V Criteria		L&V Comments
Sensitivity of landscape / townscape	Value	Unaffected by development type
	Susceptibility	Although the built development of CC1 and FR031 is of a similar overall development footprint (allowing for the open space in the southern part of FR031), the landscape / townscape is more susceptible to the possibility of larger scale (height and massing) and individual footprints of buildings that the CC1 opportunity represents than the varied but often lower height and finer grain development presented as FR031.
Potential landscape / townscape magnitude of change		<p>The commercial warehousing to the north of Castle Road has a strong presence within the context of the site. A clear advantage of the sloping ground on which it is located is that only the southern units are noticeable from Castle Road limiting the overall effect on surrounding character. CC1 would likely create a similarly commercial and warehoused built character to the south of Castle Road which would transform Castle Road into a 'through road' between large scale commercially scaled units.</p> <p>FR031 would continue the residential character established against Castle Road at Waterton Meadows and further committed to in FR084.</p> <p>Whilst both CC1 and FR031 would affect the current open character of the site area, FR031 would create a more appropriately scaled development that responds to existing built character and so would result in lower magnitude of landscape / townscape effect than CC1.</p>
Sensitivity of visual receptors	Value	Unaffected by development type
	Susceptibility	Both developments have the potential to influence existing views from key visual receptors, including – neighbouring residential properties, users of Castle Rd, A90 &

		<p>B9005 roads, visitors to the supermarket, users of the park and ride, walkers along core paths and River Ythan.</p> <p>Whilst there would be differences in the potential scale of development in these options, visual susceptibility for the key visual receptors identified is considered to be broadly similar for both development types. This is due to the nature of visual receptors (the occupation or activity which they are engaged in) and the principal visual characteristics (features that define existing views), which would be affected by both developments.</p>
Potential visual magnitude of change		<p>In terms of visual effects on nearby residential areas, higher magnitudes would be experienced at Waterton Meadows where views to the east are less obscured by the riparian vegetation of Broomies Burn or at the north eastern edges of this area where proposed (FR084) properties are proposed on the boundary of the site area. The effects experienced by these residential receptors would likely result in a greater level of magnitude for CC1 than for FR031. This difference in magnitude could be of sufficient variance that for existing Waterton Meadows properties a significant effect may result from CC1 but not for FR031 (depending on final details of any proposed development). In terms of visual effects on surrounding routes the larger scale and massing of retail warehousing would be more visually intrusive than FR031 when travelling north on the A90 (particularly from the Ythan crossing). The larger buildings of CC1 would tend to draw attention in the glimpsed views available northbound on the B9005. Distant views south from Castle Road are likely to be partly obscured by FR031 but fully obscured by CC1.</p>
Conclusions		<p>In terms of landscape and visual effects, it is considered that both developments would likely lead to localised significant effects within the immediate area surrounding the site. However, the development type proposed as CC1 would result in a generally higher magnitude of change for key L&V receptors as a result of the following differences identified in this preliminary appraisal:</p> <ul style="list-style-type: none"> the larger scale (height and massing) and individual footprints of buildings that the CC1 opportunity represents would create a more notable effect on the landscape and townscape character of the area than the varied but often lower height and finer grain development presented as FR031. Whilst both CC1 and FR031 would affect the current open character of the site area, FR031 would create a more appropriately scaled development that responds to existing built character and so would result in lower magnitude of landscape / townscape effect than CC1. Visual effects are generally expected to be of a higher magnitude for CC1 than for FR031. This difference in magnitude could be of sufficient variance that for existing Waterton Meadows properties a potentially significant effect may result from CC1 but not for FR031 (depending on final details of any proposed development).

Appendix 4 – MIR Representation – Cromleybank

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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/>.

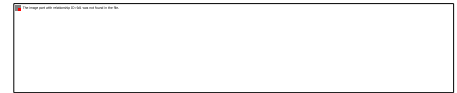
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Name	██████████
Organisation (optional)	Ryden LLP
On behalf of (if relevant)	Stewart Milne Homes
Address	██████████ ██████████████████ ██████████
Postcode	██████████
Telephone (optional)	██████████
E-mail (optional)	██████████████████████████████



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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 on behalf of Stewart Milne Homes in relation to

Site Ref: FR090 – OP1, Cromleybank (980 homes, primary school, employment land)

On behalf of Stewart Milne Homes, objection is made to the continued identification of site FR090 for 980 homes, primary school and employment land at Cromleybank within the Main Issues Report (MIR) and its subsequent identification of site OP1 within the Draft Proposed Local Development Plan (DPLDP) for the same.

This site has been zoned since the 2012 Aberdeenshire Local Development Plan and construction has still not commenced on the delivery of any housing. Aberdeenshire Council need to consider this and bring forward additional sites to meet housing needs. Therefore, it is argued that the scale of housing proposed on OP1 is excessive. It would be more appropriate to reduce the housing allocation on OP1 and transfer it to bid site FR031 to the north of Ellon.

This representation requires to be read in conjunction with Stewart Milne Homes' general representation submitted to the MIR and with their representation to the Strategic Development Plan, both at the MIR stage (Appendix 1) and Proposed Plan (Appendix 2) in particular, the housing supply targets and the housing land requirement. It also requires to be considered in the context of the representation submitted for bid site FR031 which demonstrates the capability of that site to accommodate a mixed use development, including housing. This will address the housing requirements set by the Strategic Development Plan, provide a choice of location and ensure an adequate supply of housing land is delivered in Ellon.

The Main Issues Report makes a number of statements to which we wish to respond.

“This bid site is already included as an allocation within the Local Development Plan 2017 (allocated as OP1 for 980 homes and 2 ha of employment land) and remains unchanged as part of this bid”

Site M1 was allocated within the 2012 Local Development Plan for up to 980 houses, a new primary school and associated facilities and employment land. It was expected that up to 745 of the housing units would be delivered in the first phase (2007-2016), with the remaining 235 delivered in the second phase (2017-2023).

This allocation was carried forward into the 2017 Local Development Plan for the same development, with 745 in the period to 2016 and 235 in the period 2017 – 2023. It is highlighted in Appendix 5 of the 2017 LDP that 720 units were still to be built in the period up to 2016, meaning that 25 units had been built. However, the 2018 Housing Land Audit demonstrates that no units have been built on site as the remaining capacity at 1st January 2018 was the entire 980 allocation. Only 386 units are proposed to be built by 2025, with 594 expected after 2025.

This demonstrates that the site is not delivering the required number of houses to meet the housing allowances contained in the Strategic Development Plan. Continuing to identify this site, without any additional housing allocations being identified in Ellon, means that the housing land requirements are not being met, as required by Scottish Planning Policy (SPP). Stewart Milne Homes are not suggesting that the site is removed from the Proposed Local Development Plan, but the housing numbers on the site reduced, with an additional allocation made, in the first plan period, elsewhere in Ellon. The representation made to bid site FR031 demonstrates that site is suitable for housing and as such, it should be identified for a mix of uses, including housing in the Proposed Local Development Plan. This would ensure a range of locations is identified for housing, also in line with SPP.

The text within the 2017 LDP for site OP1 states that “a number of access points to the site will be required from South Road (B9005), and either a vehicular bridge across the River Ythan or an additional east-west link road will be required to ensure the local road network provides the necessary capacity to accommodate the traffic generated by the development”.

The failure to develop the FR090/OP1 suggests that a vehicular bridge or east-west link is not viable. It is argued that the FR031 site to the north of Ellon is more suitable for some of the housing allocations, due to its location immediately adjacent to the A920 and within close proximity to the Ellon Park and Ride. No substantial additional road infrastructure is required to deliver the FR031 site. It is deliverable in the first plan period of the 2021 Local Development Plan and should be identified for a mix of uses, including 150 houses.

