

PRIVACY NOTICE

LOCAL DEVELOPMENT PLAN

PUBLIC COMMENT

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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.

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- 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:
 - Consent; or
 - Performance of a Contract;
- to request rectification or erasure of your personal data, as so far as the legislation permits.



HALLIDAY FRASER MUNRO

CHARTERED ARCHITECTS & PLANNING CONSULTANTS

Please use this form to make comments on the Proposed Aberdeenshire Local Development Plan 2020.

If you are making comments about more than one topic it would be very helpful if you could fill in a separate response form for each issue you wish to raise.

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

Your Details:

Date:	30.7.2020
Name:	HALLIDAY FRASER MUNRO
Telephone Number:	[REDACTED]
Email address:	[REDACTED]
Postal Address:	[REDACTED]
Postcode:	[REDACTED]

Are you happy to receive future correspondence only by email? Yes

Are you responding on behalf of another person? Yes

If yes who are you representing? **Ms. G Mitchell**

Would you like to subscribe to the Aberdeenshire LDP eNewsletter: Yes

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



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Your Comments (no more than 2000 words)

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

Amend appendix 7b (Buchan Settlement Statement) by allocating BU058 within the Aberdeenshire Local Development Plan for the development of 50 - 80 new homes.

Reason for change:

There is an existing development on the brownfield site and therefore the principle of 'development' has been established. Developing the site would help facilitate a clean -up of a long- standing eyesore that is contaminated and has been the source of nuisance behaviour in the area. Local employment opportunities (construction etc) would be created and the development would support local services and nearby established uses important to the area. The site is well connected to Crimond with clear linkages. Overall helping to achieve the settlements vision of developing to the south of the village.

Attached documents:

Proposed Local Development Plan Response

Supporting documents:

MS 1 – *BID document*

MS 2 – *MIR response*



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ABERDEENSHIRE PROPOSED LOCAL DEVELOPMENT PLAN 2020

RESPONSE TO PROPOSED LOCAL DEVELOPMENT PLAN

LAND AT MOSS SIDE CAMP, CRIMOND

BU058

JULY 2020

On behalf of
Ms. G Mitchell



HALLIDAY FRASER MUNRO

CHARTERED ARCHITECTS & PLANNING CONSULTANTS

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HALLIDAY FRASER MUNRO
CHARTERED ARCHITECTS & PLANNING CONSULTANTS

1. Introduction

1.1. This report has been prepared by Halliday Fraser Munro, Chartered Architects and Town Planning Consultants, on behalf of Ms, G Mitchell. It is written in response to the Proposed Aberdeenshire Local Development Plan 2020.

1.2. This representation specifically relates to site:

- BU058 – residential development for 50 – 80 homes

1.3. The Land at Moss Side Camp, Crimond was the subject of a development bid (GR117) in response to the 'pre- MIR consultation' for a residential development on a site that includes remnants of a disused former hospital camp World War Two buildings and is currently a vacant brownfield site. It was not included in the Proposed Local Development Plan on the basis the site is not well connected to Crimond.

Modifications sought: *Amend appendix 7b by allocating BU058 within the Aberdeenshire Local Development Plan for the development of 50 - 80 new homes.*

Reasons for change: *There is an existing development on the brownfield site and therefore the principle of 'development' has been established. Developing the site would help facilitate a clean up of a long- standing eyesore that is contaminated and has been the source of nuisance behaviour in the area. Local employment opportunities (construction etc) would be created and the development would support local services and nearby established uses important to the area. The site is well connected to Crimond with clear linkages. Overall helping to achieve the settlements vision of developing to the south of the village.*

2. Site Context

2.1. We believe BU058 is well connected and well – related to the settlement of Crimond. The approximately 16 ha site provides a logical extension to the south of the village and the A90 (see indicative site layout at Figure 1). In line with the settlement strategy that preferred future development to the south of the village. Currently there are no allocations facilitating this.



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Figure 1 Indicative Site Layout

Transport Connection

- 2.2. The settlement vision stated, 'In order to avoid to conflicts with the A90 trunk road, a strategy of developing to the south of this road is promoted' and 'All future development must contribute towards access roads to the south of the settlement to facilitate future growth'. Access could be taken from a road that runs along the southern boundary of the site from the A90. Additionally, there is an access road from the A90 to Moss Side Farm which is adjacent to the site. Development at BU058 would contribute to the provision of access roads to the south of the settlement and provide connection to the proposed site and access to the south of the village, in line with the settlement vision.
- 2.3. The site is already linked to the village through a popular walk and an established right of way runs through the tree belt. The proposed development could contribute to path provision, safe pedestrian crossings and formal access in Crimond belts.



