

# PROPOSED ABERDEENSHIRE LOCAL DEVELOPMENT PLAN 2020 RESPONSE FORM

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

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

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

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

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

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

Please email comments to [ldp@aberdeenshire.gov.uk](mailto:ldp@aberdeenshire.gov.uk) or send this form to reach us by 17 July 2020.

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



## ACCESSIBILITY

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

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

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

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

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

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

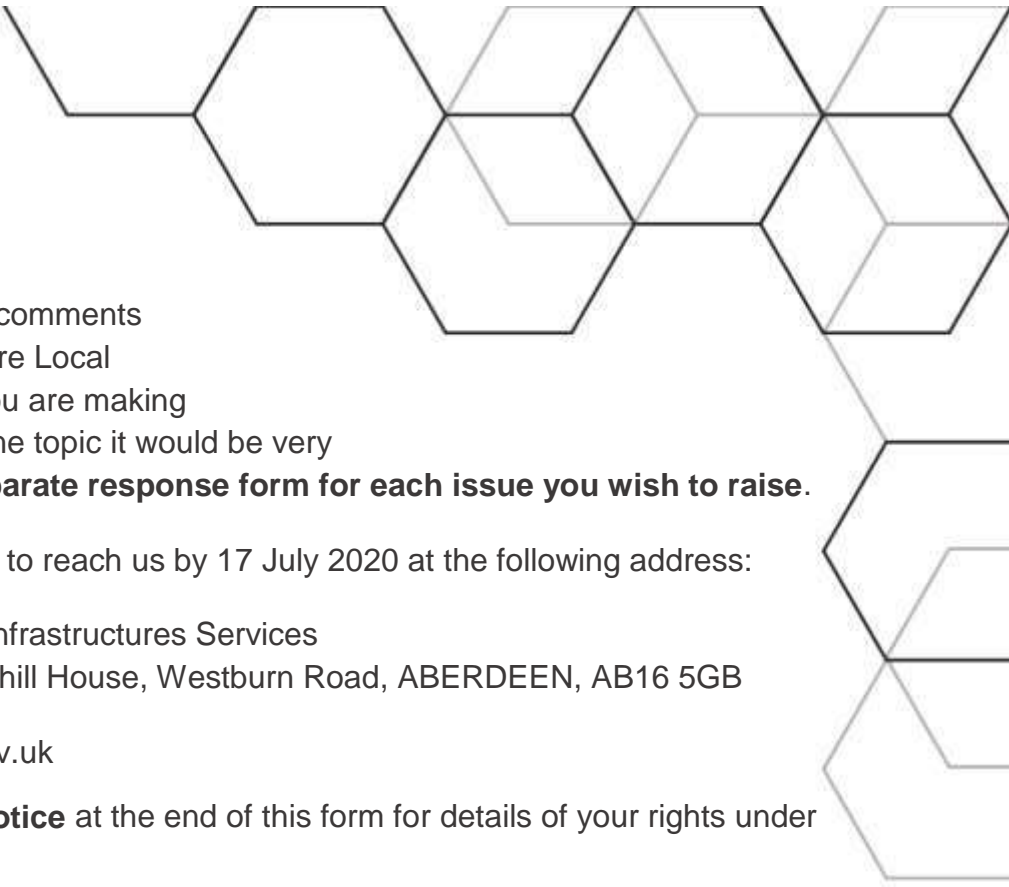
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Email: [ldp@aberdeenshire.gov.uk](mailto:ldp@aberdeenshire.gov.uk)

Web: [www.aberdeenshire.gov.uk/ldp](http://www.aberdeenshire.gov.uk/ldp)

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



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

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

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

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

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

## YOUR DETAILS

Title:	Mr
First Name:	Michael
Surname:	Lorimer
Date:	30/7/20
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? Barratt North Scotland and Dunecht Estates.

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

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

# YOUR COMMENTS

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

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

Appendix 7d Settlement Statements – Garioch - Westhill (pages 620 – 627)

Bid Site GR039 should be identified as a specific opportunity site for 100 homes to be delivered as an initial phase of development following adoption of the Plan.

The Westhill Settlement Statement wording (p 620) should include text confirming a commitment within the first 5 years of the Plan, to undertake a review of the future growth of the settlement, informed by updated transport modelling and assessment of associated impacts and interventions required to support additional growth, in line with the commitments outlined within the Proposed Strategic Development Plan.

Bid Sites GR040 and GR041 should be identified as a 'Future' Housing Opportunity 'FOP' site for the phased delivery of up to 2,400 homes to be unlocked following an interim review of the Plan after the first 5 years, to coincide with the above studies having been prepared.

The Westhill Settlement Maps (P624 – 627) should be updated to reflect the immediate and future allocations.

Proposed Plan Appendix 6 – Housing Land Allocations should be modified to identify future housing allocations to be delivered subject to an interim review of the LDP. Associated Table 2 (P171): Housing Allocations in the Aberdeen Housing Market Area should be updated to include a further immediate allocation of 100 homes and future allocation of 2,400 homes to Westhill West.

## Reason for change:

### Introduction

On behalf of Barratt North Scotland and Dunecht Estates, objection is taken to the failure of the Proposed Aberdeenshire Local Development Plan (PLDP) to identify any of the three development phasing options for the Land to the West of Westhill, South of the A944, either for immediate delivery following the adoption of the next Plan, as a Future Opportunity ('FOP') Site for delivery following an interim review of the Plan, or indeed a combination of the two.

This representation requires to be read in conjunction with the 3 Development Bids submitted at Pre-MIR stage, copies of which are included at Appendix 1. These included an overarching Bid for the entire site seeking a 2,500 home allocation, with two further bids, encompassing smaller portions of the site as alternative delivery/phasing options, as follows:

- Site 1 Ref: GR039 – 100 Homes
- Site 2 Ref: GR040 – 500 Homes
- Site 3 Ref: GR041 – 2,500 Homes

Cognisance should also be taken of the representation submitted to the Main Issues Report (MIR) and Draft Proposed Local Development Plan, which is included at Appendix 2. It also requires to be read in conjunction with detailed submissions made by Barratt North Scotland and Dunecht Estates to the Strategic Development Planning Authority (SDPA) (Appendix 3) to the Review of the Strategic Development Plan (SDP) and updated Transportation Position Statement prepared by ECS Transport Planning, copies of which are included at Appendix 4.

This representation seeks to respond to the publication of the PLDP and requests modification of the associated Settlement Statement for Westhill as that set out above. A detailed justification for these modifications is provided below, which addresses the key areas of concern raised within the Council's response to the representations made at MIR stage, as contained within their Schedule 4 – Issues and Actions Papers. It provides further analysis of the updated Westhill Capacity Study (2014) following an up-to-date transport analysis undertaken by ECS Transport Planning, in light of the AWPR and associated junctions now being fully operational and the commencement of programmed mitigation to signalise the A944 Westhill junction.

A separate related representation has also been prepared in response the Spatial Strategy and Housing Land Supply (HLS) position for the settlement, taking cognisance of the recent publication of the Report of the Examination of the Proposed Aberdeen City and Shire Strategic Development Plan (PSDP) and the specific modifications requested by the Reporter. Both related representations should be read in conjunction.

## Response to Issues and Actions Paper and Strategic Environmental Assessment

At MIR stage, Officers undertook an assessment of the 3 Development Bids and chose not to identify any of the proposed delivery options as a preference for inclusion within the Proposed Plan. Separation from the settlement, the presence of pipelines and the perceived impacts on the character of Loch of Skene, Dunecht House Inventory Garden and Designed Landscape, Ancient Woodland and protected species, all featured as reasoning for non-inclusion of the Bid sites by Officers.

These matters were all adequately addressed on behalf of Barratt Homes and Dunecht Estates through the representation prepared at MIR Stage, which is attached for information at Appendix 2. This referenced and included the high level assessment of such matters, previously undertaken by Barratt Homes and Dunecht Estates to inform their vision for the growth of Westhill, as previously submitted to the SDPA in June 2016. The assessment confirmed that the land was not subject to any special ecological, historic or landscape designations, was free from flood risk and contamination. Furthermore, it was considered that areas of Ancient Woodland, and surrounding historic interests including the Scheduled Ancient Monuments at Springhill Standing Stone and Hut Circles at Garlogie Woods could be successfully integrated into the overall development without any negative impacts.

It is noted within the more recently published Schedule 4 'Issues and Actions' Paper, that SNH and HES have both responded to the proposed allocations at Westhill West. SNH notes that the smaller bids (GR039 and GR040) are located in excess of 1KM from the Loch of Skene and should these sites be allocated, construction method statements and drainage plans would be required to avoid any adverse impacts on its integrity through run-off and sedimentation. This information would be fundamental to the submission of any future planning application and should in no way be perceived to be a barrier to allocating the sites. Accordingly, SNH and HES primary concerns only relate to the entire Masterplan site (GR041) and associated scale of development that would realise. SNH have suggested that the site could incur significant landscape and visual impacts on the setting and approach to Dunecht House.

However, as detailed within the Masterplan documentation accompanying the Bids (Appendix 1), the development will be taken forward in a highly sensitive manner, in response to the character and amenity of the surrounding locale. Large swathes of open space and strategic landscaping would be utilised, particularly along the western confines of the site to provide appropriate separation and protection to the most sensitive aspects of the landscape and affording sufficient protection and reinforcement of Ancient Woodland and associated habitats. Furthermore, Dunecht House would remain over 4.5km from the nearest pockets of new housing, thereby ensuring that any associated visual impacts from the development would be negligible.

The concerns raised by HES relate to the potential for bid GR041 to result in a significant impact on the setting of the scheduled monument at Springhill which they suggest could prevent the grant of Scheduled Monument Consent. HES also recommend that views to

the scheduled monument at the Woods of Cairnie be considered in the event that trees are felled. These concerns would however be mitigated through the detailed masterplanning of the site. As articulated within the indicative masterplan which accompanied the bid (Appendix 1), the Springhill Scheduled Monument would be sensitively integrated into the development, thereby protected and also celebrated as a feature for the new community. Both HES and SNH would be key stakeholders as part of a future western expansion to Westhill and Barratt Homes and Dunecht Estates would seek to work with them collaboratively to ensure their statutory interests are adhered to.

The presence of oil and gas pipelines have also been raised as a potential constraint. However, as was set out at MIR stage, the St Fergus – Aberdeen and Luchars Moss – Craibstone lines which cross the site can be designed around and this has been factored into the indicative layout within the submitted masterplan.

A number of the key areas of concern appear to have filtered through from the Strategic Environmental Assessment (SEA) of the 3 Bid sites. On the whole, the assessment concludes relatively positively, with any negative effects highlighted as being short term, which would revert to neutral impacts following appropriate identified mitigation measures. It is noted that the only long term negative effect associated with the 100 unit site (GR039) related to Human Health. This is however inconsistent with the GR040 500 unit site which attracts both positive and negative scoring, yet the 2,500 unit scheme (GR041) identified significant positive impacts. The supporting commentary on Human Health for each bid site is identical. This raises some concerns over the accuracy of the assessment, however on the whole, it would suggest that an initial development of 100 homes could be made without any significant environmental impacts.

Furthermore, given the substantial level of expert environmental, landscape and transport analysis that has been undertaken to inform the proposed development at Westhill West, it is disappointing that the SEA appears to ignore the findings contained therein. As noted above, these detailed reports were included as supplementary information to the preparation of both the SDP and LDP Reviews and provide high level assessment, with recommendations for further detailed studies and mitigatory recommendations.

The SEA suggests the 2,500 home bid would create significant impacts in areas concerning water, landscape, biodiversity and cultural heritage. However, as noted within the supporting technical information outlined above, water and drainage networks can accommodate the development, subject to further discussions with service providers and the provision of necessary upgrades. There would be no detrimental impacts posed to the Loch of Skene wetland and bird habitats, the protection of which would form a key requirement of any future development proposals. Similarly, the findings of initial ecological assessments confirmed there to be limited natural features within the site's boundaries, nor significant ecological issues that would constrain development. Existing woodland would be maintained, incorporated and strengthened through the proposed development, thereby reinforcing any existing habitats. Whilst it is accepted that a development of this scale would alter the landscape character of the immediate surrounding area, this would be reduced over time through a robust landscaping proposal, as set out within the concept

masterplan, thereby ensuring the development will be comfortably absorbed into the wider landscape.

### Westhill Capacity Study and Traffic Issues

At both MIR Stage and within the more recent Schedule 4 Issues and Actions Papers, further major residential development within Westhill continues to be resisted due to potential cumulative impacts on the transport network and associated capacity issues. Officers reference the Westhill Capacity Study, initially undertaken by AMEC E&I in 2008 and updated in 2014, which identifies the requirement for a range of studies to be undertaken, including a Transport Feasibility study, a review of the Green Belt and a Westhill Strategic Masterplan to consider the future development of the settlement. This also broadly aligns with the general response provided in relation to the preparation of the PSDP, with both the Strategic Development Planning Authority (SDPA) and more recently the Reporter at examination stage, reluctant to agree to any deviation from the existing spatial strategy, which would allow for major growth at Westhill or indeed its inclusion as a Strategic Growth Area, until such time as said studies are undertaken. The Reporter does however note the Planning Authority's commitment to undertake these studies within the next 5 years.

Following publication of the updated Westhill Capacity Study in May 2014, Barratt North Scotland wrote to Aberdeenshire Council in June 2014 highlighting a number of key areas of concern over the study. These included a lack of clarity on the methodology for categorising constraints, factual inaccuracies and inconsistencies within the scoring criteria applied to various sites. It was requested that these matters be suitably addressed prior to any material weight being applied to the study. Furthermore, and as a precursor to the review of the SDP and LDP, Barratt submitted a further letter to the Council on 25<sup>th</sup> August 2017, providing a more detailed analysis of the updated study and a comprehensive account of their concerns. A full record of this correspondence is included at Appendix 5, however to summarise the main areas of concern related to:

- **Factual Errors** – inconsistencies with the weighting and scoring methodology applied to sites which call into question the accuracy and reliability of the document;
- **Site Identification** – basis of identification of sites unclear and contrary to original 2008 Study with a failure to take account of land ownership and deliverability;
- **Consultation** – Lack of public consultation into the document
- **Status** – The document carries no statutory weight, yet was relied upon by both Officers and the Reporter when considering bids sites in relation to the now extant LDP.
- **Clarity on timescales** – The document is now substantially out of date and does not reflect the current transport situation nor programmed upgrades to alleviate identified constraints, particularly now the AWPR is operational.



With regard to the final item, it is worth reiterating that significant progress has been made since the updated study was published. As was highlighted at MIR stage, ECS Transport Planning Ltd (ECS), who are advisors to Barratt North Scotland and Dunecht Estates, have undertaken further technical assessments in support of the promotion of Westhill West to provide clarity on the transportation matters to be addressed should development proceed on site. This included transportation input to the comprehensive SDP submission in relation to Westhill West, submitted to the SDPA in 2016. This concluded that the development provided the opportunity, in partnership with Aberdeenshire Council, to develop a strategy to address existing transport constraints to the betterment of the settlement. At that time the overarching picture of Aberdeen's strategic traffic model 'ASAM' (Aberdeen Sub Area Model) was in the process of being updated to take into consideration likely changes to traffic flow associated with the opening of the AWPR, therefore ECS was unable to present conclusive findings on the potential impact of the development at the AWPR's Westhill junction.

Since then further work has been undertaken and meetings progressed with the Council's Roads Service, as well as Transport Scotland in May 2018. Officers confirmed that the ASAM model had been updated, which provided the data to allow for an update to the Westhill Paramics model. This identified that with no development, the ASAM flows resulted in significant congestion at the A944 AWPR junction. The Roads Service suggested that signalisation of the A944 AWPR Roundabout and an improved left slip northbound from the AWPR would significantly improve this situation. It was therefore evident that Westhill residents would experience congestion on the surrounding road network without any identified funding or mechanism to deliver a solution.

Following completion of the ASAM update and update to the Cumulative Transport Appraisal Report by SYSTRA on behalf of the Council, ECS Transport commissioned SYSTRA to undertake further model testing based on the development proposals at Westhill West to further understand the associated transport impacts. This focussed on two development scenarios comprising both 500 units and 2,500 units. The modelling exercise and results are comprehensively detailed within ECS Transport Planning's recently updated 'Westhill West Transportation Position Statement' (Appendix 4).

The Report concludes that signalisation of the Westhill AWPR junction will provide sufficient capacity to accommodate both the 500 and 2,500 unit developments at Westhill West and that these mitigatory works have now commenced at that junction. Whilst some delays would be experienced on the A944 and B9119 corridor, this has been acknowledged within all representations to both the SDP and LDP to date. Barratt and Dunecht Estates propose to strengthen the B9119 corridor to increase capacity for the development, which in turn would reduce traffic on the A944. Importantly, the Report confirms there are no strategic road network barriers to any of the proposed phasing options put forward for the development at Westhill West.

In view of the foregoing and the detailed information prepared in support of the allocation of land at Westhill West, it is maintained that there are no significant environmental or infrastructure constraints that would preclude the allocation of the land. Progress has been

made to address pre-existing constraints on the strategic transport network, with work having very recently commenced on the signalisation of the A944 Westhill junction, which will create significant improvements to traffic flows. In cognisance of the conclusions of the Reporter into the Examination of the PSDP (as outlined within the separate related representation on the Spatial Strategy and Land Supply), it is hereby requested by Barratt North Scotland and Dunecht Estates that an initial allocation of 100 homes is made in accordance with GR039, with the balance of the site GR040 & GR041 reserved as a future allocation for 2,400 to be released following an interim review of the LDP.

# PRIVACY NOTICE

## LOCAL DEVELOPMENT PLAN PUBLIC COMMENT

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

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

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

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

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

### Your information is:

Being collected by Aberdeenshire Council	X
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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:

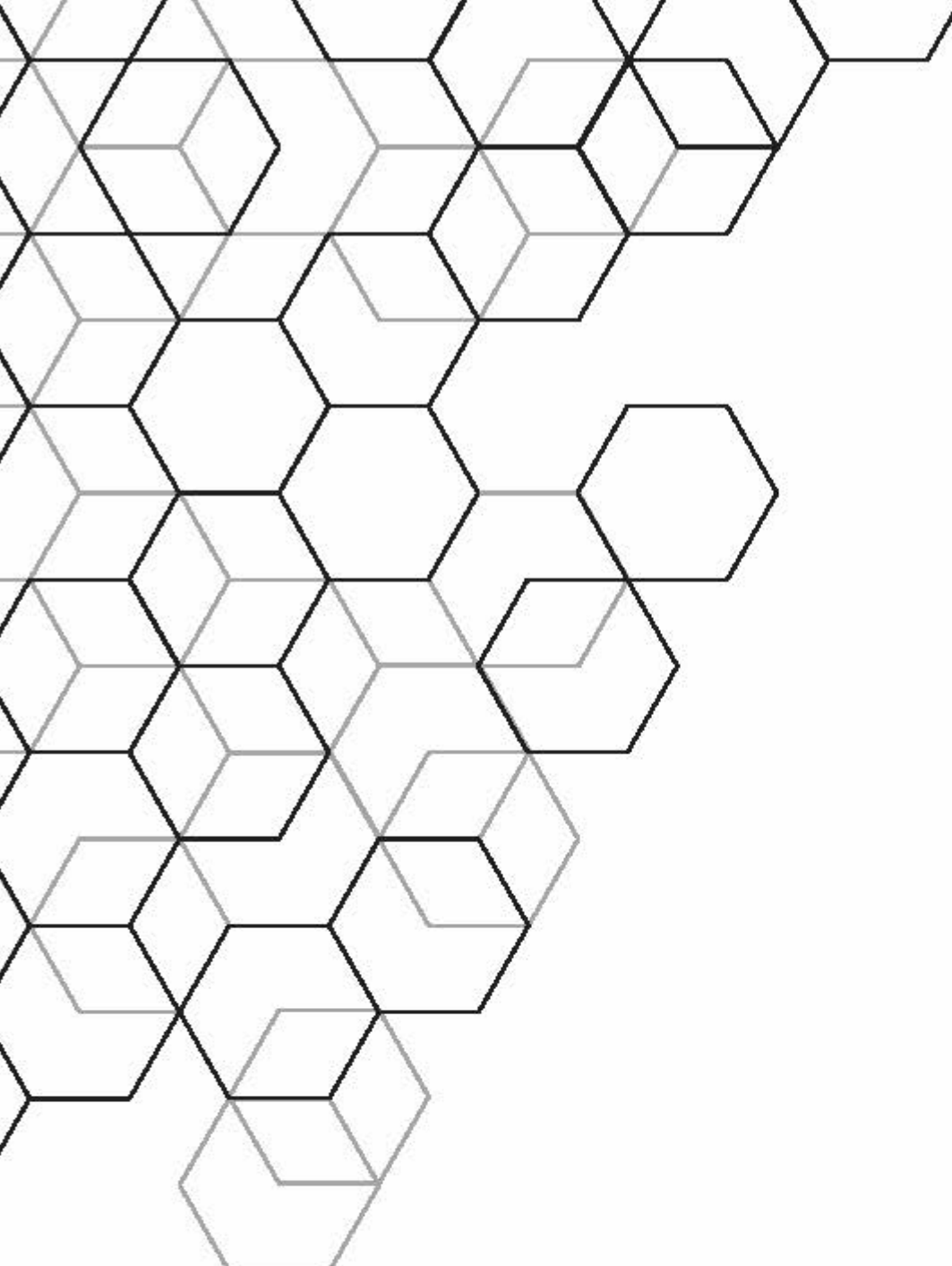
Aberdeenshire Council will only keep your personal data for as long as is needed. Aberdeenshire Council will retain your response and personal data for a retention period of 5 years from the date upon which it was collected. After 5 years Aberdeenshire Council will review whether it is necessary to continue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

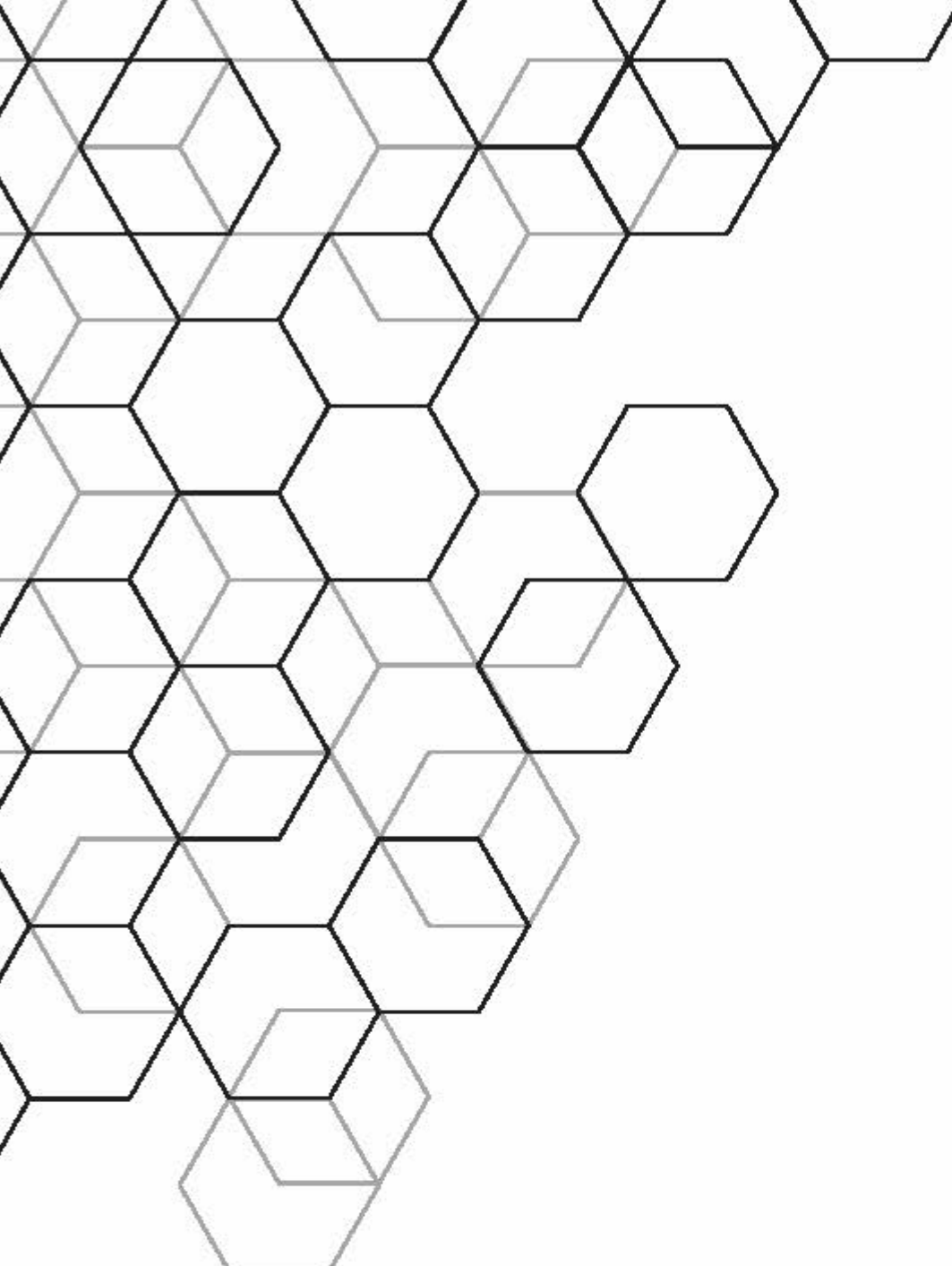
The following automated decision-making, including profiling, will be undertaken:

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**

#### 4. Site Details

Name of the site (Please use the LDP name if the site is already allocated)	Westhill West (Phase I)
Site address	Land to the west of Westhill south of the A944
OS grid reference (if available)	
Site area/size	7.2ha (8 Acres)
Current land use	Agriculture
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
	If yes, please give details
Is the site being marketed?	No
	If yes, please give details

#### 6. Legal Issues

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

#### 7. Planning History

Have you had any formal/informal pre-application discussions with the Planning Service and what was the response?	No
	If yes, please give details
Previous planning applications	Please provide application reference number(s), description(s) of the development, and whether planning permission was approved or refused: None
Previous 'Call for sites' history. See Main Issues Report 2013 at <a href="http://www.aberdeenshire.gov.uk/ldp">www.aberdeenshire.gov.uk/ldp</a>	Please provide Previous 'Call for sites'/'Bid' reference number: None
Local Development Plan status <a href="http://www.aberdeenshire.gov.uk/ldp">www.aberdeenshire.gov.uk/ldp</a>	Is the site currently allocated for any specific use in the existing LDP? No
	If yes, do you wish to change the site description and or allocation?

## 8. Proposed Use

Proposed use		Housing
Housing	Approx. no of units	100
	Proposed mix of house types	Number of: <ul style="list-style-type: none"> <li>• Detached: TBC dependant on market demand.</li> <li>• Semi-detached: TBC dependant on market demand.</li> <li>• Flats: TBC dependant on market demand.</li> <li>• Terrace: TBC dependant on market demand.</li> <li>• Other (e.g. Bungalows): TBC dependant on market demand.</li> </ul>
		Number of: <ul style="list-style-type: none"> <li>• 1 bedroom homes: TBC dependant on market demand.</li> <li>• 2 bedroom homes: TBC dependant on market demand.</li> <li>• 3 bedroom homes: TBC dependant on market demand.</li> <li>• 4 or more bedroom homes: TBC dependant on market demand.</li> </ul>
	Tenure (Delete as appropriate)	Private.
Affordable housing proportion	25%	
Employment	Business and offices	Indicative floor space: m <sup>2</sup> None
	General industrial	Indicative floor space: m <sup>2</sup> None
	Storage and distribution	Indicative floor space: m <sup>2</sup> None
	Do you have a specific occupier for the site?	No
Other	Proposed use (please specify) and floor space	Not applicable
	Do you have a specific occupier for the site?	No
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 timescales	N/A	
	Barratt are funded centrally and have the resources to deliver development sites within the timescale stated, without the requirement for external finance.	



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: Not Applicable.

## 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"> <li>• <a href="https://www.environment.gov.scot/">https://www.environment.gov.scot/</a></li> <li>• EU priority habitats at <a href="http://gateway.snh.gov.uk/sitelink/index.jsp">http://gateway.snh.gov.uk/sitelink/index.jsp</a></li> <li>• UK or Local priority habitats at <a href="http://www.biodiversityscotland.gov.uk/advice-and-resources/habitat-definitions/priority/">http://www.biodiversityscotland.gov.uk/advice-and-resources/habitat-definitions/priority/</a></li> <li>• Local Nature Conservation Sites in the LDP's Supplementary Guidance No. 5 at <a href="http://www.aberdeenshire.gov.uk/ldp">www.aberdeenshire.gov.uk/ldp</a></li> </ul>	RAMSAR Site	✓
	Special Area of Conservation	✓
	Special Protection Area	✓
	Priority habitat (Annex I)	
	European Protected Species	
	Other protected species	
	Site of Special Scientific Interest	✓
	National Nature Reserve	
	Ancient Woodland	✓
	Trees, hedgerows and woodland (including trees with a Tree Preservation Order)	
	Priority habitat (UK or Local Biodiversity Action Plan)	
	Local Nature Conservation Site	✓
	Local Nature Reserve	
<p>If yes, please give details of how you plan to mitigate the impact of the proposed development:</p> <p>The proposed site, although not directly affected, forms Phase One of a larger development proposal submitted under a separate bid 'Westhill West' which is located close to the eastern boundary of the Loch of Skene which is designated a RAMSAR, Special Protected Area (SPA) and a Site of Special Scientific Interest (SSSI) for its wetland habitat and bird populations and, forms part of the wider catchment of the River Dee Special Area of Conservation (SSC). There are also several areas of Native and Ancient Woodland within and around the vicinity of the site, particularly to the south-west (Gask Wood) that could provide refuge, habitat or protection for many species. A detailed mitigation plan has not yet been formulated but, following further survey work such as a Phase I Habitat Survey and the preparation of a Habitats Regulations Appraisal, the intention would be to prepare a plan in consultation with SNH and the Council that avoided any potential adverse impacts to the Loch on account of new development in both the immediate and wider area and ensure that habitats and species were retained, restored (where possible) and protected respectively with buffers incorporated to minimise disturbance. Initial discussions have already taken place with SNH. An important objective would be to maintain and improve habitat connectivity through the retention of</p>		

	<p>valued habitats and ongoing habitat management and landscape design in order to enhance habitat linkages through elements such as native planting along watercourses, new hedges and woodland. Protection of the designated Loch of Skene would also be achieved through:</p> <ul style="list-style-type: none"> <li>• appropriate drainage design incorporating Sustainable Drainage Systems (SuDS) to manage the quality and quantity of drainage flows; and,</li> <li>• good practice during construction including measures to ensure watercourses were not affected by pollution or siltation during development works.</li> </ul> <p>Based on the findings of an initial desk top survey and a walkover of the proposed area, there would not appear to be any significant ecological issues on the site that would prevent or constrain future development.</p>
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**Biodiversity enhancement**

<p>Please state what benefits for biodiversity this proposal will bring (as per paragraph 194 in Scottish Planning Policy), <a href="http://www.gov.scot/Resource/0045/00453827.pdf">http://www.gov.scot/Resource/0045/00453827.pdf</a>) by ticking all that apply. Please provide details.</p> <p>See Planning Advice 5/2015 on Opportunities for biodiversity enhancement at: <a href="http://www.aberdeenshire.gov.uk/media/19598/2015_05-opportunities-for-biodiversity-enhancement-in-new-development.pdf">www.aberdeenshire.gov.uk/media/19598/2015_05-opportunities-for-biodiversity-enhancement-in-new-development.pdf</a></p> <p>Advice is also available from Scottish Natural Heritage at: <a href="https://www.snh.scot/professional-advice/planning-and-development/natural-heritage-advice-planners-and-developers">https://www.snh.scot/professional-advice/planning-and-development/natural-heritage-advice-planners-and-developers</a> and <a href="http://www.nesbiodiversity.org.uk/">http://www.nesbiodiversity.org.uk/</a>.</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	Yes if appropriate
	Living roofs	Yes if appropriate
	Ponds and soakaways	✓
	Habitat walls/fences	Yes if appropriate
	Wildflowers in verges	
	Use of nectar rich plant species	✓
	Buffer strips along watercourses	✓
	Show home demonstration area	Yes if appropriate
	Other (please state):	
<p>Please provide details: Barratt North Scotland and Dunecht Estates are very much aware of the importance placed on protecting, enhancing and promoting access to</p>		

	<p>key environmental resources by Scottish Government. In this regard, they collectively support the need to facilitate positive change while maintaining and enhancing distinctive landscape character; conserving and enhancing protected sites and species; protecting and improving the water environment including rivers and wetlands in a sustainable and co-ordinated way; protecting and enhancing ancient semi-natural woodland together with other native long established woods, hedgerows and trees; and, where possible, restoring degraded habitats. Such objectives would be incorporated and embraced in a detailed biodiversity plan in consultation with SNH and the Council, which would aim to enhance biodiversity within both the immediate and wider area including Gask Wood to the south-west.</p>
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## 11. Historic environment

Historic environment enhancement		
Please state if there will be benefits for the historic environment.	No If yes, please give details: See below	
<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"> <li>• <a href="http://historicscotland.maps.arcgis.com/apps/Viewer/index.html?appid=18d2608ac1284066ba3927312710d16d">http://historicscotland.maps.arcgis.com/apps/Viewer/index.html?appid=18d2608ac1284066ba3927312710d16d</a></li> <li>• <a href="http://portal.historicenvironment.scot/">http://portal.historicenvironment.scot/</a></li> <li>• <a href="https://online.aberdeenshire.gov.uk/smrpub/master/default.aspx?Authority=Aberdeenshire">https://online.aberdeenshire.gov.uk/smrpub/master/default.aspx?Authority=Aberdeenshire</a></li> </ul>	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:	<p>The proposed site forms Phase One of a larger development being promoted under 'Westhill West' which contains a Scheduled Monument known as the Springhill Standing Stone which is part of a former stone circle.</p> <p>The Stone is located in the centre of the wider proposed development area outwith Phase One, the development of which will have no adverse impact on its setting.</p>

## 12. Landscape Impact

<p>Is the site within a Special Landscape Area (SLA)? (You can find details in Supplementary Guidance 9 at <a href="http://www.aberdeenshire.gov.uk/ldp">www.aberdeenshire.gov.uk/ldp</a>)</p>	No <b>If yes</b> , 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>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"> <li>• SNH: Landscape Character Assessments <a href="https://www.snh.scot/professional-advice/landscape-change/landscape-character-assessment">https://www.snh.scot/professional-advice/landscape-change/landscape-character-assessment</a></li> </ul>	<p><b>If your site is not within an SLA</b>, 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 proposals will result in the loss of agricultural land and a change in the character of the site from a rural to urban environment which will create a new extended area of residential</p>

<ul style="list-style-type: none"> <li>• SNH (1996) Cairngorms landscape assessment <a href="http://www.snh.org.uk/pdfs/publications/review/075.pdf">http://www.snh.org.uk/pdfs/publications/review/075.pdf</a></li> <li>• SNH (1997) National programme of landscape character assessment: Banff and Buchan <a href="http://www.snh.org.uk/pdfs/publications/review/037.pdf">http://www.snh.org.uk/pdfs/publications/review/037.pdf</a></li> <li>• SNH (1998) South and Central Aberdeenshire landscape character assessment <a href="http://www.snh.org.uk/pdfs/publications/review/102.pdf">http://www.snh.org.uk/pdfs/publications/review/102.pdf</a></li> </ul>	<p>development to the west of Westhill.</p> <p>The landscape is considered to have capacity to satisfactorily accommodate housing within the development area without significant adverse impact.</p> <p>The loss of agricultural land to the development is not considered to be significant. Agriculture is a dominant land use in the wider Aberdeenshire area and the site is not considered to represent a scarce landscape resource or to be of particular value in the context of the wider landscape. The landscape of the development area is considered to be of low-medium sensitivity.</p> <p>There would be significant visual effects for existing properties located close to the site boundary. The proposed development would change the outlook from these houses from one which is predominantly rural with some scattered buildings and houses, to one on the edge of a built-up area.</p> <p>There are clear views to the proposed site from residential properties located to the east of the development. Views of the proposed development will be most significant for those properties directly along the edge of Westhill. However, these effects will reduce quickly as the existing settlement of Westhill begins to provide screening.</p> <p>There will be a significant change in views from the north, particularly for those in close proximity such as residents in the immediate area and road users (such as the A944 and from the B979 to the south of Kirkton of Skene). However, over a short distance from the site, local topography and vegetation would screen or filter views to the development and these effects would reduce quickly.</p> <p>Overall, it is considered that the proposed development, if taken forward in line with the</p>
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	principles and concepts indicated on the attached Indicative Masterplan for the site, would sit comfortably within the landscape character of both the immediate and wider area.
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### 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 <a href="http://map.sepa.org.uk/floodmap/map.htm">http://map.sepa.org.uk/floodmap/map.htm</a> )	No
	If yes, please specify and explain how you intend to mitigate this risk:
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?	No
	If yes, please provide details:

### 14. Infrastructure

#### a. Water / Drainage

Is there water/waste water capacity for the proposed development (based on Scottish Water asset capacity search tool <a href="http://www.scottishwater.co.uk/business/Connections/Connecting-your-property/Asset-Capacity-Search">http://www.scottishwater.co.uk/business/Connections/Connecting-your-property/Asset-Capacity-Search</a> )?	Water	TBC – SW will require WIA to confirm.
	Waste water	TBC – SW will require DIA to confirm.
Has contact been made with Scottish Water?	Yes If yes, please give details of outcome:  Response awaited.	
Will your SUDS scheme include rain gardens? <a href="http://www.centralscotlandgreennetwork.org/campaigns/greener-gardens">http://www.centralscotlandgreennetwork.org/campaigns/greener-gardens</a>	Yes Please specify:  To be confirmed at the detailed design stage and based on compliance with prevailing technical standards and Scottish Water adoption requirements.	

#### b. Education – housing proposals only

Education capacity/constraints <a href="https://www.aberdeenshire.gov.uk/schools/parents-carers/school-info/school-roll-forecasts/">https://www.aberdeenshire.gov.uk/schools/parents-carers/school-info/school-roll-forecasts/</a>	Please provide details of any known education constraints. Is additional capacity needed to serve the development? It is understood that there is capacity at both primary and secondary school levels to accommodate this phase of development however, if any constraints are identified, these can be addressed by appropriate developer contributions.
Has contact been made with the Local	No

Authority's Education Department?	If yes, please give details of outcome:
<b>c. Transport</b>	
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?	No If yes, please give details of outcome:
Has contact been made with the Local Authority's Transportation Service? They can be contacted at <a href="mailto:transportation.consultation@aberdeenshire.gov.uk">transportation.consultation@aberdeenshire.gov.uk</a>	Yes If yes, please give details of outcome:  There has been initial contact but the Council's Transportation Service has advised that it has nothing tangible to say until the ASAM model is updated by NESTRANS.
Public transport	Please provide details of how the site is or could be served by public transport:  Four bus routes operating from Aberdeen currently serve Westhill as follows: <ul style="list-style-type: none"> <li>• 16 / X17 Aberdeen – Woodend – Westhill - Elrick</li> <li>• X18 Aberdeen – Kingswells Park and Ride – Westhill – Elrick – Dunecht - Alford</li> <li>• 777 Oldmeldrum - Inverurie - Westhill - Kingswells - Aberdeen Airport Kirkhills Industrial Estate</li> </ul> The closest bus stops are located on the A944 within 100m of the site boundary and are served by the X18 service linking the site with the town centre and Aberdeen City Centre. Services 16 & X17 are available from bus stops on Broadstraik Road and the A944 to the east, approximately 500m from the site boundary.  In addition, a local dial-a-bus service provides internal transport within Westhill while a Park & Ride facility provides regular bus transport from Kingswells, approximately 3 km east of Westhill, to Aberdeen Royal Infirmary, Aberdeen City Centre, Bridge of Don Park & Ride and Dubford. This Park & Ride facility includes an indoor heated and lit waiting room, accessible toilets and a covered outdoor cycle canopy.