“subject to resolution of transport issues, potentially contaminated land and impact on archaeology, in addition to avoiding potential flood risk, this is a readily available and unconstrained site with good linkages to the town of Ellon”

Although it is accepted that these issues could be resolved, it is not accepted that this is a “readily available and unconstrained site” given the failure to deliver any housing units on the site since its allocation in 2012. That is a 7 year period where housing on this site has not been delivered to meet the housing requirements identified for Ellon. As such, and as already argued, the housing numbers allocated to this site should be reduced in the 2021 Local Development Plan and housing allocated to the FR031 site to the north of Ellon instead. This would spread the housing opportunities across a range of locations and ensure that adequate housing is delivered in the first plan period of the 2021 LDP.

“This would remain as one of the largest single allocations in the Aberdeen to Peterhead Strategic growth corridor for the provision of new housing”.

This strategy is not supported going forward into the Proposed Local Development Plan. It is clear that concentrating housing to one large site does not deliver an adequate supply of housing land as, in this case in particular, no housing has been delivered on the OP1 site. Instead, a range of locations should be considered in the Draft Local Development Plan to ensure a choice and improve the deliverability of housing in Ellon. As such, the housing numbers on the OP1 site should be reduced and 150 houses redistributed to the FR031 site at Waterton, Ellon, which is capable of early delivery in the first plan period of the 2021 Local Development Plan.

Conclusion

Objection is made to the continued allocation of 980 houses within OP1 at Cromleybank, Ellon in the Draft Proposed Local Development Plan. This site has been identified since 2012 with 745 houses expected to be delivered by 2016. This has not materialised and in 2019 there are still no houses built on that site. The 2018 Housing Land Audit shows that only 386 units are proposed to be delivered by 2025. As such, there is scope for the housing units on OP1 to be reduced and redistributed elsewhere in Ellon.

Site FR031 should be identified for a mix of uses, including 150 houses, taken from the OP1 site. This would ensure a range and choice of locations for housing is identified in the settlement and that the housing requirements for Ellon are met. This is vital since the OP1 allocation is not delivering the required housing numbers.

The FR031 site is well related to existing transport routes, is an allocated site within the settlement boundary, already accepted by Aberdeenshire Council as suitable for development. It is located adjacent to existing and proposed housing and would not need any large scale transport infrastructure to deliver it. It has the backing of a housing developer who is capable of delivering the units within the first plan period of the 2021 Local Development Plan.

It is therefore respectfully requested that the housing numbers on site OP1 are reduced in the Proposed Local Development Plan and site FR031 is identified as an Opportunity Site for a mix of uses, including 150 houses in the first plan period.

Strategic Development Plan Review

Main Issues Report Consultation **12th March - 21st May 2018**

The Aberdeen City and Shire Strategic Development Planning Authority are currently reviewing the Strategic Development Plan for the area. Our Development Plan Scheme outlines a timetable for the review of the Plan, and also identifies where there are opportunities to participate. It is available to view at:

<http://www.aberdeencityandshire-sdpa.gov.uk/DevelopmentPlan/DevelopmentPlanSchemes.aspx>

The **Main Issues Report** is the first formal stage in the review process – it describes and invites discussion on options for future policies, as well as employment and housing land targets for the next Plan. No settled view on the content of the next Strategic Development Plan has yet been reached, making the Main Issues Report the key stage for public consultation. Giving us your views will help to shape the future strategy for development and the policies by which future planning applications are determined.

You can view a copy of the Main Issues Report on our website at:

<http://www.aberdeencityandshire-sdpa.gov.uk/CurrentWork/CurrentConsultations.aspx>

Copies are also available to view at all Council Offices and Libraries within the Strategic Development Plan Area.

A series of accompanying documents, including an Interim Environmental Report, Monitoring Statement, Housing Needs and Demand Assessment and Interim Cumulative Transport Appraisal can also be viewed on our website (by following the above link).

How to Respond

The Main Issues Report contains a series of issues and questions on which we would like to hear your views. Please use this form to respond to these, or any other issues raised by the Main Issues Report or any other accompanying documents.

Consultation Responses must be received by 12pm on Monday 21st May 2018

You can make your views heard in a number of ways:

- **By Post - please return a completed version of this form to:**
Aberdeen City and Shire Strategic Development Planning Authority, Woodhill House, Westburn Road, Aberdeen, AB16 5GB
- **By Email - please return a completed version of this form to:**
team@aberdeencityandshire-sdpa.gov.uk
If you choose to fill out our online Word form, please be aware that you must download the form and save any changes before submission.

Letters and emails which do not make use of this form will also be accepted, however please make sure include your name, address, telephone number and email address (if applicable), as well as the details of anyone you are representing, if you would like us to be able to contact you with any queries on your submission.

Using your Personal Information

Information you supply to the Strategic Development Planning Authority (SDPA) by responding to this consultation will be used to prepare the next Strategic Development Plan for the area. The SDPA will not share the personal information provided in response to this consultation with other parties or organisations. The SDPA will not disclose any contact information about you to any organisation or person unless it is authorised or required to do so by law.

The SDPA Officers may use your contact details to contact you about the comments you have made. Your name and organisation may be published alongside your comments but contact details will not be made public. If you chose not to provide a name or contact details, your comments will still be valid but we will not be able to contact you in the future.

For further information on how your information is used, how the SDPA maintain the security of your information, and your rights to access information the SDPA holds about you, please contact: [REDACTED], Acting Team Leader, Strategic Development Planning Authority, Woodhill House, Westburn Road, Aberdeen, AB16 5GB.

Contact Details

Name (Mr/Mrs/Miss/Ms)	
Organisation (if relevant)	Ryden LLP
Address	
Postcode	
Telephone	
Email	

Please tick this box if you wish further correspondence to be directed to this address:

☒

If you are completing this form on behalf of an organisation, group or landowner, please provide their details below.

Name (Mr/Mrs/Miss/Ms)	
Organisation (if relevant)	Stewart Milne Homes Ltd
Address	
Postcode	
Telephone	c/o Agent
Email	c/o Agent

If you wish to be added to the SDPA distribution list to be kept informed of our progress in producing the next SDP, please tick this box and provide the email you to be added to our database (if different from above):

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wish

Email : _____ Michael.lorimer@ryden .co.uk _____

Your Views

Please use a separate box for each issue/question you wish to respond to. If you wish to continue on a separate sheet, please attach to the paper copy or email.

Main Issue / Question Number:	1. Do you agree with the updated Vision as set out in the Preferred Option?
<p>The vision contained within the extant Strategic Development Plan is on the whole, worthy of retention, albeit with a number of minor tweaks as proposed within the MIR which promote industry diversification and resilience, in recognition of the challenges the North East has experienced through the recent Oil and Gas restructuring. My client is comfortable that the vision ties in with the Regional Economic Strategy and favours the preferred option, rather than proceeding with no change at all. In light of our ever changing environment, opting for the latter could be present a degree of short-sightedness when planning for a period spanning the next 20 – 25 years.</p> <p>One minor suggestion would be to slightly amend the second bullet point within the vision to read “<i>the unique qualities of our built and natural environment</i>”, in recognition of the significant contribution that the housebuilding industry makes in shaping the places we live, work and do business, as well as the high quality natural environment we benefit from across the City and Shire Region.</p>	

Main Issue / Question Number:	2. Do you agree with the Preferred Option that the existing spatial strategy, in general terms, remains fit for purpose and should be carried forward?
<p>The Spatial Strategy generally remains appropriate, and my client agrees with the overarching approach, to focus investment in areas of growth to ensure the maximum return on that investment in terms of direct and indirect jobs and economic prosperity. The MIR highlights widespread support for the spatial strategy for almost a decade, however, there remains a strong concern within the development industry that a continued focus on significant residential development within the Rural Housing Market, especially within the Strategic Growth Areas (SGAs) will continue to see more limited demand, which presents issues for maintaining an effective land supply.</p> <p>This is to the disadvantage of thriving and growing communities such as Westhill and Banchory which currently lie outwith an identified SGA. There must be a degree of flexibility to allow development in areas where there is a proven demand. My client notes the proposed alternative option to identify a modest extra site in the next LDP in recognition of delivery problems being experienced in Huntly, but would request that such flexibility is transferred to all areas, both those which are mentioned in the MIR and those which are not (Portlethen to Laurencekirk southern SGA) to assist in delivering growth.</p>	

In particular, my client considers a continued avoidance of recognising Westhill as a SGA as a significant barrier to sustainable growth, given its proximity to the City and the role it has played in recent years in the provision of housing and employment land. Westhill has been an area of sustained growth and economic performance, surrounded by Strategic Growth Areas yet somehow falling within an area of local growth. A review of Housing Land Audits from previous years indicates some 400 completions in Westhill since 2012, demonstrating strong demand for housing in the settlement. The draft 2018 Audit identifies only 13 new homes will be completed between now and 2020, with nothing programmed thereafter. This further demonstrates that the town continues to be ignored and this situation needs to be appropriately addressed.