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Visual Connection

- 2.4. The current derelict state of Moss Side Camp detracts from the amenity of the village and presents a safety risk to the public due to the number of derelict buildings on the site. As the PLDP highlights *'appropriate development will be welcomed on brownfield sites that bring a significant environmental and visual improvement'* (p.32). BU058 would give opportunity for the site to be cleaned up and provide quality useable public space, significantly improving the site visually and environmentally. A well – designed residential development that considers the wider context of Crimond and the local area would enhance the village's sense of place and would have a positive impact on Crimond. As commented by the officers' in the MIR report 2019, *'The site would relate to the village itself'* (p.14), we consider this a positive comment and agree that the site relates to the village.

3. Development

- 3.1. Crimond is within the Regeneration Priority Area in the Proposed Aberdeen City and Shire Strategic Development Plan (Figure 2). The plan states, 'Land brought forward for housing must be used efficiently, and brownfield sites and regeneration areas should be given priority'. The current LDP noted, 'positive steps are needed to help these [regeneration] areas meet their full potential'. Development at this site would be a positive step for Crimond remediating brownfield land and creating a high-quality residential development that can help to generate further development interest in the village.



Figure 2 Proposed Aberdeen City and Shire Strategic Development Plan Regeneration Priority Area

- 3.2. The Settlement statement vision expresses that *'during the next plan period it is important for Crimond to see housing development, particularly affordable housing, to meet local regeneration objectives and to sustain and grow existing services within the settlement'*. The site would provide



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25% affordable housing contribution. This will help create a sustainable community by meeting their needs with an appropriate mix, type and size of housing.

- 3.3. Despite the clear vision of housing development and preference for future development to the south of the village, officers have retained an existing allocation, OP1 South of the Corse. OP1 was identified by the Housing Land Audit 2018 as constrained and has been allocated since the 2012 Plan but no planning applications have been submitted for the site. OP1 is still identified as constrained in terms of ownership and marketability in the Draft Housing Land Audit 2020. We would therefore question the deliverability of this site.
- 3.4. Due to officers' comments in the MIR the scale of the proposed development has been reduced from 80 – 100 to 50 – 80 homes. Due to the reduction, we would propose development at Moss Side Camp along with limited land to the north that is under the same ownership as most appropriate. The site has no constraints making it highly deliverable.
- 3.5. Plans for reusing the land for a single wind turbine have been refused over the years and other commercial uses are simply not viable. The brownfield nature of the site requires a use that generates enough value to allow it to be remediated appropriately.
- 3.6. The area shown in pink on the indicative site plan at Figure 1 is proposed for small scale business uses to support the local economy.
- 3.7. A residential allocation here will help to support services in the village including the new medical centre and the primary school.

4. Woodland

- 4.1. "Crimond Belt" is included in the SNH ancient woodland inventory as a long- established woodland. Sitting to the east of the site, the proposed development would not alter the important linear woodland feature but contribute to its conservation and enhance access to the woodland through the provision of core paths. The woodland belt provides a strong defensible boundary to the site limiting visual impact from the north.

5. Conclusion

- 5.1. BU058 is well connected to the village of Crimond. The site relates well to the area and reflects the settlement vision by developing to the south of the village and A90 and provide new access to the south of the settlement that could benefit future growth.
- 5.2. The land is presently a brownfield eyesore that does not contribute to the character of Crimond. The proposed development will give opportunity to provide quality public space, a well- designed residential development and path provision whilst conserving the Crimond belt to enhance the settlements sense of place.
- 5.3. The scale of development has been reduced to 50 – 80 homes. As BU058 has no constraints the site is highly deliverable and better placed to come forward than OP1 which is constrained. It is clear future growth to the south of Crimond is desired, therefore, we consider BU058 ideally placed to deliver this and request that it be included as residential allocation in the Local Development Plan.