	<p>The nearest train station to Westhill is located approximately 6 km north-east in Dyce on the mainline between Inverurie and Aberdeen. This railway offers direct links to major cities including Dundee, Edinburgh and Glasgow.</p>
<p>Active travel (i.e. internal connectivity and links externally)</p>	<p>Please provide details of how the site can or could be accessed by walking and cycling:</p> <p>The site can be easily accessed through an extension of existing pedestrian and cycle networks in the area being located on the western edge of Westhill.</p> <p>There are existing and proposed core path routes which run along the A944 as well as north/south through and adjacent to the site to Gask Cottage and Garlogie Woods and between the to.</p>
<p><b>d. Gas/Electricity/Heat/Broadband</b></p>	
<p>Has contact been made with the relevant utilities providers?</p>	<p>Gas: No If yes, please give details of outcome(s):</p>
	<p>Electricity: Yes If yes, please give details of outcome(s):</p> <p>On the basis of plans received from Scottish and Southern Energy, an electricity connection for the proposed development would be available through the existing network.</p>
	<p>Heat: No If yes, please give details of outcome(s): Unsure what this refers to.</p>
	<p>Broadband: Yes If yes, please give details of outcome(s): Fibre available in the area.</p>
<p>Have any feasibility studies been undertaken to understand and inform capacity issues?</p>	<p>Yes Please specify: Initial service enquiries have been submitted. Responses awaited</p>
<p>Is there capacity within the existing network(s) and a viable connection to the network(s)?</p>	<p>TBC Please specify: Mains service connection points are available locally. Initial service enquiries have been submitted. Responses awaited.</p>
<p>Will renewable energy be installed and used on the site? For example, heat pump (air, ground or</p>	<p>Yes  This will be dependent on the technology and</p>

water), biomass, hydro, solar (photovoltaic (electricity) or thermal), or a wind turbine (freestanding/integrated into the building)	standards at the time.
<b>e. Public open space</b>	
Will the site provide the opportunity to <b>enhance the green network?</b> (These are the linked areas of open space in settlements, which can be enhanced through amalgamating existing green networks or providing onsite green infrastructure)  You can find the boundary of existing green networks in the settlement profiles in the LDP	Yes Please specify:  An integral part of the proposals is to enhance the green network and link areas of both existing and proposed open space as articulated on the submitted Indicative Masterplan for the site.
Will the site meet the open space standards, as set out in Appendix 2 in the <b>Aberdeenshire Parks and Open Spaces Strategy?</b> <a href="https://www.aberdeenshire.gov.uk/media/6077/approvedpandospacesstrategy.pdf">https://www.aberdeenshire.gov.uk/media/6077/approvedpandospacesstrategy.pdf</a>	Yes Please specify:  As detailed above, the provision of significant areas of open space for both passive and active recreation forms an integral part of the proposed development, all as articulated on the attached Indicative Masterplan for the site. The final provision will be in line with Council Policy.
Will the site deliver any of the shortfalls identified in the <b>Open Space Audit</b> for specific settlements? <a href="https://www.aberdeenshire.gov.uk/communities-and-events/parks-and-open-spaces/open-space-strategy-audit/">https://www.aberdeenshire.gov.uk/communities-and-events/parks-and-open-spaces/open-space-strategy-audit/</a>	Not applicable Please specify:
<b>f. Resource use</b>	
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 <a href="https://www.aberdeenshire.gov.uk/media/20555/appendix-3-boundaries-of-the-greenbelt.pdf">https://www.aberdeenshire.gov.uk/media/20555/appendix-3-boundaries-of-the-greenbelt.pdf</a>	No
Carbon-rich soils and peatland <a href="http://www.snh.gov.uk/planning-and-development/advice-for-planners-and-developers/soils-and-development/cpp/">http://www.snh.gov.uk/planning-and-development/advice-for-planners-and-developers/soils-and-development/cpp/</a>	No
Coastal Zone <a href="https://www.aberdeenshire.gov.uk/media/20176/4-the-coastal-zone.pdf">https://www.aberdeenshire.gov.uk/media/20176/4-the-coastal-zone.pdf</a>	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 <a href="https://www.aberdeenshire.gov.uk/planning/plans-and-policies/planning-advice/">https://www.aberdeenshire.gov.uk/planning/plans-and-policies/planning-advice/</a> and advice at <a href="http://www.hse.gov.uk/landuseplanning/developers.htm">http://www.hse.gov.uk/landuseplanning/developers.htm</a> )	Yes  A 324 mm SGN Gas Main (Leuchar Moss / Craibstone) is located to the immediate west of the site's developable area.
Minerals – safeguarded or area of search <a href="https://www.aberdeenshire.gov.uk/ldpmedia/6_Area_of_search_and_safeguard_for_minerals.pdf">https://www.aberdeenshire.gov.uk/ldpmedia/6_Area_of_search_and_safeguard_for_minerals.pdf</a>	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. <a href="http://map.environment.gov.scot/Soil_maps/?layer=6">http://map.environment.gov.scot/Soil_maps/?layer=6</a>	No
'Protected' open space in the LDP (i.e. P sites) <a href="http://www.aberdeenshire.gov.uk/ldp">www.aberdeenshire.gov.uk/ldp</a> and choose from Appendix 8a to 8f	No
Rights of way/core paths/recreation uses	Not for this phase but yes for the latter phases and so will need to be mindful of existing and proposed routes as outlined above.
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 powerlines running through the site are not an impediment to development as they can be rerouted or put underground. The Masterplan has been prepared adhering to PADHI consultation zone standards.</p>	

**16. Proximity to facilities**

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

**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:
	<p>In preparing a public consultation strategy, the intention would be that such an exercise would be wholly inclusive as opposed to exclusive. Advice would be sought from Planning Officers and Aberdeenshire Council requesting a comprehensive list of likely interested individuals, organisations and groups active in the Westhill area.</p> <p>It would also be important to engage with the business community operating in the area, the local Community Council, local members and appropriate Ministers, MP and MSPs.</p> <p>The intention would be to hold a public consultation over one/two days in a suitable local venue in Westhill, at which a number of exhibition panels providing the planning background to the proposal, the proposed masterplan and, identifying the key planning and environmental issues that have influenced its content would be presented with a view to seeking comments.</p> <p>The public consultation would be advertised in advance in the local press and publicity leaflets</p>

	<p>would be distributed to all known groups and organisations operating in the Westhill area including adjoining neighbours and landowners, the Community Council, local members, appropriate Ministers, the local MP, MSPs and the local business community. This would ensure an inclusive as opposed to exclusive approach to the consultation and help maximise feedback from all sectors of the community.</p> <p>Following completion of the public consultation exercise, the responses from the attendees would be collated and summarised with a view to preparing what in effect would be a document similar to that associated with a Pre-Planning Application Public Consultation Report. This would provide summary of the key issues raised and the influence such issues and comments had on the submitted masterplan proposals.</p>
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**18. Residual value and deliverability**

<p>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>	<p>I have considered the likely 'residual value' of the site, as described above, and fully expect the site to be viable:</p> <p>Please tick: <input checked="" type="checkbox"/></p>
<p>If you have any further information to help demonstrate the deliverability of your proposal, please provide details.</p> <p>The proposed development would allow for a continuation of the close working relationship between Dunecht Estates and Barratt North Scotland. Having worked closely together over a number of years, each party is very much aware of the issues that may impact on viability and deliverability within the immediate area and specifically on the site. As a consequence, they are confident that the site is deliverable.</p>	

### 19. Other information

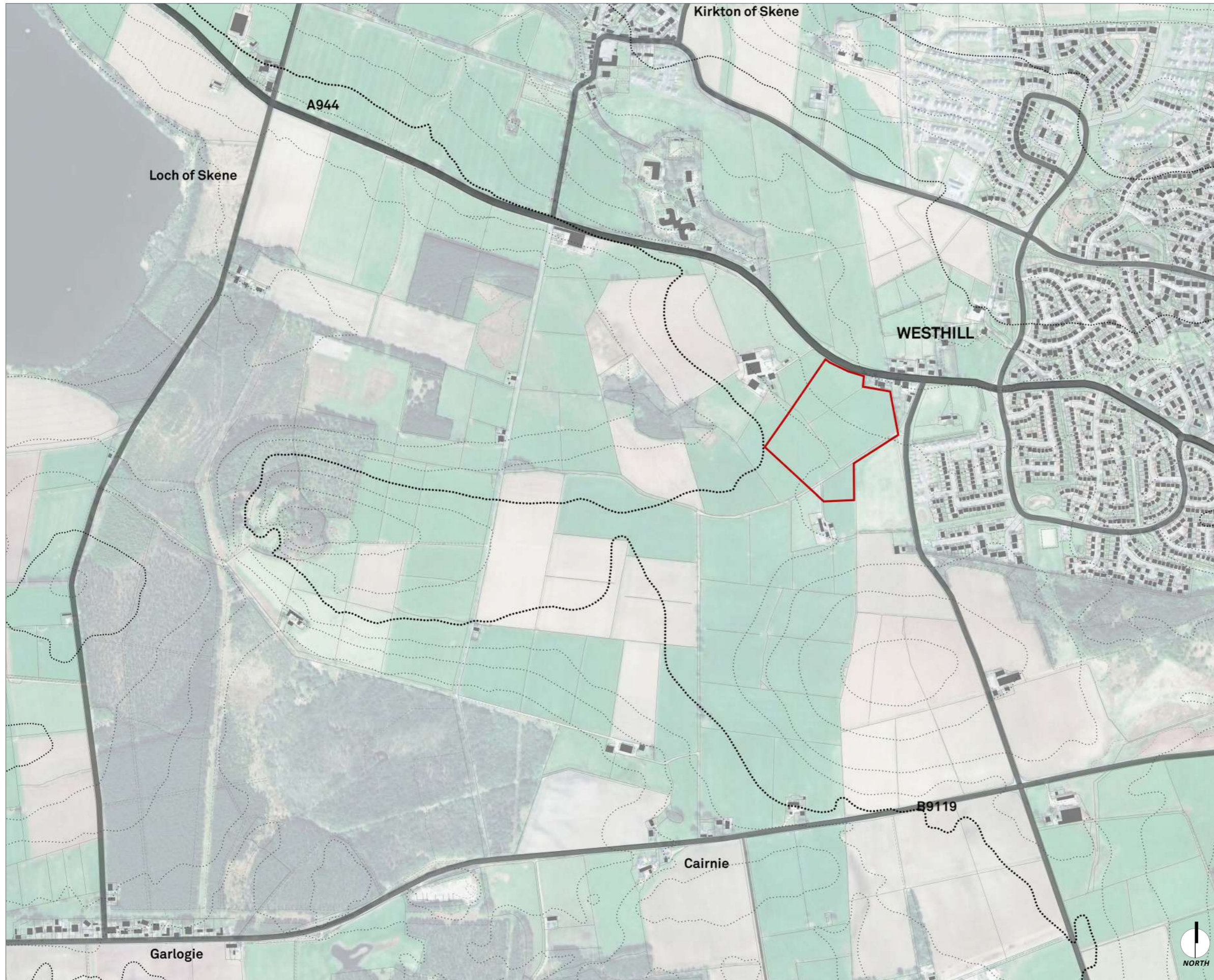
Please provide any other information that you would like us to consider in support of your proposed development (please include details of any up-to-date supporting studies that have been undertaken and attach copies e.g. Transport Appraisal, Flood Risk Assessment, Drainage Impact Assessment, Peat/Soil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

In addition to the Site Location Plan, an Indicative Masterplan is also attached. The intention would be to provide the detailed studies referred to above at the MIR Stage.

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.



The scaling of this drawing cannot be assured

Revision	Date	Drn	Chk
-	-	-	-

— Site Boundary (7.2 ha)

**GR039**

Project  
 Westhill  
 Westhill, Aberdeenshire  
 Drawing Title  
 Red Line Boundary

Date 27.03.18	Scale 1:5000@A3	Drawn by ■	Check by ■
Project No 24396	Drawing No ind06	Revision A	

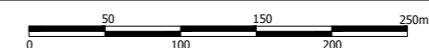
**BARTON  
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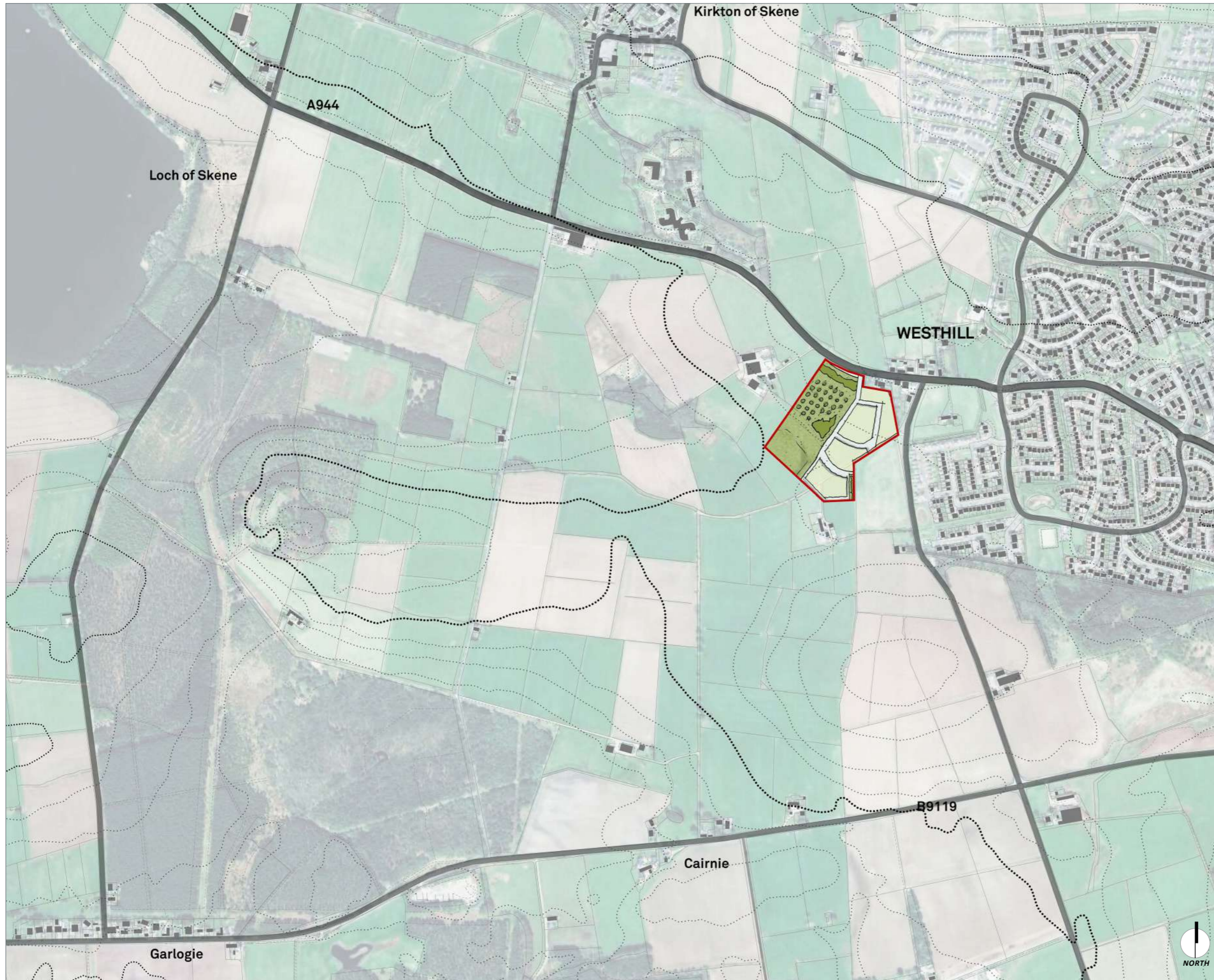
Planning Master Planning & Urban Design  
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The scaling of this drawing cannot be assured

Revision	Date	Drn	Chk
-	-	-	-

— Site Boundary (7.2 ha) **GR039**

Use	Area (hectares)	Area (acres)	Indicative Capacity (30dph)
Residential	3.7	9.1	c.100
<b>Total</b>	<b>3.7</b>	<b>9.1</b>	<b>-</b>

Project  
Westhill  
Westhill, Aberdeenshire  
Drawing Title  
Indicative Masterplan

Date 27.03.18	Scale 1:5000@A3	Drawn by ■	Check by ■
Project No 24396	Drawing No ind06	Revision A	

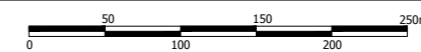
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Planning Master Planning & Urban Design  
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development?	
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**For data protection purposes, please complete the rest of this form on a new page**

#### 4. Site Details

Name of the site (Please use the LDP name if the site is already allocated)	Westhill West (Phase 2)
Site address	Land to the west of Westhill south of the A944
OS grid reference (if available)	
Site area/size	36.4ha (90 Acres)
Current land use	Agriculture
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
	If yes, please give details
Is the site being marketed?	No
	If yes, please give details

#### 6. Legal Issues

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

#### 7. Planning History

Have you had any formal/informal pre-application discussions with the Planning Service and what was the response?	No
	If yes, please give details
Previous planning applications	Please provide application reference number(s), description(s) of the development, and whether planning permission was approved or refused: None
Previous 'Call for sites' history. See Main Issues Report 2013 at <a href="http://www.aberdeenshire.gov.uk/ldp">www.aberdeenshire.gov.uk/ldp</a>	Please provide Previous 'Call for sites'/'Bid' reference number: None
Local Development Plan status <a href="http://www.aberdeenshire.gov.uk/ldp">www.aberdeenshire.gov.uk/ldp</a>	Is the site currently allocated for any specific use in the existing LDP? No
	If yes, do you wish to change the site description and or

	allocation?
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### 8. Proposed Use

Proposed use		Mixed Use
Housing	Approx. no of units	500
	Proposed mix of house types	Number of: <ul style="list-style-type: none"> <li>• Detached: TBC dependant on market demand.</li> <li>• Semi-detached: TBC dependant on market demand.</li> <li>• Flats: TBC dependant on market demand.</li> <li>• Terrace: TBC dependant on market demand.</li> <li>• Other (e.g. Bungalows): TBC dependant on market demand.</li> </ul>
		Number of: <ul style="list-style-type: none"> <li>• 1 bedroom homes: TBC dependant on market demand.</li> <li>• 2 bedroom homes: TBC dependant on market demand.</li> <li>• 3 bedroom homes: TBC dependant on market demand.</li> <li>• 4 or more bedroom homes: TBC dependant on market demand.</li> </ul>
	Tenure (Delete as appropriate)	Private.
	Affordable housing proportion	25%
Employment	Business and offices	Indicative floor space: m <sup>2</sup> None
	General industrial	Indicative floor space: m <sup>2</sup> None
	Storage and distribution	Indicative floor space: m <sup>2</sup> None
	Do you have a specific occupier for the site?	No
Other	Proposed use (please specify) and floor space	Primary School (2.8ha) including integrated community and leisure facilities.
	Do you have a specific occupier for the site?	No
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 timescales	N/A	
	Barratt are funded centrally and have the resources to deliver development sites within the timescale stated, without the requirement for external finance.	

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: Not Applicable.

## 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"> <li>• <a href="https://www.environment.gov.scot/">https://www.environment.gov.scot/</a></li> <li>• EU priority habitats at <a href="http://gateway.snh.gov.uk/sitelink/index.jsp">http://gateway.snh.gov.uk/sitelink/index.jsp</a></li> <li>• UK or Local priority habitats at <a href="http://www.biodiversityscotland.gov.uk/advice-and-resources/habitat-definitions/priority/">http://www.biodiversityscotland.gov.uk/advice-and-resources/habitat-definitions/priority/</a></li> <li>• Local Nature Conservation Sites in the LDP's Supplementary Guidance No. 5 at <a href="http://www.aberdeenshire.gov.uk/ldp">www.aberdeenshire.gov.uk/ldp</a></li> </ul>	RAMSAR Site	✓
	Special Area of Conservation	✓
	Special Protection Area	✓
	Priority habitat (Annex I)	
	European Protected Species	
	Other protected species	
	Site of Special Scientific Interest	✓
	National Nature Reserve	
	Ancient Woodland	✓
	Trees, hedgerows and woodland (including trees with a Tree Preservation Order)	
	Priority habitat (UK or Local Biodiversity Action Plan)	
	Local Nature Conservation Site	✓
	Local Nature Reserve	
<p>If yes, please give details of how you plan to mitigate the impact of the proposed development:</p> <p>The proposed site, although not directly affected, forms Phase Two of a larger development proposal submitted under a separate bid 'Westhill West' which is located close to the eastern boundary of the Loch of Skene which is designated a RAMSAR, Special Protected Area (SPA) and a Site of Special Scientific Interest (SSSI) for its wetland habitat and bird populations and, forms part of the wider catchment of the River Dee Special Area of Conservation (SSC). There are also several areas of Native and Ancient Woodland within and around the vicinity of the site, particularly to the south-west (Gask Wood) that could provide refuge, habitat or protection for many species. A detailed mitigation plan has not yet been formulated but, following further survey work such as a Phase I Habitat Survey and the preparation of a Habitats Regulations Appraisal, the intention would be to prepare a plan in consultation with SNH and the Council that avoided any potential adverse impacts to the Loch on account of new development in both the immediate and wider area and ensure that habitats and species were retained, restored (where possible) and protected respectively with buffers incorporated to minimise disturbance. Initial discussions have already taken place with SNH. An important objective would be to maintain and improve habitat connectivity through the retention of</p>		

	<p>valued habitats and ongoing habitat management and landscape design in order to enhance habitat linkages through elements such as native planting along watercourses, new hedges and woodland.</p> <p>Protection of the designated Loch of Skene would also be achieved through:</p> <ul style="list-style-type: none"> <li>• appropriate drainage design incorporating Sustainable Drainage Systems (SuDS) to manage the quality and quantity of drainage flows; and,</li> <li>• good practice during construction including measures to ensure watercourses were not affected by pollution or siltation during development works.</li> </ul> <p>Based on the findings of an initial desk top survey and a walkover of the proposed area, there would not appear to be any significant ecological issues on the site that would prevent or constrain future development.</p>
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**Biodiversity enhancement**

<p>Please state what benefits for biodiversity this proposal will bring (as per paragraph 194 in Scottish Planning Policy), <a href="http://www.gov.scot/Resource/0045/00453827.pdf">http://www.gov.scot/Resource/0045/00453827.pdf</a>) by ticking all that apply. Please provide details.</p> <p>See Planning Advice 5/2015 on Opportunities for biodiversity enhancement at: <a href="http://www.aberdeenshire.gov.uk/media/19598/2015_05-opportunities-for-biodiversity-enhancement-in-new-development.pdf">www.aberdeenshire.gov.uk/media/19598/2015_05-opportunities-for-biodiversity-enhancement-in-new-development.pdf</a></p> <p>Advice is also available from Scottish Natural Heritage at: <a href="https://www.snh.scot/professional-advice/planning-and-development/natural-heritage-advice-planners-and-developers">https://www.snh.scot/professional-advice/planning-and-development/natural-heritage-advice-planners-and-developers</a> and <a href="http://www.nesbiodiversity.org.uk/">http://www.nesbiodiversity.org.uk/</a>.</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	Yes if appropriate
	Living roofs	Yes if appropriate
	Ponds and soakaways	✓
	Habitat walls/fences	Yes if appropriate
	Wildflowers in verges	
	Use of nectar rich plant species	✓
	Buffer strips along watercourses	✓
	Show home demonstration area	Yes if appropriate
	Other (please state):	
Please provide details:		

	<p>Barratt North Scotland and Dunecht Estates are very much aware of the importance placed on protecting, enhancing and promoting access to key environmental resources by Scottish Government. In this regard, they collectively support the need to facilitate positive change while maintaining and enhancing distinctive landscape character; conserving and enhancing protected sites and species; protecting and improving the water environment including rivers and wetlands in a sustainable and co-ordinated way; protecting and enhancing ancient semi-natural woodland together with other native long established woods, hedgerows and trees; and, where possible, restoring degraded habitats. Such objectives would be incorporated and embraced in a detailed biodiversity plan in consultation with SNH and the Council, which would aim to enhance biodiversity within both the immediate and wider area including Gask Wood to the south-west.</p>
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## 11. Historic environment

Historic environment enhancement		
Please state if there will be benefits for the historic environment.	No If yes, please give details: See below	
<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"> <li>• <a href="http://historicscotland.maps.arcgis.com/apps/Viewer/index.html?appid=18d2608ac1284066ba3927312710d16d">http://historicscotland.maps.arcgis.com/apps/Viewer/index.html?appid=18d2608ac1284066ba3927312710d16d</a></li> <li>• <a href="http://portal.historicenvironment.scot/">http://portal.historicenvironment.scot/</a></li> <li>• <a href="https://online.aberdeenshire.gov.uk/smrpub/master/default.aspx?Authority=Aberdeenshire">https://online.aberdeenshire.gov.uk/smrpub/master/default.aspx?Authority=Aberdeenshire</a></li> </ul>	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
	<p>If yes, please give details of how you plan to mitigate the impact of the proposed development</p> <p>The proposed site forms Phase Two of a larger development being promoted under 'Westhill West' which contains a Scheduled Monument known as the Springhill Standing Stone which is part of a former stone circle.</p> <p>The Stone is located in the centre of the wider proposed development area outwith Phase Two, the development of which will have no adverse impacts on its setting.</p>	

## 12. Landscape Impact

<p>Is the site within a Special Landscape Area (SLA)? (You can find details in Supplementary Guidance 9 at <a href="http://www.aberdeenshire.gov.uk/ldp">www.aberdeenshire.gov.uk/ldp</a>)</p>	No <b>If yes</b> , 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>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"> <li>• SNH: Landscape Character Assessments <a href="https://www.snh.scot/professional-advice/landscape-change/landscape-character-assessment">https://www.snh.scot/professional-advice/landscape-change/landscape-character-assessment</a></li> <li>• SNH (1996) Cairngorms landscape assessment</li> </ul>	<p><b>If your site is not within an SLA</b>, 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 proposals will result in the loss of agricultural land and a change in the character of the site from a rural to urban environment which will create a new extended area of residential development to the west of Westhill.</p>

<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>

The landscape is considered to have capacity to satisfactorily accommodate housing within the development area without significant adverse impact.

The loss of agricultural land to the development is not considered to be significant. Agriculture is a dominant land use in the wider Aberdeenshire area and the site is not considered to represent a scarce landscape resource or to be of particular value in the context of the wider landscape. The landscape of the development area is considered to be of low-medium sensitivity.

There would be significant visual effects for existing properties located close to and within the site boundary. The proposed development would change the outlook from these houses from one which is predominantly rural with some scattered buildings and houses, to one within – or on the edge of – a built-up area.

There are clear views to the proposed site from residential properties located to the east of the development. Views of the proposed development will be most significant for those properties directly along the edge of Westhill. However, these effects will reduce quickly as the existing settlement of Westhill begins to provide screening.

Views from the west of the development site will be extensively screened by the woodland at Gask and Garlogie Woods. At greater distances in the west, some glimpsed views may become available through gaps in the woodland or slight rises in topography. The development will not be an obvious feature in views from the west and, effects on these views as a result of the proposals, are not considered to be significant.

There will be a significant change in views from the north, particularly for those in close proximity such as residents in the immediate area and road users (such as the A944 and from



	<p>the B979 to the south of Kirkton of Skene). However, over a short distance from the site, local topography and vegetation would screen or filter views to the development and these effects would reduce quickly.</p> <p>There will be significant changes to views from the south, particularly in some locations within approximately 1km of the development area. There will also be significant changes in views for users of the B119 as they pass the southern boundary of the site. As distance grows from the site and the context of Westhill becomes more obvious, or intervening landscape screens views to the proposals site, the significance of these effects would reduce considerably.</p> <p>Overall, it is considered that the proposed development, if taken forward in line with the principles and concepts indicated on the attached Indicative Masterplan for the site, would sit comfortably within the landscape character of both the immediate and wider area.</p>
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### 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 <a href="http://map.sepa.org.uk/floodmap/map.htm">http://map.sepa.org.uk/floodmap/map.htm</a>)</p>	No
	If yes, please specify and explain how you intend to mitigate this risk:
<p>Could development on the site result in additional flood risk elsewhere?</p>	No
	If yes, please specify and explain how you intend to mitigate or avoid this risk:
<p>Could development of the site help alleviate any existing flooding problems in the area?</p>	No
	If yes, please provide details:

### 14. Infrastructure

#### a. Water / Drainage

<p>Is there water/waste water capacity for the proposed development (based on Scottish Water asset capacity search tool <a href="http://www.scottishwater.co.uk/business/Connections/Connecting-your-property/Asset-Capacity-Search">http://www.scottishwater.co.uk/business/Connections/Connecting-your-property/Asset-Capacity-Search</a>)?</p>	Water	TBC – SW will require WIA to confirm
	Waste water	TBC – SW will require DIA to confirm

Has contact been made with Scottish Water?	Yes If yes, please give details of outcome:  Response awaited.
Will your SUDS scheme include rain gardens? <a href="http://www.centralscotlandgreennetwork.org/campaigns/greener-gardens">http://www.centralscotlandgreennetwork.org/campaigns/greener-gardens</a>	Yes Please specify:  To be confirmed at the detailed design stage and based on compliance with prevailing technical standards and Scottish Water adoption requirements.
<b>b. Education – housing proposals only</b>	
Education capacity/constraints <a href="https://www.aberdeenshire.gov.uk/schools/parents-carers/school-info/school-roll-forecasts/">https://www.aberdeenshire.gov.uk/schools/parents-carers/school-info/school-roll-forecasts/</a>	Please provide details of any known education constraints. Is additional capacity needed to serve the development?  Although a primary school is shown on the attached Indicative Masterplan, it is understood that there is capacity at both primary and secondary school levels to accommodate this phase of development however, if any constraints are identified, these can be addressed by appropriate developer contributions.
Has contact been made with the Local Authority's Education Department?	No If yes, please give details of outcome:
<b>c. Transport</b>	
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?	No If yes, please give details of outcome:
Has contact been made with the Local Authority's Transportation Service? They can be contacted at <a href="mailto:transportation.consultation@aberdeenshire.gov.uk">transportation.consultation@aberdeenshire.gov.uk</a>	Yes If yes, please give details of outcome: There has been initial contact but the Council's Transportation Service has advised that it has nothing tangible to say until the ASAM model is updated by NESTRANS.
Public transport	Please provide details of how the site is or could be served by public transport:  Four bus routes operating from Aberdeen currently serve Westhill as follows: <ul style="list-style-type: none"> <li>• 16 / X17 Aberdeen – Woodend – Westhill - Elrick</li> <li>• X18 Aberdeen – Kingswells Park and Ride – Westhill – Elrick – Dunecht - Alford</li> </ul>

	<ul style="list-style-type: none"> <li>• 777 Oldmeldrum - Inverurie - Westhill - Kingswells - Aberdeen Airport Kirkhills Industrial Estate</li> </ul> <p>The closest bus stops are located on the A944 within 100m of the site boundary and are served by the X18 service linking the site with the town centre and Aberdeen City Centre. Services 16 &amp; X17 are available from bus stops on Broadstraik Road and the A944 to the east, approximately 500m from the site boundary.</p> <p>In addition, a local dial-a-bus service provides internal transport within Westhill while a Park &amp; Ride facility provides regular bus transport from Kingswells, approximately 3 km east of Westhill, to Aberdeen Royal Infirmary, Aberdeen City Centre, Bridge of Don Park &amp; Ride and Dubford. This Park &amp; Ride facility includes an indoor heated and lit waiting room, accessible toilets and a covered outdoor cycle canopy.</p> <p>The nearest train station to Westhill is located approximately 6 km north-east in Dyce on the mainline between Inverurie and Aberdeen. This railway offers direct links to major cities including Dundee, Edinburgh and Glasgow.</p>
<p>Active travel (i.e. internal connectivity and links externally)</p>	<p>Please provide details of how the site can or could be accessed by walking and cycling:</p> <p>The site can be easily accessed through an extension of existing pedestrian and cycle networks in the area being located on the western edge of Westhill.</p> <p>There are existing and proposed core path routes which run along the A944 as well as north/south through and adjacent to the site to Gask Cottage and Garlogie Woods and between the two:</p>
<p><b>d. Gas/Electricity/Heat/Broadband</b></p>	
<p>Has contact been made with the relevant utilities providers?</p>	<p>Gas: No If yes, please give details of outcome(s):</p>
	<p>Electricity: Yes If yes, please give details of outcome(s):</p>

	<p>On the basis of plans received from Scottish and Southern Energy, an electricity connection for the proposed development would be available through the existing network.</p>
	<p>Heat: No If yes, please give details of outcome(s): Unsure what this refers to.</p>
	<p>Broadband: Yes If yes, please give details of outcome(s): Fibre available in the area.</p>
Have any feasibility studies been undertaken to understand and inform capacity issues?	<p>Yes Please specify: Initial service enquiries have been submitted. Responses awaited</p>
Is there capacity within the existing network(s) and a viable connection to the network(s)?	<p>Yes Please specify: Initial service enquiries have been submitted. Responses awaited</p>
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)	<p>Yes  It is anticipated that some form of renewable energy technology will be utilised on site, but details of this are not known at this time.</p>
<b>e. Public open space</b>	
<p>Will the site provide the opportunity to <b>enhance the green network?</b> (These are the linked areas of open space in settlements, which can be enhanced through amalgamating existing green networks or providing onsite green infrastructure)</p> <p>You can find the boundary of existing green networks in the settlement profiles in the LDP</p>	<p>Yes Please specify:  An integral part of the proposals is to enhance the green network and link areas of both existing and proposed open space as articulated on the submitted Indicative Masterplan for the site.</p>
<p>Will the site meet the open space standards, as set out in Appendix 2 in the <b>Aberdeenshire Parks and Open Spaces Strategy?</b> <a href="https://www.aberdeenshire.gov.uk/media/6077/approvedpandospacestrategy.pdf">https://www.aberdeenshire.gov.uk/media/6077/approvedpandospacestrategy.pdf</a></p>	<p>Yes Please specify:  As detailed above, the provision of significant areas of open space for both passive and active recreation forms an integral part of the proposed development, all as articulated on the attached Indicative Masterplan for the site. The final revision will be in line with Council Policy.</p>
<p>Will the site deliver any of the shortfalls identified in the <b>Open Space Audit</b> for specific settlements? <a href="https://www.aberdeenshire.gov.uk/communities">https://www.aberdeenshire.gov.uk/communities</a></p>	<p>Not applicable Please specify:</p>

<a href="#">-and-events/parks-and-open-spaces/open-space-strategy-audit/</a>	
<b>f. Resource use</b>	
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 <a href="https://www.aberdeenshire.gov.uk/media/20555/appendix-3-boundaries-of-the-greenbelt.pdf">https://www.aberdeenshire.gov.uk/media/20555/appendix-3-boundaries-of-the-greenbelt.pdf</a>	No
Carbon-rich soils and peatland <a href="http://www.snh.gov.uk/planning-and-development/advice-for-planners-and-developers/soils-and-development/cpp/">http://www.snh.gov.uk/planning-and-development/advice-for-planners-and-developers/soils-and-development/cpp/</a>	No
Coastal Zone <a href="https://www.aberdeenshire.gov.uk/media/20176/4-the-coastal-zone.pdf">https://www.aberdeenshire.gov.uk/media/20176/4-the-coastal-zone.pdf</a>	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 <a href="https://www.aberdeenshire.gov.uk/planning/plans-and-policies/planning-advice/">https://www.aberdeenshire.gov.uk/planning/plans-and-policies/planning-advice/</a> and advice at <a href="http://www.hse.gov.uk/landuseplanning/developers.htm">http://www.hse.gov.uk/landuseplanning/developers.htm</a> )	Yes  A 324mm SGN Gas Main (Leuchar Moss / Craibstone) is located to the immediate west of the site's developable area.
Minerals – safeguarded or area of search <a href="https://www.aberdeenshire.gov.uk/ldpmedia/6_Area_of_search_and_safeguard_for_minerals.pdf">https://www.aberdeenshire.gov.uk/ldpmedia/6_Area_of_search_and_safeguard_for_minerals.pdf</a>	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. <a href="http://map.environment.gov.scot/Soil_maps/?layer=6">http://map.environment.gov.scot/Soil_maps/?layer=6</a>	No
'Protected' open space in the LDP (i.e. P sites) <a href="http://www.aberdeenshire.gov.uk/ldp">www.aberdeenshire.gov.uk/ldp</a> and choose from Appendix 8a to 8f	No
Rights of way/core paths/recreation uses	Not for this phase but yes for the latter phases and so will need to be mindful of existing and proposed routes as outlined above.
Topography (e.g. steep slopes)	No
Other	No
If you have identified any of the potential constraints above, please use this space to identify	

how you will mitigate this in order to achieve a viable development:

The overhead powerlines running through the site are not an impediment to development as they can be rerouted or put underground. The Masterplan has been prepared adhering to PADHI consultation zone standards.

**16. Proximity to facilities**

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

**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:  In preparing a public consultation strategy, the intention would be that such an exercise would be wholly inclusive as opposed to exclusive. Advice would be sought from Planning Officers and Aberdeenshire Council requesting a comprehensive list of likely interested individuals, organisations and groups active in the Westhill area.  It would also be important to engage with the business community operating in the area, the local Community Council, local members and appropriate Ministers, MP and MSPs.  The intention would be to hold a public consultation over one/two days in a suitable local venue in Westhill, at which a number of exhibition panels providing the planning background to the proposal, the proposed masterplan and, identifying the key planning and environmental issues that have influenced its content would be presented with a view to seeking comments.  The public consultation would be advertised in advance in the local press and publicity leaflets

	<p>would be distributed to all known groups and organisations operating in the Westhill area including adjoining neighbours and landowners, the Community Council, local members, appropriate Ministers, the local MP, MSPs and the local business community. This would ensure an inclusive as opposed to exclusive approach to the consultation and help maximise feedback from all sectors of the community.</p> <p>Following completion of the public consultation exercise, the responses from the attendees would be collated and summarised with a view to preparing what in effect would be a document similar to that associated with a Pre-Planning Application Public Consultation Report. This would provide a summary of the key issues raised and the influence such issues and comments had on the submitted masterplan proposals.</p>
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**18. Residual value and deliverability**

<p>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>	<p>I have considered the likely 'residual value' of the site, as described above, and fully expect the site to be viable:</p> <p>Please tick: <input checked="" type="checkbox"/></p>
<p>If you have any further information to help demonstrate the deliverability of your proposal, please provide details.</p> <p>The proposed development would allow for a continuation of the close working relationship between Dunecht Estates and Barratt North Scotland. Having worked closely together over a number of years, each party is very much aware of the issues that may impact on viability and deliverability within the immediate area and specifically on the site. As a consequence, they are confident that the site is deliverable.</p>	



### 19. Other information

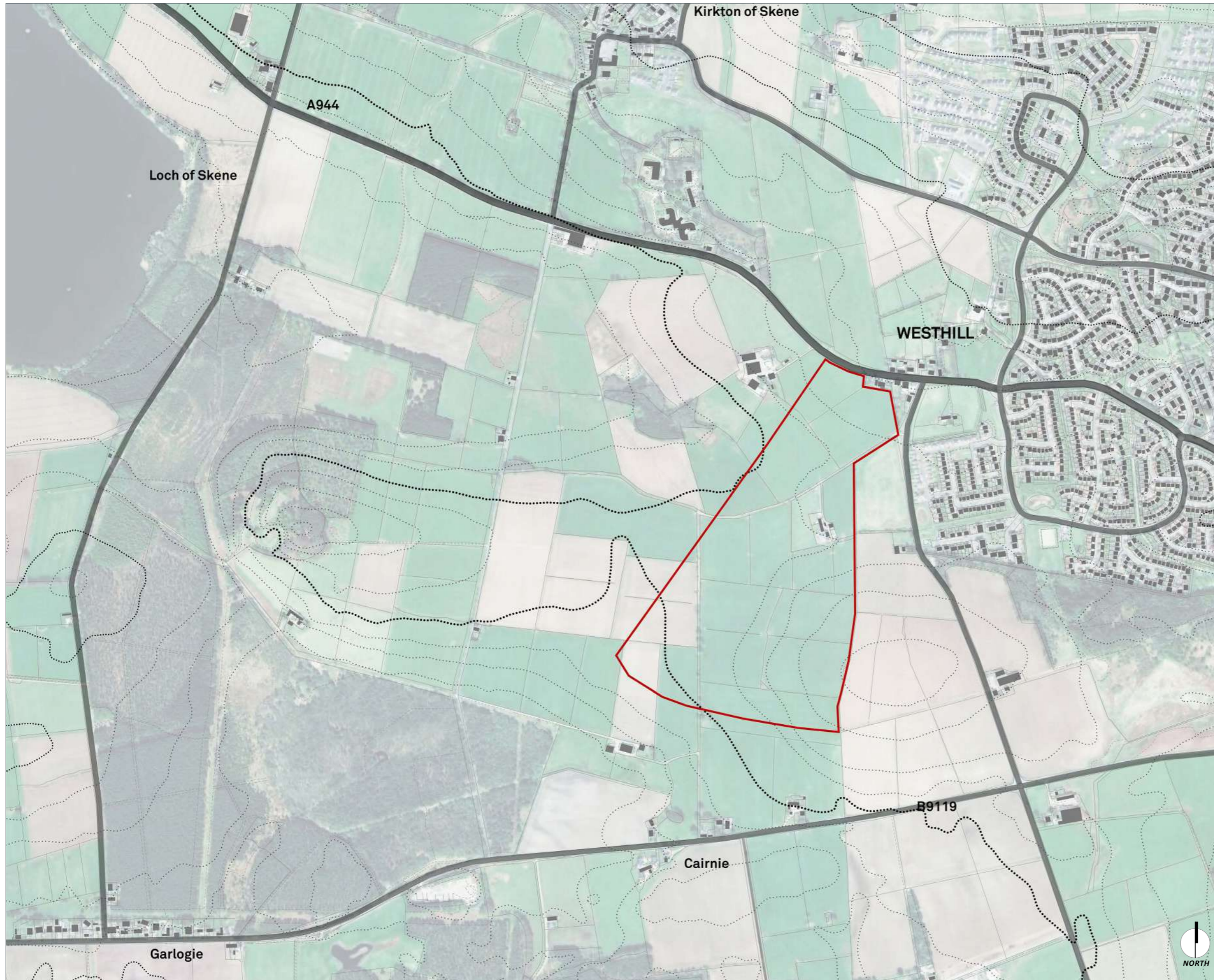
Please provide any other information that you would like us to consider in support of your proposed development (please include details of any up-to-date supporting studies that have been undertaken and attach copies e.g. Transport Appraisal, Flood Risk Assessment, Drainage Impact Assessment, Peat/Soil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

In addition to the Site Location Plan, an Indicative Masterplan is also attached. The intention would be to provide the detailed studies referred to above at the MIR Stage.

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.