Whilst it is recognised that the A944 corridor does not enjoy a rail link with Aberdeen this has not hindered its development, nor the contribution it makes to the North East economy. It benefits from excellent road links with the City, public transport and park & ride facilities, which will be further strengthened by the completion of the AWPR, serving as a crucial link to all of the Strategic Growth Areas. Westhill will benefit from a direct dual carriageway link with the AWPR and the delivery of a major junction in proximity to the existing settlement boundary. Accordingly, both the AWPR and Westhill should be identified as falling within a SGA and benefit from specific housing and employment allocations. Aberdeen City Council's recent decision to relocate Aberdeen Football Club's new stadium complex and training facilities to the Kingsford site on the outskirts of Westhill, further reinforces the town's capacity for strategic growth. Westhill must be the focus for more than just local growth over the course of the SDP plan period.

The introductory paragraph of the MIR highlights the next SDP will set a framework for development in the City and Shire for the next 20 – 25 years. To suggest that existing infrastructure challenges would make it "too risky" to identify the west of Aberdeen for strategic growth is not acceptable. The SDP needs to be much more proactive. My client believes that the SDP should set a clear direction for growth to the west of Aberdeen through the identification of land, both for early delivery and Strategic Reserve Land, which will benefit from the new AWPR and also form the basis of strategies geared toward resolving any existing infrastructure issues.

The employment areas located in Westhill harness a unique and highly skilled workforce, recognised as the largest concentrations of subsea engineering expertise in the world. This cannot continue to be ignored, especially as we are emerging from a restructuring within the Oil and Gas sector over the past number of years. The SDP should seek to capture this expertise and send out a message of confidence through formal recognition of Westhill as an area for planned future growth.

Main Issue / Question Number:	3. Do you agree with the Preferred Option that the new plan should protect the junctions of the Aberdeen Western Peripheral Route from inappropriate speculative development?
<p>My client clearly recognises the long overdue benefits associated with the completion and operation of the AWPR when it opens later this year. Given its purpose is to facilitate the free flow of traffic and ease historic congestion within the confines of the city, it is accepted that this should not be compromised through inappropriate development. However, my client also recognises the potential this new major transport corridor will have in unlocking a number of sites for well-planned development that would benefit from close proximity to key junctions and the sustainable transportation benefits it will offer.</p> <p>The SDP should aim to strike a balance between the proposed and preferred MIR options, in recognition that the route offers some potential for growth. The suggested wording of the preferred option suggests that “any development proposals” near the AWPR junctions should come through the LDP process. This however would be overly restrictive to the detriment of well-planned development proposals. It would therefore be more appropriate to suggest that any “Major” development proposals should be restricted to the LDP process, allowing for smaller scale speculative applications, which could be considered on their own merits.</p>	

Main Issue / Question Number:	4. Do you agree that the Preferred Option for the new plan should focus on the towns of Banff, Macduff, Fraserburgh and Peterhead for regeneration
<p>My client disagrees that the new SDP should solely focus its regeneration priorities on these four towns alone. Regeneration should be viewed as a priority throughout the SDP region, setting out strategies for injecting life and economic activity into many rural communities which have experienced neglect and decline over the years.</p> <p>Aberdeen City Centre must also remain a focus for regeneration. Whilst the MIR briefly highlights the ongoing work as part of the City Centre Masterplan, my client feels that the importance of the City Centre Masterplan needs to be strongly emphasised within the SDP and it too should be included as a “hotspot” for regeneration activity. My client would note that whilst every effort should be made to regenerate brownfield sites, this should not be to the detriment of greenfield housing release.</p>	

Main Issue / Question Number:	5. Do you agree that we should present an optimistic view of future economic growth in the new plan?
<p>Stewart Milne Homes strongly believes that an optimistic view of future economic growth and resilience should underpin the new plans aims and aspirations. Additionally, the Plan should provide sufficient flexibility to facilitate significantly more levels of growth than has recently experienced in the previous few years as a result of a fall in global oil price. The plan period is for the next 20 -25 years, and the city region must remain competitive on a global stage, attracting inward investment and promoting innovation and growth across all sectors to meet economic diversification expectations by 2040, in the face of a global shift away from a reliance on fossil fuels. The SDP cannot, therefore, be viewed as planning for decline.</p> <p>My client is part of a working group represented by a number of Housebuilders across the north East and HFS. They commissioned Aberdeen and Grampian Chamber of Commerce to prepare economic research. The Regional Context paper (Appendix 1) highlights significant improvements and signs of growth, as the region emerges from the challenges experienced in previous years as a result of the restricting within the oil and gas sector. It notes that economic activity levels are high, with the 2018 UK powerhouse study indicating that Aberdeen ranked second in terms of growth in Q3 of 2017, with a 2% increase in GVA, which is predicted to grow again by a further 1.24% in 2018. This evidence further demonstrates the SDP should provide an optimistic view of future economic growth.</p>	

Main Issue / Question Number:	6. Do you agree with the Preferred Option that the new plan should delay releasing safeguarded employment land until after 2030 and look at improving existing employment areas for future use?
<p>In recognition of the existing levels of employment land and the buoyant supply of both office and industrial floor space across the City and Shire, my client is in broad agreement that the employment land currently identified as Strategic Reserve (2027 – 2035) continues to be safeguarded for release post 2030. My client strongly agrees with the MIR's suggestion of a detailed review of existing employment sites, particularly more historic stock and vacant land to ensure they are fit for purpose.</p> <p>The only exception to the above would be Westhill where more limited land is available and should there should therefore be an opportunity for further release as part of residential-led, sustainable mixed use development.</p> <p>In that respect, the new SDP should recognise that a degree of pragmatism and flexibility is required when considering alternative new uses on those sites. Supported should be given to proposals which may not fit neatly into the more traditional employment Use Classes 4, 5 and 6, as per existing LDP requirements relating to allocated employment land across the City and Shire. This would ease existing restrictions on vacant/disused sites which have little prospect of securing new occupiers for traditional employment uses, and look to diversify these areas for appropriate alternative uses, which could provide equal employment opportunities in leisure, retail and tourism sectors. These sites may also prove suitable for residential developments or local authority-led affordable housing schemes.</p>	

Main Issue / Question Number:	8. Is there anything more that the planning system should do to support sustainable economic growth?
<p>The SDP should explicitly acknowledge the positive relationship between home building and sustainable economic growth. The home building industry generates significant social and economic benefits through the delivery of new homes, both direct and indirect benefits.</p> <p>Homes for Scotland published research in November 2015 which demonstrated the social benefits of Home Building in Scotland. To support sustainable economic growth in the north east, the SDP must plan for growth, and plan to meet the housing need and demand identified in the HNDA, providing for a range of sizes and locations of new housing sites across the city region to allow the delivery of new homes which will support growth.</p>	