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Supporting documents

MS 1 – *BID document*

MS 2 – *MIR response*

4. Site Details

Name of the site (Please use the LDP name if the site is already allocated)	Crimond South
Site address	Moss Side Camp, Crimond
OS grid reference (if available)	NK054559
Site area/size	Approx. 16Ha
Current land use	Agriculture/derelict site
Brownfield/greenfield	Both
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)	Land in two separate ownerships but promoted jointly
Is the site under option to a developer?	No <i>If yes, please give details</i>
Is the site being marketed?	No, unallocated therefore difficult to market <i>If yes, please give details</i>

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
	<i>If yes, please give details</i>
Are there any other legal factors that might prevent or restrict development? (e.g. ransom strips/issues with accessing the site etc.)	No
	<i>If yes, please give details</i>

7. Planning History

Have you had any formal/informal pre-application discussions with the Planning Service and what was the response?	Yes/No <i>If yes, please give details</i>
	The site has been subject to a recent planning application for a wind turbine. General site context is therefore known but as discussions were related to a wind turbine the response is not fully related to the proposed housing development
Previous planning applications	<i>Please provide application reference number(s), description(s) of the development, and whether planning permission was approved or refused:</i> APP/2016/3254
Previous 'Call for sites' history. See Main Issues Report 2013 at	<i>Please provide Previous 'Call for sites'/'Bid' reference number:</i>

www.aberdeenshire.gov.uk/ldp	
Local Development Plan status www.aberdeenshire.gov.uk/ldp	Is the site currently allocated for any specific use in the existing LDP? Yes/No
	If yes, do you wish to change the site description and or allocation?

8. Proposed Use

Proposed use		Housing/employment/mixed use/other (please specify):
Housing	Approx. no of units	Approximately 80-100
	Proposed mix of house types	Number of: <ul style="list-style-type: none"> Detached: 50% Semi-detached:25% Flats: Terrace: Other (e.g. Bungalows):25%
		Number of: <ul style="list-style-type: none"> 1 bedroom homes: 2 bedroom homes:25% 3 bedroom homes: 50% 4 or more bedroom homes:25%
	Tenure (Delete as appropriate)	Private/Rented/Self-Build/Supported houses (e.g. for elderly)/Other (please specify):
	Affordable housing proportion	25 %
Employment	Business and offices	Indicative floor space: Gross area of 2Ha
	General industrial	Indicative floor space: TBC
	Storage and distribution	Indicative floor space: TBC
	Do you have a specific occupier for the site?	No
Other	Proposed use (please specify) and floor space	NA Business start-up – included in business use above
	Do you have a specific occupier for the site?	NA
Is the area of each proposed use noted in the OS site plan?		Yes

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	No, site is unallocated	
	If yes, please give details (e.g. bank facility, grant funding, secured loan etc.)	

timescales	
Are there any other risk or threats (other than finance) to you delivering your proposed development	No
	If yes, please give details and indicate how you might overcome them:

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	Yes
	Trees, hedgerows and woodland (including trees with a Tree Preservation Order)	Yes, woodland adjacent
	Priority habitat (UK or Local Biodiversity Action Plan)	No
	Local Nature Conservation Site	No
Local Nature Reserve	No	
<p><i>If yes, please give details of how you plan to mitigate the impact of the proposed development:</i></p> <p>The woodland adjacent to the site will not be affected as a buffer zone will be implemented to provide protection to the woodland resource.</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	Yes
	Habitat creation in public open space	Yes
	Avoids fragmentation or isolation of habitats	Yes
	Provides bird/bat/insect boxes/Swift bricks (internal or external)	Yes
	Native tree planting	Yes
	Drystone wall	Yes, if appropriate
	Living roofs	Yes, if appropriate
	Ponds and soakaways	Yes
	Habitat walls/fences	Yes
	Wildflowers in verges	Yes
	Use of nectar rich plant species	Yes
	Buffer strips along watercourses	Yes
	Show home demonstration area	Yes
	Other (please state):	Site clean-

		up
	<p>Please provide details:</p> <p>Part of the site is an ex-WWWII medical camp (unused) that has been used over the post-war years for a number of differing uses, including illegal dumping and burning of tyres. The development of this brownfield sites would allow for a significant improvement to a local amenity but also good opportunities to enhance biodiversity with planned integration of watercourses and new woodland planting to enhance the existing woodland belts beside Crimond.</p>	