The scaling of this drawing cannot be assured

Revision	Date	Drn	Chk
-	-	-	-

— Site Boundary (36.4 ha)

**GR040**

Project  
 Westhill  
 Westhill, Aberdeenshire  
 Drawing Title  
 Red Line Boundary

Date 27.03.18	Scale 1:5000@A3	Drawn by ■	Check by ■
Project No 24396	Drawing No ind06	Revision A	

**BARTON  
 WILLMORE**

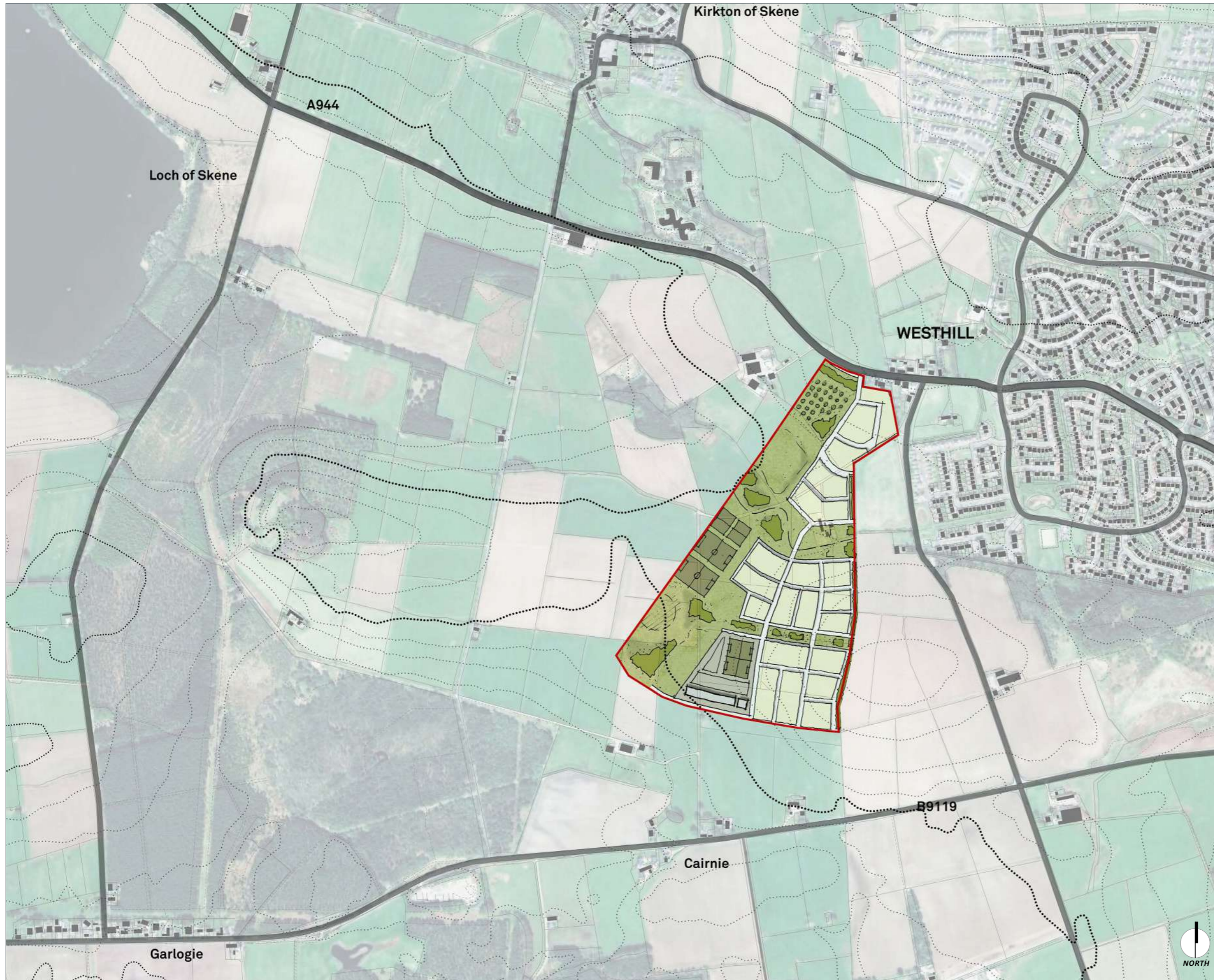
Planning Master Planning & Urban Design  
 Architecture Landscape Planning & Design Project Services  
 Environmental & Sustainability Assessment Graphic Design

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Revision	Date	Drm	Chk
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— Site Boundary (36.4 ha)

**GR040**

Use	Area (hectares)	Area (acres)	Indicative Capacity (30dph)
Education (including integrated community and leisure facilities)	2.8	6.9	-
Residential	16.8	41.5	c.500
<b>Total</b>	<b>19.6</b>	<b>48.4</b>	-

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Project  
Westhill  
Westhill, Aberdeenshire  
Drawing Title  
Indicative Masterplan

Date 27.03.18	Scale 1:5000@A3	Drawn by ■	Check by ■
Project No 24396	Drawing No ind06	Revision A	

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**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)	Westhill West incorporating Westhill West Phases 1 & 2 which are the subject of separate bids.
Site address	Land to the west of Westhill south of the A944 and north of the B9119.
OS grid reference (if available)	
Site area/size	232.9ha (575 Acres)
Current land use	Agriculture and Woodland
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
	If yes, please give details
Is the site being marketed?	No
	If yes, please give details

#### 6. Legal Issues

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

#### 7. Planning History

Have you had any formal/informal pre-application discussions with the Planning Service and what was the response?	Yes
	If yes, please give details  Informal discussions have taken place with the SDPA and Aberdeenshire Council [REDACTED] about Westhill becoming part of a Strategic Growth Corridor and how the quantum of the proposed development would provide for significant improved educational and recreational facilities and traffic circulation through road improvements for both the immediate and wider Westhill area.
Previous planning applications	Please provide application reference number(s), description(s) of the development, and whether planning permission was approved or refused: None

Previous 'Call for sites' history. See Main Issues Report 2013 at <a href="http://www.aberdeenshire.gov.uk/ldp">www.aberdeenshire.gov.uk/ldp</a>	Please provide Previous 'Call for sites'/'Bid' reference number: None
Local Development Plan status <a href="http://www.aberdeenshire.gov.uk/ldp">www.aberdeenshire.gov.uk/ldp</a>	Is the site currently allocated for any specific use in the existing LDP? No
	If yes, do you wish to change the site description and or allocation?

## 8. Proposed Use

Proposed use		Mixed Use
Housing	Approx. no of units	2,500
	Proposed mix of house types	Number of: <ul style="list-style-type: none"> <li>• Detached: TBC dependant on market demand.</li> <li>• Semi-detached: TBC dependant on market demand.</li> <li>• Flats: TBC dependant on market demand.</li> <li>• Terrace: TBC dependant on market demand.</li> <li>• Other (e.g. Bungalows): TBC dependant on market demand.</li> </ul>
		Number of: <ul style="list-style-type: none"> <li>• 1 bedroom homes: TBC dependant on market demand.</li> <li>• 2 bedroom homes: TBC dependant on market demand.</li> <li>• 3 bedroom homes: TBC dependant on market demand.</li> <li>• 4 or more bedroom homes: TBC dependant on market demand.</li> </ul>
	Tenure (Delete as appropriate)	Private.
Affordable housing proportion	25%	
Employment	Business and offices	Indicative floor space: m <sup>2</sup> None
	General industrial	Indicative floor space: m <sup>2</sup> None
	Storage and distribution	Indicative floor space: m <sup>2</sup> None
	Do you have a specific occupier for the site?	No
Other	Proposed use (please specify) and floor space	2 Primary Schools and a Secondary School (13.4ha) including integrated community and leisure facilities and, a neighbourhood centre (1.6ha)
	Do you have a specific occupier for the site?	No
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	0-5 years	

to be finished? (please tick)	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	N/A	
	Barratt are funded centrally and have the resources to deliver development sites within the timescale stated, without the requirement for external finance.	
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: Not Applicable.	

## 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"> <li>• <a href="https://www.environment.gov.scot/">https://www.environment.gov.scot/</a></li> <li>• EU priority habitats at <a href="http://gateway.snh.gov.uk/sitelink/index.jsp">http://gateway.snh.gov.uk/sitelink/index.jsp</a></li> <li>• UK or Local priority habitats at <a href="http://www.biodiversityscotland.gov.uk/advice-and-resources/habitat-definitions/priority/">http://www.biodiversityscotland.gov.uk/advice-and-resources/habitat-definitions/priority/</a></li> <li>• Local Nature Conservation Sites in the LDP's Supplementary Guidance No. 5 at <a href="http://www.aberdeenshire.gov.uk/ldp">www.aberdeenshire.gov.uk/ldp</a></li> </ul>	RAMSAR Site	✓
	Special Area of Conservation	✓
	Special Protection Area	✓
	Priority habitat (Annex I)	
	European Protected Species	
	Other protected species	
	Site of Special Scientific Interest	✓
	National Nature Reserve	
	Ancient Woodland	✓
	Trees, hedgerows and woodland (including trees with a Tree Preservation Order)	✓
	Priority habitat (UK or Local Biodiversity Action Plan)	
	Local Nature Conservation Site	✓
	Local Nature Reserve	
<p>If yes, please give details of how you plan to mitigate the impact of the proposed development:</p> <p>The proposed site is located close to the eastern boundary of the Loch of Skene which is designated a RAMSAR, Special Protected Area (SPA) and a Site of Special Scientific Interest (SSSI) for its wetland habitat and bird populations and, forms part of the wider catchment of the River Dee Special Area of Conservation (SSC). There are also several areas of Native and Ancient Woodland within and around the vicinity of the site, particularly to the south-west (Gask Wood) that could provide refuge, habitat or protection for many species. A detailed mitigation plan has not yet been formulated but, following further survey work such as a Phase I Habitat Survey and the preparation of a Habitats Regulations Appraisal, the intention would be to prepare a plan in consultation with SNH and the Council that avoided any potential adverse impacts to the Loch on account of new development in both the immediate and wider area and ensure that habitats and species were retained, restored (where possible) and protected respectively with buffers incorporated to minimise disturbance. Initial discussions have already taken place with SNH. An important objective would be to maintain and improve habitat connectivity through the retention of valued habitats and ongoing habitat management and landscape design in order to enhance habitat linkages through elements such as native planting</p>		

	<p>along watercourses, new hedges and woodland. Protection of the designated Loch of Skene would also be achieved through:</p> <ul style="list-style-type: none"> <li>• appropriate drainage design incorporating Sustainable Drainage Systems (SuDS) to manage the quality and quantity of drainage flows; and,</li> <li>• good practice during construction including measures to ensure watercourses were not affected by pollution or siltation during development works.</li> </ul> <p>Based on the findings of an initial desk top survey and a walkover of the proposed area, there would not appear to be any significant ecological issues on the site that would prevent or constrain future development.</p>
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**Biodiversity enhancement**

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.

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](http://www.aberdeenshire.gov.uk/media/19598/2015_05-opportunities-for-biodiversity-enhancement-in-new-development.pdf)

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/>.

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	Yes if appropriate
Living roofs	Yes if appropriate
Ponds and soakaways	✓
Habitat walls/fences	Yes if appropriate
Wildflowers in verges	
Use of nectar rich plant species	✓
Buffer strips along watercourses	✓
Show home demonstration area	Yes if appropriate
Other (please state):	

Please provide details:

Barratt North Scotland and Dunecht Estates are very much aware of the importance placed on protecting, enhancing and promoting access to key environmental resources by Scottish Government. In this regard, they collectively



	<p>support the need to facilitate positive change while maintaining and enhancing distinctive landscape character; conserving and enhancing protected sites and species; protecting and improving the water environment including rivers and wetlands in a sustainable and co-ordinated way; protecting and enhancing ancient semi-natural woodland together with other native long established woods, hedgerows and trees; and, where possible, restoring degraded habitats. Such objectives would be incorporated and embraced in a detailed biodiversity plan in consultation with SNH and the Council, which would aim to enhance biodiversity within both the immediate and wider area including Gask Wood to the south-west.</p>
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## 11. Historic environment

Historic environment enhancement		
Please state if there will be benefits for the historic environment.	Yes	
	If yes, please give details: See below	
<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"> <li>• <a href="http://historicscotland.maps.arcgis.com/apps/Viewer/index.html?appid=18d2608ac1284066ba3927312710d16d">http://historicscotland.maps.arcgis.com/apps/Viewer/index.html?appid=18d2608ac1284066ba3927312710d16d</a></li> <li>• <a href="http://portal.historicenvironment.scot/">http://portal.historicenvironment.scot/</a></li> <li>• <a href="https://online.aberdeenshire.gov.uk/smrpub/master/default.aspx?Authority=Aberdeenshire">https://online.aberdeenshire.gov.uk/smrpub/master/default.aspx?Authority=Aberdeenshire</a></li> </ul>	Scheduled Monument or their setting	Yes
	Locally important archaeological site held on the Sites and Monuments Record	Yes
	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
	<p>If yes, please give details of how you plan to mitigate the impact of the proposed development</p> <p>The proposed site contains a Scheduled Monument known as the Springhill Standing Stone which is part of a former stone circle.</p> <p>The Stone is located in the centre of the proposed development area. Clearly, future development in this location would impact on the setting of this Scheduled Monument which would be permanently changed. The integration of Standing Stones into new development is however known to have been successfully achieved elsewhere in Aberdeenshire such as at Inverurie, and there is no reason why the Springhill Standing Stone, subject to a careful and sensitive design approach, which incorporated enhancement measures, improved access and information boards in consultation with Historic Environment Scotland, could not be similarly, successfully accommodated as a focal feature of any future development proposals for the wider area.</p> <p>Another Scheduled Monument known as Garlogie Wood Hut Circles and Field System is located immediately south-west of the site. The proposed development would not directly impact on this area. However, as above, enhancement measures, improved access and information</p>	

	<p>boards could be provided, if considered appropriate in consultation with Historic Environment Scotland.</p> <p>There are approximately 28 Historic Environment Records (HER) within the proposed site boundary in various locations across the site. Further studies of the status and nature of these assets would be undertaken to inform a future detailed masterplan design and, wherever possible and appropriate, would be retained or recorded prior to development.</p>
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## 12. Landscape Impact

<p>Is the site within a Special Landscape Area (SLA)? (You can find details in Supplementary Guidance 9 at <a href="http://www.aberdeenshire.gov.uk/ldp">www.aberdeenshire.gov.uk/ldp</a>)</p>	<p>No</p> <p><b>If yes</b>, 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"> <li>• SNH: Landscape Character Assessments <a href="https://www.snh.scot/professional-advice/landscape-change/landscape-character-assessment">https://www.snh.scot/professional-advice/landscape-change/landscape-character-assessment</a></li> <li>• SNH (1996) Cairngorms landscape assessment <a href="http://www.snh.org.uk/pdfs/publications/review/075.pdf">http://www.snh.org.uk/pdfs/publications/review/075.pdf</a></li> <li>• SNH (1997) National programme of landscape character assessment: Banff and Buchan <a href="http://www.snh.org.uk/pdfs/publications/review/037.pdf">http://www.snh.org.uk/pdfs/publications/review/037.pdf</a></li> <li>• SNH (1998) South and Central Aberdeenshire landscape character assessment <a href="http://www.snh.org.uk/pdfs/publications/review/102.pdf">http://www.snh.org.uk/pdfs/publications/review/102.pdf</a></li> </ul>	<p><b>If your site is not within an SLA</b>, 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 proposals will result in the loss of agricultural land and a change in the character of the site from a rural to urban environment which will create a new, large residential area to the west of Westhill and south of Kirkton of Skene.</p> <p>A key external constraint to the development of the site is to avoid the coalescence of the proposed development with the settlements of Westhill and Kirkton of Skene. The <b>Westhill Capacity Study (2014)</b> notes that the western approach to Westhill is poorly defined. Enhancement to the edge of the roads along the north and south of the proposed development site and, softening the northern edge of the site through planting, will assist in providing Westhill with a more defined edge and improved gateway feature.</p>

	<p>The landscape which lies adjacent to the north, south and east of Westhill is constrained for housing development by steep topography, industrial development and the Aberdeen Green Belt.</p> <p>The landscape of the proposed development site has a gently undulating nature, set between two minor rises to the east and west and, within the context of larger hills which surround the area in all directions. The landscape is considered to have capacity to satisfactorily accommodate housing within the development area without significant adverse impact.</p> <p>The loss of agricultural land to the development is not considered to be significant. Agriculture is a dominant land use in the wider Aberdeenshire area and the site is not considered to represent a scarce landscape resource or to be of particular value in the context of the wider landscape. The landscape of the development area is considered to be of low-medium sensitivity.</p> <p>A development of the scale outlined in the Indicative Masterplan will change the character of views to the site from the immediately surrounding area, such as from the western edge of Westhill, from roads which pass around the site and, from residential receptors in the near environs with views to the development area, particularly in the north and south. Sympathetic housing design and layout (including scale of building) as indicated by the Illustrative Masterplan will greatly assist in positively setting the proposed development within both the immediate and wider landscape</p> <p>There would be significant visual effects for existing properties located within the site boundary. The proposed development would change the outlook from these houses from one which is predominantly rural with some scattered buildings and houses, to one within – or on the edge of – a built-up area.</p> <p>There are clear views to the proposed site from</p>
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residential properties located to the east of the development. Views of the proposed development will be most significant for those properties directly along the edge of Westhill. However, these effects will reduce quickly as the existing settlement of Westhill begins to provide screening.

Views from the west of the development site will be extensively screened by the woodland at Gask and Garlogie Woods. At greater distances in the west, some glimpsed views may become available through gaps in the woodland or slight rises in topography. The development will not be an obvious feature in views from the west and, effects on these views as a result of the proposals, are not considered to be significant.

There will be a significant change in views from the north, particularly for those in close proximity such as residents in the immediate area and road users (such as the A944 and from the B979 to the south of Kirkton of Skene). However, over a short distance from the site, local topography and vegetation would screen or filter views to the development and these effects would reduce quickly.

There will be significant changes to views from the south, particularly in some locations within approximately 1km of the development area. There will also be significant changes in views for users of the B119 as they pass the southern boundary of the site. As distance grows from the site and the context of Westhill becomes more obvious, or intervening landscape screens views to the proposals site, the significance of these effects would reduce considerably.

Overall, it is considered that the proposed development, if taken forward in line with the principles and concepts indicated on the attached Indicative Masterplan for the site, would sit comfortably within the landscape character of both the immediate and wider area.

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### 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 <a href="http://map.sepa.org.uk/floodmap/map.htm">http://map.sepa.org.uk/floodmap/map.htm</a> )	Yes
	If yes, please specify and explain how you intend to mitigate this risk:  There is a small area in the north-west sector of the site in association with the watercourse that traverses the site east-west and the Loch of Skene which is at risk of flooding. Areas of proposed development have been designed in the attached Indicative Masterplan to avoid this.
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?	No
	If yes, please provide details:

### 14. Infrastructure

#### a. Water / Drainage

Is there water/waste water capacity for the proposed development (based on Scottish Water asset capacity search tool <a href="http://www.scottishwater.co.uk/business/Connections/Connecting-your-property/Asset-Capacity-Search">http://www.scottishwater.co.uk/business/Connections/Connecting-your-property/Asset-Capacity-Search</a> )?	Water	Yes
	Waste water	Yes
Has contact been made with Scottish Water?	Yes	
	If yes, please give details of outcome:  In an email dated 19 October, 2015 Scottish Water advised the following:  <b>Water</b>  <b>Parts 2 and 3 (network)</b> – This large site will require a new local reservoir, probably upsizing Kingshill DSR again, Pitfodels DSR, Pitfodels TWP and Mannofield MPS2, as well as significant mains upgrades. A Water Impact Assessment (WIA) will also be required.  <b>Part 4 (WTW)</b> – This has not been allowed for as far as Part 4 assets are concerned, so there could be treatment capacity issues. Early engagement and updates on development progress would help Scottish Water to plan	

	<p>for the associated demand.</p> <p><b>Wastewater</b></p> <p><b>Parts 2 and 3 (network)</b> – Downstream of the site there is at least one pumping station, which will take flows from the whole of the west side of Elrick. A Drainage Impact Assessment (DIA) would be required to assess the capacity of the pumping station(s) and the network further downstream, which runs through the town.</p> <p><b>Part 4 (WWTW)</b> – There will be a significant amount of development coming forward before this site which would be treated by Nigg WWTW. Growth may be required here in the future. However, as long as contact is made with Scottish Water as the development moves forward and it is kept updated with timescales, it will be able to take the new demand into account.</p>
<p>Will your SUDS scheme include rain gardens?  <a href="http://www.centuralscotlandgreennetwork.org/campaigns/greener-gardens">http://www.centuralscotlandgreennetwork.org/campaigns/greener-gardens</a></p>	<p>Yes  Please specify:</p> <p>To be confirmed at the detailed design stage and based on compliance with prevailing technical standards and Scottish Water adoption requirements</p>
<p><b>b. Education – housing proposals only</b></p>	
<p>Education capacity/constraints  <a href="https://www.aberdeenshire.gov.uk/schools/parents-carers/school-info/school-roll-forecasts/">https://www.aberdeenshire.gov.uk/schools/parents-carers/school-info/school-roll-forecasts/</a></p>	<p>Please provide details of any known education constraints. Is additional capacity needed to serve the development?</p> <p>On the basis of a proposed development of 2,500 new dwellinghouses and using child house ratios of 0.4 and 0.25 for Primary and Secondary Schools respectively, provision would need to be made for 1,000 primary children and 625 secondary aged pupils. It has been assumed that future development would take place over a number of phases. Following an analysis of the existing primary and secondary school provision within the area, particularly with respect to Skene Primary School and Westhill Academy, it is proposed</p>

	<p>to provide two primary schools and a new secondary school large enough to meet the needs of the current pupils at the Academy and those emanating from any future development of this site. Any such secondary school would include for a community wing to provide a focus for this part of Westhill.</p> <p>Two serviced sites for the primary schools and a serviced site for the secondary school as detailed in the Council's Developers Guidelines would be provided. Payment would also be made at the appropriate rate for the pupils generated by the development.</p>
<p>Has contact been made with the Local Authority's Education Department?</p>	<p>No If yes, please give details of outcome:</p>
<p><b>c. Transport</b></p>	
<p>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?</p>	<p>Yes If yes, please give details of outcome: Transport Scotland, although not directly responsible given it would be a local road, are supportive of the proposed southern orbital road detailed below and fully appreciate the relief and benefit it would give to Westhill in respect of strategic traffic. It is aware however that an updated ASAM model is key to an assessment of the wider road network and are pursuing NESTRANS for its release.</p>
<p>Has contact been made with the Local Authority's Transportation Service? They can be contacted at <a href="mailto:transportation.consultation@aberdeenshire.gov.uk">transportation.consultation@aberdeenshire.gov.uk</a></p>	<p>Yes If yes, please give details of outcome:</p> <p>There has been initial contact but the Council's Transportation Service has advised that it has nothing tangible to say until the ASAM model is updated by NESTRANS.</p> <p>However, the proposal provides the opportunity, in partnership with Aberdeenshire Council, to develop a strategy to address the existing transport constraints in the town which would support the development proposals and provide a betterment to the existing settlement.</p> <p>The main proposals can be summarised as follows:</p>



	<ul style="list-style-type: none"> <li>• Provide a new spine road within the site linking the A944 and B9119;</li> <li>• Divert strategic traffic from the current A944 through the town onto the proposed spine road thereby creating a southern orbital road;</li> <li>• Capacity enhancements on the B9119 between the B797 and the A944 to the east; and,</li> <li>• Environmental improvements on the A944 as it passes through the town.</li> </ul> <p>Diverting strategic traffic from the town centre will provide a considerable betterment to the existing town and address the primary constraint identified in the Westhills Capacity Assessment.</p> <p>The proposed development would be supported by a range of sustainable measures including improved bus services which would be discussed and agreed in detail with Aberdeenshire Council, once the principle of development has been accepted.</p>
Public transport	<p>Please provide details of how the site is or could be served by public transport:</p> <p>Four bus routes operating from Aberdeen currently serve Westhill as follows:</p> <ul style="list-style-type: none"> <li>• 16 / X17 Aberdeen – Woodend – Westhill - Elrick</li> <li>• X18 Aberdeen – Kingswells Park and Ride – Westhill – Elrick – Dunecht - Alford</li> <li>• 777 Oldmeldrum - Inverurie - Westhill - Kingswells - Aberdeen Airport Kirkhills Industrial Estate</li> </ul> <p>The closest bus stops are located on the A944 within 100m of the site boundary and are served by the X18 service linking the site with the town centre and Aberdeen City Centre. Services 16 &amp; X17 are available from bus stops on Broadstraik Road and the A944 to the east, approximately 500m from the site boundary.</p> <p>In addition, a local dial-a-bus service provides</p>

	<p>internal transport within Westhill while a Park &amp; Ride facility provides regular bus transport from Kingswells, approximately 3 km east of Westhill, to Aberdeen Royal Infirmary, Aberdeen City Centre, Bridge of Don Park &amp; Ride and Dubford. This Park &amp; Ride facility includes an indoor heated and lit waiting room, accessible toilets and a covered outdoor cycle canopy.</p> <p>The nearest train station to Westhill is located approximately 6 km north-east in Dyce on the mainline between Inverurie and Aberdeen. This railway offers direct links to major cities including Dundee, Edinburgh and Glasgow.</p> <p>The internal street network will be designed so that key arterial links can accommodate buses. The aspiration would be to have every household within 400m of a bus stop which would ensure that bus travel was available to all and a viable alternative to the private car.</p> <p>Services 16 &amp; X17 provide a loop service from the A944 which could be extended to travel in to the site, ensuring that the wider development area would be linked to the town centre and Aberdeen City Centre by a regular service.</p> <p>The critical mass of development will generate up to 200 bus passengers which will be extremely attractive to bus operators, thereby ensuring that the site will be served by a frequent service. Discussions would be undertaken with Aberdeenshire Council to agree the most effective way to serve the site with a sustainable and self-funding bus service.</p>
<p>Active travel (i.e. internal connectivity and links externally)</p>	<p>Please provide details of how the site can or could be accessed by walking and cycling:</p> <p>The site can be easily accessed through an extension of existing pedestrian and cycle networks in the area being located on the western edge of Westhill.</p>

There are existing and proposed core path routes which run along the A944 as well as north/south through and adjacent to the site to Gask Cottage and Garlogie Woods and between the two.

The proposed Indicative Masterplan creates two east – west and one north - south green corridors which will be utilised to create traffic free pedestrian and cycle routes throughout the site. The corridors will be linked to ensure that every house is within a short walk of a corridor which can then link to the wider green space within the site.

The corridors will link to the A944 and the B979 which will ensure that access to the wider footway network is readily available and will likely become Core Paths. The routes will provide an important link between the existing settlement, the proposed development and Gairlogie Woods. .

The layout of any proposed development will be detailed through a phased series of future detailed planning applications. However, the site will be designed taking cognisance of pedestrian and cycle connectivity, with the aim of creating an accessible development that will provide for viable alternatives to the private car and allow residents to move freely within the site.

The internal street layout will aim to comprise a network of shared surface routes and links, which will be interconnected and formed in a 'grid type' arrangement, where possible, to reduce the requirement for vehicles to reverse / turn and also avoid 'dead mileage'. Residential roads within the development layout will be designed to promote speeds of 20mph or less.

The main educational and community facilities have been located in the north-east corner of

	<p>the site ensuring they link closely to the existing settlement. Locating the facilities in this area will ensure that they are accessible to the wider settlement and become an integral part of the wider town, rather than simply serving the new development.</p> <p>The proposals to remove strategic through traffic from the A944 within the town would allow environmental improvements to be introduced to the existing corridor to improve the environment for non-motorised modes of travel. Improving crossing facilities, urban realm and public transport facilities will all assist with improving the north – south connectivity and ensuring the route becomes an integral part of the town.</p>
<b>d. Gas/Electricity/Heat/Broadband</b>	
Has contact been made with the relevant utilities providers?	<p>Gas: No If yes, please give details of outcome(s):</p> <p>Electricity: Yes If yes, please give details of outcome(s): On the basis of plans received from Scottish and Southern Energy, an electricity connection for the proposed development would be available through the existing network.</p> <p>Heat: No If yes, please give details of outcome(s): Unsure what this refers to.</p> <p>Broadband: Yes If yes, please give details of outcome(s): Fibre available in the area.</p>
Have any feasibility studies been undertaken to understand and inform capacity issues?	Yes Please specify: Initial service enquiries have been submitted. Responses awaited
Is there capacity within the existing network(s) and a viable connection to the network(s)?	TBC Please specify: Mains service connection points are available locally. Initial service enquiries have been submitted. Responses awaited.
Will renewable energy be installed and used on the site? For example, heat pump (air, ground or water), biomass, hydro, solar (photovoltaic	Yes  This will be dependent on the technology and standards at the time.

(electricity) or thermal), or a wind turbine (freestanding/integrated into the building)	
<b>e. Public open space</b>	
Will the site provide the opportunity to <b>enhance the green network?</b> (These are the linked areas of open space in settlements, which can be enhanced through amalgamating existing green networks or providing onsite green infrastructure)  You can find the boundary of existing green networks in the settlement profiles in the LDP	Yes Please specify:  An integral part of the proposals is to enhance the green network and link areas of both existing and proposed open space as articulated on the submitted Indicative Masterplan for the site.
Will the site meet the open space standards, as set out in Appendix 2 in the <b>Aberdeenshire Parks and Open Spaces Strategy?</b> <a href="https://www.aberdeenshire.gov.uk/media/6077/approvedpandospacesstrategy.pdf">https://www.aberdeenshire.gov.uk/media/6077/approvedpandospacesstrategy.pdf</a>	Yes Please specify:  As detailed above, the provision of significant areas of open space for both passive and active recreation forms an integral part of the proposed development, all as articulated on the attached Indicative Masterplan for the site. The final provision will be in line with Council Policy.
Will the site deliver any of the shortfalls identified in the <b>Open Space Audit</b> for specific settlements? <a href="https://www.aberdeenshire.gov.uk/communities-and-events/parks-and-open-spaces/open-space-strategy-audit/">https://www.aberdeenshire.gov.uk/communities-and-events/parks-and-open-spaces/open-space-strategy-audit/</a>	Not applicable Please specify:
<b>f. Resource use</b>	
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 <a href="https://www.aberdeenshire.gov.uk/media/20555/appendix-3-boundaries-of-the-greenbelt.pdf">https://www.aberdeenshire.gov.uk/media/20555/appendix-3-boundaries-of-the-greenbelt.pdf</a>	No
Carbon-rich soils and peatland <a href="http://www.snh.gov.uk/planning-and-development/advice-for-planners-and-developers/soils-and-development/cpp/">http://www.snh.gov.uk/planning-and-development/advice-for-planners-and-developers/soils-and-development/cpp/</a>	No
Coastal Zone <a href="https://www.aberdeenshire.gov.uk/media/20176/4-the-coastal-zone.pdf">https://www.aberdeenshire.gov.uk/media/20176/4-the-coastal-zone.pdf</a>	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 <a href="https://www.aberdeenshire.gov.uk/planning/plans-and-policies/planning-advice/">https://www.aberdeenshire.gov.uk/planning/plans-and-policies/planning-advice/</a> and advice at <a href="http://www.hse.gov.uk/landuseplanning/developers.htm">http://www.hse.gov.uk/landuseplanning/developers.htm</a> )	Yes There are two high pressure gas mains that cross the site in a north-south direction. These are the 36" National Grid Gas Line (St Fergus to Aberdeen) to the west and the 324 mm SGN Gas Main (Leuchar Moss/Craibstone) to the east.
Minerals – safeguarded or area of search <a href="https://www.aberdeenshire.gov.uk/ldpmedia/6_Area_of_search_and_safeguard_for_minerals.pdf">https://www.aberdeenshire.gov.uk/ldpmedia/6_Area_of_search_and_safeguard_for_minerals.pdf</a>	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. <a href="http://map.environment.gov.scot/Soil_maps/?layer=6">http://map.environment.gov.scot/Soil_maps/?layer=6</a>	No
'Protected' open space in the LDP (i.e. P sites) <a href="http://www.aberdeenshire.gov.uk/ldp">www.aberdeenshire.gov.uk/ldp</a> and choose from Appendix 8a to 8f	No
Rights of way/core paths/recreation uses	Yes
Topography (e.g. steep slopes)	No
Other	No
If you have identified any of the potential constraints above, please use this space to identify how you will mitigate this in order to achieve a viable development:	
<p>The overhead powerlines running through the site are not an impediment to development as they can be rerouted or put underground. The Masterplan has been prepared adhering to PADHI consultation zone standards.</p> <p>The eastern pipeline will see no development within both of the inner and middle zones, with only residential development within the outer zone. Education and other high volume uses are not permitted within any zone. All existing Core Paths will be protected and maintained and physically linked into the site's proposed footpath network.</p>	

## 16. Proximity to facilities

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

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**17. Community engagement**

<p>Has the local community been given the opportunity to influence/partake in the design and specification of the development proposal?</p>	<p>Not yet</p>
	<p>If yes, please specify the way it was carried out and how it influenced your proposals:</p>
	<p>If not yet, please detail how you will do so in the future:</p> <p>In preparing a public consultation strategy, the intention would be that such an exercise would be wholly inclusive as opposed to exclusive. Advice would be sought from Planning Officers and Aberdeenshire Council requesting a comprehensive list of likely interested individuals, organisations and groups active in the Westhill area.</p> <p>It would also be important to engage with the business community operating in the area, the local Community Council, local members and appropriate Ministers, MP and MSPs.</p> <p>The intention would be to hold a public consultation over two/three days in a suitable local venue in Westhill, at which a number of exhibition panels providing the planning background to the proposal, the proposed masterplan and, identifying the key planning and environmental issues that have influenced its content would be presented with a view to seeking comments.</p> <p>The public consultation would be advertised in advance in the local press and publicity leaflets would be distributed to all known groups and organisations operating in the Westhill area including adjoining neighbours and landowners, the Community Council, local members, appropriate Ministers, the local MP, MSPs and the local business community. This would ensure an inclusive as opposed to exclusive approach to the consultation and help maximise feedback from all sectors of the community.</p> <p>Following completion of the public consultation exercise, the responses from the attendees would be collated and summarised</p>

	with a view to preparing what in effect would be a document similar to that associated with a Pre-Planning Application Public Consultation Report. This would provide a summary of the key issues raised and the influence such issues and comments had on the submitted masterplan proposals.
--	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

**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: <input checked="" type="checkbox"/>
-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

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

?

The proposed development would allow for a continuation of the close working relationship between Dunecht Estates and Barratt North Scotland. Having worked closely together over a number of years, each party is very much aware of the issues that may impact on viability and deliverability within the immediate area and specifically on the site. As a consequence, they are confident that the site is deliverable.



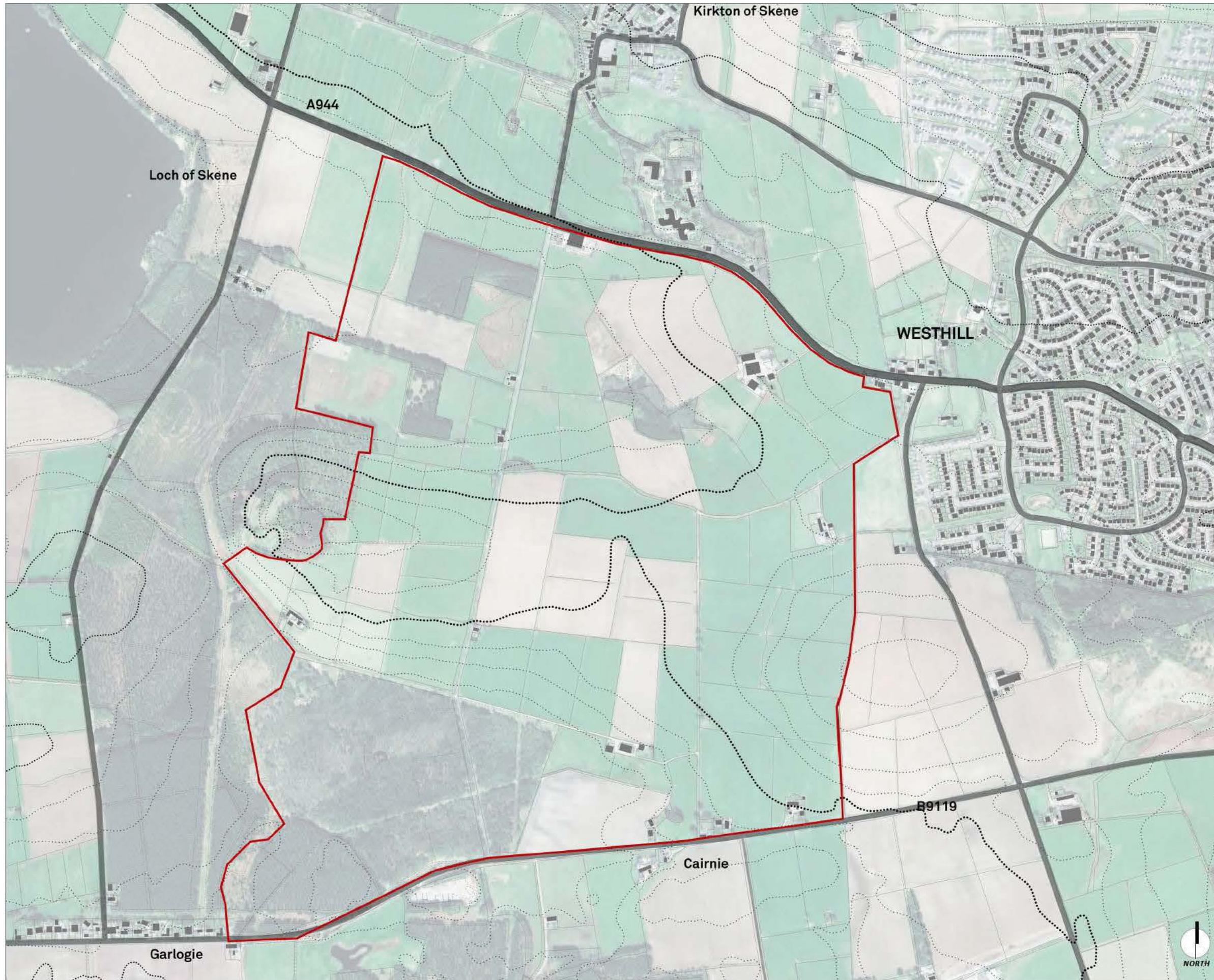
### 19. Other information

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.)

In addition to the Site Location Plan, an Indicative Masterplan is also attached. The intention would be to provide the detailed studies referred to above at the MIR Stage.

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.



The scaling of this drawing cannot be assured

Revision	Date	Drm	Chk

— Site Boundary (232.9 ha)

GR041

Project  
**Westhill**  
 Westhill, Aberdeenshire  
 Drawing Title  
**Red Line Boundary**

Date 27.03.18	Scale 1:5000@A3	Drawn by █	Check by █
Project No 24396	Drawing No ind06	Revision A	

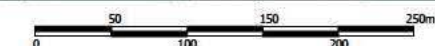
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The scaling of this drawing cannot be assured

Revision      Date      Dm      Chk

— Site Boundary (232.9 ha) **GR041**

Use	Area (hectares)	Area (acres)	Indicative Capacity (33dph)
Residential	75.5	186.6	c.2500
Education (including integrated community and leisure facilities)	13.4	33.1	-
Neighbourhood Centre	1.6	4	-
<b>Total</b>	<b>90.5</b>	<b>223.7</b>	<b>-</b>

Project  
**Westhill**  
 Westhill, Aberdeenshire  
 Drawing Title  
**Indicative Masterplan**

Date      Scale      Drawn by      Check by  
 27.03.18      1:5000@A3      [ ]      [ ]  
 Project No      Drawing No      Revision  
 24396      ind06      A

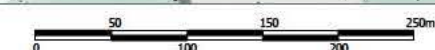
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## **APPENDIX 2**

### **Main Issues Report Rep**

Date: 08 April 2019

Reference: [REDACTED]

Aberdeenshire Council  
Planning Policy Team  
Infrastructure Services  
Woodhill House  
Westburn Road  
Aberdeen  
AB16 5GB

By Email ([jdip@aberdeenshire.gov.uk](mailto:jdip@aberdeenshire.gov.uk)) & Post

Dear Sirs

**ABERDEENSHIRE LOCAL DEVELOPMENT PLAN 2021 – MAIN ISSUES REPORT 2019**

**Introduction**

The following representations to the **Aberdeenshire Local Development Plan 2021 – Main Issues Report 2019** are made on behalf of **Barratt North Scotland and Dunecht Estates**.

Despite being presented by the Council for information purposes only at this stage, and as such, has no material role to play in this current consultation process, these representations are also relevant to the **Draft Proposed Local Development Plan (DPLDP)** that accompanies the **Main Issues Report (MIR)**.

They should be read in conjunction with the comprehensive submission made on behalf of **Barratt North Scotland and Dunecht Estates** to the **Strategic Development Planning Authority** in June 2016 (pre-MIR) and the **Westhill West Transportation Position Statement** prepared by **ECS Transport Planning Limited** (copies attached).