Main Issue / Question Number:	10. Do you agree that the housing supply target should be based on a composite scenario rather than directly on any of the three scenarios identified in the Housing Need and Demand Assessment?
<p>My client has serious reservations in relation to the proposed Housing Supply Target (HST) identified within the MIR. There appears to be very little evidence or justification provided in respect of how the figures have been arrived at, which conflicts with the requirements of SPP Paragraph 115, which requires “compelling evidence” to back up the HST. Additionally, the proposed Allowances do not appear to correlate with the proposed Housing Land Requirement. There needs to be further clarity provided on this.</p> <p>The proposed “composite” growth scenario bears no relation to any the actual scenarios contained within the HNDA. It is based on past/recent trends to try and justify an unambitious growth plan for the period 2016 – 2030. This is not recognised best practice. Why set the target for the next five years with one that reflects completion levels achieved in 2016 (1,950 homes a year)? The North East was in the midst of a period of uncertainty created by a global drop in the price of oil, when house completions would naturally have reflected lower numbers than previous years. We are now emerging from that period of uncertainty and there are positive signs of stability and optimism returning to the market. Continued growth in the economy is predicted as sentiment in the Aberdeen oil and gas industry improves and the price of oil has currently stabilised at around \$78 a barrel. This confidence will have a positive knock-on effect on the housebuilding industry, therefore my client believes the Housing Supply Targets should be set to reflect a more optimistic growth plan.</p> <p>A primary concern is that the current SDP sets clear aspirations to be building 3000 homes per annum by the year 2020, yet the MIR suggests a target of only 2,100 - 2,200 homes per year in the period 2020 – 2030. This is significantly short of existing aspirations, therefore the MIR housing section appears to be planning for decline. Given the main thrust of the next SDP plans for growth and prosperity for the region, my client believes that setting the HST at the suggested MIR levels sends out a negative message. Such low targets impact on the Housing</p>	

Land Requirement (HLR), thus creating unnecessarily conservative Housing Land Allowances beyond what is considered to be the Existing Effective Supply as identified within table 6 of the MIR, particularly in the 2016 – 2030 period. My client feels a total allowance of 5,500 homes within this period demonstrates a lack of ambition for future growth and continues to rely heavily on an established land supply, laden with strategic sites which have failed to deliver at their projected rates over the previous 5 years. Indeed, the MIR highlights a shortfall of 2,769 from the SDP requirement between 2011 and 2016. The requirement for these homes has not gone away, and requires to be carried forward into the HLR within the next Plan.

My client believes that the SDP should adopt the suggested alternative MIR option, and utilise the high growth scenario contained within the Housing Needs and Demand Assessment (HNDA). This proposes house building levels closer to the 3,000 homes per annum target as contained within the current SDP. In turn, this would boost the Housing Land Requirement for the region over next SDP period, and create more ambitious Housing Allowances as a result, bolstering market confidence and ensuring sustained growth. This approach would coincide with positive signs of continued economic growth for the region, as set out within AGCC's Regional Context Paper (Appendix 1). It highlights some £8.9 billion worth of investment in committed infrastructure projects across the region, therefore the SDP must take a more proactive approach to planning for a growing population.

Additionally, the next SDP's proposed date of approval is 2020, the first period of the Plan should therefore be 2016-2032 in accordance with SPP paragraph 118 which states the amount and broad locations of land should be identified in local development plans to meet the housing requirement up to year 12 from the expected year of approval. The plan periods within the MIR do not reflect this. My client therefore suggests that the plan periods are formalised into two periods 2016-2032 and 2033-2040. This is a small change which would provide closer alignment with SPP.

My client proposes an amendment to MIR Table 1: Proposed Housing Supply Targets which is based on a HST that corresponds with HNDA scenario (Scenario 3), and adjusts the plan periods to include the first 12 year period (2016 -2032), and the remaining 8 years as the second period (2033-2040).

**Amended Table 1:
Proposed Housing Supply Targets**

	2016-2032	2033-2040
Aberdeen Housing Market Area	37,060	17,400
Rural Housing Market Area	10,268	4,032
Total	47,328	21,432
Split as follows:		
Aberdeen City Council	23,664	10,716
Aberdeenshire Council	23,664	10,716

Main Issue / Question Number:	11. Do you agree that we should assume continued funding for affordable housing at 2020/2021 levels from the Scottish Government for the whole of the next plan period?
<p>Given the Scottish Government's commitment to the delivery of affordable housing, it appears sensible that the MIR preferred option assumes funding levels remain similar to the agreed 2020/2021 levels over the course of the next plan period. Stewart Milne Homes would however stress that appropriate land needs to be allocated to ensure the continued delivery of affordable housing as new mainstream housing developments come forward. My client welcomes the MIR's statement that there will no plans to increase the 25% obligation for affordable housing. Instead the focus should be on securing flexible and alternative delivery mechanisms such as Council-led partnership initiatives to deliver fully affordable development sites. Whilst 25% delivery is the current requirement for all sites in the City and Shire, recognition of viability implications on some sites need to be considered to ensure their ultimate delivery is not compromised.</p> <p>Similarly, the Aberdeen City Centre Masterplan has an objective to create a "living city for everyone" and aims to add some 3,000 new residents to the city over the next 25 years. The MIR touches on this briefly under its section on regeneration, however in order to unlock city centre sites and bring forward new housing proposals to meet these ambitious demands, a degree of flexibility must be provided. City Centre brownfield sites will often experience more constraints and extraordinary development costs, therefore a relaxation in current affordable housing requirements would serve as a strong incentive for delivery of new housing in the City Centre.</p>	

Main Issue / Question Number:	12. Do you agree that significant generosity should be included in the early years of the plan but, for the later periods, no generosity should be added? This would be subject to review in future plans.
<p>In general, my client agrees that there should be significant generosity included within the Housing Land Requirement (HLR) in the early years of the plan and would encourage the proposed application of 20% generosity. However this generosity should be extended across the entire plan period, not just the early years. As highlighted in response to question 10 above, the Housing Land Requirement is deemed to be too conservative, based on the HST set out within the MIR. Adopting out a more ambitious growth plan, by increasing the supply target to reflect HNDA scenario 3, would provide a greater HLR. This could also present an opportunity for the generosity to be reduced to a slightly lower rate across the entire plan period, rather than the MIR's suggestion of restricting it to the initial 2016 -2030 period only, which conflicts with SPP paragraph 116 requirements.</p> <p>It is important to appreciate the reasoning behind the generosity margin. Over the lifecycle of a plan, some land may not come forward for development at the rate anticipated. This has large allocations in the City and Shire such as Chapleton of Elrick and Cromleybank at Ellon, which are not delivering at the rates anticipated in the LDPs. Therefore, a flexibility margin in</p>	

the form of 'generosity' is important to ensure that a generous supply of land is allocated in LDPs, informed by SDP allowances. This generous supply of land will ensure that enough homes can be delivered across the life of the Plan to meet the need and demand for new homes identified in the HNDA.

Accordingly, my client proposes an amendment to MIR Table 4: Proposed Housing Land Requirements allowing for 20% generosity extending over the plan period to 2040,

HFS Amended Table 4: Proposed Housing Land Requirements			
	2016-2032	2033-2040	TOTAL
Aberdeen Housing Market Area	44,472	20,880	65,352
Rural Housing Market Area	12,322	4,838	17,160
Total	56,794	25,718	82,512
Split as follows:			
Aberdeen City Council	28,397	12,859	41,256
Aberdeenshire Council	28,397	12,859	41,256

Main Issue / Question Number:

13. Do you agree that our Preferred Option should allow Local Development Plans to make some further housing allowances?

Stewart Milne Homes agree strongly that additional housing allocations are required beyond existing LDP allocations to ensure a healthy land supply is maintained at all times. However, my client has concerns over the proposed allowances as they do not appear to correlate with the Housing Land Requirement when deducted from the Existing Effective Housing Land Supply. Further clarity on the figures needs provided. Notwithstanding, an allowance of only 5,500 homes up to 2030 is much too low and as highlighted in response to Question 10 above on the Housing Supply Target, the MIR figures do not appear to be planning for growth.

Additionally, at the time of publication of the MIR, the 2017 Audit had been agreed and was publicly available and should therefore have formed the evidence base for the MIR. The 2018 audit is likely to be agreed prior to the publishing of the Proposed MIR and my client would request that this forms the basis of establishing the Effective Housing Land Supply and proposed allowances.