11. Historic environment

Historic environment enhancement		
Please state if there will be benefits for the historic environment.	Yes	
	<p><i>If yes, please give details:</i></p> <p>Interpretation of the site's history has been included as aprt of eth proposed development option. An area at the south of the site could be set aside for interpretation material and tie on with path networks and open space provision. The existing buildings are derelict and dangerous and access to the site is not encouraged. The buildings cannot be retained.</p>	
<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
	If yes, please give details of how you plan to mitigate the impact of the proposed development	

12. Landscape Impact

Is the site within a Special Landscape Area (SLA)? (You can find details in Supplementary	<p>Yes/No</p> <p>The North East Aberdeenshire Coast boundary of special Landscape Area lies just within 200m</p>
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<p>Guidance 9 at www.aberdeenshire.gov.uk/ldp)</p>	<p>North of the site</p> <p><i>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:</i></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 • SNH (1998) South and Central Aberdeenshire landscape character assessment http://www.snh.org.uk/pdfs/publications/review/102.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 is well hidden from the A90 with appropriate landscape treatment will be seen as an extension of the existing settlement. The site is already developed (brownfield) in part with existing buildings.</p>

13. Flood Risk

<p>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?</p> <p>(You can view the SEPA flood maps at http://map.sepa.org.uk/floodmap/map.htm)</p>	<p>Yes/No</p> <p><i>If yes, please specify and explain how you intend to mitigate this risk:</i></p> <p>Basically, indicated in flood map that the plot is located further to the west is at risk exposure of flooding by two rings of water surface.</p>
<p>Could development on the site result in additional flood risk elsewhere?</p>	<p>Yes/No</p> <p><i>If yes, please specify and explain how you intend to mitigate or avoid this risk:</i></p>
<p>Could development of the site help alleviate any existing flooding problems in the area?</p>	<p>Yes/No</p> <p><i>If yes, please provide details:</i></p>

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 Apparently, water area is at capacity. Nonetheless, consultation with SW is recommended by action program.	Yes/No
	Waste water Currently waste water in Crimond is at sufficient capacity	Yes/No
Has contact been made with Scottish Water?	Yes/No If yes, please give details of outcome:	
Will your SUDS scheme include rain gardens? http://www.centralscotlandgreennetwork.org/campaigns/greener-gardens	Yes/No Please specify:	
b. Education – housing proposals only		
Education capacity/constraints https://www.aberdeenshire.gov.uk/schools/parents-carers/school-info/school-roll-forecasts/	Please provide details of any known education constraints. Is additional capacity needed to serve the development? Crimond PS is forecast to be operating at 50% in 2022. Mintlaw academy is forecast to be operating at 96% in 2022.	
Has contact been made with the Local Authority's Education Department?	Yes/No If yes, please give details of outcome:	
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?	Yes/No If yes, please give details of outcome:	
Has contact been made with the Local Authority's Transportation Service? They can be contacted at transportation.consultation@aberdeenshire.gov.uk	Yes/No If yes, please give details of outcome: During the recent planning application – no objections and the proposed development will also provide additional direct access to Crimond.	
Public transport	Please provide details of how the site is or could be served by public transport: Russel Court bus stop only 70m west of the proposed site – services 69 and 69B hourly between Peterhead and Fraserburgh.	
Active travel	Please provide details of how the site can or	

(i.e. internal connectivity and links externally)	could be accessed by walking and cycling: Development of the site will allow for the formalisation of informal path networks and provide new footpaths/cycleways and road links all allowing greater options for active travel.
d. Gas/Electricity/Heat/Broadband	
Has contact been made with the relevant utilities providers?	Gas: Yes/ No If yes, please give details of outcome(s):
	Electricity: Yes/ No If yes, please give details of outcome(s):
	Heat: Yes/ No If yes, please give details of outcome(s):
	Broadband: Yes/ No If yes, please give details of outcome(s):
Have any feasibility studies been undertaken to understand and inform capacity issues?	Yes/ No Please specify:
Is there capacity within the existing network(s) and a viable connection to the network(s)?	Yes/ No Please specify:
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)	Yes If yes, please specify the type of renewable energy technology(s), if it is to provide electricity and/or heating (i.e. space heating and/or hot water), and the scale of provision (To supplement off-site connection all the way to 100% energy provision (off-grid)): PVs or alternative appropriate technology
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/ No Please specify: The site is not within the boundary of green network. However, the site is already linked to the village through a popular walk and established right of way runs through the tree belt. This creates an opportunity for new development within the site to contribute to path provision and formal access in Crimond belts as it is mentioned in settlements profiles.
Will the site meet the open space standards, as set out in Appendix 2 in the Aberdeenshire Parks and Open Spaces Strategy?	Yes/No Please specify:

https://www.aberdeenshire.gov.uk/media/6077/approvedpandospacesstrategy.pdf	The development will provide 40% open space as required by the strategy.
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/	Yes/No/ Not applicable Please specify:
f. Resource use	
Will the site re-use existing structure(s) or recycle or recover existing on-site materials/resources?	Yes/No If yes, please specify: The site is previously developed so there's an opportunity to reuse materials where appropriate.
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?	Yes/No If yes, please provide details:

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	Unknown
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 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	No
'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	No
<p>If you have identified any of the potential constraints above, please use this space to identify how you will mitigate this in order to achieve a viable development:</p> <p>The overhead lines can either be relocated or incorporated into the design/layout. Not considered an issue.</p> <p>Potential contamination is not expected to be significant as previous uses are not considered major polluters. However, development of the site is the only viable means to deliver site clean up and safety improvements.</p>	

16. Proximity to facilities

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

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
	<p>If yes, please specify the way it was carried out and how it influenced your proposals: Public consultation has been carried out during several sessions on different dates. For example, as a result of the attendee's concern about tree planting and shelter belts, the masterplan providers have ensured that this form the key part of the masterplan design.</p>
	<p>If not yet, please detail how you will do so in the future:</p> <p>If allocated public engagement will inform the development scale, content, design and layout.</p>

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.

I have considered the likely 'residual value' of the site, as described above, and fully expect the site to be viable:

Please tick:



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.)

We believe that a good case can be made for the redevelopment of Crimond Camp and the areas to the north based on the following:

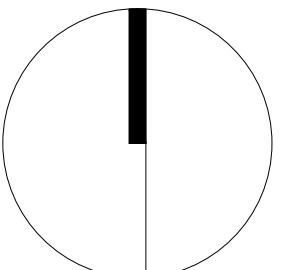
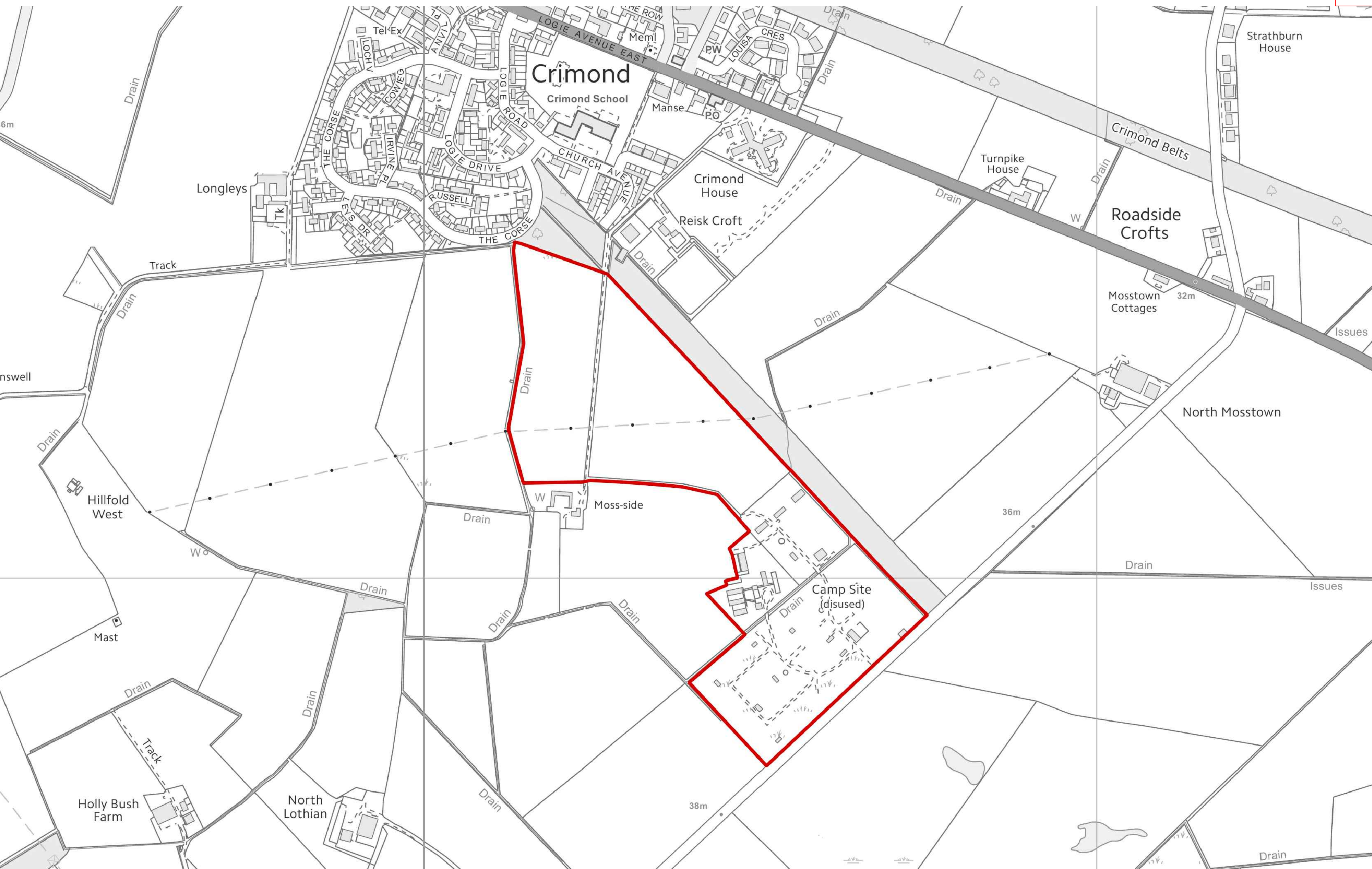
- Reuse of a brownfield site in a regeneration corridor;
- Existing development on site and therefore the principle of 'development' has been established;
- Facilitates the clean-up of a long standing eyesore site that is contaminated and has been the source of nuisance behaviour in the area;
- Is in line with the treatment of other ex MoD and ex public sector sites in Aberdeenshire;
- Creates local employment opportunities (construction etc) and supports local services and nearby established uses important to the area such as that at St Fergus; and
- Clear linkages to the existing village.

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.





HALLIDAY FRASER MUNRO

CHARTERED ARCHITECTS & PLANNING CONSULTANTS

05.04.2019

PLANNING POLICY TEAM
INFRASTRUCTURE SERVICES
ABERDEENSHIRE COUNCIL
WOODHILL HOUSE
WESTBURN ROAD
ABERDEEN
AB16 5GB
By email to ldp@aberdeenshire.gov.uk

Dear Sir/ Madam,

11134 – ABERDEENSHIRE LDP RESPONSE TO THE MAIN ISSUES REPORT MOSS SIDE CAMP, CRIMOND BU058

We refer to the current consultation process in respect of the Local Development Plan Main Issues Report 2019 and welcome the opportunity to comment on this document.

We write on behalf of our client Ms. G Mitchell. A development bid (reference BU058) to have land allocated for 80 - 100 houses at Moss Side Camp, Crimond was lodged in response to the Council's 'call for sites' in March 2018. The proposed development includes remnants of disused former hospital camp World War Two buildings and is currently a vacant brownfield site. The site is well-related to the settlement of Crimond. The bid has not been supported as an 'Officer's Preference' in the Main Issues Report.

The MIR states that in relation to Crimond, 'During the next plan period **it is important for Crimond to see housing development**, particularly affordable housing, to meet local regeneration objectives and to sustain and grow existing services within the settlement'. The MIR goes on to explain that 'In order to avoid to conflicts with the A90 trunk road, **a strategy of developing to the south of this road is promoted**' and 'All future development must contribute towards **access roads to the south of the settlement** to facilitate future growth'. However, despite this being the vision for the settlement Officers have retained an existing allocation, OP1, that is identified as constrained in the Housing Land Audit 2018 and have not preferred BU058. This means that as it stands there are no deliverable housing sites identified and no strategy that will provide housing development in Crimond.