**Summary of Representations**

In brief, the following representations:

1. **Seek an initial allocation of 500 houses (MIR Site Ref. GR040) in the first Plan period, with the remainder allocated as Strategic Reserve Land for 2,000 houses (MIR Site Ref. GR041) on land to the west of Westhill in the emerging Proposed Local Development Plan;**
2. **Address issues raised by the Council in the MIR's Westhill Appendix and the Strategic Environmental Assessment and site specific comments made on the subject land in respect of MIR Site Refs. GR039, GR040 and GR041, following the Call for Sites exercise in March 2018; and,**
3. **Make comments on the options presented under Main Issue 5, Page 13, of the MIR in respect of Green Belt policy.**

**The Growth Status of Westhill in the Proposed Strategic Development Plan**

At the outset, it is acknowledged that the **Proposed Strategic Development Plan (PSDP)** which is currently with **Scottish Ministers** for Examination, does not include **Westhill** within a **Strategic Growth Area (SGA)**. However, this position could change following consideration of the **PSDP** by **Scottish Ministers** as a consequence of the **robust objections** made by **Barratt North Scotland and Dunecht Estates (and others)**, particularly in relation to the **issues associated with Westhill**. In this [www.farnham.co.uk](http://www.farnham.co.uk)

[REDACTED]

regard, despite being strategically located on the cusp of the Aberdeen City and Aberdeen to Huntly SGAs, it is only included within a Local Growth & Diversification Area (LGDA) at this time within the Proposed Plan, although such status does not necessarily preclude growth.

Given the strategic contribution that Westhill makes to the economy of the North-East of Scotland, this is considered to be an opportunity missed, particularly as a major strategic expansion to the west of Westhill would meet and satisfy the general objectives of the PSDP as articulated in Paragraph 2.3. It would also satisfy the specific objectives for SGAs articulated in the PSDP's Paragraphs 3.10, 3.11 and 3.12 in terms of providing for well-connected sustainable homes and job opportunities supported by appropriate and improved levels of services and facilities.

A major strategic expansion of Westhill to the west would also be consistent with the Council's priorities detailed on Page 3 of the MIR which are to:

- Support a strong, sustainable, diverse and successful economy;
- Have the best possible transport and digital links across the area's communities;
- Have the right mix of housing across all of Aberdeenshire; and,
- Protect the area's special environment, including tackling climate change by reducing greenhouse gas emissions.

#### **Main Issues Report – Westhill Appendix**

Given the settlement's LGDA status in the PSDP, the MIR's Appendix in respect of Westhill primarily focuses development within the Plan period on meeting local needs and seeking to maintain Westhill's function as a successful employment centre and, as such, does not consider it appropriate to allocate any new major opportunity sites for housing. It also identifies significant traffic congestion; the lack of smaller and affordable homes; a lack of outdoor play and recreational facilities; the need to identify an appropriate site for a community sports facility; and, the need to sustain community facilities and services as key issues and objectives. It does not however provide any solutions to address these matters. A major expansion at Westhill to the west would satisfactorily address and provide for all of these issues and objectives.

As currently proposed, the piecemeal growth approach of the emerging LDP (which only allocates two sites that already have the benefit of planning permission for a total of 48 houses and, a small future opportunity site (1.4 hectares) to be reserved for affordable housing (Site Ref. GR125)) does not provide the quantum of growth required to facilitate the significant road improvements to the A944/B9119 corridor needed to address the acknowledged traffic issues and support future development in Westhill. Furthermore, if sufficient levels of housing are not delivered in Westhill, then the business sector in the town will also suffer, contrary to one of the MIR's key planning objectives for Westhill which is to maintain opportunities for employment. In this regard, there is a clear link between the correlation of businesses and housing in terms of sustainability.

The current Spatial Strategy which was approved in the 2009 Structure Plan and then subsequently carried over into the extant SDP 2014, now forms an integral part of the SDP 2019. As a consequence, in the past decade, the capacity of the A944/B9119 corridor link to one of Aberdeenshire's major settlements and economic locations has been disregarded. Without a specific 'focus' on improvement(s) to the A944/B9119 corridor within the LDP, there is a very real danger that this will not be realised. Furthermore, as highlighted on Page 6 of the MIR, it is critical that infrastructure investment continues to encourage development.

As detailed in Paragraphs 3.45 and 3.46 of the PSDP, encouraging sustainable mixed communities and economic growth within the LGDAs and focusing new investment and housing in, or as an extension to, specific larger towns which are well served by public transport such as Westhill, is supported. Support is also given to the flexibility provided in PSDP Paragraph 3.47 which allows for development proposals in LGDAs to come forward which meet more than local needs, subject to justification against the aims, strategy and targets of the Plan.

It is considered relevant that in the submissions made by Barratt North Scotland and Dunecht Estates to the PSDP in December 2018, it was suggested that should Westhill not be included within a SGA, PSDP Paragraph 3.47 should be expanded to provide specific support for well-considered housing growth proposals in locations such as Westhill which provide for significant local and wider infrastructural improvements which are in the public interest. The Proposed LDP should also make provision for such a future scenario.

PSDP Paragraph 8.7 in Chapter 8 under 'Monitoring and Reviewing this Plan' specifically allows for a review early in the Plan period, (i.e. within the next five years) as to whether new locations for growth should be designated, for example, "in the corridor west of Aberdeen" which includes Westhill. The Proposed LDP should also acknowledge and reflect this with a particular emphasis on Westhill.

#### **Westhill Traffic Matters and the AWPR**

In the concluding section of the Westhill Appendix, the MIR highlights that further major expansion of the town needs to be carefully considered and that the cumulative impact of future development will require to be determined in relation to the Aberdeen Western Peripheral Route (AWPR) as well as its effects on travel patterns overall. This would appear to align with that contained in the PSDP Committee Report to the respective Councils in September 2018, which stated that although the Strategic Development Planning Authority recognised the merits of Westhill and a western expansion as a growth location, it considered SGA status at this time to be premature pending detailed consideration of traffic movements and patterns in both the immediate and wider area, post opening of the AWPR. It is worth noting that Barratt North Scotland and Dunecht Estates specifically objected to the 'prematurity' position adopted by the SPA in the PSDP.

Indeed, since that time, ECS Transport Planning Ltd (ECS), transportation advisors to Barratt North Scotland and Dunecht Estates, has carried out further assessments and corresponded with Aberdeenshire Council Roads and Transport Scotland (TS). This is articulated in detail in the attached Westhill West Transportation Position Statement.

In summary, it has been confirmed that the residents of Westhill will experience considerable traffic congestion on the surrounding road network (as highlighted in the MIR Appendix for Westhill) in the near future without any funding or mechanism to deliver a potential solution. Indeed, since the AWPR opened, there are regular reports of traffic exiting the AWPR at the Westhill junction at peak travel times queuing back onto the AWPR main carriageway.

Discussions with Transport Scotland (TS) have highlighted that it was always of the opinion the AWPR Westhill junction would require to be upgraded to accommodate development growth as it was designed to facilitate traffic volumes that were forecast over 10 years ago. Furthermore, TS considers that the cost of delivering these improvements should be borne by developers and managed by the relevant local authorities.

Following completion of the ASAM model update and the updating of the Westhill Paramics Model by SYSTRA on behalf of Aberdeenshire Council, in order to provide for a broader understanding of the transport impacts, ECS commissioned SYSTRA to carry out model testing for a major expansion of Westhill to the west as proposed by Barratt North Scotland and Dunecht Estates. It concluded that the model results clearly demonstrated there were no strategic road infrastructure issues which prevented a major housing allocation of circa 2,500 homes to the west of Westhill, including an initial first phase of 500 houses as proposed.

#### **Future Housing Land Allocations**

With respect to housing land supply figures and related allocations, Barratt North Scotland and Dunecht Estates are aligned with the position presented by Homes for Scotland (HfS) in its response to the MIR which largely supports the Spatial Strategy as set out within the PSDP, with suggested changes made to extend the boundary of the Aberdeen SGA to include Westhill, or to create a new

SGA to the west of Aberdeen, and to remove any reference to resisting new development adjacent to the AWPR.

The draft Proposed Plan notes the split between the Aberdeen Housing Market Area (HMA) and the Rural HMA of 80%/20% as set out in the Proposed SDP. It is acknowledged that this split will be set by the SDP, but would highlight that representations made to the PSDP on behalf of both Barratt North Scotland and HFS promote a further increase in the split to 85%/15%, with justification for this further increase provided within the representations.

HFS would support the LDP aligning with the SDP's spatial strategy but maintaining the statements for each administrative area to acknowledge the different and distinct character of each area. Without the identification of the six areas, the needs of each area become diluted into transport corridors, which do not necessarily reflect the different characters of each area. For example, areas such as Westhill and Banchory could, without the different administrative area statements, become part of "other locations" alongside Banff and Portsoy which clearly have very different drivers and characteristics.

PSDP Paragraph 4.20 makes provision in principle for Strategic Reserves of Housing Land. On Page 9 of the MIR, there is a commitment to the 2021 LDP identifying sufficient Strategic Reserve Land for Employment for the period up to 2040. However, there is no such commitment in respect of housing land and there is no explanation given for this omission, although Page 19 of the MIR allows for sites to be allocated that are not expected to come forward immediately. In this regard, it is noted that in other settlements in the MIR, there are a proposed number of significant sites that have been 'reserved' for future housing development to be considered for release at the mid-term review.

Consistent with the provisions allowed for in the PSDP as highlighted at the beginning of this representation, the Proposed LDP should specifically allocate Site Ref. GR040 to the west of Westhill for 500 houses, with the remainder of Site Ref. GR041 being allocated as Strategic Reserve Land for 2,000 houses, thereby providing a base foundation for the proper future planning and growth of Westhill and, providing developers and the community with certainty.

Neither the PSDP nor the emerging LDP rule out a future development expansion at Westhill West and, as referred to above, given the recent findings of ECS and SYSTRA, the biggest identified potential constraint to future development being traffic has now moved forward positively. Such findings have turned what initially appeared to be a significant constraint into an opportunity, whereby a technical and physical transport solution prevails to the benefit of Westhill and the immediate surrounding road network.

#### **A Response to the MIR's Assessment of 'Bid' Site Refs. GR039, GR040 and GR041 – Land West of Westhill**

The MIR's Westhill Appendix highlights a number of physical constraints to further expansion within the town including pipelines and topography and, lists avoiding coalescence with Kirkton of Skene to the west as a key planning objective. The MIR's Strategic Environmental Assessment of the subject land west of Westhill: Site Reference Nos GR039, GR040 and GR041 on balance concludes very positively, particularly when compared to other 'bid' sites in and round Westhill, although raises issues in respect of future development not relating well to the existing settlement and, impacts on the Loch of Skene, Dunecht House Inventory Garden & Designed Landscape, Ancient Woodland and protected species.

In presenting a vision for the growth of Westhill to the west to the Strategic Planning Authority in June 2016 (copy attached), Barratt North Scotland and Dunecht Estates robustly demonstrated the suitability of the subject land for major housing-led, mixed-use development including a range of educational, community and leisure facilities and integrated open and green spaces, through a high level assessment of issues in respect of ecology, landscape and visual impact, archaeology, transport and access, flood risk, water and drainage, educational provision and potential development capacity including phasing.



The assessment found that the subject land does not form part of any special ecological, cultural, historic or landscape designation at either national, strategic or local level. Flood risk is minimal, while contamination is not an issue. There is a limited structure of natural features within the site's boundaries. Areas of Ancient Woodland, archaeological interests such as the Springhill Standing Stone Scheduled Monument and Garlogie Wood Hut Circles and protected species, can all be positively integrated into the overall development without prejudice or adverse impact.

Although the character of the site's landscape and the setting of the immediate area would be altered as a result of development, if taken forward sensitively as proposed, the development could be successfully integrated with the existing settlement at Westhill, all without adversely impacting on the landscape character of the immediate and wider area, as graphically articulated on the submitted Concept Masterplan. Impacts on the Loch of Skene and the Dunecht House Inventory Garden & Designed Landscape would at worst be minimal. In this regard, positive discussions have already taken place with Scottish Natural Heritage (SNH).

From a more strategic perspective, as highlighted in both the 2008 and 2014 Westhill Capacity Studies, the subject land on account of its topography and woodland structure, especially to the south-east (i.e. Garlogie Wood), compares very favourably with potential expansion areas to the north and south of the settlement which are visually prominent on account of topography and lack of tree cover respectively, while the land to the east is affected negatively by Green Belt policy.

The presence of gas and oil pipelines (i.e. the St Fergus - Aberdeen and Leuchars Moss - Craibstone) which run through the subject land, can be effectively designed around and accommodated as graphically articulated on the submitted Concept Masterplan.

Finally, the need to avoid coalescence with Kirkton of Skene has historically and consistently been highlighted as a constraint to any further expansion of Westhill to the west. This can be satisfactorily addressed by ensuring there is a suitable, physical separation distance between the edge of Kirkton of Skene and the new development to the south, supplemented by significant landscape structure planting along the northern boundary of the subject land.

#### **MIR Policy Options**

Barratt North Scotland has submitted a separate representation on policy issues which aligns with that submitted by Homes for Scotland. However, Main Issue 5, Page 13, Green Belt policy requires specific comment here in respect of future development at Westhill as follows:

The 'preferred option' not to make any changes to the Green Belt policy is supported by the respondents, while the 'alternative option' to amend the Green Belt around Aberdeen to include land to the north and west of Westhill to avoid coalescence is not supported.

Paragraph 49 of SPP states that for most settlements, a Green Belt is not necessary as other policies can provide an appropriate basis for directing development to the right locations. It goes on to state that designating a Green Belt can support a spatial strategy by a) directing development to the most appropriate locations; b) protecting and enhancing the character and landscape setting of a settlement; and, c) protecting and providing access to open space. There is no specific reference to avoiding coalescence in SPP as a reason or objective to confer Green Belt status. In this regard, it is considered that with specific reference to Kirkton of Skene and Westhill, such matters can continue to be satisfactorily addressed through the implementation of prevailing planning policies, which have been very successful to date, without recourse to an extended Green Belt boundary.

The basis of a Green Belt boundary extension has no supporting rationale and seems to have been stimulated through stakeholders suggesting a review may be required because of completion of the AWPR, as stated in Paragraph 3, Page 13, of the MIR. It is not clear and indeed lacks rationale as to how completion of the AWPR could advance coalescence pressures and therefore justify a Green Belt extension around Westhill to the north and west.

## **Conclusions**

To conclude, on the basis of the representations made above and that presented in the attached documents listed below, Barratt North Scotland and Dunecht Estates consider that there are no technical, environmental, infrastructural or policy issues in principle precluding an initial allocation of 500 houses on MIR Site Ref. GR040 in the first Plan period with the remainder allocated as Strategic Reserve Land for 2,000 houses (MIR Site Ref. GR041) on land to the west of Westhill in the emerging Proposed Local Development Plan.

I would be grateful if you could please acknowledge receipt in writing of this representation which is made on behalf of the following parties:

- **Barratt North Scotland, Blairton House, Old Aberdeen Road, Balmedie, Aberdeenshire, AB23 8SH**
- **Dunecht Estates, Estates Office, Westhill, Aberdeenshire, AB32 7AW**

Yours faithfully,



**DIRECTOR**

Encs Representation to the Strategic Planning Authority pre-MIR Strategic Development Plan (June 2016)

Westhill West Transportation Position Statement (April 2019)

## **APPENDIX 3**

### **Strategic Development Plan Reps**

# Strategic Development Plan Review

## **Main Issues Report Consultation 12<sup>th</sup> March - 21<sup>st</sup> 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 21<sup>st</sup> 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](mailto: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: Claire McArthur, Acting Team Leader, Strategic Development Planning Authority, Woodhill House, Westburn Road, Aberdeen, AB16 5GB.

### Contact Details

<b>Name</b> <i>(Mr/Mrs/Miss/Ms)</i>	
<b>Organisation</b> <i>(if relevant)</i>	
<b>Address</b>	
<b>Postcode</b>	
<b>Telephone</b>	
<b>Email</b>	

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.

<b>Name</b> <i>(Mr/Mrs/Miss/Ms)</i>	
<b>Organisation</b> <i>(if relevant)</i>	Barratt North Scotland
<b>Address</b>	
<b>Postcode</b>	
<b>Telephone</b>	
<b>Email</b>	

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 wish 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.

<b>Main Issue / Question Number:</b>	<b>1. Do you agree with the updated Vision as set out in the Preferred Option?</b>
<p>Barratt North Scotland (BNS) supports the overarching vision of the MIR including the ambition for the city region to grow and diversify its economy.</p> <p>We suggest that a small insertion under bullet two of the vision could add to this vision, inserting "built and natural" to add clarity that both the built and the natural environments have unique qualities: "the unique qualities of our built and natural environments".</p> <p>This would ensure that the vision includes mention of the importance of supporting the economies of the city region, and also its environments</p>	

<b>Main Issue / Question Number:</b>	<b>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?</b>
<p>The MIR suggests that the existing spatial strategy of growth corridors is the Preferred Option for the new SDP. We note that there are sections detailing the Aberdeen to Peterhead corridor (page 7 of the MIR) and the Aberdeen to Huntly corridor (page 8 of the MIR) but the southern growth corridor is ignored, and there is no mention of this corridor within the MIR. We query this approach, particularly given that the large allocations from the previous round of plans (primarily Chapleton, but also other larger allocations in other areas) have not delivered at anywhere near the rates anticipated. We consider there is a need to address this in the MIR, to provide a new preferred strategy for the delivery of homes in this strategic growth corridor, and to direct LDPs to allocate additional sites within this corridor.</p> <p>The MIR notes that there is 'one major area in Huntly which is restricted due to a range of technical issues'. We query the Preferred Option of maintaining the current spatial strategy and including this area despite acknowledgements of the significant issues here. The result will be to artificially restrict homes that could actually be delivered on the ground. Allocations should be deliverable in areas with market demand. Identifying a strategic level of housing in an area where there is a slow market will not generate the revenues required to overcome the technical constraints here.</p> <p>BNS queries the reluctance to identify a western expansion corridor. The MIR acknowledges that the opening of the AWPR will have a significant effect on settlements to the west of the city (paragraph 4.8), therefore this should be considered as a viable strategic growth corridor, as it will have a significant impact on travel patterns throughout</p>	

the region. As this is a 25-year plan, it is not sufficient simply to state that there are education and transport issues within an area. It is clearly the role of the SDP to plan for the future and to identify strategic reserve land as a minimum, and to work with developers and the public sector to resolve any issues or barriers to delivery. Without identification of its significance in serving a large part of Aberdeen City & Shire, pre-existing and future transport issues will not be addressed without a strategic focus on its significance.

In Conjunction with Barratt North Scotland, Homes for Scotland has commissioned some independent research from Aberdeen and Grampian Chamber of Commerce to support our representation to the MIR. Attached are two separate reports – a “Local Business Survey” and “Regional Context” papers. Respondents to the survey indicated interest in the western corridor being developed to help the growth in the north-east of Scotland (as well as other strategic growth areas). There is a clear link between the co-location of businesses and housing in sustainability terms.

With the spatial strategy predicated on transport corridors and strategic transport movement, the impact of the AWPR should be taken into consideration in planning future growth over the next 20-year period in the city region. Transport patterns will be significantly altered once the AWPR opens, and this will have an impact on the region.

**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?**

The Aberdeen Western Peripheral Route will provide a significant contribution to easing congestion in and around the City as well as providing sustainable transportation options, and it is understood that a full appraisal has yet to be carried out on the impacts of the AWPR once opened. This is covered further in the response to question 16 below.

Homes for Scotland considers that a blanket policy restriction from development around new junctions would be too prescriptive and is not the most appropriate policy response.

We consider that longer term strategic thinking is required, and that the SDP is the ideal vehicle for providing a policy approach to this strategic thinking over the plan period to 2040.



<b>Main Issue / Question Number:</b>	<b>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</b>
<p>The Aberdeen City Centre Masterplan is of key importance to the City and should be part of the Preferred Option for regeneration. We would stress, however, that any brownfield housing delivery should not be to the detriment of greenfield release which will be important in increasing the supply of new homes across the City Region.</p>	

<b>Main Issue / Question Number:</b>	<b>5. Do you agree that we should present an optimistic view of future economic growth in the new plan?</b>
<p>Yes.</p> <p>BNS agreed that an optimistic view of future economic growth should be presented in the new SDP. It is important to note that this is a strategic plan, which must take a longer-term vision and plan for the growth and success of the city region for the next 20 years.</p> <p>The Strategic Development Planning Authority (SDPA) expects this plan to be approved in 2020, therefore in accordance with SPP, the plan covers the 20-year period to 2040. It is essential that the SDP plans for economic success and does not rely solely on recent trends to inform the long-term future of the region. Despite a recent downturn in the economy, the plan must proactively seek to meet its Vision of an "even more attractive, prosperous, resilient and sustainable European city region and an excellent place to live, visit and do business".</p> <p>Without a strong focus on an optimistic future for the city region's economy, there will be little chance of actually meeting that aim. The SDP must be positive, leading and shaping the growth of the city region. The Both the survey and the Regional Context demonstrate that there is increased optimism in the Aberdeen City Region and that activity is increasing. The SDP must plan to support this increasing level of optimism over the next 20 years. It will, in effect, be self-fulfilling for the city region – if there is not an ambitious plan for growth, the region will not be able to reach and sustain optimistic levels of growth in the future.</p>	

<b>Main Issue / Question Number:</b>	<b>8. Is there anything more that the planning system should do to support sustainable economic growth?</b>

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.

Homes for Scotland published research in November 2015 on the Economic and Social Benefits of Home Building in Scotland. The headline figures are on a Scotland-wide basis, not on a north east specific basis but provide insight into the range of benefits of home building:

- 31,630 direct jobs created
- 4.1 total jobs for every home built
- £78m one-off first occupation expenditure in the local economy
- £3.2bn direct, indirect and induced GVA

The attached Aberdeen & Grampian Chamber of Commerce research report "Regional Context" acknowledges that "*economic activity level in the north-east of Scotland are high*". A higher percentage of working aged people in Aberdeen City and Aberdeenshire are economically active compared to both the Scottish and British averages. This must be supported in order to be maintained and strengthened.

Therefore, 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.

**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?**

No.

Barratt North Scotland does not support the Composite Scenario Housing Supply Target (HST) as set out in the MIR.

Paragraph 115 of Scottish Planning Policy (SPP) states that the HST set within the plan "should properly reflect the HNDA estimate of housing demand in the market sector and should be supported by compelling evidence".

The Composite Scenario used within the MIR as the basis of the HSTs for the plan does not "properly reflect" any of the HNDA estimates set out within Figure 3 on page 17 of the MIR. Whilst we acknowledge that the HST is a "policy view of the number of homes the authority has agreed will be delivered" (SPP, paragraph 115), the Composite Scenario bears no resemblance to any of the actual HNDA scenarios.

The Composite Scenario seems to be based on past completions trends rather than the evidence provided by the HNDA. This methodology is not supported by SPP or best practice.

It is not possible to adequately ascertain the methodology used by the SDPA to reach the Composite Scenario. All other SDPs have provided a form of background or technical paper detailing the methodology and background information supporting the housing assumptions, policy decisions and estimates within the plan at Main Issues Report stage. This provided the basis upon which the housing sections of each plan could be scrutinised and for an informed opinion to be drawn from this evidence. However, the Aberdeen City and Shire MIR is not supported with any evidence base. This makes the interrogation of the housing section difficult, and results in an opaque process for consultation that is not easily navigable. We therefore consider that there is no "compelling evidence" as required by Paragraph 115 of SPP to support the HSTs set out in the MIR.

BNS supports the Alternative Option set out in Paragraph 6.12 of the MIR and suggests the use of one of the HNDA scenarios. BNS proposes that Scenario 3 is used by the SDPA as the basis for setting the HSTs for the new SDP.

Scenario 3 is the most ambitious growth scenario of the HNDA. It is the only scenario which maintains the ambition of the current SDP. Page 33 of the current SDP sets out the Targets of the Plan and how these Targets will be met. The third bullet includes a Target "*To move towards building at least 3,000 homes a year by 2020 through the development plan.*" Accepting either Scenario 1 or Scenario 2 from the HNDA, or the Composite Scenario proposed by the SDPA would result in an unambitious Plan which plans for less growth than the current approved SDP. By accepting growth Scenario 3, together with ambitious Housing Land Allowances, the city region can still aim towards delivering more homes per annum to meet housing need in a growth focussed, strategic approach.

As mentioned earlier, the 2015 HfS research "Economic and Social Benefits of Home Building in Scotland" states that 4.1 jobs are created for every home built. In aiming towards 3,000 homes per annum, this would sustain 12,300 jobs each year in the city region. The delivery of homes is not only positive in terms of meeting the need and demand of the region as identified in the HNDA, but is also a significant driver of economic

growth. There is therefore substantial merit in an ambitious approach to setting the HST and HLR.

The "Local Business Survey" Report carried out by Aberdeen & Grampian Chamber of Commerce which is submitted by BNS in support of this representation, provides interesting insight into factors affecting recruitment and retention in the region, challenges faced by businesses due to housing issues, and requirements of businesses in the region highlight a number of key issues which should be addressed in the SDP. The availability of the right type of housing in the locations where people want to live is an issue, as is the cost or affordability of suitable housing. This emphasises the need for the SDP to plan appropriately to meet the needs and demand in the region.

Paragraph 118 of SPP states that SDPs should set the Housing Supply Target (HST) and Housing Land Requirement) and should "state 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, making sure that the requirement for each housing market area is met in full." We support the start date of 2016 for the HST, HLR and Housing Land Allowances as the base date of the HNDA. Since this SDP's proposed date of approval is 2020, the first period of the plan should therefore be 2016-2032. SPP paragraph 118 goes on to state that "beyond year 12 and up to year 20, the strategic development plan should provide an indication of the possible scale and location of housing land, including by local development plan area". This means that the second plan period would be 2032-2040. We notice that the plan periods within the MIR follow an inconsistent pattern of periods. Table 1 includes five periods, each of five years to set out the HST. Tables 4, 5 and 6 include three periods, the first from 2016-30. It is not understood why this period does not include the final 2 years of the 12-year plan period (as set out in SPP paragraph 118).

Paragraph 6.21 describes the MIR's Preferred Option for Proposed Allowances and describes its method in terms of two local development plan periods. It states that it will 'safeguard' homes for the 10-year period beyond 2030. However, to comply with SPP, this should be from 2032 onwards. SPP paragraph 118 clearly sets out the two plan periods as the first 12 years, and then beyond year 12 to year 20. For this SDP, the periods would then be 2016-2032 and 2032-2040. By splitting the periods the way the SDP has, years 11 and 12 of the plan are not appropriately dealt with as required by SPP paragraph 118.

We suggest this is formalised in the Proposed Plan into the two periods 2016-2032 and 2033-2040 (both inclusive). This is a small change which would provide closer alignment with SPP.

Homes for Scotland have amended Table 1: Proposed Housing Supply Targets based on a HST that "properly reflects" the HNDA scenario (Scenario 3), and amends the plan periods to include the first 12 year period of the plan as the first period, and the remaining 8 years as the second period and BNS concur with this.

HFS Amended Table 1:  
Proposed Housing Supply Targets

	<b>2016-2032</b>	<b>2033-2040</b>
<b>Aberdeen Housing</b>	37,060	17,400

<b>Market Area</b>		
<b>Rural Housing Market Area</b>	10,268	4,032
<b>Total</b>	<b>47,328</b>	<b>21,432</b>
Split as follows:		
<b>Aberdeen City Council</b>	23,664	10,716
<b>Aberdeenshire Council</b>	23,664	10,716

\*HFS amended Table 1 based on HNDA Scenario 3 data

<b>Main Issue / Question Number:</b>	<b>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?</b>
<p>Barratt North Scotland supports the continued and increasing funding of affordable housing in the city region. It is reasonable to assume that this funding will continue for the purposes of the SDP, and while funding has increased year on year to date, the levels anticipated in the SDP provide a useful guide, given that availability of funding is not confirmed on a long-term basis.</p>	

<b>Main Issue / Question Number:</b>	<b>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.</b>
<p>No.</p> <p>Barratt North Scotland does not consider that the approach taken by the SDPA to include 20% generosity to 2030 and then no generosity thereafter to be compliant with Scottish Planning Policy (SPP).</p>	

SPP Paragraph 116 states that the HST "should be increased by a margin of 10 to 20% to establish the housing land requirement, in order to ensure that a generous supply of land for housing is provided". While SPP goes on to clarify that "the exact extent of the margin will depend on local circumstances", there is no explicit provision for the Plan to provide no generosity for part of the plan period. We do not consider the approach taken by the SDPA to be compliant with the provisions of SPP.

Furthermore, the final part of SPP Paragraph 116 states that "a robust explanation for it should be provided in the plan". There is very little explanation within the MIR regarding the level of generosity provided. Paragraph 6.18 deals with the explanation of generosity. In explaining the reasoning behind a 0% generosity beyond 2030, the final 3 lines of this paragraph are relevant. This states that "a large element of generosity is likely to be carried forward from the earlier period". BNS does not consider this to be a 'robust explanation', nor does it consider this explanation to be adequate to allow for no generosity from 2030 onwards. SPP does not stipulate that generosity can be carried forward from one period to the next, it requires that the overall HST is increased by a margin of 10 to 20% to establish the HLR.

In addition, the MIR states that "there will be opportunities to review the need for housing in this period before it is needed". BNS objects to this approach. Under the current legislative system, the SDP, once approved, will guide the preparation of Local Development Plans (LDPs) for both Aberdeen City and Aberdeenshire Councils. The current planning system makes no provision for the SDP to be updated on an interim basis, therefore the next opportunity to update the HLR would be at the time of the preparation of the next SDP. Of course, with ongoing planning reform, and the possible removal of SDPs as a tier of plan making, there may not be a further SDP as a formal plan for this city region, therefore it is even more uncertain when there will be an opportunity to review the need for housing in the period post 2030. This will not be clear until the Planning Bill is enacted, and secondary legislation / guidance provide further detail on the exact procedures going forward, and the dates for the implementation of the new system. It is inappropriate for the SDP to identify 0% generosity post-2030 and for the reasoning provided to state that this could be subject to change in the future. This SDP must set out 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" in accordance with SPP Paragraph 118, which is to 2032 for this SDP, and further it must "provide an indication of the possible scale and location of housing land" beyond year 12 up to year 20.

We query the methodology in providing 20% generosity up to 2030 and then nothing after this. The expected date of approval of the plan is 2020, therefore from this date to year 12 (the period defined by SPP) takes us to 2032, not 2030. No justification is provided within the MIR, therefore it is not possible to properly interrogate the basis for this proposal.

It is important to remember the reasoning behind the generosity margin. It is accepted that as the plan moves on, some land may not come forward for development at the rate anticipated. This has been experienced in recent years with the large allocations in the City and Shire (Chapleton, Grandhome, sites OP1 and OP2 at Huntly and site OP4 at Inverurie for example; all of which were allocated for development in 2012 and the latter

three remain undeveloped remain undeveloped) which are not delivering completions at the rates anticipated in the LDPs for a number of reasons. Therefore, a flexibility margin in the form of 'generosity' is an important inclusion to ensure that a generous supply of land is allocated in LDPs that will follow on from this SDP. 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.

Homes for Scotland have updated Table 4: Proposed Housing Land Requirements to provide the 20% generosity as included in the MIR but extending this over the plan period to 2040 to ensure that generosity is applied over the whole plan period and BNS concur with this.

**HFS Amended Table 4:  
Proposed Housing Land Requirements**

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

\*HFS Table 4 based on HNDA Scenario 3 data with 20% generosity added from 2016-40

**Main Issue / Question Number:**

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

Yes. Homes for Scotland agrees that further housing allowances should be made by future Local Development Plans.

We query the level of allowances set out within the MIR. In line with the amended HFS Table 1 and Table 4 promoting a more ambitious approach to growing the economy of the Aberdeen city region, ensuring that housing need and demand within the HNDA is met through the lifetime of the SDP, and recognising the home building industry's ambition and

support to increase the supply of homes across the region, the allowances should be set at a more ambitious level.

We query the level of allowances set out within the MIR. In line with the amended BNS Table 1 and Table 4 promoting a more ambitious approach to growing the economy of the Aberdeen city region, ensuring that housing need and demand within the HNDA is met through the lifetime of the SDP, and recognising the Scottish Government and the home building industry's ambition and support to increase the supply of homes across the region, the allowances should be set at a more ambitious level.

We will soon be in a position to agree the 2018 HLA, therefore we expect the Proposed Plan to be based on this Audit as the most up to date evidence base upon which to calculate proposed allowances in Table 6.

HFS has amended Table 6: Proposed Allowances based on the amended Table 4 and BNS concur with this approach. It was, however, difficult to properly scrutinise the evidence base of Table 5 which is integral to the preparation of Table 6 as the background evidence was not initially available. We request that the background evidence base is made publicly available to provide greater transparency and a robust evidence base for the MIR.

The table below reflects the difference between the effective land supply at the 2016 Housing Land Audit and the amended Proposed Housing Land Requirements (HFS Amended Table 4).

<b>HFS Amended Table 6: Proposed Allowances (land to be identified beyond the 2016 effective supply)</b>			
	<b>2016-2032</b>	<b>2033-2040</b>	<b>TOTAL</b>
<b>Aberdeen Housing Market Area</b>	16,576	17,423	33,999
<b>Rural Housing Market Area</b>	3,907	3,562	7,469
<b>Total</b>	<b>20,483</b>	<b>20,985</b>	<b>41,468</b>

Because of the lack of an associated technical paper to support the MIR, it is very difficult to work out the split between Aberdeen City and Aberdeenshire Councils of the housing allowances, and there is no explanation given at all as to the rationale for this split. In discussions with the SDPA team, it seems that the splits have been based on historical splits in previous plans, however we consider that a wider discussion should be undertaken with stakeholders to ensure that the splits between housing market areas and authority areas are reasonable and reflect the aspirations for the delivery of homes in these areas.



<b>Main Issue / Question Number:</b>	<b>14. Do you agree that any new greenfield allocations should preferably be under 100 houses in size?</b>
<p>No.</p> <p>Barratt North Scotland is concerned about this overly prescriptive Preferred Option. We support a range and choice of sizes and locations of sites to be allocated in LDPs, and do not consider the role of the SDP to be as prescriptive as this proposal. The LDPs themselves should provide this range of sites to meet the HLR set in the SDP.</p> <p>We query the statement in paragraph 6.25 which suggests that these smaller sites will "aim to deliver affordable housing above 25%". SPP Paragraph 129 sets out details on affordable housing provision and states that "the level of affordable housing required as a contribution within a market site should generally be no more than 25% of the total number of houses". Further, the MIR itself in Paragraph 6.17 states "we do not expect to ask Local Development Plans to increase the 25% obligation for affordable housing from private-developer sites". We therefore seek clarification of the text in Paragraph 6.25.</p> <p>Smaller allocations, up to 100 units are a temporary measure to utilise existing infrastructure, but this proposal is not forward thinking to the identification of areas where allocations of a larger size could overcome current infrastructure constraints and allow for settlements to improve through the delivery of facilities and community infrastructure – ignoring the individual circumstances of sites and settlements. This approach is overly prescriptive for an SDP. Delivery of allocations is key, artificially restraining the size of allocations in the SDP could preclude a sustainable and deliverable LDP proposal from being assessed and adopted based on size, rather than sustainability and delivery. Similarly, if such a proposal were allocated in the Proposed Plan, there is a danger that a Reporter could remove it at EIP on the basis that it does not accord with the SDP strategy.</p>	

<b>Main Issue / Question Number:</b>	<b>16. Do you agree that the next Strategic Development Plan should continue to identify regionally significant long-term transport projects and cumulative transport interventions?</b>
<p>Barratt North Scotland notes that the spatial strategy of the SDP is predicated on major transport corridors and movements. These will change significantly in the next 12 months with the opening of the Aberdeen Western Peripheral Route.</p> <p>The MIR notes (paragraph 9.6) that the timing of the Strategic Transport Appraisal (STA) currently being carried out means that "its output will inform future plans rather than this one". Whilst we understand the difficulties in timing of this appraisal, its outputs are critical to the success of the SDP. It would be useful to have more clarity on the timescales for the preparation of this work, and expected date of publication, and how it might fit in with the timescales of the SDP. In light of this, the SDP should acknowledge the significance of the AWPR as a strategic transport corridor within the Spatial Strategy and make provision within the Proposed Plan to incorporate the findings of the STA once they are finalised.</p>	

This would provide a clear strategy for the growth of the region that acknowledges the importance of this development to the region. ~~It may be pertinent to pause progress on the SDP to allow for this important study to be finalised to properly inform the preparation of the Proposed Plan.~~

Whilst the Planning Bill proposes the removal of SDPs and there is a time pressure to have this plan approved prior to the removal of this tier of plan making, it is misleading and short-sighted to assume that 'future plans' will deal with the Strategic Transport Appraisal when this plan covers a significant period of time to 2040, and we do not yet know the future structure of plan making in Scotland post-planning reform.

Any long-term strategy such as the SDP which does not account for permanent and significant changes in traffic distribution is premature and will not represent the transport infrastructure position of the city region in the near future.

There is an opportunity for this SDP to anticipate likely improvements that will be required, as part of a future 'bid' for the funding to carry out such improvements in the future if the SDP becomes part of the new National Planning Framework, ensuring that the needs of the north east are clearly set out to link in with future national government capital plans.



Date: 17 December 2018

Reference: [REDACTED]

Aberdeen City and Shire Strategic Development Planning Authority  
Woodhill House  
Westburn Road  
Aberdeen  
AB15 5GB

By Email ([team@aberdeencityandshire-adpa.gov.uk](mailto:team@aberdeencityandshire-adpa.gov.uk)) & Post

For the attention of [REDACTED]

Dear Sirs

**ABERDEEN CITY AND SHIRE STRATEGIC DEVELOPMENT PLAN – PROPOSED PLAN 2018**

The following comments to the Aberdeen City and Shire Strategic Development Plan – Proposed Plan 2018 are made on behalf of Barratt North Scotland and Dunecht Estates.

They should be read in conjunction with the comprehensive submission made on behalf of Barratt North Scotland and Dunecht Estates to the Strategic Development Planning Authority in July 2016 which presented a robust and detailed case for conferring Strategic Growth Area status on Westhill within the new Strategic Development Plan.

At the outset, it is noted that although Westhill is strategically located on the cusp of the Aberdeen City and Aberdeen to Huntly Strategic Growth Areas, it has not been given Strategic Growth Area status in the Proposed Plan but is included within a Local Growth and Diversification Area as articulated on Figure 1.

Given the strategic contribution that Westhill makes to the economy of the North-East of Scotland, this is considered to be an opportunity missed, particularly as a major strategic expansion to the west of Westhill as proposed, would meet and satisfy the general objectives of the Proposed Plan as articulated in Paragraph 2.3 and, the specific objectives for Strategic Growth Areas articulated in Paragraphs 3.10, 3.11 and 3.12 of the Proposed Plan in terms of providing for well-connected sustainable homes and job opportunities supported by appropriate and improved levels of services and facilities including primary and secondary school provision, recreation, water supply and waste water systems; protecting and enhancing historic, natural and cultural heritage assets including linking habitats and open spaces through existing and improved green infrastructure and networks and implementing new planting; helping to create sustainable mixed communities and provide associated infrastructure meeting the highest standards of placemaking and design; and, making the most efficient and effective use of the transport network to provide for sustainable options and choices including walking, cycling and public transport.

If strictly applied, the Local Growth and Diversification Area status will not provide for the quantum of growth required to facilitate the significant road improvements needed to support future development in Westhill and will lead to only piecemeal growth. If sufficient levels of housing are not delivered in Westhill, then the business sector in the town will suffer. In this regard, there is a clear link between the correlation of businesses and housing in terms of sustainability. Paragraph 3.12 requires Strategic Growth Areas to specifically 'focus' on creating sustainable mixed communities with the services, facilities and infrastructure necessary for the 21<sup>st</sup> century. This includes improvements to roads, bus networks and active travel. Without a specific 'focus' on improvement(s) to the A944/B9119 corridor within the Plan, there is a very real danger that this will not be realised within its lifecycle. The current Spatial Strategy was approved in the 2009 Structure Plan and, in the past

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decade, the capacity of this vital link to one of Aberdeenshire's major settlements and economic locations has been disregarded. If the route/corridor to Westhill is not given the Strategic Growth Area focus that it deserves, there is little in the Plan that specifically aims to address transport links within the area. In this regard, Barratt North Scotland and Dunecht Estates would propose that either the Aberdeen City Strategic Growth Area boundary is extended along the A944 to encompass Westhill and Eirick or, the A944 corridor is recognised as a standalone western Strategic Growth Area.

Encouraging sustainable mixed communities and economic growth within the Local Growth and Diversification Areas and focusing new investment and housing in, or as an extension to, specific larger towns which are well served by public transport such as Westhill, all as detailed in Paragraphs 3.45 and 3.46 of the Proposed Plan is supported. Support is also given to the flexibility provided in Paragraph 3.47 which allows for development proposals in Local Growth and Diversification Areas to come forward which meet more than local needs subject to justification against the aims, strategy and targets of the Plan. It is however recommended that, should Westhill not be included within a Strategic Growth Area as requested above, Paragraph 3.47 be expanded to provide specific support for well-considered housing growth proposals in locations such as Westhill which provide for significant local and wider infrastructural improvements which are in the public interest.

With respect to housing land supply figures, Barratt North Scotland and Dunecht Estates are aligned with the position presented by Homes for Scotland in its response to the Proposed Plan which advocates that adequate/increased provision must be made to meet recognised housing needs and demand by providing for a range of sizes and locations of new housing across the City Region to allow for the delivery of new homes which will support growth.