In recognition of the previous shortfall of 2,769 homes in the period 2011 to 2016 from the SDP requirement, as well as existing SDP's aspirations to move toward building 3,000 homes per annum by 2020, a more ambitious Housing Supply Target must be set, more in line with Scenario 3 within the HNDA. Based on the revised HST and HLR proposed in modified Tables 3 & 4 above, my client proposes a further modification to MIR Table 6: Proposed Allowances as a result of adopting a more ambitious HST based on HNDA scenario 3. As illustrated, this provides a much more ambitious plan for growth than the 5,500 quoted within the MIR in the

initial plan period. In turn, this would allow City and shire LDPs to allocate further sites, with a focus on areas which have proven market demand and are deliverable to ensure a healthy land supply going forward. In that regard, my client must also express disappointment that the allowances only look at the overall numbers and high level splits rather than breaking it down further into SGAs. To ensure no marketability or potential infrastructure constraints exist, this should really have been presented within the MIR for discussion, rather than Proposed SDP stage which is really too late.

HFS Amended Table 6:

Proposed Allowances

(land to be identified beyond the 2016 effective supply)

	2016-2032	2033-2040	TOTAL
Aberdeen Housing Market Area	16,576	17,423	33,999
Rural Housing Market Area	3,907	3,562	7,469
Total	20,483	20,985	41,468

Main Issue / Question Number:

14. Do you agree that any new greenfield allocations should preferably be under 100 houses in size?

My client recognises that both Councils have a desire to see existing LDP allocations delivered, however these should not serve as an impediment to new sites coming forward. Whilst there should be a strong focus on delivery, restricting all new greenfield allocations to below 100 homes, is not perceived to be the best way to ensure delivery of sites. Accordingly, a range of sites of various sizes, providing variety and choice in areas where there is proven market demand should be the preferred option. There would be a concern that allocating too many smaller scale sites could present the same infrastructure requirements as a smaller number of strategic allocations, which can achieve the required economies of scale to deliver the infrastructure requirements. An over-reliance on small sites could lead to future viability issues.

Main Issue / Question Number:	16. Do you agree that the next Strategic Development Plan should continue to identify regionally significant long-term transport projects and cumulative transport interventions?
<p>My client is in broad agreement that the SDP is an appropriate document to identify strategic-term transport projects and cumulative interventions, however the MIR falls short in providing clarity on timescales and responsibilities for the delivery of these key pieces of infrastructure.</p> <p>Too often in the past, there has been an overreliance on the development industry to fund these projects. The previous STF was effectively a development tax and served to add a further financial burden on the housebuilding industry, often leading to exorbitant costs being placed on sites over and above standard developer obligations, thus resulting in viability issues. The STF has since been quashed by the Supreme Court, who deemed it to be unlawful. We therefore remain in a state of limbo, with identified projects yet to be delivered, stymieing further development in those areas and a lack of detail within the MIR on how investment in those projects will be made.</p>	

Proposed Aberdeen City & Shire Strategic Development Plan Representation Form

Please use this form to make comments on the Proposed Aberdeen City & Shire Strategic Development Plan, ensuring that your comments relate to a specific issue in either the Proposed Plan, Proposed Action Programme or Strategic Environmental Assessment Environmental Report. Please include the relevant paragraph(s) and use a separate form for each issue you wish to raise.

The period for representations will run between Monday 8 October - Monday 17 December 2018

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

What is your preferred method of communication: Email

What document are you commenting on?	Proposed Strategic Development Plan <input checked="" type="checkbox"/>		
	Proposed Action Programme <input type="checkbox"/>		
	Strategic Environmental Assessment Environmental Report <input type="checkbox"/>		
Issue	4. Our Communities	Paragraph(s)	Section 4

What would you like to say about the issue?

(if you would like to write more than the box allows then please attach this form to any additional papers)

Stewart Milne Homes (SMH) are generally supportive of the objective to ensure new development meets the needs of the whole community, both now and in the future, and make the city region a more attractive and sustainable place for residents and businesses to remain, grow, and relocate to. However, in order to realise this there must be an abundant supply of housing land in locations where people wish to live, close to employment opportunities and infrastructure. It is recognised that these communities should be mixed in terms of type and size of homes, as well as tenure and cost, as set out in paragraph 4.7 of the proposed Plan, which reinforces the requirements of SPP to create sustainable, mixed communities. However, in reality the range and size of house types will be determined by the market and Local Development Plans should avoid being over-prescriptive in this regard.

Affordable Homes

SMH welcomes the clarity provided within the Proposed SDP under the section on 'Our Communities' which advises that the target will be for housing to meet the needs of the whole community, through the provision of appropriate levels of affordable housing at "*generally no more than 25%*". This aligns with the benchmark figure set by Scottish Planning Policy (SPP) in its quest to ensure the delivery of sustainable, mixed communities and SMH welcomes clarification in the Proposed SDP that this level will remain unchanged across the City and Shire. As highlighted by SMH at MIR stage, there will be instances where viability implications ultimately determine the level of affordable housing which can be sought from a site, without compromising its overall deliverability.

In recognition that some 75% of affordable housing is delivered by the development industry through Section 75 Legal Agreements and the anticipated decrease in Scottish Government funding post 2021, SMH would stress that appropriate land needs to be allocated to ensure the continued delivery of affordable housing as new mainstream housing developments come forward.

SMH would reiterate their comments made in their representations at MIR stage, that the provision of affordable homes should not be the sole responsibility of the housebuilding industry. Council-led partnership initiatives and alternative mechanisms to deliver affordable housing at scale must also continue to play their role in meeting demands and targets. The final bullet point on Page 27 of the Proposed Plan is therefore welcomed, which identifies that both Councils will consider "*innovative ways to ensure the delivery of affordable housing in order to address identified need*".

Density Targets

SMH is generally content with the Proposed SDP Target for sites larger than one hectare to provide no less than 30 dwellings per hectare in SGAs, which has been rolled forward from the Targets set within the extant SDP. However, setting a higher target of 50 homes per hectare across the Aberdeen City SGA could present some issues. Whilst this may be appropriate in some higher density, inner city locations, it may not be appropriate or indeed achievable for every site. The focus should be on the creation of sustainable mixed communities, however high density development in excess of 50 units per hectare is unlikely to provide a range and mix of family homes. SMH would object to any strict application of a 50 units per hectare requirement being rolled out across the Aberdeen City SGA.

Housing Need and Demand

With regard to delivering new homes across the Region, SMH appreciates that there has been significant discussion on this matter between the Strategic Development Planning Authority, Homes for Scotland and a number of housebuilders (including Stewart Milne Homes) who had submitted their concerns at MIR stage. We therefore welcome the adjustments made to the Plan periods within the Proposed SDP from those presented at MIR Stage. In line with SPP Paragraph 118, these now identify the amount and broad locations of land which should be allocated in local development plans to meet the housing land requirement up to year 12 from the expected year of plan approval (2020-2032), as well as beyond year 12 and up to year 20 (2033-2040).

SMH also tentatively welcomes the SDPA's decision to rightly move away from the 'composite' growth scenario as previously set out as the preferred option within the MIR, which lacked sufficient evidence to justify the suggested Housing Supply Target (HST), Housing Land Requirement (HLR) and related Allowances. Notwithstanding, SMH do not agree with the use of the Modified Principal Growth Scenario, details of which are set out below.

SMH support the 20% generosity applied to the Housing Supply Target (HST) in the plan period (up to 2032), in line with Paragraph 116 of SPP. It is noted that it is proposed to reduce this to 10% in the second plan period (2033-2040), however SMH would seek the 20% generosity to be extended across all plan periods to ensure the SDP maintains an ambitious plan for growth and a generous supply of land for housing is provided as per SPP, paragraph 116. It should also be made mandatory for LDPs to make provision for Strategic Reserves for the period 2033 to 2040. Further comment on this is provided below.