Crimond is in a Regeneration Priority Area and it is noted in the current LDP that in these areas 'positive steps are needed to help these areas meet their full potential'. Through the current Plan period there has been only one consent for residential development (APP/2017/0334) of 40 homes. There has been a start on site but to date no houses have been delivered and as mentioned above OP1 is constrained. Site BU058 has no constraints and is highly deliverable. Development at this site would be a positive

step for Crimond remediating brownfield land and creating a high-quality residential development that can help to generate further development interest in the village.

Bid Site BU058 provides a logical extension south of the village and the A90 in line with the strategy detailed above. Development at BU058 would contribute to the provision of access roads to the south of the settlement, again in line with the above strategy. It is clear from the MIR that there is a preference for future development to the south of the village however there are no allocations to facilitate this taking place. BU058 has been overlooked by Officers in favour of OP1 which is confirmed as being constrained. OP1 has been allocated since the 2012 Plan but no planning applications have been submitted for the site. We would therefore question the deliverability of this site.

The overview of BU058 provided in the MIR reports that there is 'a long-established woodland adjacent to the east of the site known as the "Crimond Belt" and it is important to conserve this linear woodland feature'. Development at BU058 would not alter this feature and could contribute to its conservation. The woodland belt provides a strong defensible boundary to the site limiting visual impact from the north. Development at BU058 would enhance access to the woodland through the provision of core paths.

The MIR reports that, 'The site would relate to the village itself', we consider this a positive and agree that the site relates to the village. The site represents a logical extension to the south of the village. A residential allocation here will help to support services in the village including the new medical centre and the primary school.

Site access has been raised as an issue in the MIR which states, 'It is not clear how the site would be accessed from the A90 or from an alternative road'. There is an access road from the A90 to Moss Side Farm which is adjacent to the site. This existing access could be upgraded to provide access to Site BU058 therefore we do not consider this is a reason to not allocate the site. Additionally, this access to the south of the village is in line with the settlement vision discussed above and could be used to facilitate future growth. Access could also be taken from a road that runs along the southern boundary of the site from the A90. We therefore do not consider access to the site to be an issue.

The scale of development proposed is raised in the MIR which notes, 'The proposed development would result in doubling the size of the settlement'. The MIR states that the proposal for BU058 was for 100 homes, however, the bid set out a range of 80-100. 100 homes is the maximum number that could be delivered due to the size of the site but the scale of development could be reduced if a smaller allocation was deemed more appropriate. If a reduced scale of development is supported, we would propose development at Moss Side Camp along with limited land to the north that is under the same ownership as most appropriate.

It is clear from the MIR that future growth to the south of Crimond is desired, therefore, we consider BU058 ideally placed to deliver this. The scale of the allocation appears to be the only negative issue raised by Officers and we consider this can be addressed by reducing the scale of the development.

The MIR reports that the proposed development would have an 'irreversible impact on its (Crimond) sense of place'. We consider that a well-designed residential development that considers the wider context of Crimond and the local area would enhance the village's sense of place and would have a positive impact on Crimond. The current derelict state of Moss Side Camp detracts from the amenity of the village and presents a safety risk to the public due to the number of derelict buildings on the site. A

residential development would give opportunity for the site to be cleaned up and provide quality useable public space, again contributing positively to Crimond's sense of place.

Development at BU058 meets the planning objectives for Crimond set out in the MIR in that it will meet market demand by delivering a variety and choice of homes, will sustain existing local services and provide opportunities for community infrastructure. The land is presently a brownfield eyesore that does not contribute to the character of Crimond. The site relates well to the village and can provide a new access to the south of the village that could benefit future growth. The site has no constraints making it highly deliverable and better placed to come forward than OP1 which is constrained by marketability and ownership. Development would undoubtedly increase the size of the village but given that the MIR states that **housing development in Crimond is important** we struggle to understand why BU058 has not been supported as an Officer's Preference in the MIR.

For the reasons set out in this letter we respectfully request the BU058 is allocated in the 2021 LDP for residential use (50-80 homes). Please do not hesitate to get in touch should you wish to discuss any aspect of this further. We reserve the right to make further comment as the LDP preparation process evolves.

Yours faithfully,

A black rectangular box used to redact the signature of the sender.

**PLANNING CONSULTANT
FOR AND ON BEHALF OF HALLIDAY FRASER MUNRO**