The increased percentage split in respect of new allocations across the City Region in favour of the Aberdeen Housing Market Area from 75/25 to 80/20 is supported. However, the respondents agree with the representation made by Homes for Scotland that this should be pushed further. As set out in its *Housing Methodology Paper*, 67% of allocations within the Rural Housing Market Area are constrained by marketability and 40% of completions over the past 10-years have been on unallocated sites. Given this backdrop and the increasingly pivotal role the private sector has in the delivery of affordable housing, allocating 20% of the region's planned growth to the Rural Housing Market Area seems unrealistic, particularly when the relaxation of Aberdeenshire Council's Local Development Plan policies introduced in 2012 to promote organic growth and redevelopment of rural brownfield sites, has yielded significant contrasting results.

The recognition in Paragraph 4.18 that some new development will need to take place on greenfield sites to help deliver the Plan's vision and future strategy for growth is recognised and supported. It is however considered that the SDP should not be so prescriptive in advocating in Paragraph 4.19 that allocations should be 'small scale'. There is no rationale for this. There is a need to support a range and choice of sizes and location of sites to be allocated in LDPs and the SDP should recognise this.

Furthermore, Paragraph 4.20 should be amended to require LDPs to make provision for additional Strategic Reserves for Housing for the period 2033 to 2040 in the best interests of proper future planning and to help provide for greater flexibility and deliverability, not just simply leave it as a matter of choice. The Plan needs to provide direction on such matters.

As highlighted in the Committee Report to the respective Councils in September 2018, it is understood that although the Strategic Development Planning Authority recognises the merits of Westhill and a western expansion as a growth location, it considers Strategic Growth Area status at this time to be premature pending detailed consideration of traffic movements and patterns in both the immediate and wider area, post opening of the AWPR.

In this regard, the Proposed Plan in Chapter 8 under 'Monitoring and Reviewing this Plan', specifically Paragraph 8.7, allows for a review early in the Plan period, (i.e. within the next five

years) as to whether new locations for growth should be designated, for example, *"in the corridor west of Aberdeen"* which includes Westhill.

This element of the Proposed Plan is supported subject to the reference to *"for example"* being deleted; *"the corridor west of Aberdeen"* being extended to specifically include and refer to Westhill; and, there being a firm commitment to such a review being commenced within an absolute 'maximum' period of 5 years.

Notwithstanding the respondents' support in principle for a Spatial Strategy Review contained in Paragraph 8.7, with suggested amendments as detailed above, it is considered that it falls seriously short in terms of commitment in that, although there is reference to a range of studies being undertaken including the *"impact of the AWR on travel patterns across the City Region"*, there is nothing specifically referenced in the Proposed Action Programme 2018.

It is therefore considered that there needs to be a firm commitment in the Plan's accompanying Action Programme, all as set out above, in order to ensure there is a clear timescale and delivery programme attached to not only reviewing the extent and nature of the Strategic Growth Areas, but also the accompanying studies which will form an integral part and significant influence on any such Review.

I would be grateful if you could please acknowledge receipt in writing of this representation which is made on behalf of the following parties:

- Barratt North Scotland, Blairton House, Old Aberdeen Road, Balmedie, Aberdeenshire, AB23 8SH
- Dunecht Estates, Estates Office, Westhill, Aberdeenshire, AB32 7AW

Yours faithfully,



**DIRECTOR**





**RESPONSE TO ABERDEEN CITY & SHIRE FURTHER INFORMATION  
REQUEST 03 – ISSUES 12, 13, 14 & 15**

**ON BEHALF OF BARRATT NORTH SCOTLAND**

**AUGUST 2019**

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**Introduction**

Barratt North Scotland welcome the opportunity to respond to this further information request. We have participated in the preparation of the response made by Homes for Scotland and reinforce the points made therein.

We confirm that Barratt North Scotland will attend the hearing arranged to explore this issue and have set out our response to the questions below in turn. Some of the questions touch on similar issues and so we have cross referenced our responses as necessary. We are grateful to the Reporter for allowing additional time to prepare this response.

Five appendices support this submission, as follows:

1. 2018 HLA Extrapolated Programming;
2. 2018 HLA Based Allowances;
3. Aberdeen & Grampian Chambers of Commerce Economics Work
  - a. Regional Context
  - b. Local Business Survey
4. Updated 2016 HLA Based Allowances.

**1. Setting the housing supply target - ambition**

***(1a) The past Aberdeen City and Shire Structure Plan 2009 identified a target of 2,500 new homes to be built per year by 2016 and 3,000 by 2020. Is it correct that this target is not identified or brought forward in the extant Aberdeen City and Shire Strategic Development Plan 2014, or the proposed plan? If so, what is the reasoning for moving away from this ambition?***

For the SDPA.

***(1b) The Aberdeen City and Shire Structure Plan 2009 identified a housing requirement of 56,304 homes between 2007 and 2030 (an average of 2,346 per year); the extant Aberdeen City and Shire Strategic Development Plan 2014 identifies a housing requirement of 53,972 homes between 2011 to 2035 (an***



***average of 2,159 per year); and the proposed plan sets a housing supply target of 55,120 for the period 2016 to 2040 (an average of 2,205 per year) but also adds a margin to set the housing land requirement at 64,272 homes to 2040 (an average of 2,574 homes per year). Are these calculations correct? And, if so, does this not suggest an ambitious growth strategy with higher year-on-year requirements than previously set at a strategic level?***

The question of whether the proposed targets are ambitious cannot be resolved by looking back at the targets set out in previous strategic plans. These plans had different evidence bases, aspirations and policy contexts. Whether proposed targets are fit for purpose should primarily be judged against up-to-date evidence of housing need and demand. Secondly, wider policy aspirations, including economic growth and job creation ambitions, are relevant as set out in Scottish Planning Policy (SPP, para. 115). Targets from previous plans are not listed as a consideration for setting Housing Supply Targets (HST) within SPP.

The HSTs from 2016-32, which inform the Housing Land Requirements (HLRs), are significantly below the housing need and demand projections for this period in both the Principal and High Migration Scenarios set out in the 2017 Housing Need and Demand Assessment (HNDA) (see Question 5b). Setting targets below the anticipated rate of household growth in the HNDA Principal Scenario does not represent an ambitious growth strategy. It would constrain household growth to a rate which is below what the evidence base projects will be necessary to meet need and demand.

The HSTs to 2032 are also inconsistent with ambitious economic growth planned for the region. The HNDA is an objective assessment of housing need and demand which is free from policy considerations. However, as SPP (para. 115) explains, the HST is ultimately a policy view which should consider a range of factors which include economic and job creation ambitions. The SDPA's Housing Methodology Paper (2018) lists a number of important considerations which demonstrate that the City Region "is in a position of strength and rightly has aspirations for economic and population growth" (para. 3.13). The following are listed as potentially contributing to higher rates of long term growth:

1. considerable investment from the United Kingdom and Scottish Governments, through the creation of the City Region Deal;
2. plans and programmes for a growing and diversified regional economy in the Wider economic growth aspirations and investment is also relevant Regional Economic Strategy
3. numerous large-scale infrastructure projects are in the process of completion such as; the Aberdeen Western Peripheral Route (AWPR), the Aberdeen Harbour Expansion South, improvements to Aberdeen International Airport, upgrading of regional rail links, offshore wind energy, The Exhibition Centre Aberdeen and high-quality office and commercial developments.

It is notable that the City Deal funding was agreed some time after the current SDP was adopted, the Regional Economic Strategy Action Plan has been updated recently and progress has been made on the various infrastructure projects, including the completion

of the AWPR. These significant investments support the case for a more ambitious approach to housing delivery in order to support job creation and help ensure the large public expenditure leverages in private sector investment.

Placed in historical context the Principal Household projections, which inform the HNDA Principal Scenario (more detail in response to Question 5b), predict a reduced growth rate. The number of households in Aberdeen and Aberdeenshire increased by 29% between 1989 and 2014. The Principal Scenario predicts a 24% increase, but the High Migration Scenario predicts a 31% increase. This is more in line with historic household growth rates and is more appropriate in the context of economic aspirations outlined above.

Barratt North Scotland agree with Homes for Scotland that for the reasons outlined above the High Migration Scenario should be used to inform the HST as it represents an appropriately ambitious yet achievable objective.

## **2. Setting the housing supply target - affordable housing**

***(2a) The housing supply target of 55,120 homes set in the proposed plan (using a modified principal migration scenario) includes 19,292 affordable homes (35% of the target). That would equate to 772 affordable homes per year for the period 2016 to 2040. Has that level of affordable housing delivery been achieved in the past?***

For the SDPA.

***(2b) In this context, how would application of the high migration scenario figures from the HNDA (69,200 homes) achieve a higher level of affordable housing delivery?***

The delivery of affordable housing is directly related to the delivery of market housing as new housing developments are required to provide 25% affordable housing in both Aberdeen and Aberdeenshire.

Setting a higher HST would create a higher HLR, requiring each of the LDPs to allocate more effective housing land. This would allow higher levels of housing delivery and in turn more affordable housing delivery through Section 75 agreements.

The delivery of more housing also creates a more active housing market which delivers wider benefits. It directly creates more choice of new homes and indirectly helps to bring more second hand stock to the market as occupiers of new build homes vacate and sell their existing properties.

Over the longer term increased levels of supply can dampen house price inflation, increasing the proportion of households who can afford a home which meets their requirements in the private sector, other things being equal. This can help reduce the pressure on subsidised affordable housing in the long term, which is an important policy

objective in light of the uncertainty over the continued scale of grant funding beyond 2021.

***(2c) The HNDA suggests a high level of affordable housing is required using the low migration (56% of housing); principal migration (48% of housing); and high migration (49% of housing) scenarios. The proposed plan suggests that new housing development should, generally, contribute 25% affordable housing. Are there separate products supplied by the market housing industry and/or funding schemes/projects that will enable the delivery of the higher rate of affordable housing?***

SPP states that "Affordable housing is defined broadly as housing of a reasonable quality that is affordable to people on modest incomes." (para. 126). New market housing includes homes of a range of sizes and support such as Help to Buy is available in some circumstances, reducing the required deposit. Some new market homes do meet the definition set out in SPP, providing affordable homes in addition subsidised affordable housing.

Increased housing supply also improves affordability. However, the HNDA modelling does not account for the impact of increased supply and the interaction of this with prices and rents in the long term. The tenure outputs from the HNDA are sensitive to minor changes in the assumptions used relating to house price, mortgage lending and wage data. The tenure splits in the HNDA are therefore susceptible to significant change over time.

### **3. Setting the housing supply target – housing completions**

***(3a) Historical housing completion data from 1981 to 2016 indicates only three years (1984, 1985 and 1993) where housing completions were over 3,000 units. The average from this 35 year period is 2,216 homes per year. Does this not indicate that adoption of the modified principal migration scenario figures in the proposed plan are akin to the average (using the housing supply target) and ambitious in the context of the housing land requirement?***

We do not consider that past completions data is of primary significance to the setting of the HST or HLR, or the judgment of how ambitious it is. The HST should be set based on up-to-date evidence of housing need and demand as well as aligning with wider policy aspirations. Rates of past completions are not specifically mentioned as one of the factors which should inform the HST in SPP (paras. 114 and 115).

Past completions will be heavily influenced by past planning decisions relating to the amount and quality of land released for housing. Using completions data to set HSTs would introduce further path dependency into the planning system. If past completions had been less than was required to meet need and demand, then planning for future need and demand on this basis would serve to exacerbate existing shortfalls in provision. This would be "planning to fail" and would implicitly rely on the rather despondent assumption that plan-making can do little to change what has gone before.



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As an example, in the late 1990's / early 2000's the economy of the North East was particularly strong but the housing land supply was severely constrained due to out of date development plans. This resulted in planning by appeal. Completions in those years would have been substantially higher had there been a sufficient supply of allocated land. This, and other similar periods since 1981, are likely to have lowered the average completions. As such the averages are not an appropriate comparison.

Nevertheless, as a matter of fact neither the Modified Principal HST (2,241 per annum for 2016-32) or Principal Projections(2,205 per annum) exceeds the rate of delivery over the 1981-2016 period.

Whether the plan is ambitious should primarily be judged upon up-to-date evidence of housing need and demand and wider policy aspirations. In this context we consider the High Migration Scenario in the HNDA should be used, as set out in response to Questions 1b and 4a.

***(3b) It is argued by parties that recent completion rates have been influenced by the drop in oil prices and other economic influences. During the period since 1981 have there been highs and lows in relation to oil prices and fluctuations in the economy? Is the average, therefore, not a good indication of what can be achieved?***

We do not consider that average completions are a good indication of what can be achieved. Oil prices do influence the regional economy and therefore the level of demand for housing. However, they are not the only determinant and the factors influencing new housing development are complex. For instance, planning policy has a fundamental role in restricting or increasing the availability of land. Land availability is a major constraint to the delivery of more homes in Scotland which has influenced past completions.

Previous planning decisions impact upon past performance and planning decisions made now will impact upon what is delivered in the future. The starting point for plan making should be the assumption that the plan is capable of affecting change and that it should be led by up to date evidence on the amount of housing which is necessary to meet existing need, demographic change and ensure alignment with wider policy aspirations.

***(3c) The 2018 Housing Land Audit (HLA) identifies that 343 fewer homes were completed in 2016 and 734 fewer homes in 2017 than anticipated in the 2016 HLA (with a total of 1,966 and 2,059 homes built in these years). Do these shortfalls not indicate that aspirations do not always transpire into reality? What reassurance is there that higher levels of housing completions will occur in the future? And, how are these shortfalls considered in relation to the period to 2040?***

The delivery of sites does not always go according to plan. Landowners cannot always find buyers, builders cannot always raise finance. Sometimes sites allocated for housing are refused planning permission against officer recommendation and an appeal is necessary, adding significant delay. Even where planning applications are successful, delays in obtaining consent, clearing conditions and road construction consents (a particular problem in Aberdeen) can delay lead-in times. Sites which have been subject to extensive site investigation can still encounter unexpected issues with ground

conditions once construction begins, particularly on brownfield sites. Housing development therefore is subject to many risks which can delay and prevent delivery.

The audit is a snapshot of the land supply at a specific time and should be based upon the best evidence available at that time. The basis of the programming should be firmer than an aspiration, but slippage in programming does occur and sites can stall, hence why the generosity margin is essential. In line with Homes for Scotland, Barratt North Scotland agree on the narrow point that programming in the 2016 Housing Land Audit did not accurately predict completions in 2016 and 2017. However, we consider care should be taken in drawing too many conclusions from two years' analysis.

We are unclear what element of the PSDP / representations the question asking what reassurance is there that higher levels of housing completions will occur in the future is referring to. However, it seems particularly pertinent to the SDPA's programming assumptions from the end of the audit period (2023 for the 2016 HLA and 2025 for the 2018 HLA) to 2032. Whilst the site specific assumptions have not been published, it is clear from comparison of the SDPA's allowances and HFS allowances informed by our extrapolated programming, that the SDPA is assuming delivery rates for sites which are significantly in excess of what has been agreed in the Housing Land Audits.

An agreed housing land audit is the best tool available for understanding the delivery of the current housing supply despite their susceptibility to overly optimistic programming. Any departure from using an agreed audit should be justified. However, the SDPA has not justified its inflated programming. A crucial role for any plan which allocates land or makes delivery assumptions about the existing land supply (as this PSDP does) is to rigorously assess first whether a site is deliverable and secondly to interrogate whether programming assumptions are realistic and consistent. The PSDP fails to do this.

The apparent over programming of existing supply reduces the allowances for new allocations and will undermine the ability of the City Region to meet the SDP targets as insufficient effective land will be made available. Housing targets and aspirations are more likely to be realised if the allowances are informed by robust and transparent delivery assumptions.

***(3d) The 2016 HLA figures suggest an average anticipated housing completions between 2016 and 2023 of 2,614 homes per year. For the period 2018 to 2025 the 2018 HLA anticipates 1,907 homes per year. Are these averages not closer to the principal and modified principal migration scenario figures set out in the HNDA and the authority's housing methodology paper than the high migration figures?***

We agree with Homes for Scotland that housing need and demand and ambitions for economic growth should inform the setting of the HST and allocation of new supply rather than basing targets on what existing supply is expected to deliver. Nevertheless, our analysis suggests the programming in these periods is more closely aligned with the High Migration Scenario of 2,807 dwellings per annum (dpa) than the Housing Supply targets of 1,950 (dpa) for the 2016-19 period and 2,200 (dpa) for the 2020-32 period. Our review of the 2018 HLA shows programmed completions of 20,969 for the 8 year period from 2018-2025 or an average of 2,621 dpa.

We consider that it is reasonable to assume that new allocations in the Aberdeen and Aberdeenshire LDPs could increase this rate of delivery by c. 200 dwellings per annum to enable the High Migration Scenario to be met.

#### **4. Setting the housing supply target – other matters**

***(4a) The authority refer to a range of constraints which would prevent the adoption of the high migration scenario figures for the housing supply target. Commentary, and evidence to support conclusions, on the following is requested:***

- ***Capacity of the construction sector – skilled labour; supply chains and logistics.***
- ***Water supply and impact on water abstraction on the River Dee.***
- ***Regional economic factors.***
- ***Inter-dependency between delivery of market and affordable housing at a local level.***
- ***Availability of resources and impact on minerals.***
- ***Planned demolitions.***
- ***Planned new or replacement housing or housing being brought back into effective use.***
- ***The risk to existing strategic allocations.***

In line with Homes for Scotland, Barratt North Scotland do not consider that any of these matters would constrain housing delivery to such an extent that the High Migration Scenario could not be met. No evidence has been presented to indicate that planned demolitions, new housing brought back into use or the inter-dependency between delivery of market and affordable housing at a local level would constrain housing delivery. In any case its unclear how these factors could conceivably constrain delivery.

We do not consider that skilled labour, supply chains and logistics would prevent the high migration target from being met. Both the agreed 2016 and 2018 Housing land audits anticipate years with programming in excess of 3,000 dwellings per annum. If this level of completions can be sustained for several years, it could be sustained in the longer term too, boosting employment.

The SDPA's Schedule 4 response (Issue 12) asserts that both mineral availability and water abstraction from the River Dee are constraining factors. However, no specific evidence is provided to explain at what threshold these would have a limiting impact on delivery. In line with Homes for Scotland, Barratt North does not consider either of these factors would prevent the High Migration Scenario from being met.

In relation to the risk to strategic allocations, we deal with a similar point in response to Questions 7b and 7c below. The risk is unfounded as it appears to implicitly rely on the assumption that the homebuilding industry has a fixed appetite for development and that substitution from one site to another is relatively straightforward. Neither of these assumptions are accurate. Furthermore, constraining supply across the whole city region on the unfounded assumption that it would assist delivery on a few strategic sites would be a very blunt policy intervention which would risk perverse consequences such as inflated land and house prices.

Finally, we consider that rather than acting as a constraint on setting a higher target, regional economic factors justify an upward adjustment to the target. Homes for Scotland commissioned work by the Aberdeen & Grampian Chambers of Commerce (AGCC) in May 2018 and submitted this to the MIR consultation (Appendix 3). It found that the economy was beginning to recover after the sharp drop in oil prices between 2014 and 2016 with employment growing again. This trend was confirmed also in the recently updated Regional Economic Strategy (RES) Action Plan.

A detailed survey of AGCC members found that the availability of suitable regional housing was amongst the top five negative impacts upon recruitment. 62% of business had lost a potential recruit due to the cost of housing in the North East. Availability of housing in preferred locations was also impacting upon recruitment. It will be essential to address these constraints in order to make the most of City Deal funding, other infrastructure investment and realise the ambitious growth strategy set out in the RES and Proposed SDP

As our response to Question 1b explains, several major infrastructure projects have been completed or had funding granted since the previous SDP was adopted. We consider that these combined with ambitious growth plans and the negative impact of existing housing pressures justify adoption of the High Migration Scenario.

## **5. Adoption of a modified principal growth scenario**

***(5a) The authority suggests in its schedule 4 response that the modified principal figures would result in 636 additional homes per year for the period 2020 to 2032 and an additional 1,721 per year between 2032 and 2035. Are these figures actually overall rather than per year?***

For the SDPA.

***(5b) Concerned parties argue that the principal migration scenario figures should be used instead of the modified figures but this would result in a lower average housing supply target. Why should the principal figures be used?***

In line with Homes for Scotland, Barratt North Scotland supports the use of the High Migration Scenario as the basis for setting the HST. Use of the Principal Scenario would be preferable to the Modified Principal Scenario. Using the Modified Principal Scenario is inconsistent with SPP as it is not aligned with the HNDA output.

We note and agree with the SDPA's ambitions for higher growth in the longer term than the Principal Projection shows (Housing Methodology Paper 2018, para. 3.13). However, rather than achieving the positive modification the SDPA explains is its intention in the Housing Methodology Paper (para. 3.13), the result of using the Modified Principal Projection is in fact a reduction in the HST over the period to 2032.

Whilst over the period from 2016-35 the Principal and Modified Principal projections set the same target, it is only the target to 2032 which will need to be met through housing

allocations. This is because LDPs are only required to allocate land for the ten year period following adoption (DPP, para. 119).

The approach taken by the SDPA defers dealing with unmet housing need and demand, leaving it to future plans instead. Setting a HST based on the Modified rather than Principal Scenario would result in a significant cumulative undersupply for the period, with a shortfall of 1,084 remaining by 2032 (Figure 5.1). The HLR is 1,301 dwellings lower for the 2016-32 period using the Modified rather than the Principal Scenario as our PSDP submission demonstrated. It is not an appropriate strategy to meet housing need and demand.

The PSDP should be amended to meet housing need and demand promptly and in full, otherwise unmet need and demand will accumulate with undesirable social and economic consequences.

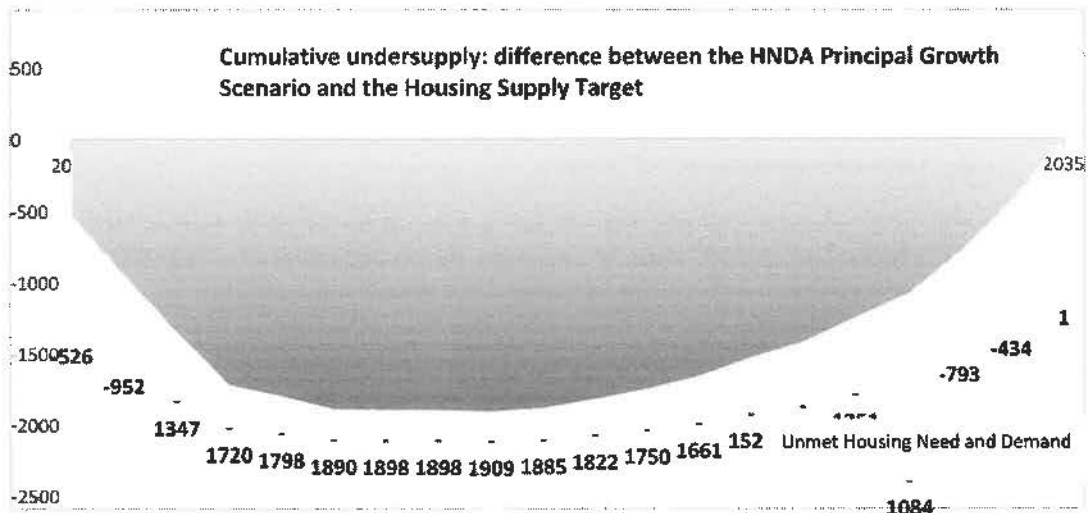


Figure 5.1 Cumulative Undersupply

**(5c) Why does the proposed plan refer to the period 2016 to 2020 if, as stated by the authority, the plan does not cover that period? And, is it justifiable to reduce the housing supply target to 1,950 for that period?**

The Plan must cover the period over which the HNDA applies. This is a requirement of SPP "The HNDA, development plan, and local housing strategy processes should be closely aligned" (para. 114), "They should set out the housing supply target... based on evidence from the HNDA" (para. 115). If the HST did not start at the beginning of the HNDA period then there would be no way of accounting for under delivery in the period since 2016 and so this housing need and demand could go unmet and would not be planned for.

This principle is particularly important as the HNDA identifies a backlog of existing need totalling 820 households (either homeless or concealed households living in overcrowded accommodation) which it seeks to meet over the first 10 years of the HNDA from 2016-



2025. Starting the HST at 2020 would mean that 328 of these households, in the most acute need, would not be planned for.

In Schedule 4 (Issue 12) the SDPA claims that the respondents incorrectly include the period 2016 to 2019 within the total Housing Supply Target (HST) up to the period 2032. However, this response conflicts with the SDPA's explanation of the methodology which we received by email at the PSDP stage. They explained:

"We looked at the HLR from 2016-2032 which totalled 43,680 and then subtracted the effective supply 2016-2032 which was 35,345. The difference was 8,335. As such we set allowances for 8,335 for the period 2020-2032." (SDPA)

We believe there is some confusion here with the Schedule 4 response appearing to contradict the methodology which the SDPA has used.

We consider that the PSDP must cover the 2016-19 period in order to be consistent with Scottish Planning Policy. The figure for this period should reflect the HNDA High Migration Scenario or as a second preference the Principal Scenario.

## 6. Use of housing land audits

***(6a) Is it correct that the HNDA has a base-date of 2016 but is informed by data from 2012 and 2014? And, if so, does that suggest that using data sources from different years to inform the housing situation is acceptable?***

For the SDPA.

***(6b) The authority argue that the agreed 2016 HLA figures should be used to inform the proposed plan and calculate the effective housing land supply. When the authority refers to "total effective land supply" (Table 3) is it referring to effective land supply and land that is expected to become effective beyond five years?***

For the SDPA.

***(6c) The 2016 HLA identifies a "total effective land supply" of 37,077 homes whereas the agreed 2018 HLA identifies a total of 37,442. Therefore, would applying the 2018 figures slightly reduce the need for local development plan allowances?***

There is common ground between HFS and the SDPA that the 2016 HLA should be the basis for calculating the allowances. Though HFS consider that actual completions should be used for 2016 and 2017 whereas the SPDA use programming instead.

Nevertheless, we would not object to using the 2018 HLA and set out the implications of this in response to Question 9a. The allowances relate to specific timescales and so a detailed analysis of the programmed effective supply is required to answer the question. This is set out in Appendix 1 and 2.

***(6d) Were the 2016 and 2018 HLAs agreed with the house-building industry or contested? If contested, which sites were not agreed and what impact does that have, if any, on the housing land supply?***

We confirm that both were agreed.

***(6e) How has the total effective land supply been calculated? And, as argued by parties, has the total effective land supply been falsely inflated? If so, how?***

We are unsure what assumptions the SDPA has made in calculating its effective land supply. We understand that the basic methodology used by HFS and the SDPA for calculating the 2016-32 allowances was the same i.e. effective supply for the 2016-32 period has been subtracted from the 2016-32 HLR. However, calculating the 2020-32 allowances (PSDP Table 3) using the Modified Principal Scenario gives allowances of 8,335 using the SDPA effective supply assumptions and 11,446 using HFS assumptions. It is therefore apparent that the SDPA assumes an effective supply which is c. 3,000 dwellings in excess of HFS programming.

To calculate effective land supply, Homes for Scotland projected forward already agreed 2016 HLA programming until the end of the plan period or until site capacity was reached. It is apparent that the SDPA has used a different approach. However, the approach taken is not explained nor are the assumptions involved. It is important that these assumptions are made available as they directly impact upon the amount of new homes the LDP's will have to allocate land for.

It appears that the SDPA's land supply position assumes much higher rates of completions on sites than has been agreed in the Housing Land Audit. We do not consider that it is reasonable to deviate from agreed rates of completions, without justification as this approach reduces the allowances. By assuming a unilateral position on expected programming without wider consultation, the PSDP is inconsistent with the approach to managing land supply which SPP requires

"Planning authorities should actively manage the housing land supply. They should work with housing and infrastructure providers to prepare an annual housing land audit as a tool to critically review and monitor the availability of effective housing land, the progress of sites through the planning process, and housing completions, to ensure a generous supply of land for house building is maintained and there is always enough effective land for at least five years." (para. 123)

The PSDP approach is also inconsistent with Planning Advice Note 2/2010 which explains the vital role of Housing Land Audits

"Annual housing land audits are the established means for monitoring housing land. This information [in the audit] is vital to the preparation of the development plan and the audit process enables adjustments to the supply to be made in response to issues identified." (para. 45).

Taken together these two policy documents set a clear expectation that the monitoring of land supply and programming should be done collaboratively with stakeholders and that Housing Land Audits will be central in informing any adjustments to supply – allowances in this instance. As the 2016 HLA was agreed with the industry it is unclear why the PSDP assumes different programming and does not justify the reason for this departure from agreed programming.

The use of the Modified Principal Scenario by the SDPA and the apparently inflated programming have the effect of minimising the amount of land which is required to be allocated. The approach in both instances is inconsistent with relevant policy and is not adequately explained or justified.

We agree with Homes for Scotland that if the 2016 HLA is used Homes, the allowances should be as set out in the appendices to our PSDP submission. The SDPA Schedule 4 response identified some typographical errors in our previous submission. These have been updated (with changes in red text) and are included as Appendix 4.

## **7. Housing land requirement – generous margin**

***(7a) CALA homes refer to the extant SDP including a 25% margin compared to a 17% margin for the proposed plan. Is the 25% figure derived from what the HNDA (2011) suggested and the actual housing requirement set in that document? If not, the source of the figure should be explained. Similarly, for the proposed plan is the 17% figure taken across the period 2016 to 2040?***

***(7b) Is there evidence to suggest that adoption of the 20% margin over the housing supply target would dilute demand; undermine the delivery of other sites; and lead to the failure to meet the spatial strategy set out in the extant 2014 SDP? Or, would an increase improve choice and distribution of housing across the region and improve supply?***

The 20% margin will improve choice as it will lead to further land being made available, increasing opportunities to build new homes. Increased supply of land will provide opportunities for new entrants to the market and for existing homebuilders to upscale their delivery. The capacity of the industry is dynamic and it can respond to increased land supply by increasing housing delivery. As such we do not consider the scenario of diluted demand due to increased availability of effective sites is realistic, particularly at a time when constrained supply is a major impediment for many private and social housing providers across Scotland.

Furthermore, the land market is relatively illiquid. New allocations provide new opportunities for those looking to develop new homes. However, new allocations do not provide potential alternative sites for home builders attached to or underway on existing sites. The time and cost penalties of swapping would be prohibitive, particularly for an industry reliant on debt finance, where any delay quickly leads to escalating interest costs.



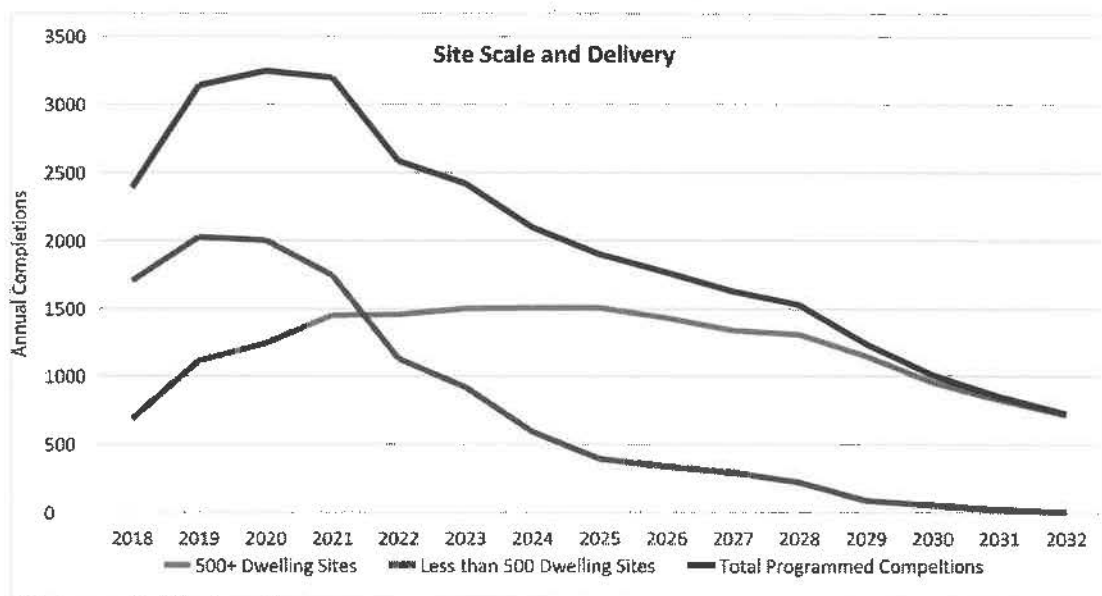
The under delivery in 2017 and 2018 compared to the 2016 HLA programming demonstrates that sometimes sites deemed effective stall or suffer delays (highlighted in Question 3c). It is for this reason that the generosity margin exists. The 2017 and 2018 programming was 27% higher than actual delivery. Whilst this is a small sample, it further justifies using a generosity at the top of the 10-20% range for the period to 2032, a position which is common ground between Homes for Scotland and the SDPA.

***(7c) Is there justification to suggest, as argued in representations, that allocation of additional housing would prevent an improved rate of delivery?***

No, this argument is incompatible with the evidence. Insufficient effective land supply is a significant constraint to the delivery of new homes.

The variety of sites available is set to significantly diminish over the plan period. Our analysis (Figure 7.1) shows that by 2032 the existing housing land supply will be reduced to just thirteen active sites delivering just over 700 dwellings in that year, well below the HST and roughly a third of the delivery rate in recent years. To put this into context the 2,388 completions anticipated in 2018 by the 2018 HLA are spread across 133 active sites and many different builders of all scales. New allocations are imperative not only to improve the delivery rate, but also to sustain current rates of delivery.

Smaller sites will be particularly scarce by the end of the plan period. Our analysis of the 2018 Housing Land Audit, with sites programmed out until 2032, shows an increasing reliance on the largest sites (500 dwellings or over) with a markedly diminished supply of smaller sites (less than 500 dwellings) within five years. Sites of less than 500 dwellings are expected to deliver 1,705 dwellings in 2018, 71% of the programmed land supply, but this total falls to 392 dwellings by the end of the agreed HLA period in 2025. In the longer term the contribution declines significantly to less than 100 dwellings per annum by 2029. By 2032 our analysis shows that just one of the 13 active sites will have capacity of less than 500 dwellings.



**Figure 7.1 Site Scale and Delivery**

The denuding of the supply of smaller sites, if unaddressed, would have significant negative impacts on delivery. Sites of under 500 dwellings have historically been responsible for a large proportion of new housing delivery. They also generally have shorter lead-in times, are more manageable for small and medium sized companies to develop and allow a more varied land supply as smaller sites can be allocated in greater variety of locations. Whilst the contribution of 500+ dwelling sites is forecast to increase, the level of delivery (Figure 7.1) will not be enough to meet housing need and demand.

Figure 7.1 shows that the City Region faces a significant shortage of land in the longer term. The decrease in the variety of sites is particularly pronounced. Further allocations are essential to sustain and improve upon current rates of delivery.

**(7d) Does Scottish Planning Policy (at paragraphs 116 and 118) require an increased margin to be added beyond year 12 and up to year 20?**

Yes, paragraph 116 suggests that the “overall HST” applying “over the plan period” should be increased by a margin to establish the HLR.

## 8. Constrained sites

**(8a) Does the constrained supply (9,828 homes identified in the 2016 HLA) indicate a failure of the spatial strategy to deliver?**

We do not consider this is necessarily the case. However, it does suggest that insufficient attention may have been paid to the deliverability of new allocations at the plan-making stage.

***(8b) Could the constrained supply become effective within the plan period to augment the housing land supply? If so, where could sites come forward and at what scale could be anticipated?***

Constrained sites could become effective, but equally as highlighted in Question 8a sites which are currently considered effective could become constrained. Rather than undertaking a complicated exercise to understand if/when constraints could be overcome and which sites are at risk of becoming constrained in the future, we consider it is most appropriate to proceed using the agreed baseline in the 2016 HLA or the 2018 HLA. This is the most robust way in which to proceed and we understand is common ground between HFS and the SDPA.

***(8c) Is Aberdeenshire unable to support an effective housing land supply? And, if so, would this be sufficient justification to allocate more in the Aberdeen Housing Market Area to compensate?***

There is considerable demand for new housing in Aberdeenshire, however the overall level of demand is significantly lower in the Rural HMA compared with the Aberdeen HMA.

## **9. Housing allowances**

***The allowances are calculated by subtracting the total effective land supply from the housing land requirement. This results in an allowance for 2020 to 2032 of 8,335 homes (43,680 effective supply minus 35,345 requirement) and for the period 2033 to 2040 an allowance of 18,860 homes (1,732 effective supply minus 20,592 requirement). The period beyond 2032 has been split in the proposed plan providing 9,000 over three years from 2033 to 2035 and 9,860 between 2036 and 2040.***

***(9a) How would using the HLA 2018 figures affect the allowances?***

Using the 2018 HLA, with site programming extrapolated to 2032 would lower the housing allowances. Our extrapolated programming is set out in Appendix 1. The consequential changes to the allowances are set out in Appendix 2. If it is decided that the 2018 HLA should be used instead of the 2016 HLA, Appendix 2 would replace Appendices 5 & 6 in our Proposed SDP submissions with amended allowances based on the programming in Appendix 1 of this submission.

The table over the page summarises the impact on the 2020-32 allowances of moving from the 2016 HLA to the 2018 HLA (using HFS programming for both). It shows that overall the allowances are reduced, but with a slight increase for the Rural HMA and a decrease for the Aberdeen HMA. All of the allowances remain higher than in Table 3 of the PSDP due to the apparent differences in programming assumptions discussed in response to Question 6e.

In line with Homes for Scotland, Barratt North Scotland does not object to using the 2018 HLA. However, any update must be transparent about the delivery assumptions it makes beyond the agreed Audit period, ending in 2025. We consider that our approach shown in

Appendix 1 should be used. We have updated Table 3 of the Proposed LDP so that delivery assumptions for each period are clearly shown making the allowances more intelligible and transparent, these are shown in Appendix 2.

Scenario	HMA	2020-32 Allowance Using 2018 HLA	2020-32 Allowance Using 2016 HLA	Difference
<b>Principal 80/20</b>	Aberdeen HMA	8522	10474	-1952
	Rural HMA	2712	2273	439
<b>Modified 80/20</b>	Aberdeen HMA	7482	9434	-1952
	Rural HMA	2451	2012	439
<b>High 80/20</b>	Aberdeen HMA	18005	19958	-1953
	Rural HMA	5081	4643	438
<b>Principal 85/15</b>	Aberdeen HMA	10771	12724	-1953
	Rural HMA	463	23	440
<b>Modified 85/15</b>	Aberdeen HMA	9666	11618	-1952
	Rural HMA	267	-172	439
<b>High 85/15</b>	Aberdeen HMA	20848	22799	-1951
	Rural HMA	2241	1801	440

**(9b) Are the allowances for the period 2033 to 2035 contrary to the authority's position that completion rates closer to 3,000 homes per year are not achievable?**

For the SDPA.

**(9c) Is the site at Royal Devenick Park allocated and/or considered as part of the recent local development plan examination? In other words, is it a new proposed site or is it part of the established supply?**

For the SDPA.

**(9d) Would it present a difficulty if Aberdeenshire Council and Aberdeen City Council took different approaches in identifying any strategic reserves for housing?**

Barratt North Scotland agree with Homes for Scotland that identifying strategic reserves would be prudent long-term planning.

***(9e) Is it reasonable to allow local development plans to dictate what is considered to be "small scale" in relation to housing allocations?***

We do not see any merit in defining "small scale" in the SDP.

***(9f) Would the introduction of further strategic sites instead of small scale allocations undermine the potential delivery of existing strategic sites?***

In line with Homes for Scotland, Barratt North Scotland supports a varied housing land supply as set out in response to Question 7c. For the reasons set out in response to Question 7b we do not consider further strategic (c. 500+) allocations would undermine the delivery of existing large sites as those currently engaged on existing sites are unlikely to be able to substitute for another site without incurring prohibitive costs. However, our analysis in response to Question 7c suggests a particular shortage of smaller (sub 500 dwelling) sites will emerge in the medium term (beyond 2021/22).

## **10. Housing market areas**

***(10a) Parties argue that a 85%/15% split in housing between the Aberdeen Housing Market Area and Rural Housing Market Area could be achieved while maintaining a 50%/50% allocation to both Aberdeen City and Aberdeenshire. Would such an approach result in greater allocations in the AHMA part of Aberdeenshire? And, what impact would that have on delivery in the RHMA?***

An 85/15 split would mean more allocations in the Aberdeenshire part of the AHMA if the 50/50 split was maintained between the Council areas. We consider this would be desirable as it would lead to more allocations being required in the part of the authority where development is generally most sustainable and where the housing market is stronger. It is logical to direct development to sustainable locations which can be viably developed.

Using the 80/20 split would lead to allowances being split roughly 50/50 between the Aberdeenshire part of the AHMA and The Rural HMA if the 2018 HLA is used (Appendix 2). We consider that this approach would be less likely to result in deliverable allocations and that the split in allowances should instead be significantly in favour of the Aberdeenshire part of the AHMA for the reasons outlined above.

Paragraph 6.6 of the authority's Housing Methodology Paper states that 45% of the identified housing land supply in the RHMA is constrained. Of these constrained sites in the RHMA, 67% have a marketability issue. Paragraph 6.7 of the Housing Methodology Paper goes on to state that 40% of completions in the RHMA between 2006-2016 were on unallocated sites (compared to 25% in the Aberdeenshire part of the AHMA), further highlighting the issue with the delivery of allocated sites in the RHMA.

Given that nearly half of sites in the Rural HMA are constrained and 40% of delivery comes from unallocated, mostly small sites, it calls in to question any approach which would require significant new allocations in the Rural HMA. New allocations should instead be focused on the Aberdeenshire part of the AHMA. Using an 85/15 split would





better align with this strategy, allowing more sustainable development to viably take place.