Paragraph 4.16 of the Proposed SDP identifies that the Housing Allowances derived from the HLR will now be split proportionately on the basis of 80% directed to the Aberdeen Housing Market Area (AHMA) and 20% to the Rural Housing Market Area (RHMA). This is supported by SMH, who strongly agrees that the balance must be heavily weighted toward the AHMA, to support sustainable communities, secure positive

placemaking and make the most efficient use of infrastructure and resources. However, in recognition of the consistently low completion rates in the Rural Housing Market Area and recognition within Paragraph 6.7 of the Housing Methodology Paper that 40% of completions within the RHMA between 2006 – 2016 came from unallocated sites (in comparison to 25% in the AHMA), my client would query whether increasing the allowances within the more marketable AHMA to 85% and reducing those in the RHMA to 15% would be a more appropriate split. Additionally, it is apparent from Tables 1, 2 and 3 that the split for the period 2016 - 2019 appears to be 75%/25%, with no reasoning provided. This should be amended to include a consistent split between all three plan periods.

SMH believe that the modified version of the Principle Growth Scenario presented within the Proposed SDP and supporting Housing Methodology Paper, would result in unambitious aspirations for growth across the next SDP Plan period. Whilst the Proposed SDP is now slightly better aligned with the Principal Growth scenario as set out within the HNDA, from that proposed under the previous 'composite' scenario at MIR stage, further assessment of the Proposed SDP's use of a Modified Principal Growth Scenario appears to be flawed.

All three growth scenarios contained within the HNDA give a declining Supply Target in the later years. The SDPA has attempted to reverse this through the creation of a "Modified Principal Growth Scenario", providing a rising HST through the Plan periods. Disappointingly however, it is apparent from our assessment of the Modified Principal Scenario, that it actually provides more conservative growth aspirations for the period up to 2032 from those that would be achieved utilising the standard Principal Scenario as contained within the HNDA. Paragraph 4.10 of the Proposed SDP is therefore misleading, as it suggests the Housing Supply Target has been informed by the Principle Scenario from the HNDA, but fails to mention that in fact it presents a negatively modified version of this.

The supporting Housing Methodology Paper, which informs the Proposed SDP suggests that the HST for both the Principal and Modified Principal Scenarios result in 43,420 homes up to the period 2035. Whilst that may be true, assessment of the annual HST figures across the 2016 – 2032 plan period actually demonstrates a shortfall of some 1,084 new homes between the Proposed SDP's Modified Principal Scenario and the Principal Scenario contained within HNDA. The HST deficit in this initial plan period would only catch up through enhanced supply post-2032, however there is no certainty over this as it would fall to strategic reserve, which will be subject to review as part of future Local Development Plans.

SMH thereby object to the proposed use of the Modified Principal Growth Scenario on the basis that it departs from the Principal Growth Scenario as contained within the HNDA and further reduces the aspirations for the delivery of new homes across the lifetime of the emerging SDP and subsequent LDPs. Paragraph 115 of SPP requires the HST to be "supported by compelling evidence", however SMH do not

consider that the Methodology Paper provides sufficient explanation for adopting the Modified Principle Scenario and the apparent implications this would cause for the period up to 2032.

The Housing Methodology Paper cites the pace and scale of delivery experienced through historic completion rates and concern regarding the ability of the housebuilding industry to deliver higher targets, as one of the main reasons for adopting the modified Principal Growth Scenario. It states that since 2009, completion rates have only once surpassed 2,000 homes in 2015. The 2018 Housing Land Audit (HLA) Audit has now been agreed and published. My client would request that this forms the basis of establishing the Effective Housing Land Supply as it forms the most up-to-date evidence base at the time of writing. The 2018 HLA also demonstrates that the 2,000 homes figure was again surpassed in 2017, with 2,059 new homes completed that year. This brings the average number of completions across the last 5 years to 2,005 homes per annum.

One must also appreciate the background and circumstances behind these trends. Since 2012, the Housing Land Supply across the North East has been dominated by large scale, strategic sites, a fact recognised by Paragraph 4.15 the proposed SDP. These sites have taken a substantial length of time to come to fruition due to complex Development Framework / Masterplanning exercises as well as significant infrastructure requirements, and delivery of these sites has really only come on stream in the last few years. Furthermore, since late 2014 the Region has experienced a period of economic uncertainty due to the downturn in the Oil and Gas sector. Accordingly, if the housebuilding industry is able to achieve an average exceeding 2,000 completions per annum in such difficult circumstances, undoubtedly the industry can achieve significantly higher completion rates going forward, as the region emerges into a period of economic recovery and accelerated delivery is being experienced on key strategic sites. If the Plan is to be aspirational and allocate sufficient land for housing, efforts must be made to ensure that there is an adequate supply of land.

As per my client's submissions made to the MIR, Stewart Milne Homes wish to see the adoption of the High Growth Scenario as detailed within the HNDA. The extant SDP sets clear aspirations to move toward building 3000 homes per year by 2020, therefore setting the HST at an average of 1,950 homes in the period 2016 – 2019 and 2,200 homes per annum between 2020 – 2032 lacks ambition and contradicts the wider growth aspirations for the regional economy. It will also send out as message that the next SDP is planning for decline, which is unacceptable to SMH. The evidence set out in the preceding paragraphs with regard to recent trends in completion rates, further compounds my client's concerns with the HST and HLR contained within the Modified Principal Growth Scenario. The High Migration Scenario therefore presents the only option within any of the HNDA scenarios that gives my client comfort in relation to achieving sufficient growth, through an ambitious HST, HLR and sufficiently generous additional allowances, thereby

creating a healthy supply of housing land and the optimum conditions to achieve accelerated housing delivery and growth within the industry.

Paragraph 4.20 of the Proposed SDP stipulates that Local Development Plans “may” choose to make provision for additional strategic reserves for housing for the period 2033-2040 in accordance with Table 3. However, it goes on to highlight that this is not a requirement. Such ambiguity could result in an inconsistent approach across the City and Shire and it is contended that there should be an obligation on both Councils to identify strategic reserves for housing over that period. This would provide some indication of the direction of growth, providing certainty for communities and the development industry.

SMH have been working closely with Homes for Scotland (HFS) in respect of their concerns over the delivery of new homes contained within the Proposed SDP. HFS share these concerns over the proposed use of the Modified Principal Scenario and have prepared updated Tables 1, 2 and 3 of the Proposed SDP to reflect the HST, HLR and Allowances on the basis of utilising the High Growth Scenario and 85%/15% split in favour of the AHMA. These tables are attached as Appendix 1.

What change would you like to see made?

(if you would like to write more than the box allows then please attach this form to any additional papers)

In view of the preceding arguments, my client would request the following modifications to the Proposed SDP:

Paragraph 4.16 should be adjusted to read, *"In order to support sustainable communities, the best use of infrastructure, and increased levels of housing delivery, these allocations are divided on an **85% / 15%** basis between the Aberdeen Housing Market Area and the Rural Housing Market Area respectively".*

In calculating the Housing Supply Target, the Modified Principal Growth Scenario should be substituted for the High Growth Scenario and the figures within Table 1 on page 29 of Proposed SDP should be updated in line with HFS Table 1 (Appendix 1). A 20% generosity should then be applied to the High Growth Scenario HST across all three plan periods to give the HLR. Table 2 on Page 29 of the Plan should be updated to reflect Table 2 prepared by HFS (Appendix 1). This will ensure more ambitious allowances to be identified within Table 3 on Page 30 of the Plan, which should be updated to reflect Table 3 prepared by HFS as attached at Appendix 1. The initial sentence within Paragraph 4.10 should be amended to read, *"Table 1 illustrates the Housing Supply Target for the City Region, as informed by the **High Migration Growth Scenario** from the Housing Needs and Demand Assessment 2017."*

Finally, Paragraph 4.20 should be adjusted to read, *"In order to provide communities and the development industry a degree of certainty over the long term future growth of the Region, Local Development Plans should make provision for additional Strategic Reserves for housing for the period 2033 to 2040 in line with Table 3."*

Please return the completed form and any additional papers:

- **By Post :**
Aberdeen City and Shire Strategic Development Planning Authority, Woodhill House, Westburn Road, Aberdeen, AB16 5GB
- **By Email :** team@aberdeencityandshire-sdpa.gov.uk

If you wish to fill out a Word form, please be aware that you must email the above address for a copy of the form. Please save any changes before submission.