We do not consider this approach would impact upon the delivery of new development in the Rural HMA. The HLR sets the minimum not the maximum amount of allocations.

## **APPENDIX 4**

### **ECS Transport Position Statement**





Discussions with Transport Scotland identified that it was always of the opinion that the AWPR junction would require to be upgraded to accommodate development growth as the infrastructure was designed to accommodate traffic volumes determined over 10 years ago. It considered that the cost of delivering these improvements should be borne by developers and managed by the relevant Local Authorities.

It should be recognised that the 2023 flows include for all major committed development, namely, Countesswells and Arnhall Phase 3. These developments have a considerable bearing on the operation of the A944 and the AWPR junction, however, they are not committed to providing any improvement to the AWPR despite adding to the considerable congestion which is forecast.

With regards to the LDP process, ECS raised AC's proposals for small allocations of housing throughout Aberdeenshire with Transport Scotland. It was put to Transport Scotland that the impact of numerous small residential developments would ultimately result in a wide spread impact on the strategic road network but without the potential to source mitigation as the impact of each small development would be diluted prior to reaching the AWPR / A96.

The benefit of a large scale development is that the supporting Transport Assessment considers the impact of the development over a large area with appropriate mitigation detailed for the strategic road corridor. Although Transport Scotland was clear that it could not directly support Westhill West, it confirmed that the process of allocating numerous small scale sites without a mechanism to identify cumulative impact and deliver appropriate mitigation would lead it to agree that the delivery of larger sites is more transparent and likely to lead to an improved position for the trunk road network.

In August 2018 the Cumulative Transport Appraisal Report prepared by Systra on behalf of Aberdeen City & Aberdeenshire Councils was issued. The report provides very limited information on the Westhill area and the A944. The limited mentions of the area simply indicate that there are some notable congestion issues with the conflicting turning movements at the AWPR junction leading to delays.

As the ASAM model update is complete and Systra, on behalf of AC, has updated the Westhill Paramics Model, it was possible to commission model testing for the proposals at Westhill West to get a broad understanding of the transport impacts. The following provides a summary of the methodology employed within the model testing and the results.

### **Paramics Model Testing**

The methodology for assessing the proposed development was outlined in the ECS model scoping letter which was submitted to AC on the 13th February 2019 and is included in Appendix A for reference. The scoping letter sets out the proposed generation of the phased development, the distribution of traffic and the development scenarios to be tested.

The modelling has generally been undertaken in accordance with the scoping letter, however, the potential reduction in traffic accessing the wider road network due to the provision of amenities in the site and those working from home has been reduced from the suggested 22% to 15% which is consistent with similar developments in the wider area.

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The information contained within the scoping letter was presented to Systra to allow it to undertake the various model test. It should be recognised that the primary focus of the model testing was to identify the impact of the proposed allocation on the strategic road network as this has been the primary focus of AC with respect to road capacity concerns.

The Systra model report is included as Appendix B for review but the following provides a non-technical summary of the assessment and findings.

For the purposes of this assessment it was considered appropriate to assess two phases of development, namely, 500 dwellings and the full development content of 2,550 dwellings. The considerable range of development allowed a clear distinction to be created between scenarios which make the development impacts easy to interpret.

In addition to the development scenarios, the 2023 reference case (do nothing scenario) and the 2023 reference case with the Westhill AWPR junction signalised were also included in the reporting. The model tests were as follows:

- 2023 Ref Case (No Signals)
- 2023 Ref Case (Signals)
- Test 1 2023 Ref Case & 500 Dunecht (No Signals)
- Test 1 2023 Ref Case & 500 Dunecht (Signals & Left Slip)
- Test 1 2023 Ref Case & 500 Dunecht (Signals only)
- Test 5 2023 Ref Case & 2550 Dunecht (No Signals)
- Test 5 2023 Ref Case & 2550 Dunecht (Signals & Left Slip)
- Test 5 2023 Ref Case & 2550 Dunecht (Signals only)

The Reference Case without signalisation of the AWPR junction results in significant queuing and delay at the junction in both the AM and PM peaks. The inclusion of signals at the junction removes the majority of the queuing by introducing gaps on the circulating carriageway which significantly increases the capacity of the junction thereby reducing delay and queuing.

Within both the Reference Case scenarios there is considerable queuing forecast at the Westhill Drive / A944 Roundabout.

The assessment of 500 dwellings indicates that the signalisation of the AWPR junction is required to accommodate the traffic but there is no requirement for the left slip on to the A944 for traffic heading from the south. The AWPR junction has sufficient capacity to accommodate the development.

The addition of the 500 units results in an increase in queueing at the Westhill Drive / A944 Roundabout which would require to be mitigated or, alternatively, the development could introduce measures to encourage traffic toward the B9119 which would provide a better long term solution. The model indicates that the inclusion of the development would result in a marginal increase in delay to journey times throughout the model, however, it should be recognised that the impacts on the local road network have not been mitigated at this early stage in the planning process.

The assessment of 2,550 dwellings again indicates that the signalisation of the AWPR junction is required to accommodate the traffic but there is no requirement for the left slip on to the A944 for

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traffic heading from the south. The AWPR junction has sufficient capacity to accommodate the full development.

The addition of the development traffic further increases the queuing at the Westhill Drive / A944 Roundabout and increases queuing and delay on the B9119. The modelling has assumed that measures would be put in place to enhance the B9119 as an alternative route to the A944 which has resulted in the increased traffic for both the development and background traffic.

As outlined in the original SDP representation, the B9119 would require capacity improvements to accommodate the full development which the developer is willing to investigate fully and demonstrate as part of any planning application on the basis of no net detriment as required by National Guidance.

The average journey time delay increases when assessing the 2,550 units but this is attributable to the delay at the Westhill Drive / A944 Roundabout and the B9119 junctions which will be mitigated as part of the development proposals.

The Systra report provides the following summary:

*“The results in Table 4.1 show that in each of the options without traffic signals at the AWPR junction, there are considerable delays predicted by the modelling, particularly in the AM peak. Whilst the options with the Dunecht development with signals still show an increase in journey time, these are mainly down to congestion along the A944 and B9119 corridors.*

*The results show that the left slip has minimal benefit in each of the tests, with the traffic signals only option showing similar results.”*

### **Signalisation of the A944/AWPR Roundabout**

On the 5<sup>th</sup> March a report was submitted to the Operational Delivery Committee of Aberdeen City Council (ACC) which proposed the signalisation of the A944 / AWPR Roundabout due to the uncharacteristically high collision rates since the junction opened in February 2019.

The report states the following:

*“3.3...It has become apparent, especially at peak times, that the strategy for allowing flows to dictate the priority of traffic movements has led to significant congestion and delays for commuters entering from both the North and South slip Roads of the AWPR. This is primarily due to the size and high-speed nature of the roundabout and additionally to the uneven flows being encountered.*

*3.4 Fast-moving traffic already on the roundabout requires drivers entering the junction to be able to match their speed almost immediately on deciding to proceed. Due to the imbalanced flows currently experienced at this junction and the resulting delays, numerous motorists are attempting to access the roundabout without taking sufficient time to correctly judge the suitability of gaps in the traffic required to allow them to enter the roundabout safely, resulting in the type of side impacts collisions currently being recorded.*

*3.5 Due to motorists being inhibited from entering the junction it is a regular occurrence for queues to develop on the AWPR slip roads during peak hour periods, which at times extend onto the mainline*

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carriageway of the AWPR. Given the high-speed nature of the AWPR this is undesirable for Transport Scotland.

4.8 Initial modelling of the proposed signalised layout of the AWPR / A944 roundabout indicated that there would be an increase in queuing on both legs of the A944 during peak periods, with both predicted to have an increase of average queues than the current operation.

4.9 The introduction of signals would however significantly improve safety for traffic exiting the AWPR and improve driver confidence. Aberdeenshire Council have stated that they welcome the positive impact in reducing road traffic collisions which introducing signals should have and this view is also supported by both Transport Scotland and Police Scotland.”

The proposals for signalisation of the roundabout were approved by Aberdeen City Council and it is understood that works will begin in July and be completed in August 2020.

The findings of ACC’s report are consistent with the modelling undertaken by Systra which demonstrated that signalisation of the roundabout would introduce a significant betterment to the operation of the roundabout as a whole. It is evident that the council’s primary driver for the implementation of the signals was road safety, however, the capacity benefits demonstrated within the Systra report will also be delivered which will release additional capacity for development in the wider area.

It is evident that the A944/AWPR Roundabout capacity has been a primary concern for Aberdeenshire Council with respect to allocating further development sites in the Westhill area. The signalisation of the roundabout removes this concern and provides additional capacity on the network to accommodate future growth.

## **Conclusions**

As Aberdeenshire Council Roads Officer’s primary concern with a housing allocation in Westhill has been the capacity of the strategic road network, the AWPR junction in particular, the primary focus of the assessment undertaken by Systra has been the strategic road network.

The Systra report demonstrates that signalisation of the Westhill AWPR junction will provide sufficient capacity to accommodate both the 500 and 2,550 unit developments. The implementation of the signalisation by Aberdeen City Council ensures that the additional capacity as a result of the signals will be realised therefore the AWPR / A944 Roundabout will no longer be a capacity concern or a reason to limit growth in this locale.

The 500 unit development results in a marginal increase in average journey times which is largely attributable to the congestion at the Westhill Drive / A944 Roundabout. This node is already identified as having a capacity issue in the Reference Case, therefore, an increase in capacity or diversion of traffic to an alternative route is required.

The 2,550 unit development results in an increase in delay on the A944 and B9119 corridor which will require mitigation. As outlined throughout the various SDP representations and the LDP’s Call for Sites exercise, it is proposed to strengthen the B9119 corridor to increase capacity for the development and which could reduce traffic on the A944 for the wider benefit of the town.

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The modelling has demonstrated that the AWPR junction can accommodate the development with mitigation and, in light of this strategic road network concern being addressed, detailed consideration of the local road network can now commence in consultation with Aberdeenshire Council.

The model results clearly demonstrate that there are no strategic road infrastructure issues which prevent a major housing allocation within Westhill.

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## **APPENDICES**

### **A. Masterplan**



The scaling of this drawing cannot be assured

Revision	Date	Drn	Chk
-	-	-	-

- 280m standoff from centreline of western pipeline
- 31m standoff from centreline of eastern pipeline
- Buffer along watercourse
- Diverted A944 connecting to new junctions on B9119
- Scheduled Monument (stone circle)
- Potential SuDS pond identified

Project  
Westhill  
Westhill, Aberdeenshire

Drawing Title  
Opportunities and Constraints  
DRAFT

Date	Scale	Drawn by	Check by
19.11.15	1:5000@A3	■	■

Project No	Drawing No	Revision
24396	ind03	-

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The scaling of this drawing cannot be assured  
 Revision      Date      Dn      Chk  
 -                   -                   -                   -

	Ha	Ac	Use
1	19	47	Residential
2	2.6	6.4	Residential
3	21	52	Residential
4	7	17	Residential
5	11.8	29	Residential
6	17	42	Residential
7	5.8	14.3	Residential
<b>Sub Total</b>			
	<b>84.2</b>	<b>207.7</b>	
Capacity	<b>2,526 @30 dph</b>		
<b>A</b>			
	7.7	19	Education
<b>B</b>			
	1.6	4	Education
<b>C</b>			
	1.4	3.5	Retail

Project  
 Westhill  
 Westhill, Aberdeenshire  
 Drawing Title  
 Developable Areas  
 DRAFT

Date                      Scale                      Drawn by      Check by  
 19.11.15                      1:5000@A3                      ■                      ■

Project No                      Drawing No                      Revision  
 24396                      ind03                      -

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Revision	Date	Drn	Chk
-	-	-	-

Project  
Westhill  
Westhill, Aberdeenshire

Drawing Title  
Concept Masterplan  
DRAFT

Date	Scale	Drawn by	Check by
19.11.15	1:5000@A3	■	■

Project No	Drawing No	Revision
24396	ind03	-

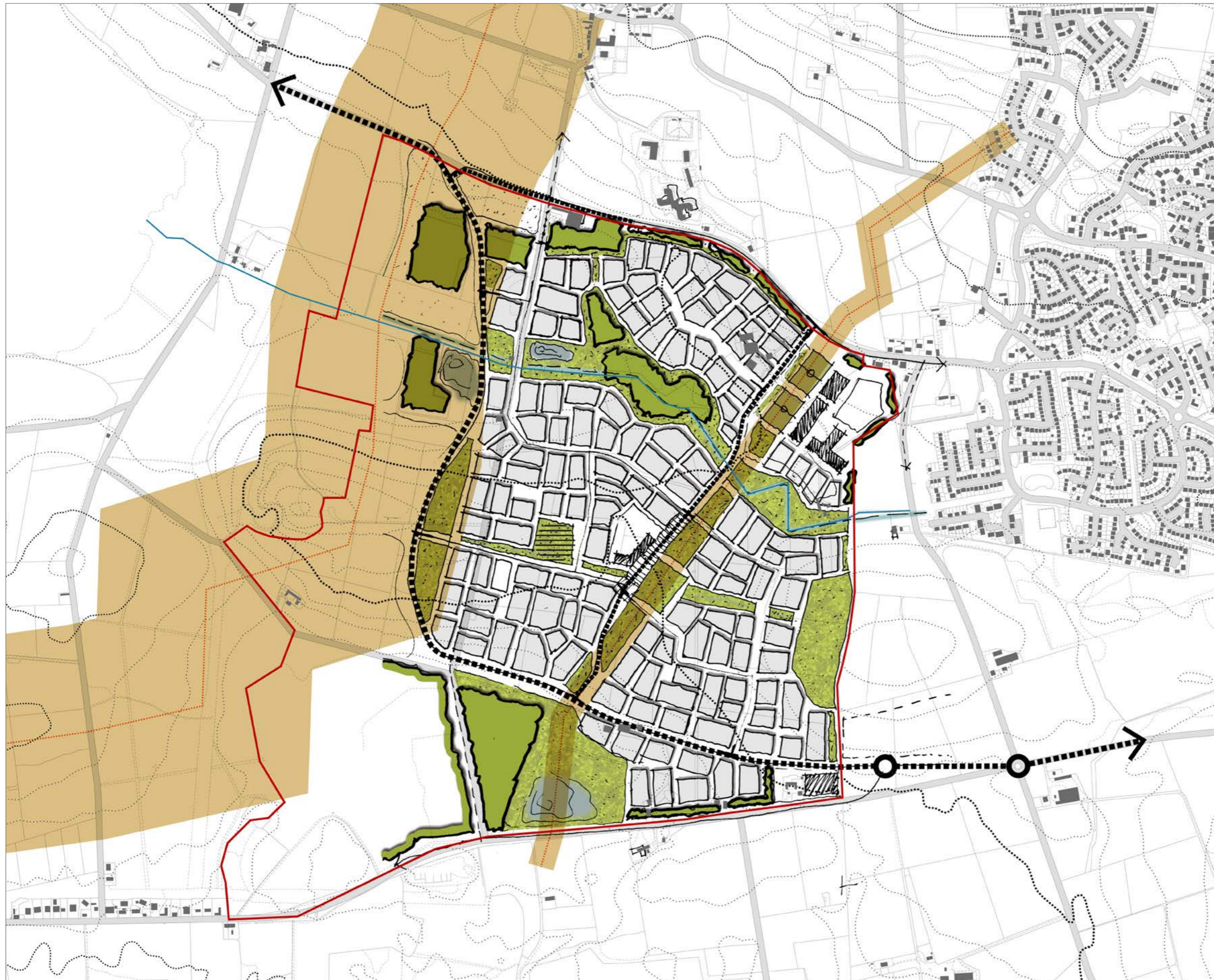
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The scaling of this drawing cannot be assured

Revision	Date	Drn	Chk
-	-	-	-

Project  
Westhill  
Westhill, Aberdeenshire

Drawing Title  
Concept Masterplan (Opps & Cons)  
DRAFT

Date	Scale	Drawn by	Check by
19.11.15	1:5000@A3	■	■

Project No	Drawing No	Revision
24396	ind03	-

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## B. TRICS Output

Calculation Reference: AUDIT-654801-151127-1146

TRIP RATE CALCULATION SELECTION PARAMETERS:

Land Use : 03 - RESIDENTIAL  
 Category : A - HOUSES PRIVATELY OWNED  
 VEHICLES

Selected regions and areas:

05	EAST MIDLANDS	
	LN LINCOLNSHIRE	1 days
06	WEST MIDLANDS	
	SH SHROPSHIRE	1 days
07	YORKSHIRE & NORTH LINCOLNSHIRE	
	NY NORTH YORKSHIRE	1 days
08	NORTH WEST	
	CH CHESHIRE	1 days
11	SCOTLAND	
	FA FALKIRK	1 days
	SR STIRLING	1 days

This section displays the number of survey days per TRICS® sub-region in the selected set

Filtering Stage 2 selection:

This data displays the chosen trip rate parameter and its selected range. Only sites that fall within the parameter range are included in the trip rate calculation.

Parameter: Number of dwellings  
 Actual Range: 108 to 186 (units: )  
 Range Selected by User: 100 to 792 (units: )

Public Transport Provision:

Selection by: Include all surveys

Date Range: 01/01/07 to 20/05/14

This data displays the range of survey dates selected. Only surveys that were conducted within this date range are included in the trip rate calculation.

Selected survey days:

Monday	2 days
Tuesday	1 days
Wednesday	1 days
Thursday	1 days
Friday	1 days

This data displays the number of selected surveys by day of the week.

Selected survey types:

Manual count	6 days
Directional ATC Count	0 days

This data displays the number of manual classified surveys and the number of unclassified ATC surveys, the total adding up to the overall number of surveys in the selected set. Manual surveys are undertaken using staff, whilst ATC surveys are undertaken using machines.

Selected Locations:

Suburban Area (PPS6 Out of Centre)	6
------------------------------------	---

This data displays the number of surveys per main location category within the selected set. The main location categories consist of Free Standing, Edge of Town, Suburban Area, Neighbourhood Centre, Edge of Town Centre, Town Centre and Not Known.

Selected Location Sub Categories:

Residential Zone	4
No Sub Category	2

This data displays the number of surveys per location sub-category within the selected set. The location sub-categories consist of Commercial Zone, Industrial Zone, Development Zone, Residential Zone, Retail Zone, Built-Up Zone, Village, Out of Town, High Street and No Sub Category.



Filtering Stage 3 selection:

Use Class:

C3 6 days

This data displays the number of surveys per Use Class classification within the selected set. The Use Classes Order 2005 has been used for this purpose, which can be found within the Library module of TRICS®.

Population within 1 mile:

1,001 to 5,000	1 days
10,001 to 15,000	1 days
15,001 to 20,000	2 days
20,001 to 25,000	2 days

This data displays the number of selected surveys within stated 1-mile radii of population.

Population within 5 miles:

5,001 to 25,000	1 days
50,001 to 75,000	1 days
75,001 to 100,000	1 days
100,001 to 125,000	3 days

This data displays the number of selected surveys within stated 5-mile radii of population.

Car ownership within 5 miles:

0.6 to 1.0	1 days
1.1 to 1.5	5 days

This data displays the number of selected surveys within stated ranges of average cars owned per residential dwelling, within a radius of 5-miles of selected survey sites.

Travel Plan:

No 6 days

This data displays the number of surveys within the selected set that were undertaken at sites with Travel Plans in place, and the number of surveys that were undertaken at sites without Travel Plans.

LIST OF SITES relevant to selection parameters

1	CH-03-A-06 CREWE ROAD	SEMI -DET./BUNGALOWS	CHESHIRE
	CREWE Suburban Area (PPS6 Out of Centre) No Sub Category Total Number of dwellings: 129 Survey date: TUESDAY 14/10/08		
2	FA-03-A-02 ROSEBANK AVENUE & SPRINGFIELD DRIVE	MIXED HOUSES	FALKIRK
	FALKIRK Suburban Area (PPS6 Out of Centre) Residential Zone Total Number of dwellings: 161 Survey date: WEDNESDAY 29/05/13		
3	LN-03-A-02 HYKEHAM ROAD	MIXED HOUSES	LINCOLNSHIRE
	LINCOLN Suburban Area (PPS6 Out of Centre) Residential Zone Total Number of dwellings: 186 Survey date: MONDAY 14/05/07		
4	NY-03-A-06 HORSEFAIR	BUNGALOWS & SEMI DET.	NORTH YORKSHIRE
	BOROUGHBRIDGE Suburban Area (PPS6 Out of Centre) Residential Zone Total Number of dwellings: 115 Survey date: FRIDAY 14/10/11		
5	SH-03-A-04 ST MICHAEL'S STREET	TERRACED	SHROPSHIRE
	SHREWSBURY Suburban Area (PPS6 Out of Centre) No Sub Category Total Number of dwellings: 108 Survey date: THURSDAY 11/06/09		
6	SR-03-A-01 BENVIEW	DETACHED	STIRLING
	STIRLING Suburban Area (PPS6 Out of Centre) Residential Zone Total Number of dwellings: 115 Survey date: MONDAY 23/04/07		

This section provides a list of all survey sites and days in the selected set. For each individual survey site, it displays a unique site reference code and site address, the selected trip rate calculation parameter and its value, the day of the week and date of each survey, and whether the survey was a manual classified count or an ATC count.

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED  
VEHICLES

Calculation factor: 1 DWELLS

BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	6	136	0.084	6	136	0.253	6	136	0.337
08:00 - 09:00	6	136	0.155	6	136	0.403	6	136	0.558
09:00 - 10:00	6	136	0.170	6	136	0.220	6	136	0.390
10:00 - 11:00	6	136	0.150	6	136	0.167	6	136	0.317
11:00 - 12:00	6	136	0.168	6	136	0.178	6	136	0.346
12:00 - 13:00	6	136	0.213	6	136	0.188	6	136	0.401
13:00 - 14:00	6	136	0.200	6	136	0.188	6	136	0.388
14:00 - 15:00	6	136	0.160	6	136	0.193	6	136	0.353
15:00 - 16:00	6	136	0.254	6	136	0.200	6	136	0.454
16:00 - 17:00	6	136	0.328	6	136	0.173	6	136	0.501
17:00 - 18:00	6	136	0.382	6	136	0.254	6	136	0.636
18:00 - 19:00	6	136	0.231	6	136	0.205	6	136	0.436
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
<b>Total Rates:</b>			2.495			2.622			5.117

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP\*FACT. Trip rates are then rounded to 3 decimal places.

#### Parameter summary

Trip rate parameter range selected: 108 - 186 (units: )  
 Survey date range: 01/01/07 - 20/05/14  
 Number of weekdays (Monday-Friday): 6  
 Number of Saturdays: 0  
 Number of Sundays: 0  
 Surveys manually removed from selection: 0

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

## C. Datashine Outputs

			North	North East	East	South East	South	West	
Garlogie and Elrick	Garlogie and Elrick	145	145						
Garlogie and Elrick	Cove North	143				143			
Garlogie and Elrick	Bucksburn North	140		140					
Garlogie and Elrick	No fixed place	111	111						
Garlogie and Elrick	Midstocket	86				86			
Garlogie and Elrick	City Centre West	80				80			
Garlogie and Elrick	West End North	72				72			
Garlogie and Elrick	City Centre East	57				57			
Garlogie and Elrick	Westhill Central	54	54						
Garlogie and Elrick	George Street	44				44			
Garlogie and Elrick	Summerhill	35				35			
Garlogie and Elrick	Dyce	31		31					
Garlogie and Elrick	Hazlehead	31				31			
Garlogie and Elrick	Hanover South	27				27			
Garlogie and Elrick	Garthdee	25					25		
Garlogie and Elrick	Banchory-Devenick and Findon	23				23			
Garlogie and Elrick	Seaton	21				21			
Garlogie and Elrick	Balgownie and Donmouth East	19		19					
Garlogie and Elrick	Westhill North and South	19	19						
Garlogie and Elrick	Inverurie South	18		18					
Garlogie and Elrick	Ashgrove	18				18			
Garlogie and Elrick	Kingswells	16				16			
Garlogie and Elrick	Denmore	15		15					
Garlogie and Elrick	Ferryhill North	14				14			
Garlogie and Elrick	Rosemount	13				13			
Garlogie and Elrick	Mastrick	13				13			
Garlogie and Elrick	Cults, Bieldside and Milltimber East	13					13		
Garlogie and Elrick	Inverurie North	12		12					
Garlogie and Elrick	Howe of Alford	12						12	
Garlogie and Elrick	Balgownie and Donmouth West	12		12					
Garlogie and Elrick	Stockethill	12				12			
Garlogie and Elrick	Froghall, Powis and Sunnybank	11				11			
Garlogie and Elrick	Torry West	11					11		
Garlogie and Elrick	Bucksburn South	10		10					
Garlogie and Elrick	Dunecht, Durris and Drumoak	9						9	
Garlogie and Elrick	Blackburn	9		9					
Garlogie and Elrick	Culter	8					8		
Garlogie and Elrick	Kintore	8		8					
Garlogie and Elrick	Hanover North	8				8			
Garlogie and Elrick	Tillydrone	8		8					
Garlogie and Elrick	Kincorth, Leggart and Nigg South	7				7			
Garlogie and Elrick	Durno-Chapel of Garioch	6		6					
Garlogie and Elrick	Banchory West	6						6	
Garlogie and Elrick	Northfield	6				6			
Garlogie and Elrick	Banchory East	6						6	
		1444	329	53	235	564	222	8	33
			0.227839	0.036704	0.16274238	0.39	0.15373961	0.00554	0.022853
			22.78393	3.67036	16.2742382	39.1	15.3739612	0.554017	2.285319

			North	North East	East	South East	South	West
Westhill Central	Bucksburn North	159		159				
Westhill Central	Garlogie and Elrick	143	143					
Westhill Central	No fixed place	124	124					
Westhill Central	Cove North	116				116		
Westhill Central	Midsocket	93			93			
Westhill Central	City Centre West	75			75			
Westhill Central	George Street	66			66			
Westhill Central	West End North	61			61			
Westhill Central	City Centre East	47			47			
Westhill Central	Summerhill	40			40			
Westhill Central	Westhill Central	39	39					
Westhill Central	Garthdee	27				27		
Westhill Central	Dyce	27		27				
Westhill Central	Hazlehead	26			26			
Westhill Central	Hanover South	23			23			
Westhill Central	Ashgrove	23			23			
Westhill Central	Seaton	23			23			
Westhill Central	Kingswells	23			23			
Westhill Central	Banchory-Devenick and Findon	22				22		
Westhill Central	Denmore	21		21				
Westhill Central	Mastrick	21			21			
Westhill Central	Balgownie and Donmouth East	20		20				
Westhill Central	Hanover North	19			19			
Westhill Central	Froghall, Powis and Sunnybank	19			19			
Westhill Central	Blackburn	19	19					
Westhill Central	Cults, Bielside and Milltimber East	19				19		
Westhill Central	Kincorth, Leggart and Nigg South	17				17		
Westhill Central	Westhill North and South	16	16					
Westhill Central	Inverurie North	15	15					
Westhill Central	Dunecht, Durris and Drumoak	15						15
Westhill Central	Inverurie South	14	14					
Westhill Central	Balgownie and Donmouth West	14		14				
Westhill Central	Rosemount	14			14			
Westhill Central	Bucksburn South	13		13				
Westhill Central	West End South	12			12			
Westhill Central	Durno-Chapel of Garioch	11	11					
Westhill Central	Ferryhill North	11			11			
Westhill Central	Old Aberdeen	10		10				
Westhill Central	Kintore	10	10					
Westhill Central	Culter	9					9	
Westhill Central	Ferryhill South	8			8			
Westhill Central	Torry West	8				8		
Westhill Central	Stockethill	8			8			
Westhill Central	Northfield	8			8			
Westhill Central	Outside UK	6	6					
Westhill Central	Offshore installation	6	6					

1520      334      69      264      620      209      9      15

0.219737   0.045   0.1736842   0.407894737   0.1375   0.006   0.01  
21.97368   4.539   17.368421   40.78947368   13.75   0.592   0.99

			North	North East	East	South East	South	West
Westhill North and South	Bucksburn North	184		184				
Westhill North and South	Garlogie and Elrick	134	134					
Westhill North and South	No fixed place	130	130					
Westhill North and South	Cove North	118				118		
Westhill North and South	City Centre West	93			93			
Westhill North and South	Midsocket	86			86			
Westhill North and South	West End North	75			75			
Westhill North and South	Westhill Central	71	71					
Westhill North and South	George Street	58			58			
Westhill North and South	City Centre East	44			44			
Westhill North and South	Hazlehead	34			34			
Westhill North and South	Dyce	34		34				
Westhill North and South	Summerhill	27			27			
Westhill North and South	Denmore	25		25				
Westhill North and South	Westhill North and South	25	25					
Westhill North and South	Seaton	24			24			
Westhill North and South	Banchory-Devenick and Findon	23				23		
Westhill North and South	Garthdee	21				21		
Westhill North and South	Ferryhill North	19			19			
Westhill North and South	Mastrick	19			19			
Westhill North and South	Balgownie and Donmouth East	17		17				
Westhill North and South	Kingswells	16			16			
Westhill North and South	Hanover South	16			16			
Westhill North and South	Dunecht, Durris and Drumoak	14						14
Westhill North and South	Inverurie South	14	14					
Westhill North and South	Balgownie and Donmouth West	14		14				
Westhill North and South	Cults, Bielside and Milltimber East	13				13		
Westhill North and South	Stockethill	12			12			
Westhill North and South	Blackburn	12	12					
Westhill North and South	Inverurie North	12	12					
Westhill North and South	Froghall, Powis and Sunnybank	11			11			
Westhill North and South	Braeside, Mannofield, Broomhill and Seafield North	11			11			
Westhill North and South	Kincorth, Leggart and Nigg South	11				11		
Westhill North and South	Ashgrove	10			10			
Westhill North and South	Durno-Chapel of Garioch	9	9					
Westhill North and South	Culter	9					9	
Westhill North and South	Barrahill	8	8					
Westhill North and South	Torry West	8				8		
Westhill North and South	Hanover North	8			8			
Westhill North and South	Cults, Bielside and Milltimber West	8				8		
Westhill North and South	Rosemount	7			7			
Westhill North and South	Banchory West	7						7
Westhill North and South	Ferryhill South	7			7			
Westhill North and South	Old Aberdeen	6		6				
Westhill North and South	Northfield	6			6			
Westhill North and South	Howe of Alford	6						6
Westhill North and South	Kintore	6		6				

1522      360      61      280      583      202      9      27

0.236531 0.040079 0.183968 0.383049 0.13272 0.005913 0.01774  
23.65309 4.007884 18.39685 38.30486 13.27201 0.591327 1.773982

Internal	North	North East	East	South East	South	West
22.8%	4.1%	17.3%	39.4%	14.1%	0.6%	1.7%



## **B. Systra Modelling Report**

# WESTHILLOPTION TESTING

## DUNECHT ESTATES TRAFFIC MODELLING

IDENTIFICATION TABLE	
Client/Project owner	ECS Transport
Project	Westhill
Title of Document	Dunecht Estates Option Testing – Future Year Traffic Modelling
Type of Document	Technical Note
Date	11/03/2019
Reference number	GB01T18J35/1
Number of pages	24

## 1. INTRODUCTION

### 1.1 Background

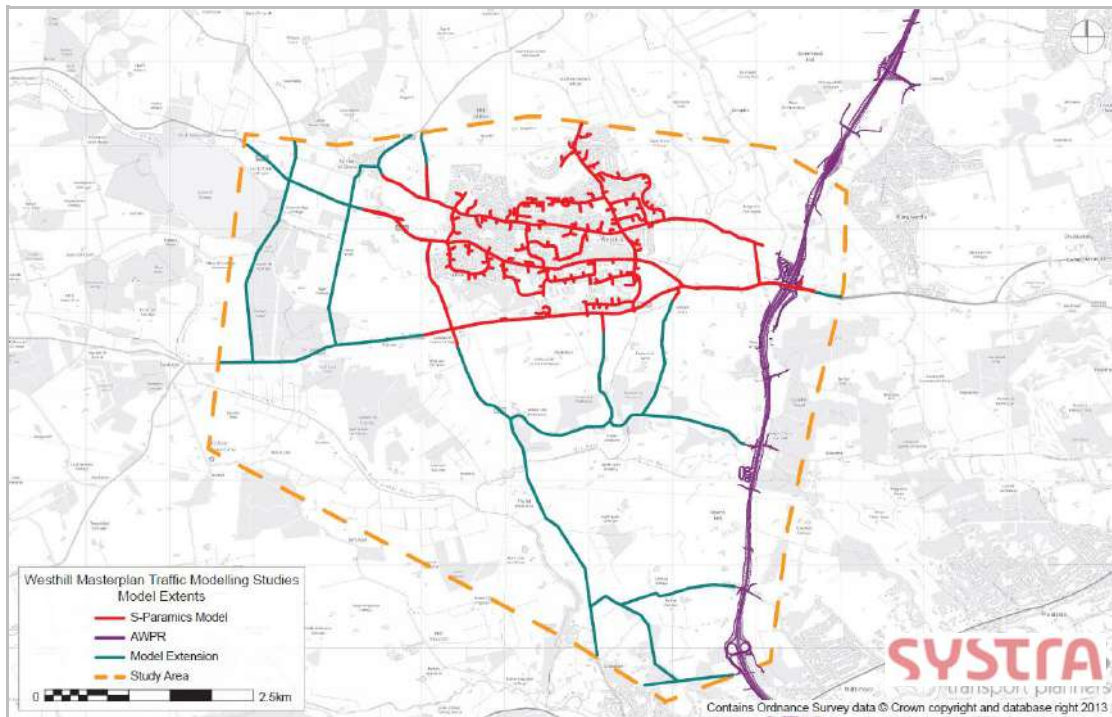
- 1.1.1 In 2019, SYSTRA Limited (SYSTRA) was commissioned by ECS Transport (ECS) to undertake microsimulation traffic modelling to assess the potential traffic impacts of the generated traffic associated with the proposed housing at Dunecht Estate, Westhill.
- 1.1.2 The study involved using the 2023 Future Year traffic model developed for Aberdeenshire Council (AC) which included local traffic growth associated with a combination of committed developments plus those included in the council's Local Development Plan (LDP), plus strategic traffic derived from the Aberdeen Sub Area Model (ASAM) regional model.

## 1.2 2023 Future Year Microsimulation Model

1.2.1 The 2023 Future Year microsimulation traffic model was developed in S-Paramics microsimulation software, and covers Westhill and its environs plus a section of the AWPR. The model covers the following weekday AM and PM peak periods:

- AM Peak Period 06:00 – 10:00
- PM Peak Period 15:00 – 19:00

1.2.2 The extent of the model area is shown in Figure 1.1.



**Figure 1.1: Extent of the 2023 Future Year Road Network Description**

## 1.3 Scope of Assessment

1.3.1 This Note summarises the results of the traffic assessment and considers the potential future year traffic impact, both within Westhill and at the AWPR/A944 Kingswell junction.

1.3.2 The assessment was undertaken using the Westhill S-Paramics Model (2014), growthed to a 2023 Future Year that includes both local (LDP) and strategic (ASAM14) traffic growth.

1.3.3 The assessment was undertaken using the revised ASAM14 model cordon.

1.3.4 For clarity, the assessment excludes the potential impacts associated with Aberdeen City Council's recent decision to grant planning permission for the relocation of Aberdeen Football Club to Kingsford, Westhill.

## 2. WESTHILL MASTERPLAN

### 2.1 Overview

2.1.1 As alluded to earlier, the ASAM14 regional model has recently been updated and now reflects more up-to-date build-out assumptions around the expansion of Westhill and wider Aberdeenshire.

### 2.2 Local Traffic Growth (Committed and LDP)

2.2.1 The S-Paramics microsimulation traffic modelling takes cognisance of both committed development currently in the planning process, and a number of development sites identified in the council's LDP.

2.2.2 Table 2.1 summarises the anticipated traffic growth to 2023 associated with each of the developments for both AM and PM peak periods.

**Table 2.1 : Committed and LDP Traffic Growth Westhill to 2023**

Development	LDP Ref.	AM Peak Period (06:00 - 10:00)		PM Peak Period (15:00 - 19:00)	
		Arrivals	Departures	Arrivals	Departures
<u>Committed Developments</u>					
Silvertrees	Com.	315	108	106	309
Arnhall Phase 2 Extension	Com.	293	38	47	299
Broadshade Phase 1	Com.	57	139	172	118
Subsea 7 Extension	Com.	140	15	20	143
<u>LDP Phase 1 Developments</u>					
Broadshade Phase 2	H1	44	106	131	90
Ben View	H2	5	11	14	9
Arnhall Phase 3	E1	1,873	206	268	1,912
<b>Total</b>		<b>2,727</b>	<b>623</b>	<b>758</b>	<b>2,880</b>

2.2.3 Table 2.1 suggests that there is potentially a large volume of committed and LDP development traffic to be added to the background traffic growth. It is anticipated the developments will add an additional 3,350 trips in the AM peak period and 3,638 trips in the PM peak period.

### 2.3 Strategic Traffic Growth (ASAM14)

2.3.1 To capture the potential changes in strategic traffic levels, a cordon matrix of the ASAM14 regional model was requested from colleagues in SYSTRA's Edinburgh office. SYSTRA Edinburgh (separately) develop and maintain the regional model on behalf of regional transport authority NEStran.

2.3.2 ASAM is a higher-tier strategic traffic model, developed to provide a forecasting tool for Aberdeen City and Aberdeenshire Councils. The current version, ASAM14, is the only tool available to produce forecast effects of the following wide-scale measures:

- Aberdeen Western Peripheral Route (AWPR)
- Public Transport (Bus and Rail) Improvements
- Aberdeen City and Shire Local Development Plans/Structure Plan

2.3.3 Future year cordon trip matrices for the ASAM Base Year, in this case 2014, and the future year scenarios 2022, and 2032 were provided. Although not aligning perfectly with the 2023 forecast year for the Aberdeenshire Council LDP, the 2022 forecast year for ASAM was considered sufficiently close to allow interpretation.

- 2.3.4 It should be noted that ASAM simulates traffic for an AM and PM peak hour (1hr) only, whereas the S-Paramics microsimulation model reflects a 4hr morning and evening peak period. In addition, the ASAM trip matrices reflect *Light* and *Heavy* vehicle types only, whereas the S-Paramics microsimulation models simulate *Car*, *LGV*, *OGV1*, *OGV2*, and *Bus/Coach* vehicle types. Consequently, a degree of matrix manipulation was required to expand the ASAM matrices for use in S-Paramics.
- 2.3.5 The internal to external traffic movements from the ASAM cordon matrix were used to derive the predicted changes in strategic traffic movements arising from the opening of the AWPR. The cordon differences between the 2014 Base and 2022 Future Year ASAM trip matrices were applied to the strategic movements in the Future Year trip microsimulation model trip matrices. The net differences were applied as opposed to the absolute values.
- 2.3.6 In summary, the 2023 Future Year trip matrices informing the microsimulation model included the addition of both committed and LDP developments, plus strategic matrix changes derived from cordon information exported from the ASAM14 regional model.

### 3. OPTION TESTING

#### 3.1 Overview

- 3.1.1 ECS have requested SYSTRA to undertake option testing of a proposed residential development of up to 2,550 units, to the West of Westhill.
- 3.1.2 ECS have requested that the following option tests are undertaken using the 2023 LDP model:
  - Test 1 - 2023 LDP model & 500 units (with & without traffic signals & left slip at AWPR junction)
  - Test 2 - 2023 LDP model & 1000 units (with & without traffic signals & left slip at AWPR junction)
  - Test 3 - 2023 LDP model & 1500 units (with & without traffic signals & left slip at AWPR junction)
  - Test 4 - 2023 LDP model & 2000 units (with & without traffic signals & left slip at AWPR junction)
  - Test 5 - 2023 LDP model & 2550 units (with & without traffic signals & left slip at AWPR junction)
- 3.1.3 ECS have, at present requested that only Tests 1 and 5 are undertaken
- 3.1.4 ECS have provided SYSTRA with all trip generation and distribution associated with the proposed development.

#### 3.2 Trip Generation

- 3.2.1 Table 3.1 below presents the AM and PM trip generation provided by ECS.

**Table 3.1 : Dunecht Estate Housing Trip Generation**

Development	AM Peak Period (06:00 - 10:00)		PM Peak Period (15:00 - 19:00)	
	Arrivals	Departures	Arrivals	Departures
Test 1 - 500 Units	210	480	508	354
Test 2 - 2550 Units	1069	2447	2590	1803

### 3.3 Trip Distribution

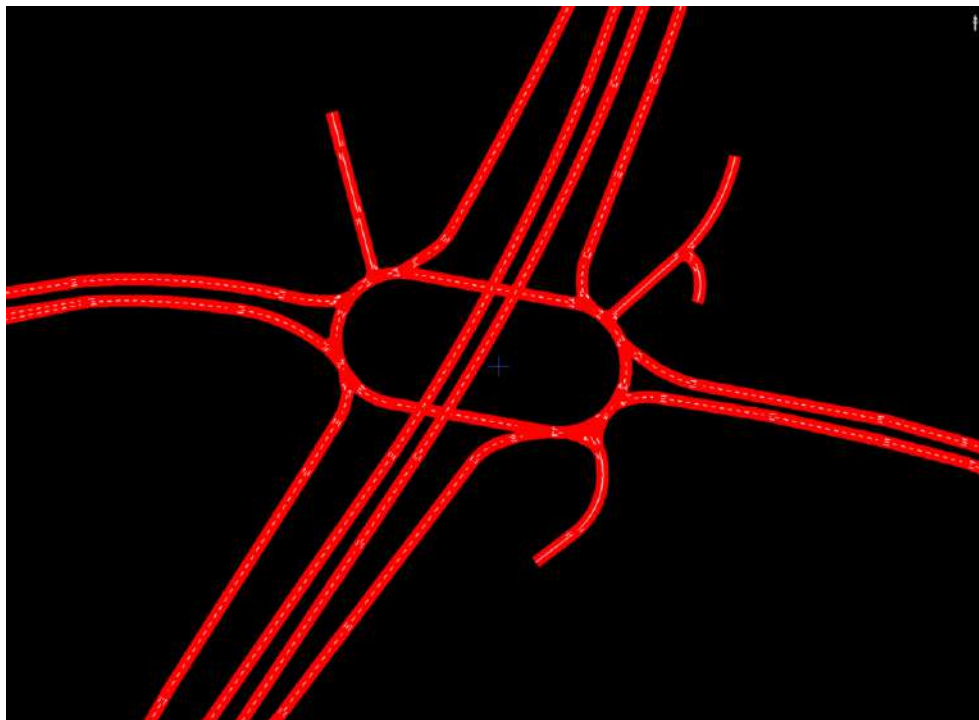
3.3.1 Table 3.2 presents the AM and PM trip distribution which was supplied by ECS.