Please ensure all representations are with us by midnight Monday 17 December 2018.

Thank you. For more information, please visit www.aberdeencityandshire-sdpa.gov.uk or contact the Strategic Development Planning Authority on 01467 539734.

Privacy Notice

Why does the SDPA need your information?

As part of the review of the Strategic Development Plan, the Strategic Development Planning Authority (SDPA) is obliged by the Town and Country Planning (Scotland) Act 1997 and Town and Country Planning (Development Planning) (Scotland) Regulations 2008 to consult on a Proposed Strategic Development Plan and Proposed Action Programme. The Environmental Assessment (Scotland) Act also requires us to consult on a Strategic Environmental Assessment Environmental Report.

If you choose to respond to the consultation on any of the above documents, or the associated documents which support them, then you must submit your name and address in order to ensure that your representation can be considered valid. This is because we are required by the legislation noted above to contact you in relation to your response.

By submitting a response to the consultation you understand that the SDPA will use the information contained in your response, including your personal data, as part of the review of the Aberdeen City and Shire Strategic Development Plan. This will include consultation on the Proposed Plan (including any subsequent Proposed Plan as Modified), but also the Examination of the Proposed Plan and its eventual approval.

Any personal information that you provide in response to this consultation will be jointly held by both Aberdeen City Council and Aberdeenshire Council on behalf of the SDPA. Aberdeen City Council and Aberdeenshire Council will therefore be the Joint Data Controllers for your information. This is because the SDPA is a partnership organisation made up of both Councils.

Following the end of the consultation, i.e. after 17 December 2018, your name and respondent identification number (provided to you by the SDPA on receipt of your submission) will be published alongside a copy of your completed response on the SDPA website.

Your name, respondent identification number and a copy of your response will be retained on the SDPA website until a decision on the approval of the Proposed Strategic Development Plan has been made by Scottish Ministers. This decision is currently expected sometime in 2019. Once a decision on the Proposed Plan is made by Scottish Ministers, your name, respondent identification number and response will be removed from the SDPA website.

Other personal contact details associated with your response; such as postal address, telephone number and / or e-mail address will not be made public, although we will share this information with Scottish Ministers and the Scottish Government's Planning and Environmental Appeals Division (DPEA). We are obliged under the Town and Country Planning (Development Planning) (Scotland)

Regulations 2008 to issue a copy of all unresolved issues to Scottish Ministers / the DPEA when submitting the Proposed Plan for Examination in Public. Scottish Ministers / the DPEA then have a statutory requirement to contact respondents via The Town and Country Planning (Scotland) Act 1997, which again makes it necessary for us to provide your response and preferred method of contact to them. Should the DPEA request further information from you then they may subsequently publish that information on the DPEA website.

The SDPA will only keep your personal data for as long as is needed. The SDPA 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 the SDPA will review whether it is necessary to continue to retain your information for a longer period.

Your Data, Your Rights

You've got legal rights about the way the SDPA handles and uses your data, which include the right to ask for a copy of it, and to ask us to stop doing something with your data.

If you are unhappy with the way that the SDPA or the Joint Data Controllers have processed your personal data then you do have the right to complain to the Information Commissioner's Officer, but you should raise the issue with the Data Protection Officers first. The Data Protection Officers can be contacted by writing to:

- [REDACTED], Data Protection Officer, Aberdeen City Council, Legal and Democratic Services, Level 1 South, Marischal College, Aberdeen, AB10 1AU.
- [REDACTED], Data Protection Officer, Aberdeenshire Council, Business Services, Town House, 34 Low Street, Banff, AB45 1AY

APPENDIX 1

**Table 1:
Housing Supply Targets – High Migration Scenario**

Table 1: Housing Supply Target by Housing Market Area, Local Authority and Tenure Mix											
		2016-2019			2020-2032			2033-2040			2016-2040
		Affordable	Market	Total	Affordable	Market	Total	Affordable	Market	Total	Global Total
Aberdeen Housing Market Area		3,438	6,386	9,824	10,652	19,781	30,433	6,263	11,631	17,894	58,152
Rural Housing Market Area		607	1,127	1,734	1,880	3,491	5,371	1,105	2,053	3,158	10,262
Aberdeen City Council		2,023	3,756	5,779	6,266	11,636	17,902	3,684	6,842	10,526	34,207
Aberdeenshire Council		2,023	3,756	5,779	6,266	11,636	17,902	3,684	6,842	10,526	34,207
Aberdeen City and Shire	Total	4,045	7,513	11,558	12,531	23,273	35,804	7,368	13,684	21,052	68,414

[85%/15% split between AHMA /RHMA]

Note – components may not sum to totals due to rounding.

**Table 2:
Housing Land Requirements – High Migration Scenario**

Table 2: Housing Land Requirements by Housing Market Area, Local Authority and Tenure Mix											
		2016-2019			2020-2032			2033-2040			2016-2040
		Affordable	Market	Total	Affordable	Market	Total	Affordable	Market	Total	Global Total
Aberdeen Housing Market Area		4,127	7,664	11,790	12,782	23,738	36,520	7,516	13,957	21,473	69,782
Rural Housing Market Area		728	1,353	2,081	2,256	4,189	6,445	1,326	2,463	3,789	12,315
Aberdeen City Council		2,428	4,507	6,935	7,519	13,963	21,482	4,421	8,210	12,631	41,048
Aberdeenshire Council		2,428	4,507	6,935	7,519	13,963	21,482	4,421	8,210	12,631	41,048
Aberdeen City and Shire	Total	4,854	9,016	13,870	15,037	27,928	42,965	8,842	16,421	25,262	82,097

[85%/15% split between AHMA /RHMA, 20% Generosity allowance throughout]

Note – components may not sum to totals due to rounding.

**Table 3:
Housing Allowances – High Migration Scenario**

Table 3. <u>High Migration</u> Scenario based on an 85% Aberdeen Housing Market Area/15% Rural Housing Market Area split								
	5 Year Effective* 2016	Post 5 Year Effective* 2016	Total Effective Land Supply	Allowances 2020-2032	Allowances 2033-2035	Allowances 2036-2040	Total Allowances	
Aberdeen Housing Market Area	10,083	18,125	28,708	22,799	6,942	11,833	41,574	
Rural Housing Market Area	3,143	3,822	7,047	1,801	1,315	2,233	5,349	
Aberdeenshire Part of AHMA				10,499				
Aberdeen City Council	6,210	11,228	17,438	12,300	4,129	7,033	23,462	
Aberdeenshire Council	7,016	10,719	17,735	12,300	4,129	7,033	23,462	
Aberdeen City and Shire	Total	13,226	21,947	35,173	24,600	8,257	14,066	46,923

85%/15% split between AHMA /RHMA

Note – components may not sum to totals due to rounding. Allowances will not include sites of less than 5 homes.

*Taken from Aberdeen City and Shire Housing Land Audit 2016

Appendix 5 – Town Centre Health Check – Ellon (2015)

Aberdeenshire Town Centre Health Check 2015



'Turra Coo' statue, Turriff



Saltoun Square, Fraserburgh



Huntly Square



High Street, Banchory



Biggar Fountain, Banff



Shore Street, Macduff

10. Ellon

10.1. Ellon Context

Ellon is a market town and major service centre situated within the Ythan river valley, 16 miles north of Aberdeen. The population, currently 10,100, has been growing rapidly with the oil industry and the town is part of the Energetica Corridor. Ellon can continue to expand in the near future through important housing and employment land allocations included at Cromleybank, and can become a high quality lifestyle, leisure and business location. USP indicates Ellon is a fairly independent town, has a wide diversity of jobs and has a high number of public sector jobs despite the significant percentage of workers who commute to Aberdeen.