**Table 3.2 : Dunecht Estate Housing Trip Generation**

Direction	Proportion
Internal (Distribution as per new housing at Cairnie Cres.)	22.8%
North (Westhill Dr / B979 North as per existing proportions)	4.1%
North East (AWPR North)	17.3%
East (A944 Aberdeen)	39.4%
South East (AWPR South)	14.1%
South (B979 South)	0.6%
West (A944 West)	1.7%
Total	100.0%

### 3.4 Reference Case: 2023 Committed + LDP

3.4.1 Figure 3.1 illustrates the 2023 road network description for the AWPR/A944 Kingswell South junction. The new junction forms the grade-separated interchange between the AWPR and A944 with the new Aberdeen Bypass passing over the at-grade roundabout.



**Figure 3.1: AWPR/A944 Kingswell South Junction**

3.4.2 The trip matrices were assigned to the road network for both AM and PM peak periods, with the outcome noted in the following sections.



## AM Peak Period

- 3.4.3 The results of the AM peak traffic modelling suggest that due to the volume of traffic on the A944, AWPR traffic will have difficulty in exiting the off-slip roads.
- 3.4.4 Figure 3.2 is a snapshot taken from the traffic model and illustrates the forecast situation at 09:00 in the morning.



**Figure 3.2 : AWPR/A944 Junction – 2023 Com + LDP (09:00)**

- 3.4.5 The modelling predicts significant queues forming on the off-slips from the AWPR. Without intervention (junction improvements), the volume of traffic on the roundabout leaves very few gaps in the circulating traffic stream for AWPR traffic to merge.

## PM Peak Period

- 3.4.6 A similar situation is predicted in the PM peak, with queueing predicted on both off-slips. Figure 3.3 shows the impact in the PM peak at 18:00 in the evening.



**Figure 3.3 : AWPR/A944 Junction – 2023 Com + LPD (17:00)**

- 3.4.7 Again, the results predict significant queues forming on the off-slips from the AWPR. The volume of traffic on the roundabout leaves very few gaps for AWPR traffic to merge. Traffic is predicted to block back onto the AWPR mainline.

### **3.5 Reference Case: 2023 Committed + LDP + Partial Signalisation**

- 3.5.1 A sensitivity test was run which considered partial signalisation of the roundabout, thereby allowing better management of the AWPR traffic. Figure 3.4 illustrates the junction configuration with the addition of signalisation of the northbound and southbound AWPR off slips.



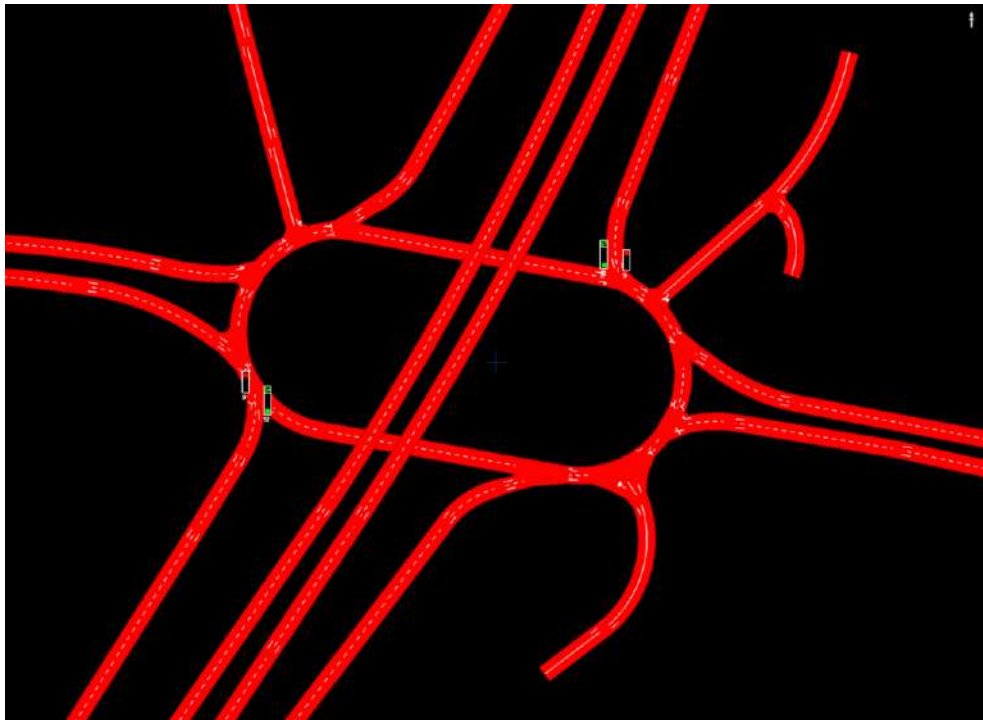


Figure 3.4 : AWPR/A944 Kingswell South Junction with Partial Signalisation

3.5.2 The outcome of the sensitivity test is summarised in the following sections.



## AM Peak Period

3.5.3 Figure 3.5 below shows a snapshot taken from the model at 09:00 in the morning.



**Figure 3.5 : AWPR/A944 Junction – 2023 Com + LDP + Partial Signalisation (09:00)**

3.5.4 With the introduction of traffic signal control of the AWPR off-slips, the operation of the junction at 09:00 is forecast to be much improved with queuing on the slip road much reduced compared to the scenario with no traffic signals.

## PM Peak Period

3.5.5 Figure 3.6 shows a snapshot of the model taken at 18:00 in the evening.



Figure 3.6 : AWPR/A944 Junction – 2023 Com + LDP + Partial Signalisation (18:00)

3.5.6 Figure 3.6 shows that at 18:00 in the evening, the operation of the junction is forecast to be much improved with queuing on the slip road reduced compared to the previous test.

### 3.6 Test 1: 2023 Committed + LDP+500 Units at Dunecht (No AWPR traffic signals)

3.6.1 The first option test to be run was to add 500 units at Dunecht Estates to the Reference Case model with the 2023 Committed and LDP developments with no traffic signals at the AWPR junction.

#### AM Peak Period

3.6.2 Similar to the 2023 Reference Case, the results of the modelling again suggest that due to the volume of traffic on the A944, AWPR traffic will have difficulty in exiting the off-slip roads.

3.6.3 Figure 3.7 is a snapshot taken from the traffic model and illustrates the forecast situation at 09:00 in the morning.

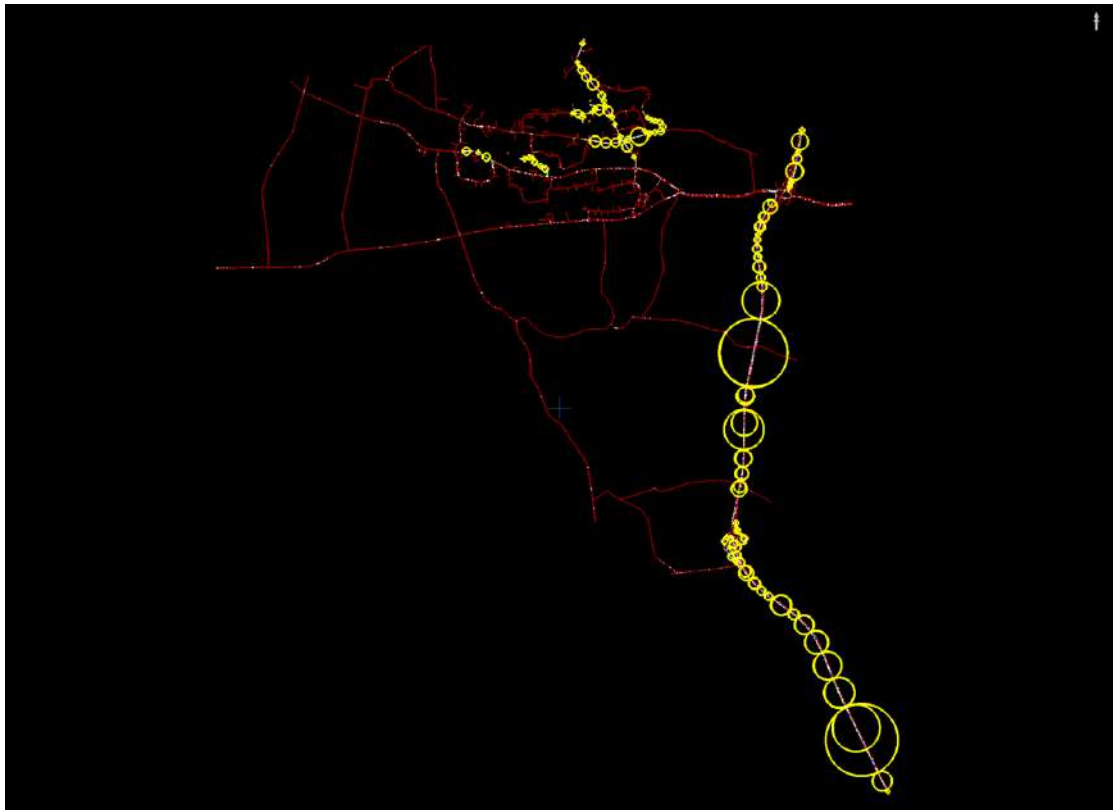


Figure 3.7 : AWPR/A944 Junction – 2023 Com + LDP + Dunecht 500 units (09:00)

- 3.6.4 Again, the modelling predicts significant queues forming on the off-slips from the AWPR. Without intervention (junction improvements) the volume of traffic on the roundabout leaves very few gaps in the circulating traffic stream for the AWPR to merge.
- 3.6.5 Significant queues are also predicted on Westhill Drive, due to congestion at the junction with the A944.

PM Peak Period

- 3.6.6 A similar situation is predicted in the PM peak, with the results of the modelling suggesting that due to the volume of traffic on the A944, AWPR traffic will have difficulty in exiting the off-slip roads.
- 3.6.7 Figure 3.8 shows the impact in the PM peak at 18:00 in the evening.





Figure 3.8 : AWPR/A944 Junction – 2023 Com + LDP + Dunecht 500 units (18:00)

3.6.8 Again, the modelling predicts significant queues forming on the off-slips from the AWPR. Without intervention (junction improvements) the volume of traffic on the roundabout leaves very few gaps in the circulating traffic stream for the AWPR to merge.

3.6.9 Queues are also predicted on Westhill Drive, due to congestion at the junction with the A944.

### 3.7 Test 1: 2023 Committed + LDP+500 Units at Dunecht + Partial Signalisation + Left Slip from AWPR South to A944 West

#### AM Peak Period

3.7.1 A test was run which considered a left slip lane from the AWPR South to the A944 West and partial signalisation of the roundabout, thereby allowing better management of the AWPR traffic.

3.7.2 Figure 3.9 shows a snapshot taken from the model at 09:00 in the morning.



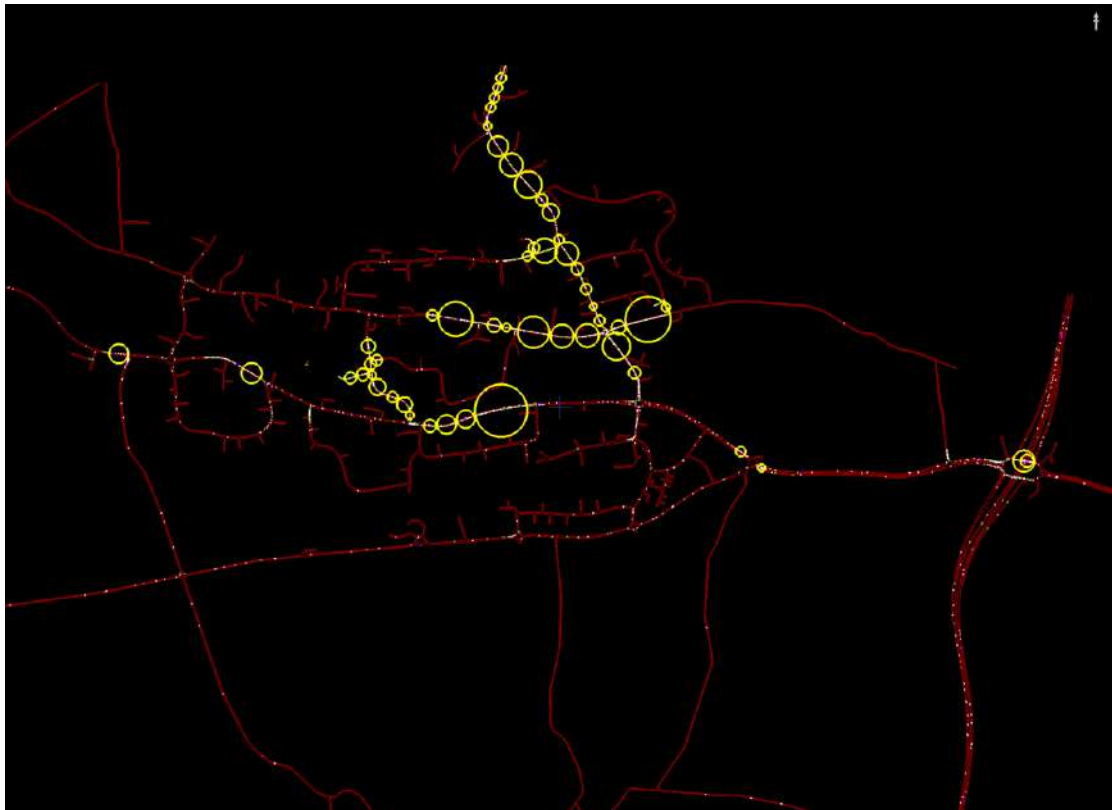


Figure 3.9 : AWPR/A944 Junction – 2023 Com + LDP + Dunecht 500 units + partial signalisation + Left Slip (09:00)

- 3.7.3 With the introduction of the left slip lane and traffic signal control of the AWPR off-slips, the operation of the junction is forecast to be much improved with queuing on the slip road much reduced compared to the test with no left slip and signalisation. The main queues are now localised on the A944
- 3.7.4 Significant queues are also predicted on Westhill Drive, due to congestion at the junction with the A944.

PM Peak Period

- 3.7.5 Without the junction intervention, the results of the modelling suggested that due to the volume of traffic on the A944, AWPR traffic will have difficulty in exiting the off-slip roads.
- 3.7.6 Figure 3.10 shows the impact in the PM peak at 18:00 in the evening with interventions included.





Figure 3.10 : AWPR/A944 Junction – 2023 Com + LDP + Dunecht 500 units + Partial Signalisation + Left Slip (18:00)

3.7.7 Figure 3.10 shows that at 18:00 in the evening , the operation of the AWPR junction is forecast to be much improved with queuing on the slip road reduced compared to the scenario with no left slip lane and traffic signals.

3.7.8 Significant queues are predicted on Endeavour Drive and into Tesco in the PM peak.

### 3.8 Test 1: 2023 Committed + LDP+500 Units at Dunecht + Partial Signalisation only

#### AM Peak Period

3.8.1 A further test was subsequently run which considered partial signalisation of the roundabout only, thereby allowing better management of the AWPR traffic.

3.8.2 Figure 3.11 shows a snapshot taken from the model at 09:00 in the morning.



Figure 3.11 : AWPR/A944 Junction – 2023 Com + LDP + Dunecht 500 units + partial signalisation (09:00)

- 3.8.3 With the introduction of traffic signal control of the AWPR off-slips, the operation of the junction is again forecast to be much improved with queuing on the slip road much reduced compared to the test with no signalisation. The main queues are now localised on the A944, similar to the results with the inclusion of the left slip lane
- 3.8.4 Significant queues are also predicted on Westhill Drive, due to congestion at the junction with the A944.

PM Peak Period

- 3.8.5 A similar situation is predicted in the PM peak, with the results of the modelling suggesting that due to the volume of traffic on the A944, AWPR traffic will have difficulty in exiting the off-slip roads.
- 3.8.6 Figure 3.12 shows the impact in the PM peak at 18:00 in the evening with the introduction of traffic signals.





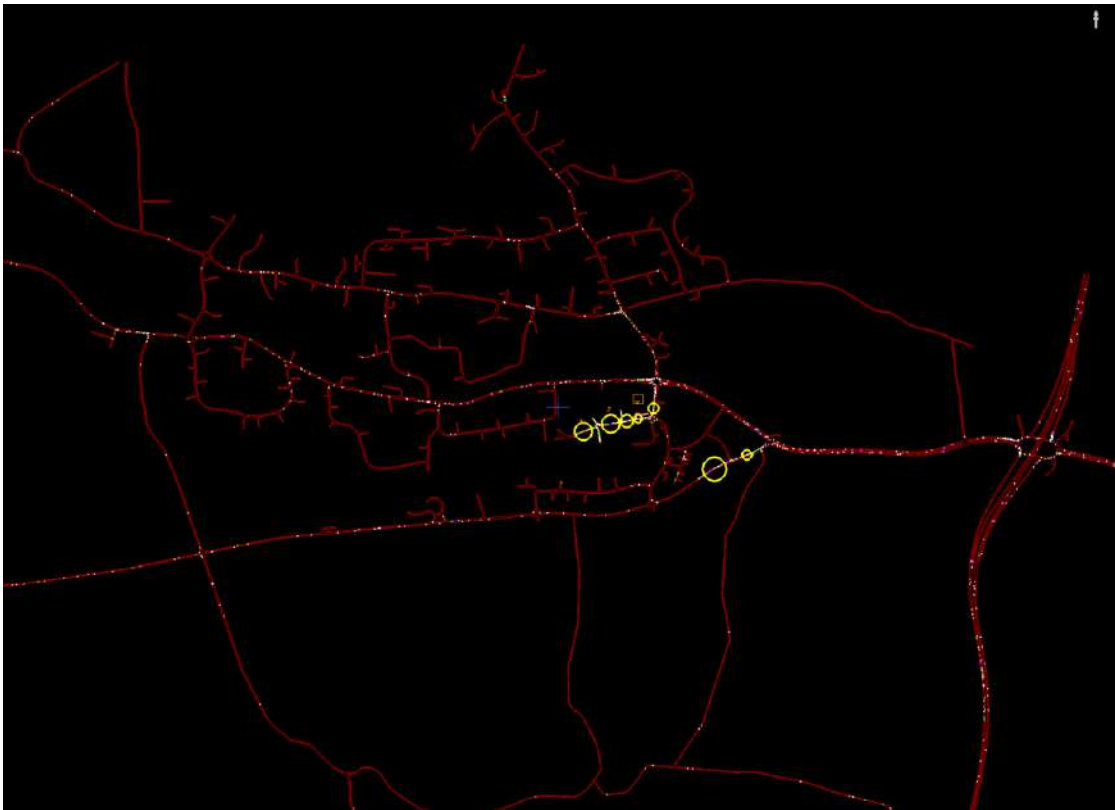


Figure 3.12 : AWPR/A944 Junction – 2023 Com + LDP + Dunecht 500 units + Partial Signalisation (18:00)

3.8.7 Figure 3.12 shows that at 18:00 in the evening , the operation of the AWPR junction is forecast to be much improved with queuing on the slip road reduced compared to the scenario with no traffic signals.

3.8.8 Queues are again predicted on Endeavour Drive and into Tesco in the PM peak.

### 3.9 Test 5: 2023 Committed + LDP+2550 Units at Dunecht (No AWPR traffic signals)

3.9.1 This option was to add 2550 units at Dunecht Estates to the Reference Case model with the 2023 Committed and LDP developments with no traffic signals at the AWPR junction.

3.9.2 The B9119 was also upgraded to a primary route in this test to try and attract more traffic to use this road, and relieve the pressure on the A944.

#### AM Peak Period

3.9.3 Similar to the earlier tests, the results of the modelling again suggest that due to the volume of traffic on the A944, AWPR traffic will have difficulty in exiting the off-slip roads.

3.9.4 Figure 3.13 is a snapshot taken from the traffic model and illustrates the forecast situation at 09:00 in the morning.

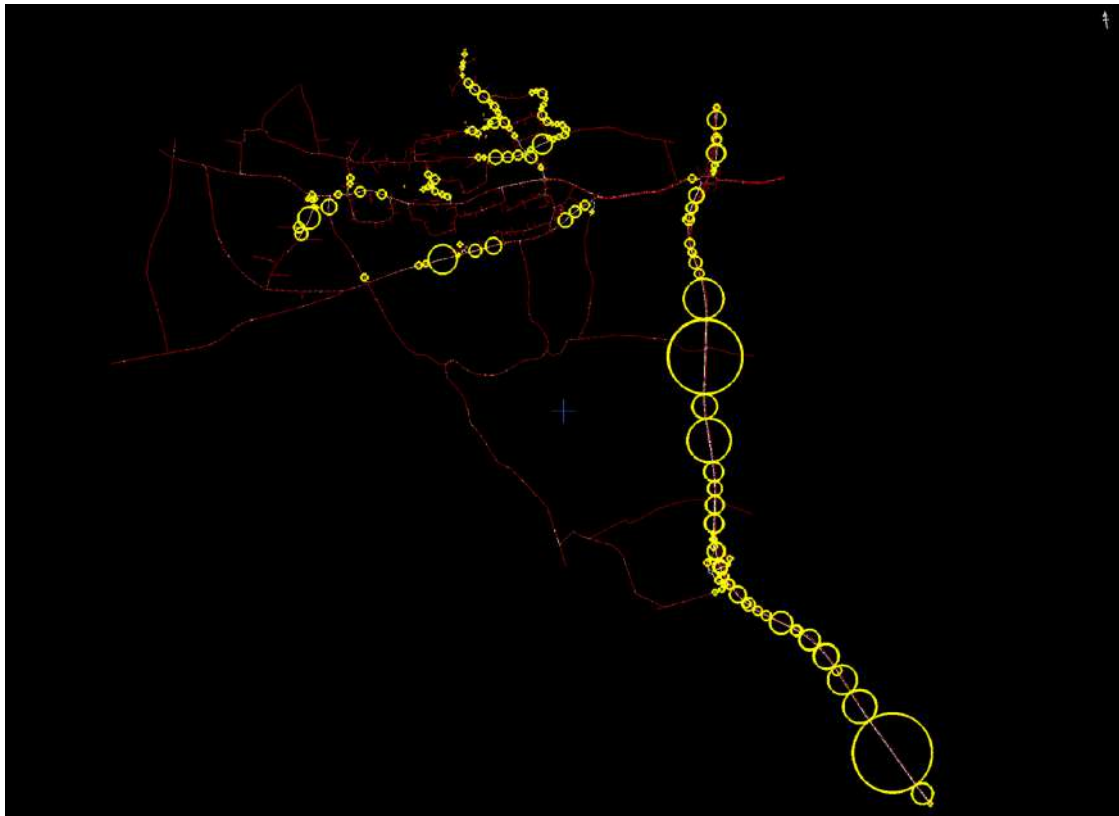


Figure 3.13 : AWPR/A944 Junction – 2023 Com + LDP + Dunecht 2550 units (09:00)

- 3.9.5 Again, the modelling predicts significant queues forming on the off-slips from the AWPR. Without intervention (junction improvements) the volume of traffic on the roundabout leaves very few gaps in the circulating traffic stream for the AWPR to merge.
- 3.9.6 Significant queues are also predicted on Westhill Drive, due to congestion at the junction with the A944.

PM Peak Period

- 3.9.7 A similar situation is predicted in the PM peak, with the results of the modelling suggesting that due to the volume of traffic on the A944, AWPR traffic will have difficulty in exiting the off-slip roads.
- 3.9.8 Figure 3.14 shows the impact in the PM peak at 18:00 in the evening.



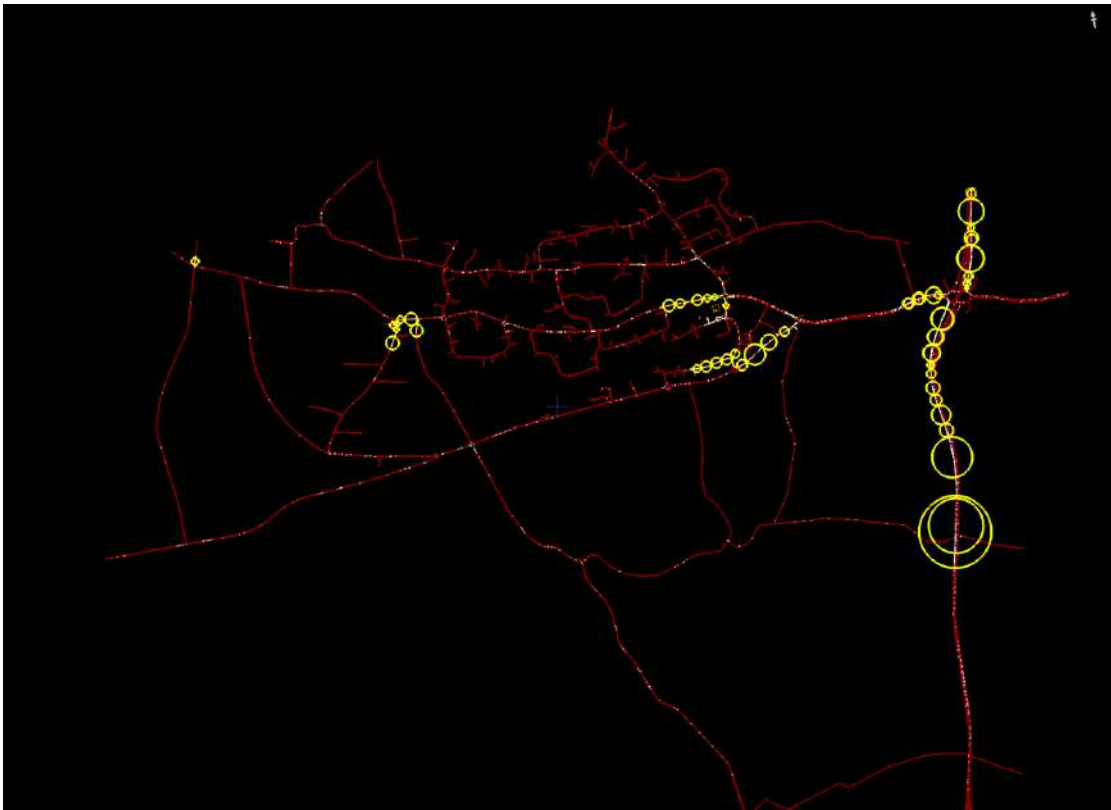


Figure 3.14 : AWPR/A944 Junction – 2023 Com + LDP + Dunecht 2550 units (18:00)

- 3.9.9 Again, the modelling predicts significant queues forming on the off-slips from the AWPR. Without intervention (junction improvements) the volume of traffic on the roundabout leaves very few gaps in the circulating traffic stream for the AWPR to merge.
- 3.9.10 Significant queues are also predicted on Westhill Drive, due to congestion at the junction with the A944.

**3.10 Test 5: 2023 Committed + LDP+2550 Units at Dunecht + Partial Signalisation + Left Slip from AWPR South to A944 West**

AM Peak Period

- 3.10.1 Again, a test was run which considered a left slip lane from the AWPR South to the A944 West and signalisation of the roundabout, thereby allowing better management of the AWPR traffic.
- 3.10.2 Figure 3.15 shows a snapshot taken from the model at 09:00 in the morning.



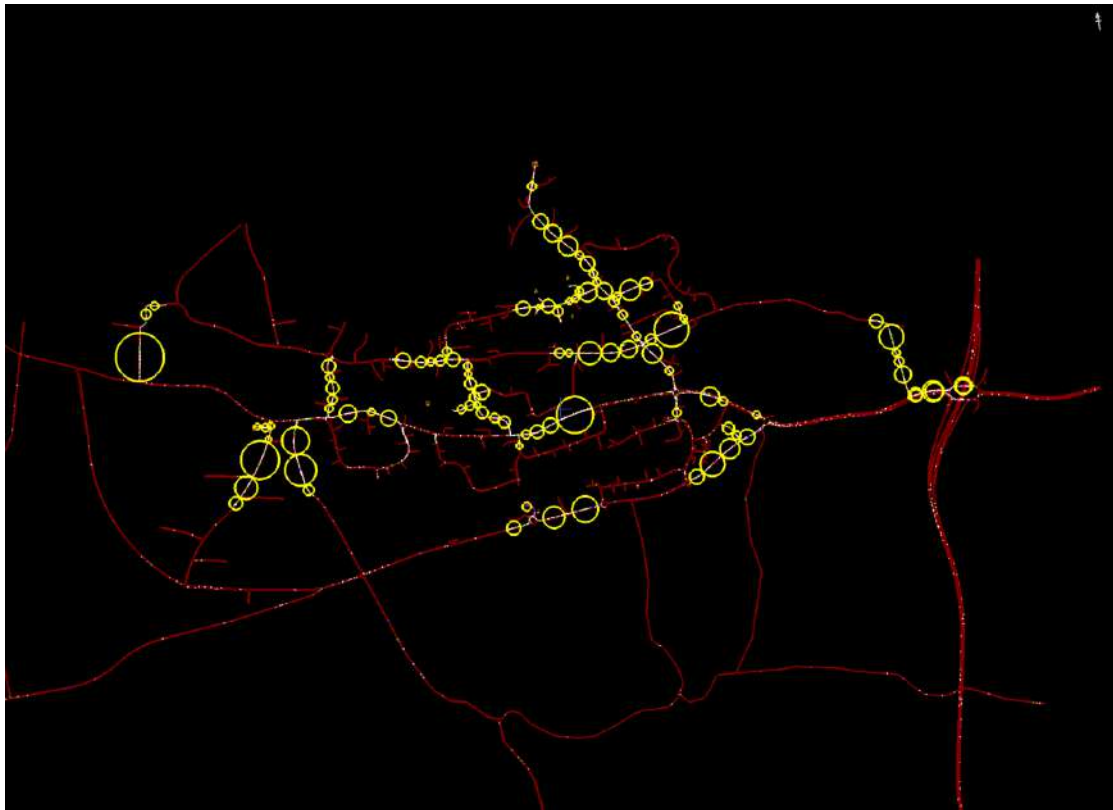


Figure 3.15 : AWPR/A944 Junction – 2023 Com + LDP + Dunecht 2550 units + partial signalisation + Left Slip (09:00)

- 3.10.3 With the introduction of the left slip lane and traffic signal control of the AWPR off-slips, the operation of the junction is forecast to be much improved with queuing on the slip road much reduced compared to the test with no left slip and signalisation. The main queues are now localised on the A944
- 3.10.4 Significant queues are also predicted on Westhill Drive, due to congestion at the junction with the A944.

PM Peak Period

- 3.10.5 Figure 3.16 shows the impact in the PM peak at 18:00 in the evening.



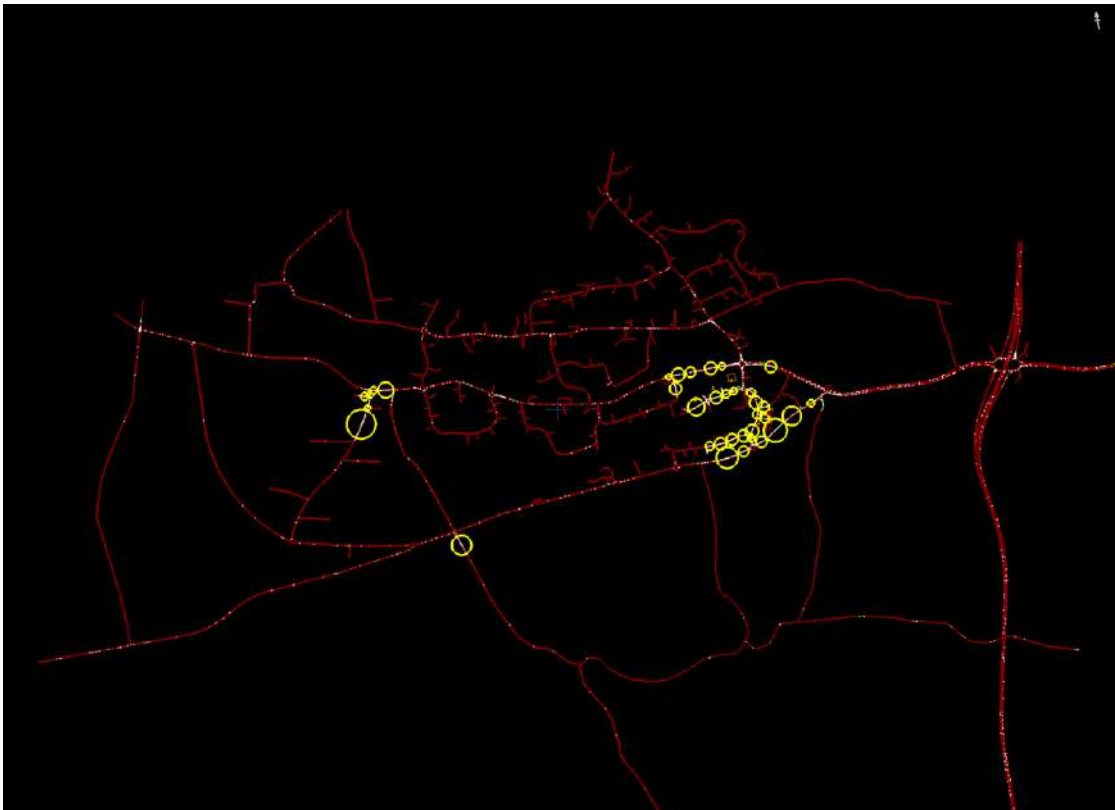


Figure 3.16 : AWPR/A944 Junction – 2023 Com + LDP + Dunecht 2550 units + Partial Signalisation + Left Slip (18:00)

3.10.6 Figure 3.16 shows that at 18:00 in the evening , the operation of the AWPR junction is forecast to be much improved with queuing on the slip road reduced compared to the scenario with no left slip lane and traffic signals.

3.10.7 Queues are also predicted on Endeavour Drive and into Tesco in the PM peak.

**3.11 Test 1: 2023 Committed + LDP+500 Units at Dunecht + Partial Signalisation only**

AM Peak Period

3.11.1 A final test was run which considered signalisation of the AWPR roundabout, thereby allowing better management of the AWPR traffic.

3.11.2 Figure 3.17 shows a snapshot taken from the model at 09:00 in the morning.



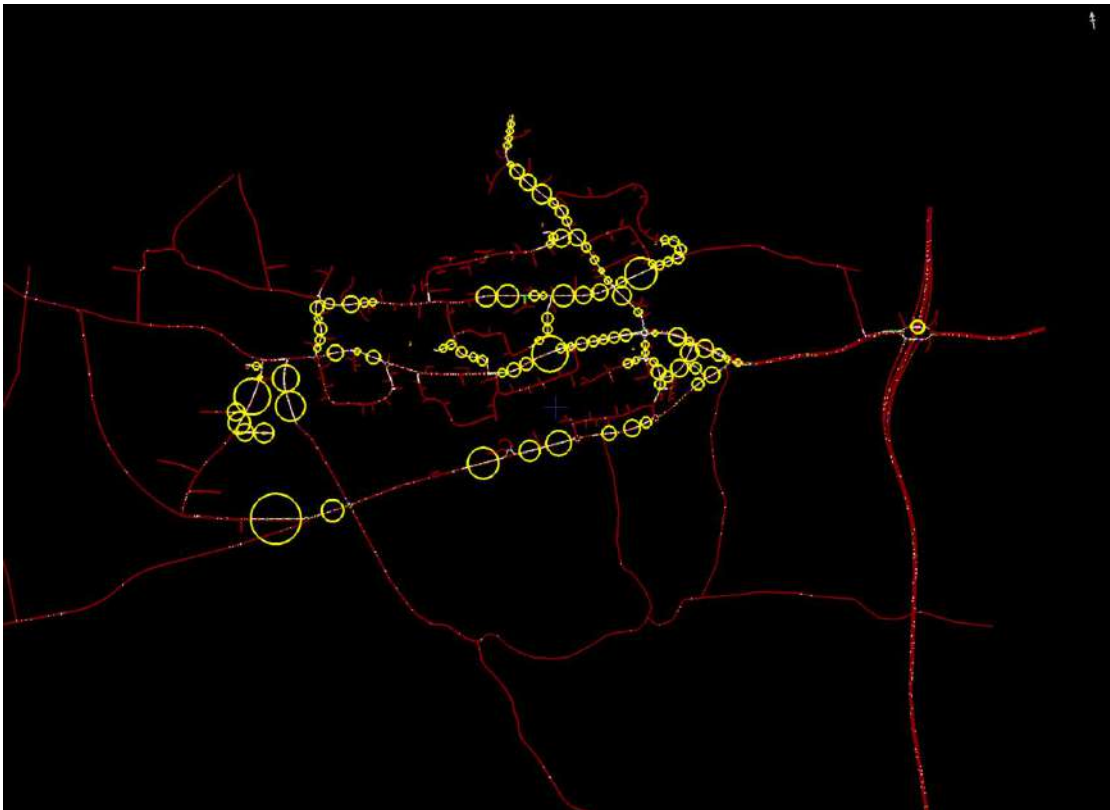


Figure 3.17 : AWPR/A944 Junction – 2023 Com + LDP + Dunecht 500 units + partial signalisation (09:00)

- 3.11.3 With the introduction of traffic signal control of the AWPR off-slips, the operation of the junction is again forecast to be much improved with queuing on the slip road much reduced compared to the test with no signalisation. The main queues are now localised on the A944, similar to the results with the inclusion of the left slip lane
- 3.11.4 Significant queues are also predicted on Westhill Drive, due to congestion at the junction with the A944.

PM Peak Period

- 3.11.5 A similar situation is predicted in the PM peak, with the results of the modelling suggesting that due to the volume of traffic on the A944, AWPR traffic will have difficulty in exiting the off-slip roads.
- 3.11.6 Figure 3.18 shows the impact in the PM peak at 18:00 in the evening with the introduction of traffic signals.





Figure 3.18 : AWPR/A944 Junction – 2023 Com + LDP + Dunecht 500 units + Partial Signalisation (18:00)

- 3.11.7 Figure 3.18 shows that at 18:00 in the evening , the operation of the AWPR junction is forecast to be much improved with queuing on the slip road reduced compared to the scenario with no traffic signals.
- 3.11.8 Significant queues are still predicted on Endeavour Drive and into Tesco in the PM peak.



## 4. ANALYSIS OF MODEL RESULTS

### 4.1 Average Journey Times

4.1.1 Average journey times for all vehicles in the network have been pulled out for each of the options in both the AM and PM peak periods. The results are presented below in Table 4.1.

**Table 4.1 : Average Modelled Journey Times**

Scenario	AM Average	PM Average
2023 Ref Case (No Signals)	00:16:54	00:07:13
2023 Ref Case (Signals)	00:07:57	00:06:21
Test 1 2023 Ref Case & 500 Dunecht (No Signals)	00:19:48	00:09:20
Test 1 2023 Ref Case & 500 Dunecht (Signals & Left Slip)	00:09:10	00:07:53
Test 1 2023 Ref Case & 500 Dunecht (Signals only)	00:09:03	00:07:40
Test 5 2023 Ref Case & 2550 Dunecht (No Signals)	00:26:32	00:18:35
Test 5 2023 Ref Case & 2550 Dunecht (Signals & Left Slip)	00:15:20	00:12:37
Test 5 2023 Ref Case & 2550 Dunecht (No Signals)	00:15:27	00:12:22

4.1.2 The results in Table 4.1 show that in each of the options without traffic signals at the AWPR junction, there are considerable delays predicted by the modelling, particularly in the AM peak. Whilst the options with the Dunecht development with signals still show an increase in journey time, these are mainly down to congestion along the A944 and B9119 corridors.

4.1.3 The results show that the left slip has minimal benefit in each of the tests, with the traffic signals only option showing similar results.

### 4.2 Summary of Traffic Flows

4.2.1 Table 4.2 and Table 4.3 below present the peak period link flows in the AM and PM peaks on the A944 and B9119 in both directions and compares these to the number of strategic trips in each direction. For the purposes of this report strategic trips are defined as those that route to and from the A944 West to and from the AWPR North, A944 East and AWPR South.

**Table 4.2 : Modelled Link Flows (AM Peak)**

Scenario	A944 EB	A944 WB	B9119 EB	B9119 WB	Strategic EB	Strategic WB
2023 Ref Case (Signals)	4898	4465	1500	2288	809	97
Test 1 2023 Ref Case & 500 Dunecht (Signals only)	5208	4595	1507	2241		
Test 5 2023 Ref Case & 2550 Dunecht (Signals only)	6022	4379	1775	3350		

4.2.2 Table 4.2 above shows that the number of strategic trips is relatively low when compared against the link flows on the A944 and B9119, suggesting that the majority of trips originate and destinate within Westhill.

**Table 4.3 : Modelled Link Flows (PM Peak)**

Scenario	A944 EB	A944 WB	B9119 EB	B9119 WB	Strategic EB	Strategic WB
2023 Ref Case (Signals)	5442	4459	2280	1801	191	312
Test 1 2023 Ref Case & 500 Dunecht (Signals only)	5697	4839	2314	1830		
Test 5 2023 Ref Case & 2550 Dunecht (Signals only)	6423	5346	2532	2900		

4.2.3 Table 4.3 again shows that the number of strategic trips is relatively low when compared against the link flows on the A944 and B9119, suggesting that the majority of trips originate and destinate within Westhill.





## 5. SUMMARY AND FINDINGS

### 5.1 Summary

- 5.1.1 In 2017, SYSTRA was commissioned by Aberdeenshire Council (AC) to undertake microsimulation traffic modelling to assess the potential traffic impacts of the development traffic associated with the proposed Westhill Masterplan. The study involved developing a 2023 Future Year traffic model which included local traffic growth associated with a combination of committed developments plus those included in the council's Local Development Plan (LDP), plus strategic traffic derived from the Aberdeen Sub Area Model (ASAM) regional model.
- 5.1.2 The outcome from the traffic modelling suggests that partial signalisation of the AWPR off-slips would help mitigate against the predicted level of traffic growth coming from the revised ASAM14 regional model.
- 5.1.3 Subsequently, In 2019, SYSTRA was commissioned by ECS to undertake microsimulation traffic modelling to assess the potential traffic impacts of the generated traffic associated with the proposed housing at Dunecht Estate, Westhill.
- 5.1.4 The study involved using the 2023 Future Year traffic model developed for Aberdeenshire Council (AC) to test the following options
- Test 1 - 2023 LDP model & 500 units (with & without traffic signals & left slip at AWPR junction)
  - Test 5 - 2023 LDP model & 2550 units (with & without traffic signals & left slip at AWPR junction)
- 5.1.5 The results of the modelling predict that the previously tested traffic signals at the AWPR off slips will mitigate against any delay at that location, however delays are forecast within Westhill on both the A944 and B9119 corridors.

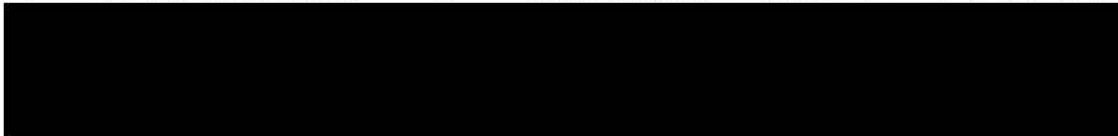
## **APPENDIX 5**

### **Westhill Capacity Study Critical Analysis**



## Westhill Capacity Study Update 2014

2 September 2019 at 18:13



Hi [redacted]

Thank you for taking the opportunity to meeting with us last week and for the helpful update and insight that you provided around the key considerations that have informed the Draft Proposed LDP.

One of the points that we discussed was the Westhill Capacity Study Update (2014) and the concerns that we had raised regarding this document. I have attached a copy of this and the covering letter which was sent back in August 2017 (please disregard the 'DRAFT' watermark). We received no formal response but were assured that the document had no status and would not be used to inform future decisions relating to the growth of Westhill. As mentioned when we met, we are concerned to see some references to this report now being made.

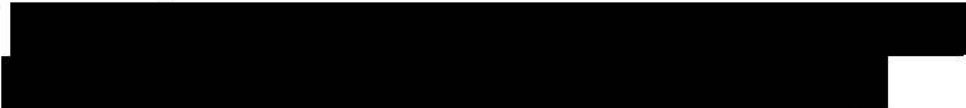
Hopefully this is informative and we'd be more than happy to meet again to discuss.

In the meantime you'd mentioned one of your colleagues, [redacted] was working on a Strategic Assessment of Westhill and I wondered if you could pass this on to him? We'd also welcome the opportunity to meet with him as well to introduce ourselves and understand more about the study that is underway.

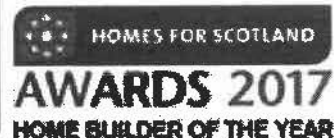
Kind regards,



[redacted] Development Director | Barratt North Scotland



**BARRATT**  
HOMES



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**2 attachments**



Our Ref: [REDACTED]

**25 August 2017**

Aberdeenshire Council  
Planning and Building Standards  
Woodhill House  
Westburn Road  
Aberdeen  
AB16 5GB

**For the Attention of** [REDACTED]

Dear [REDACTED]

**Aberdeenshire Council Update to 2008 Westhill Capacity Study (2014)**

Thank you for meeting [REDACTED] and myself recently regarding the above.

As you know we believe the Update Study contains inaccuracies that call into question the conclusions reached. With that in mind, please find enclosed our review of the same. We would welcome the opportunity to discuss our review at your earliest convenience.

We are aware of the forthcoming review of the Strategic Development Plan and will be arguing for Westhill to be treated as a Strategic Growth Area. This would provide the opportunity for the town to expand significantly over time in an appropriately planned way.

Westhill (like most settlements) has infrastructure pressures but development can help address these as we have seen in other situations. These pressures certainly should not be a total block on development and growth would provide the opportunity to redress concerns over transportation, education, affordable housing, recreational facilities etc.

Meantime the town is at a standstill with only limited scope for development given current allocations in the Local Development Plan. It is arguably unthinkable that a town such as Westhill has virtually no new housing prospects for the foreseeable future.

I look forward to hearing back from you.



Yours sincerely  
for BARRATT NORTH SCOTLAND



**Development Director**

CC:



**Review of the Aberdeenshire Council Update to 2008 Westhill Capacity Study  
(2014) by AMEC Environment & Infrastructure UK Limited**

**Barratt North Scotland & Dunecht Estates**

**25 August 2017**

**1. INTRODUCTION**

- 1.1 This representation is submitted on behalf of Barratt North Scotland & Dunecht Estates in respect of the Aberdeenshire Council update to the 2008 Westhill Capacity Study (2014) by AMEC Environmental & Infrastructure Limited. The update was approved at Garioch Area Committee on 24 June 2014.
- 1.2 Prior to that Committee meeting, Barratt North Scotland wrote to Aberdeenshire Council (see Appendix 1) to highlight issues with the Westhill Capacity Study Update and our serious concerns around those, but ultimately these were ignored and the report progressed to committee regardless.
- 1.3 We continue to have serious concerns about the document which we have outlined below and would seek that these matters be addressed and no weight be attached to the document in the meantime.
- 1.4 These concerns are summarised as;
- Errors with scoring;
  - Errors with methodology;
  - Lack of public consultation;
  - Lack of amendments as per Minutes of the Garioch Area Committee on 24 June 2014;
  - Status of the document;
  - Weight afforded to the document;
  - Lack of clarity regarding site selection;
  - Delays in updating the Study.
- 1.5 These concerns raise questions regarding the integrity of the document that consequently impact upon deliverability and fundamental issues affecting development which have not been appropriately considered.
- 1.6 The following sections provide background to the update study, how it has been used to date, and our detailed examination of the concerns mentioned in 1.3 above.

**2.0 WESTHILL CAPACITY STUDY UPDATE (MAY 2014)**

- 2.1 AMEC Environmental & Infrastructure UK Ltd (AMEC E&I) were commissioned by Aberdeenshire Council in December 2013 to update the 2008 Westhill

Capacity Study by Entec UK Ltd "the Original Study". Due to the time that has lapsed since the initial capacity study, and the increasing pressure from businesses and developers regarding Westhill, an update was required to understand the future growth potential of the settlement. Page 1 of the 2014 Update Study "the Update Study" states "The rationale behind the updated study was the need to support economic development within Westhill, and in particular to accommodate the growing and world leading subsea engineering cluster which had developed in the town".

- 2.2 The Update Study considers opportunities to accommodate development within and around Westhill to arrive at high level growth options and planned expansion for Westhill. In this regard, the options for growth are underpinned by the following vision:

*"Westhill will continue to be a place where people choose to live, work, visit and invest in. The town will fully exploit its position as the world centre of excellence for subsea engineering, and it will seek to attract a wide range of businesses and skilled workers. Westhill will develop a distinctive spatial character and a high quality physical environment with enhanced provision of services for residents and businesses. This will be achieved through creating a sustainable mixed community, balancing residential, commercial and employment related development in such a way as to reduce the need to travel and create a vibrant place" – page 70.*

- 2.3 In aspiring to this vision, page 70 of the Update Study identifies a number of strategic objectives for the future development of Westhill;

- *To enhance its function as a successful employment centre;*
- *To enhance services and the role of Westhill as one of Aberdeenshire's main towns;*
- *To meet the need for housing in Westhill and the Aberdeen Housing Market Area including the specific housing needs for workers associated with the subsea engineering sector and the town's ageing population;*
- *To enhance connectivity and permeability through reducing traffic connection and severance impacts;*
- *To integrate land uses within Westhill and enhance the town's spatial identity; and,*
- *To maintain the separate identities of Kirkton of Skene and Westhill through preventing the coalescence of these settlements.*



2.4 Westhill has always been, and will continue to be, a popular settlement for families and businesses. However, there are clear barriers to development. The Update Study highlights a number of constraints to development within and around the town, which are generally summarised as follows:

- The need to avoid coalescence with Kirkton of Skene in order to prevent a detrimental impact on the village's heritage and setting;
- Road network capacity and associated congestion within and around the Westhill area;
- Education capacity, and to a lesser extent, community services provision;
- The location of gas and oil pipelines to the east and west;
- Topographical constraints on account of visual prominence in respect of land to the north and south of Westhill and, Green Belt policy restrictions to the east;
- The need for a more clearly defined settlement edge and gateway approach to the west, and;
- The close proximity of the administrative boundary between Aberdeenshire Council and Aberdeen City Council to the east of Westhill.

2.6 The Update Study recognises that due to the high level nature of the exercise, it was not possible to consider detailed site specific or design related issues and so the document has a more overarching approach to the area as a whole.

### **3.0 ABERDEENSHIRE LOCAL DEVELOPMENT PLAN (LDP) 2017**

3.1 It was confirmed by The Garioch Area Committee on 24 June 2014 that the findings and recommendations of the Update Study be noted subject to comments raised by Committee being taken into consideration. The Committee Minute is attached at Appendix 2. It further states that the committee agreed "*that the study be used as an information base to inform the preparation of future Development Plan documents*" presumably on the basis of that the comments of Committee were first considered and taken into account.

3.2 However, there is no evidence to suggest that these amendments were taken into account and therefore the validity of the document must be called into question.

- 3.3 Prior to the document being presented to the Area Committee, no formal consultation was undertaken, as would be required for Supplementary Guidance. Nonetheless, we had secured a copy and after reviewing it we had written to Aberdeenshire Council (Appendix 1 - Chris Ross email to Aberdeenshire Council 20/06/2014) to outline our concerns about the document and highlight the inaccuracies within it which were required, in our opinion, to be taken into account before the document progressed. No response was received and no updates were made before it was presented to Committee.
- 3.4 Despite this, the Main Issues Report of the recently adopted Aberdeenshire LDP, raised the possibility of further development opportunities in Westhill as a key issue for debate (no.18), and made specific mention about the importance of the Update Study. The Update Study was taken into consideration by the Scottish Government Reporter in determining the suitability of potential development sites, in so far as specific mention was made of the Update Study in the Reporter's Conclusions relative to nearly every proposed site within Westhill and the immediate area (Kirkton of Skene for example). Its importance was also highlighted with respect to subsequent potential impact on the local transport network within the Reporter's conclusions. In the section 'Shaping Garioch' (pg 646/647), the Reporter acknowledges the on-going work to *"examine the longer-term interventions needed to improve road and public transport access in Westhill."* Indeed, it quotes the Update Study paragraph 4.2.2 specifically - *"a strategic solution to current congestion issues that would allow the long term expansion of Westhill has not yet been identified."* Within the first paragraph on page 647 of the conclusions the Reporter states *"the Transport Infrastructure Feasibility Study has recently been commissioned. This will inform the production of a Westhill Strategic Masterplan, which was also recommended by the Westhill Capacity Study Update, and this will in turn inform the next review of the Local Development Plan."*

#### **4.0 ANALYSIS AND CONCERNS**

- 4.1 In order to ensure that suitable development comes forward in Westhill over the course of the current and future Development Plan periods, it is essential that sites are deliverable. The importance of ensuring deliverability through the planning process is a key theme of the Scottish Government's current review of the Scottish Planning System.
- 4.2 We are deeply concerned that the sites identified as being '*most suitable*' for development in the Update Study are highly unlikely to be deliverable due to the fundamental constraints identified within the Original Study but not recognised as such by the Update Study. Given this, the sites are, therefore, less suitable than the Update Study indicates. With this in mind, we are alarmed that, despite previous issues being raised and amendments sought by both ourselves (Appendix 1 - Chris Ross email to Aberdeenshire Council

20/06/2014) and Aberdeenshire Councillors (Appendix 2 - Garioch Area Committee 24/06/2016), the Update Study has not been duly amended and has subsequently been used as a formal tool in the evaluation of development bid sites in the examination of the current LDP by both Aberdeenshire Council and the Scottish Government Reporter, as highlighted in the preceding section.

4.3 Having had the opportunity to fully review the document we would wish to formally confirm our concerns that there are a number of fundamental errors in the document which need to be corrected in order for the Update Study. Our concerns relate to the following and are detailed below:

- Errors:
  - Scoring
  - Methodology
- Site identification;
- Status of document;
- Subsequent weight given to the document and reasons for this;
- Lack of public consultation;
- Further updates (or lack thereof).

#### 4.4 Scoring and Methodology

4.4.1 Section 4 of the report identifies a range of constraints affecting sites. These are categorised as either Absolute or Relative constraints.

4.4.2 Absolute Constraints, are considered as *"issues which cannot be overcome due to cost or technical reasons within the 20 to 25 year period of this study and therefore require no further consideration..."* (pg 38).

4.4.3 The Absolute Constraints are listed as:

- Steep slopes;
- Current alignment of the A944;
- Safeguarded areas for major gas and oil pipelines to the east and west of Westhill;
- Main electricity pylons to the west of Westhill.

4.4.4 In terms of Relative Constraints, these are identified as *"issues which present difficulties but which could be tolerated or resolved within reasonable limits of cost and timescales. There is therefore merit in considering options to resolve these constraints within this study."*

4.4.5 The Relative Constraints are listed as:

- The town's rural setting and current greenbelt boundaries;
- Aberdeen City boundary;
- The lack of capacity in the existing road network in Westhill;
- The lack of capacity of the education infrastructure within Westhill.

4.4.6 Despite this methodology there are a number of sites within the study area that are affected by Absolute Constraints yet are nonetheless considered positively

within the individual site analysis. For example, Area 1 is rated 3 (good) in respect of pipeline constraints despite noting that the Forties Pipeline (which is an Absolute Constraint) crosses part of the site whereas Area 8 is given the lowest score of 1 for that same constraint.

4.4.7 Taking into account the foregoing, it is clear that the weighting and scoring of certain criteria has been incorrectly and inconsistently applied to some sites.

4.4.8 If the study was intent on assessing sites with Absolute constraints further it is those criteria which should be weighted rather than aspects which can be addressed.

4.4.9 On that specific point alone, it is incumbent for the Council to provide clarification on the scoring and methodology in order that we can be satisfied that there is consistency across the board.

4.4.10 Furthermore, from our own analysis of the scoring matrix we have confirmed that there are errors in the totalling and score percentage of a number of site scores. For example Sites 1 and 23. These errors only serve to deepen our concerns about the reliability of the Study.

4.4.11 To provide some clarity to the above, we have appended our analysis of preferred Sites 1 & 2 within Appendix 3 as well a simplified version of the full scoring matrix within Appendix 4 for ease of reference. In summary, whilst these two sites have the highest scores and therefore are deemed 'most preferable' in terms of potential future development, you will note that the reality of the fundamental constraints are that the chances of delivering any development on either site is severely restricted. We do not understand why these Absolute Constraints have been ignored on these sites but not on others given the clear methodology set out in the study.

#### 4.5 Site identification

4.5.1 The basis upon which the how the Update Study identified sites is unclear (they do not reflect the same sites as the Original Study and does not take account of parcels which are under the same ownership and therefore can be delivered together as well as individually).

4.5.2 Barratt North Scotland and Dunecht Estates together control a significantly large area of land to the west of Westhill which provides substantial development opportunities. The benefit of this is that there is greater certainty in the ability to deliver sites. Despite this, we did not receive any request for information in the run-up to the Original Study or Update Study. Had we received such a request we would have been in a position to assist.

4.5.3 No account has been taken of land ownership/interest in the Potential Development Areas plan (Fig 9.1 on Pg 75 of the 2014 Update). This therefore presents problems if indeed these areas were to be identified for development. The consequence of this is that sites with fragmented land ownership are generally more difficult and slower to deliver than those with one landowner. In

the Original Study the land to the west of Westhill was looked at on a strategic scale and recognised that it is the most suited to residential expansion. Nothing has changed in the meantime in our minds.

- 4.5.4 A more sensible approach would have been to look at the ownership of land and evaluate the parcels on the basis of a single landowner which should make future development easier to undertake. In that respect, consultation of the document would have been beneficial to understand and confirm the land position.
- 4.5.5 In addition, we must query why the site selection criteria appear to change between the Original Study and Update Study given that the interests in the land did not change in that period.
- 4.5.6 We would seek clarification from the Council as to why the sites were identified as shown on Fig 9.1 on Pg 75 of the Update Study. In addition, and taking into account the points made above, we would seek clarification that the sites identified as being 'most preferred' (Table 10.1 on page 77 of the Update Study) can actually be delivered.

#### 4.6 Consultation

- 4.6.1 In the lead-in to presenting the Update Study to the Garioch Area Committee, there was no public consultation. Therefore, the credibility of the document has to be called into question.

#### 4.7 Status of Update Study

- 4.7.1 The Update Study does not carry any formal planning weight, being that it is not Supplementary Guidance but instead is an "informational document" as stated in Appendix 2 – Extract from Minutes of Garioch Area Committee Meeting 24/06/2014).
- 4.7.2 We are therefore concerned that significant weight appears to have been given to the document which has no planning status and had no public consultation. This is clear in the responses to the development bids by both Aberdeenshire Council and the Scottish Government Reporter in the report on the now current LDP. If the document was to be used as an informational tool only, then there should have been less weight given to it during the determination of 'bids'.
- 4.7.3 Clarification is sought on the weight which should be attributed to the Update Study.

#### 4.8 Timing of further updates

- 4.8.1 With respect to the Roads network capacity, paragraph 4.2.2 of the Update Study states "The lack of capacity in the existing local road network within Westhill. Congestion is a significant issue in Westhill. Problem junctions include the 'six mile' and Tarland junctions. Improvements to the 'six mile' junction are

*being delivered in conjunction with development at the Arnhall Business Park. However, a strategic solution to current congestion issues that would allow the long term expansion of Westhill has not yet been identified."*

- 4.8.2 It is this last sentence which is perhaps the most important to take into account. Our Transport Consultant (ECS) contacted Peter MacCallum (Principal Engineer, Aberdeenshire Council) in May 2017 to gain a better understanding of the plans for the next update of the Capacity Study. We were advised that that there are no plans to undertake a further update of the Westhill Capacity Study, predominantly on the basis that the AWPR junction between Westhill and Kingswells is already showing signs of severe stress (even though it is not even open yet) with the committed development shown in the ASAM model. Peter also made it clear that, as of 2023, that same junction will be under undue stress and that improvements will be required (the cost of which no doubt to be footed by developers through some kind of Developer Obligations), although the timing and amount is yet to be fully understood.
- 4.8.3 Subsequent discussions have taken place between ECS and NESTRANS. The most recent exchange on 7<sup>th</sup> August from NESTRANS confirms further programme slippage which means that the calibration validation report for the updated ASAM model which should have been made available w/c 10<sup>th</sup> July will not be available until September 2017.
- 4.8.4 This further adds to our concerns outlined above. It is inconceivable that Aberdeenshire Council and the Scottish Government Reporter has made an assessment on the suitability of sites in and around Westhill based on a document which has not been updated to take full account of the current transport situation and potential future upgrades. As outlined above, the Update Study does not offer any solutions for the transport issues in the area. This would only come through as part of an updated transport modelling exercise which has yet to be undertaken and through proper consideration of the development options.
- 4.8.5 In light of the above, we would seek clarification on the timescales involved in the ASAM modelling exercise and what the purpose of the modelling is.

## **5.0 CONCLUSIONS**

- 5.1 As a result of our analysis, we are deeply concerned that the Update Study will be, and has been, used as the basis for decisions around the future growth of Westhill. There are factual errors, inconsistencies in scoring and weight given to constraints, and lack of consultation, all of which place doubts over the methodology and add to our general concern about the lack of deliverability as a key consideration. We also have concerns about the influence that the Update Study, which is an informational document, may have for potential future development in and around Westhill, especially given it has had a major influence on the recent LDP review.

- 5.2 We would urge you to review this document in light of these points to ensure the Update Study is presented accurately and consistently. In the meantime the document should not be given any weight in the evaluation of potential development sites in and around Westhill and would seek a timeous review in order that the sites are reviewed consistently and accurately. Any such review must be open and transparent and subject to public consultation and scrutiny

DRAFT

## APPENDIX 1

[REDACTED] (BARRATT HOMES) EMAIL TO ABERDEENSHIRE COUNCIL (20 JUNE 2014)

**From:** [REDACTED]  
**Sent:** 20 June 2014 16:31  
**To:** [REDACTED]

**Subject:** Westhill Capacity Study Update

[REDACTED]

I write on behalf of Barratt North Scotland and Dunecht Estates in respect of the updated Westhill Capacity Study (dated May 2014) which is due to be presented for approval to the Garioch Area Committee on 24<sup>th</sup> June 2014.

Having had the opportunity to review the document we would wish to raise our concern that there are some fundamental errors in the document which need to be corrected prior to any committee consideration. We would summarise our key concerns as follows:

- Section 4 of the report identifies a range of constraints affecting sites. These are categorised as either Absolute or Relative constraints. In respect of Absolute constraints it is confirmed that where these exist no further consideration will be given. There are however a number of sites within the study area that are affected by such Absolute constraints but are nevertheless considered within the individual site assessments. We would seek clarification why this proposed methodology is not reflected in the outcomes.
- We believe that the weighting element for scoring of certain criteria has been incorrectly applied. If the study was intent on assessing sites with Absolute constraints further it is those criteria which should be weighted rather than aspects which can be addressed.
- The basis for the identification of sites is unclear. As you will be aware Barratt North Scotland and Dunecht Estates control a significantly large area of land to the west of Westhill and it is therefore important that the potential of the sites within this area are considered collectively as well as individually. It appears that this potential for combined sites is given to sites to the east of Westhill but no such analysis is evident for sites to the west.



- Having reviewed the assessment of sites controlled by Barratt North Scotland and Dunecht Estates the assumptions made in arriving at these scores are incorrect. We would therefore welcome the opportunity to discuss the sites within our control to ensure that the potential of these is properly reflected.
- There are some incorrect scores in the analysis of sites, for example, Area 1 is rated good in respect of pipeline constraints despite noting that the Forties Pipeline crosses part of the site.

We would urge you to review this document in light of these points to ensure the report is presented accurately. On this basis we do not believe that this report can be presented to the Garioch Area Committee until these points have been addressed.

Please do not hesitate to contact me should you wish to discuss further.

Regards,

[Redacted]

[Redacted]

Senior Land Manager | Barratt North Scotland

[Redacted]

[Redacted]



**P Save a tree....Please don't print this e-mail unless you really need to**

## APPENDIX 2

### EXTRACT FROM MINUTES OF GARIOCH AREA MEETING (24 JUNE 2014)

#### 8. WESTHILL CAPACITY STUDY UPDATE

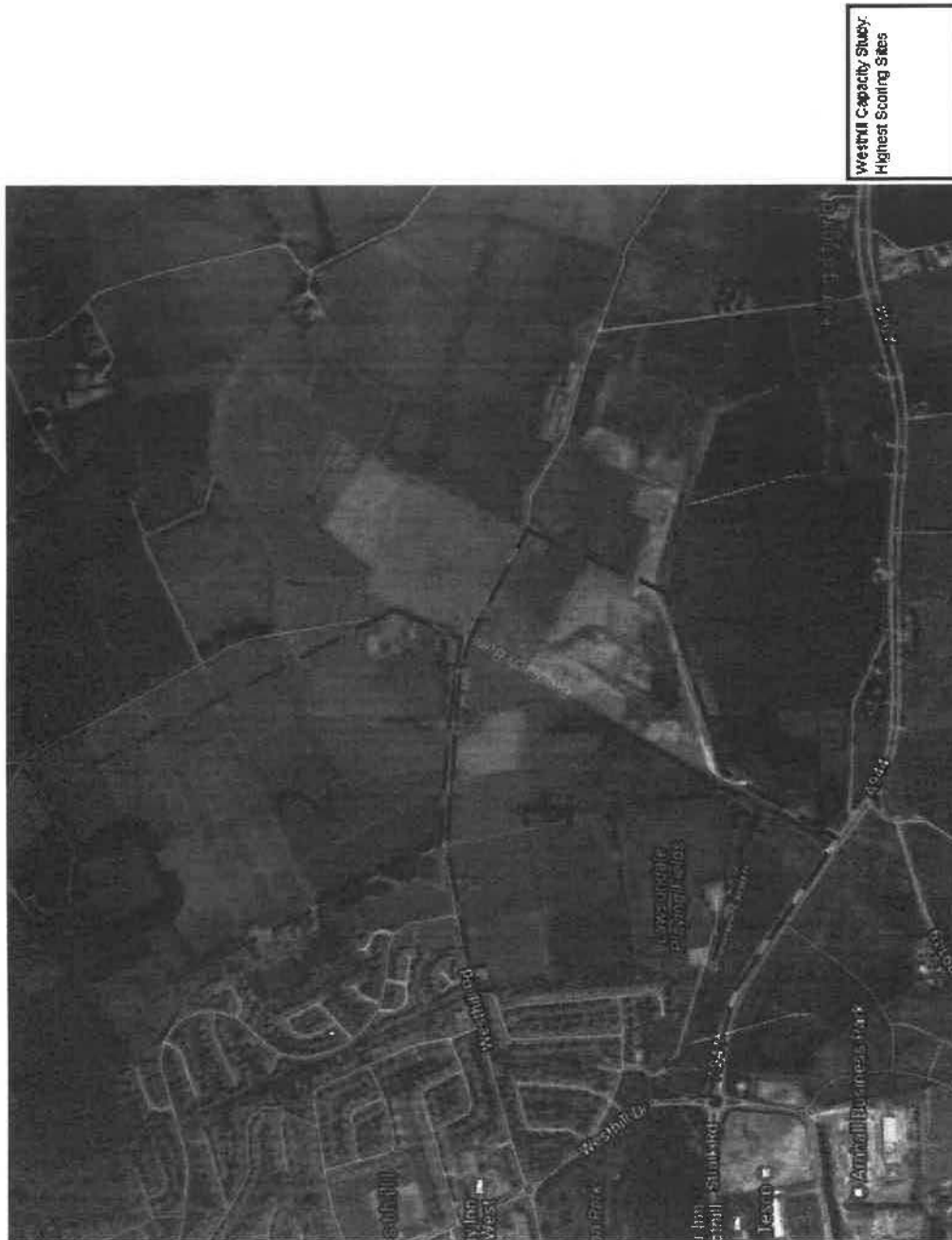
A report by the Director of Infrastructure Services was circulated recommending that the Committee agree the Westhill Capacity Study Update.

The Committee agreed:-

1. to note the findings and recommendations within the Updated Westhill Capacity Study subject to the following comments being taken into consideration:-
  - a) need information about how many people travel into Westhill to work;
  - b) need to have a better diversity of business within Westhill
  - c) need more cycling routes, particularly a track round the perimeter of Westhill
  - d) acute need for affordable housing in Westhill alongside more sheltered housing and properties suitable for downsizing;
  - e) need for sporting facilities similar to that provided in Mintlaw;
  - f) need more car parking;
  - g) need pedestrian links between the old and new parts of Westhill
  - h) need public open space in the town centre and possibly a second town centre to the west of the town;
  - i) higher density housing should be explored
  - j) all sectors of business need to be considered within housing needs, not just the subsea sector; and
  - k) bigger maps need to be provided for assessment areas; and
2. that the recommendations are pursued and the Study be used as an information base to inform the preparation of future Development Plan documents.

**APPENDIX 3**

**ANALYSIS OF WESTHILL CAPACITY STUDY UPDATE 2014 – PREFERRED SITES 1 AND 2**



Westhill Capacity Study  
Highest Scoring Sites  
- Aberdeenshire  
Administrative Boundary



Westhill Capacity Study:  
Highest Scoring Sites  
- Brodiech Burn

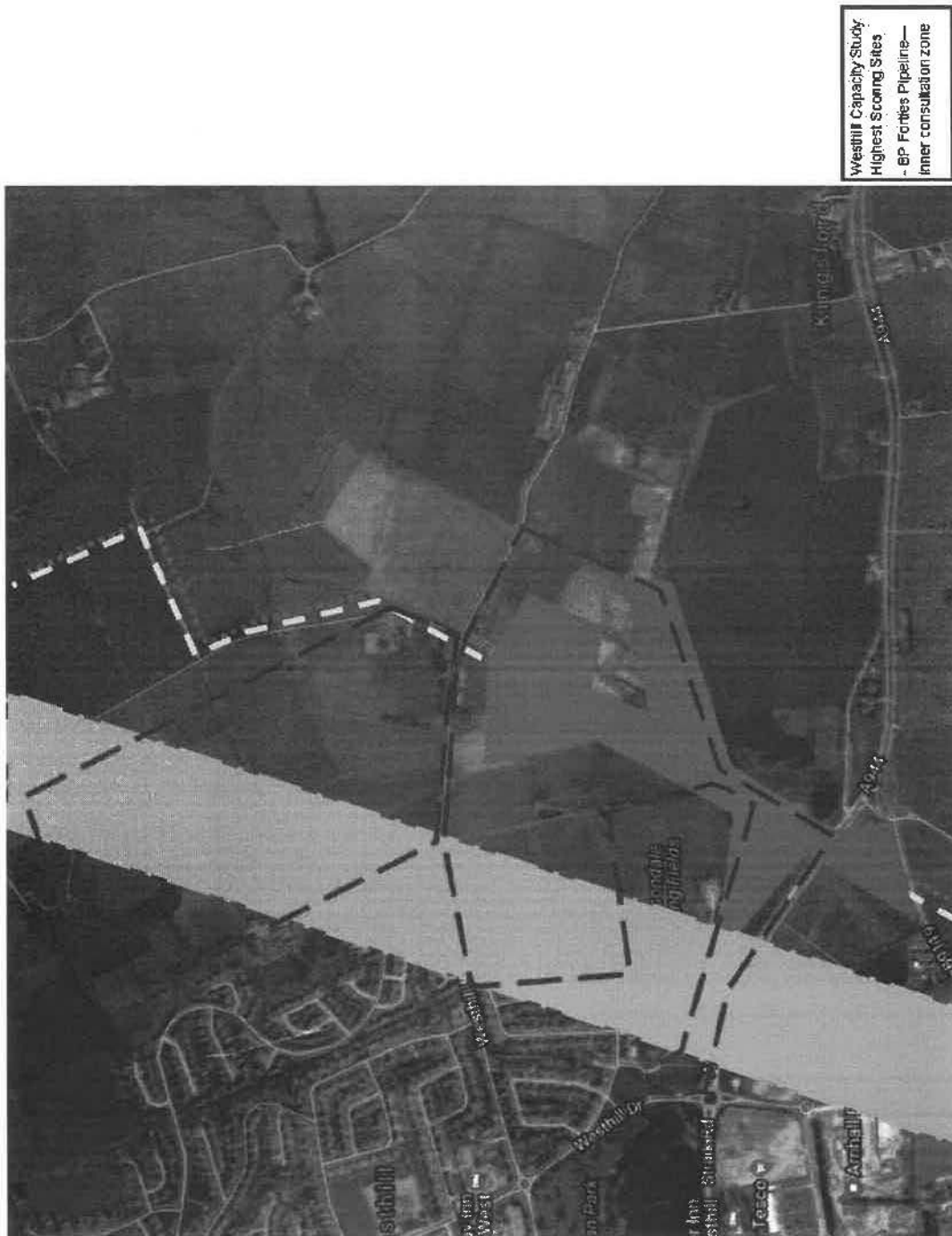


Westhill Capacity Study:  
Highest Scoring Sites  
- Brodloch Burn including flood map



Westhill Capacity Study:  
Highest Scoring Sites  
- BP Forties Pipeline







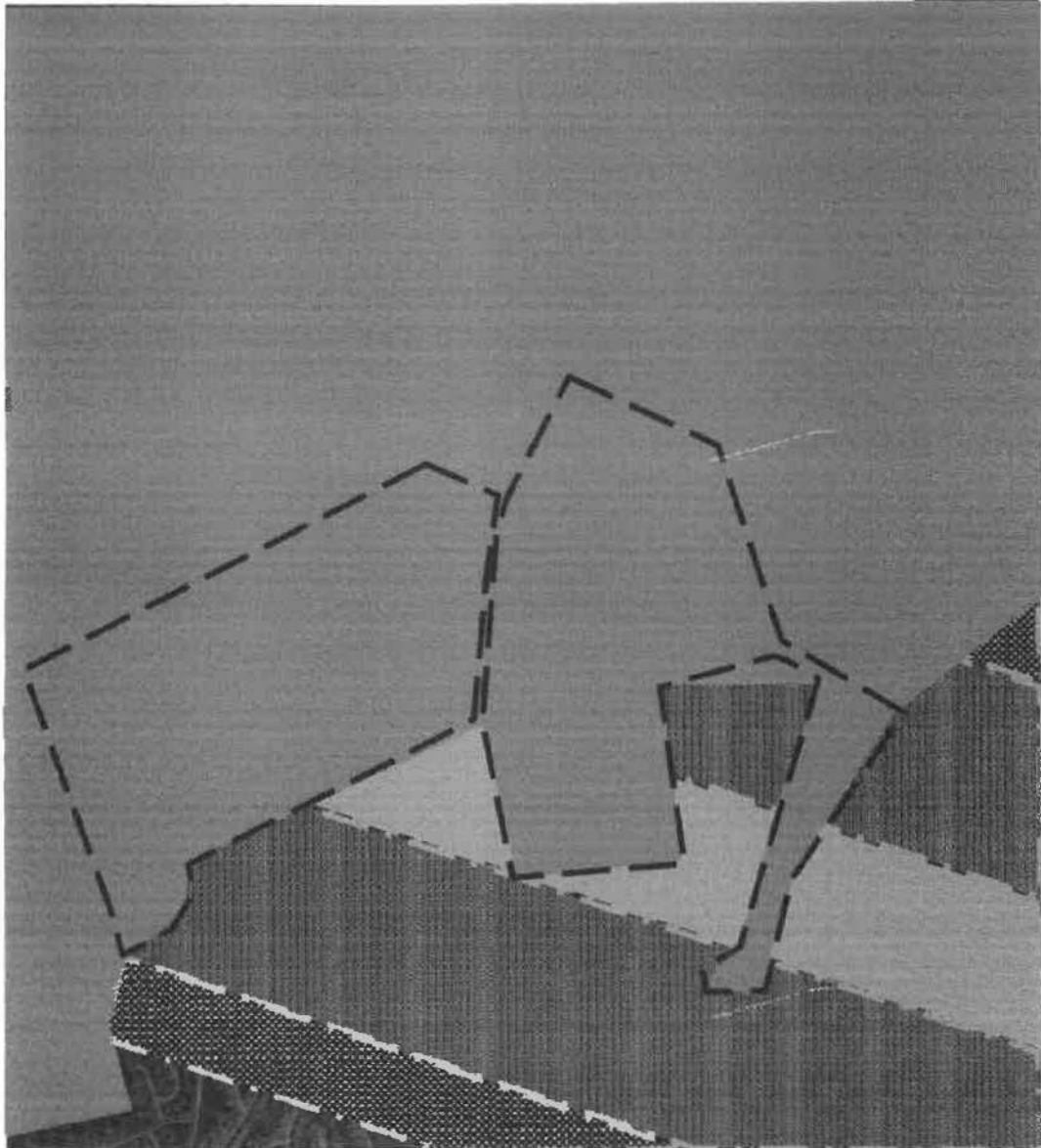
Westhill Capacity Study  
Highest Scoring Sites  
- BP Fortes Pipeline -  
middle consultation zone



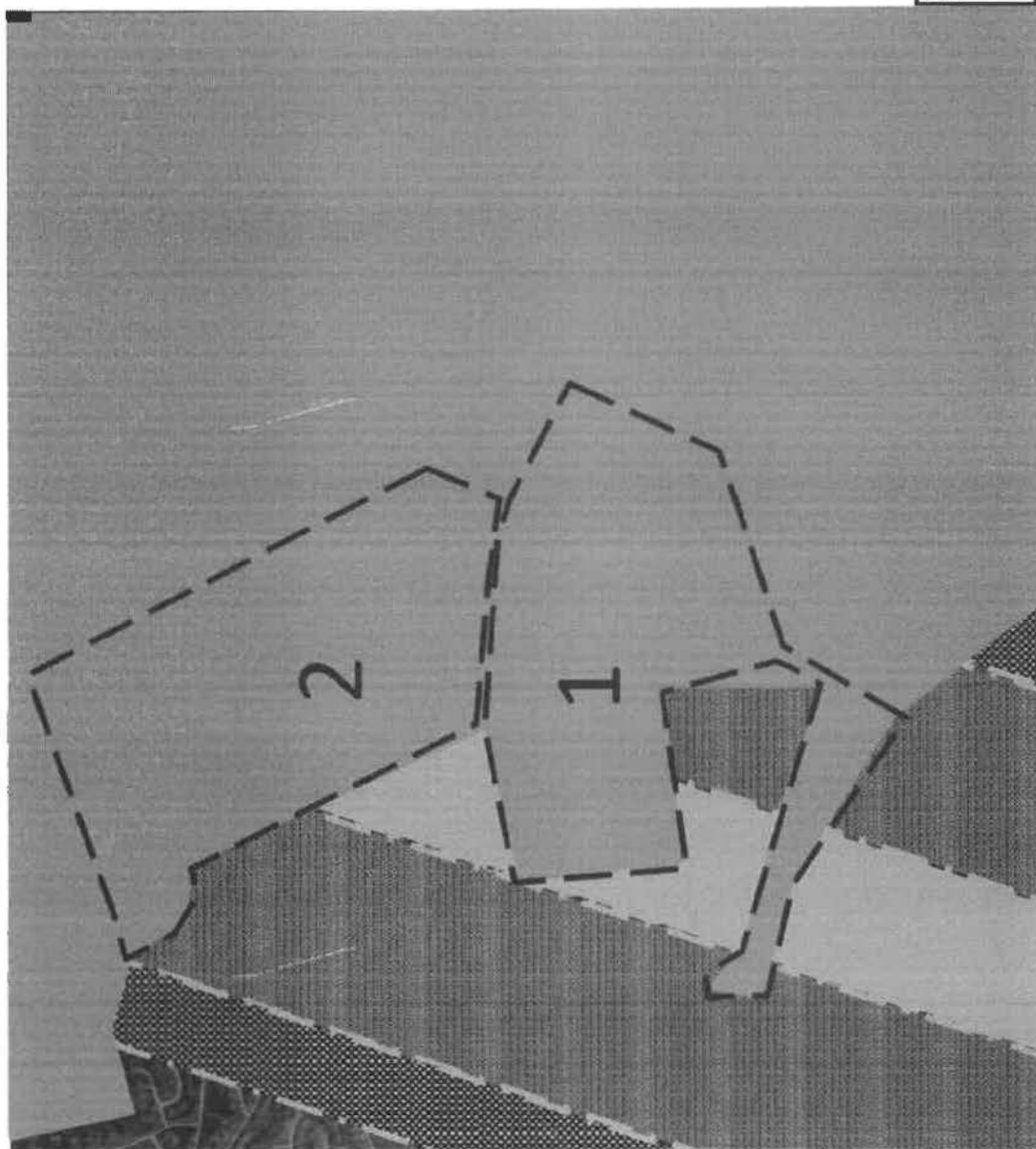
Westhill Capacity Study  
Highest Scoring Sites  
- BP Forties Pipeline—  
outer consultation zone



Westhill Capacity Study  
Highest Scoring Sites  
- Greenbelt



Westhill Capacity Study  
Highest Scoring Sites



APPENDIX 4

ANALYSIS OF WESTHILL CAPACITY STUDY UPDATE 2014 – BARRATT NORTH SCOTLAND SCORING MATRIX

03/02/2011		SITE																							
WESTHILL CAPACITY STUDY UPDATE 2014		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
GENERAL CRITERIA		2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2
Subtotal		50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50
TECHNICAL ASSESSMENT CRITERIA		3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	
Subtotal		15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	
<b>TOTAL</b>		<b>65</b>	<b>65</b>	<b>65</b>	<b>65</b>	<b>65</b>	<b>65</b>	<b>65</b>	<b>65</b>	<b>65</b>	<b>65</b>	<b>65</b>	<b>65</b>	<b>65</b>	<b>65</b>	<b>65</b>	<b>65</b>	<b>65</b>	<b>65</b>	<b>65</b>	<b>65</b>	<b>65</b>	<b>65</b>	<b>65</b>	