10.2. Ellon Final Scores

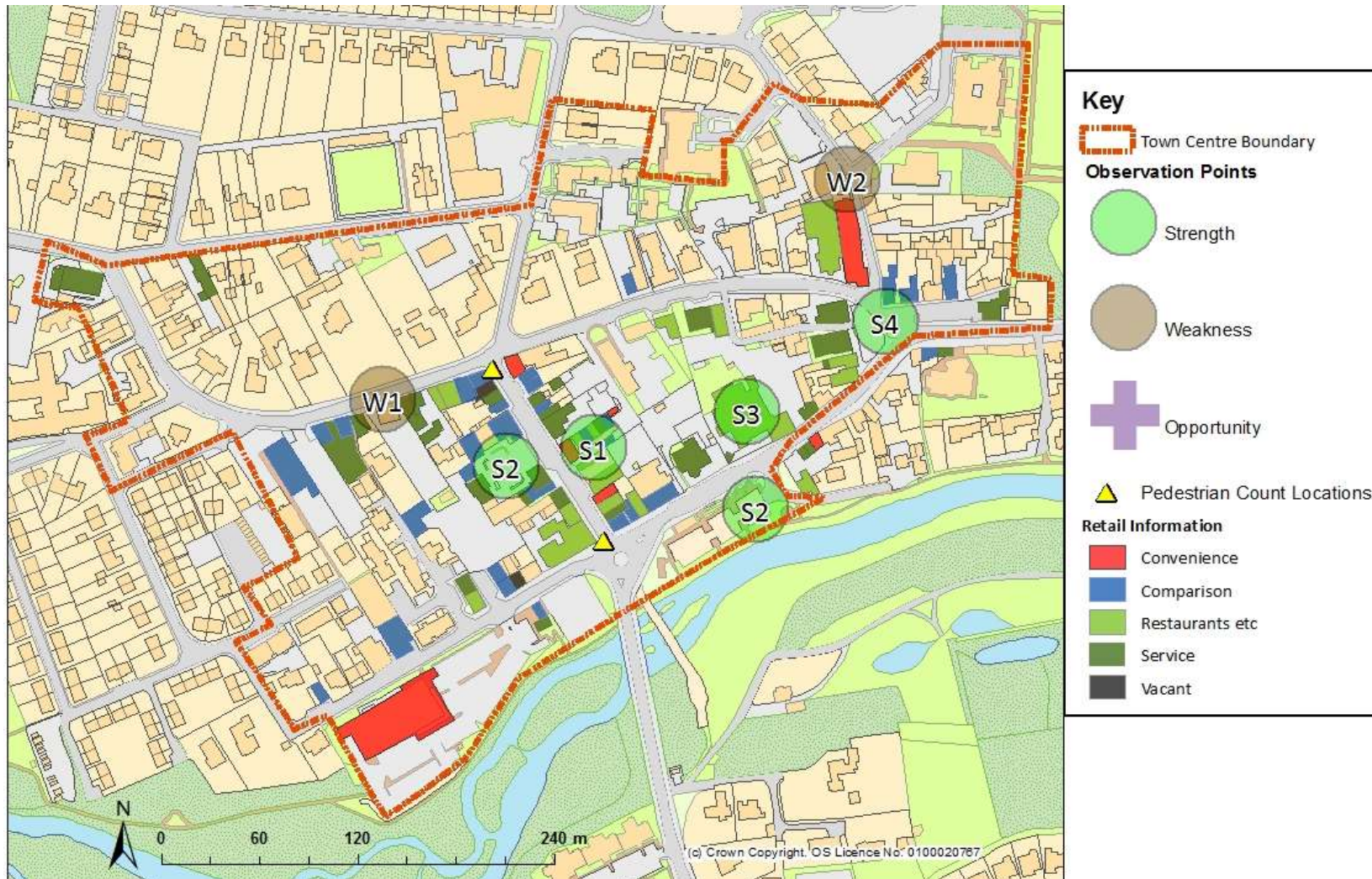
Retail	Activity	Physical Environment	Property	Accessibility	Community	Total
21/35	10/15	11/20	9/15	17/30	8/10	76/140

See Ellon's full scores in Appendix 1: Indicator table.

10.3. Ellon Town Centre Health Check Results

<p><u>Strengths</u></p> <ol style="list-style-type: none"> 1. Although small, Ellon shopping centre provides a pleasant area away from traffic with a group of appealing shops. 2. Green infrastructure includes several flowered areas including some at the square off Bridge Street and near the main bus stop along the river bank. 3. The New Inn hotel stands out from other buildings in the town centre. 4. The War Memorial at The Square is an attractive, meaningful piece of public art. 5. Ellon has a good range of independent shops and professional services to provide for its population. 6. There is a very low vacancy rate which shows retailers are in good health (although this does leave little room for new businesses). 7. There is a wide range of cultural and community facilities such as the health centre, the Kirk centre, the library and the Ythan centre, with Victoria Hall on the town centre boundary. 8. There are frequent bus services to Aberdeen from the pleasant main bus stop next to the river. 9. There are few crimes committed in Ellon town centre relative to the town's population. 	<p><u>Weaknesses</u></p> <ol style="list-style-type: none"> 1. There is very little cycling infrastructure in Ellon. There are several narrow roads with Station Road considered to be not suitable for cyclists. 2. Schoolhill Road is extremely narrow for pedestrians in places. 3. There is a smaller than average range of multiple retailers in Ellon. 4. There is also a smaller than average range of convenience outlets with no butcher or greengrocer. 5. There is concerns regarding traffic on Bridge Street.
<p><u>Opportunities</u></p> <ol style="list-style-type: none"> 1. Retailers could take advantage of a large planned housing development in Ellon which can potentially increase footfall. 2. There is scope for more convenience or comparison outlets in Ellon if more units in the town centre can be made available for retail use. 	<p><u>Threats</u></p> <ol style="list-style-type: none"> 1. The supermarket to the east of the town attracts footfall away from the town centre. 2. There is potential for further retail facilities to be developed also to the east of the town. These will offer different services to the town centre and so should not compete directly.

10.4. Observational map of Ellon



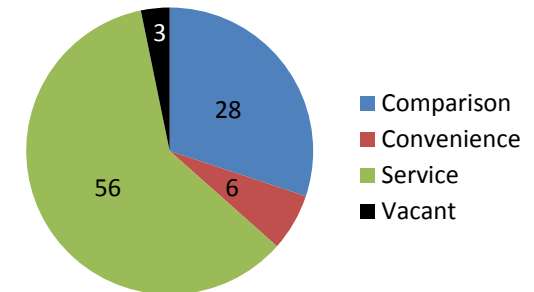
10.5 Ellon Retail Review

Ellon town centre has a good range of retail and gives a pleasant shopping experience. The main bus stop in Ellon is on Market Street which attracts footfall to its retail units including its professional services and food outlets including the charming Chocolate Bar and the New Inn. Bridge Street hosts a variety of retail and cafes and gives access to an attractive square and Ellon Shopping Centre. The main town square is at the east end of Market Street where Costcutter generates footfall. Indeed, Costcutter and Aldi are Ellon's main convenience outlets and mitigate the impact of Tesco supermarket on the town centre. There is a high percentage of professional services within Ellon's number of occupied units including banks, property services, a vet, a photography studio and a Sea Energy Ship Management office which attract a range of people to the town centre.

10.6. Ellon Pedestrian Count Analysis

Ellon town centre recorded higher levels of footfall at both locations compared to the previous health checks. However, there still wasn't as many pedestrians recorded as other similarly sized towns, despite the counts being taken on a Bank Holiday. A possible reason for this is that the lower than average number of convenience shops in the town centre mean that people look to the supermarket on the outskirts of Ellon for their groceries. In any case, Ellon town centre has a good retail scene overall.

Ellon Retail Units



Ellon Average Pedestrian Counts

