

# PROPOSED ABERDEENSHIRE LOCAL DEVELOPMENT PLAN 2020 RESPONSE FORM

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

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

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

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

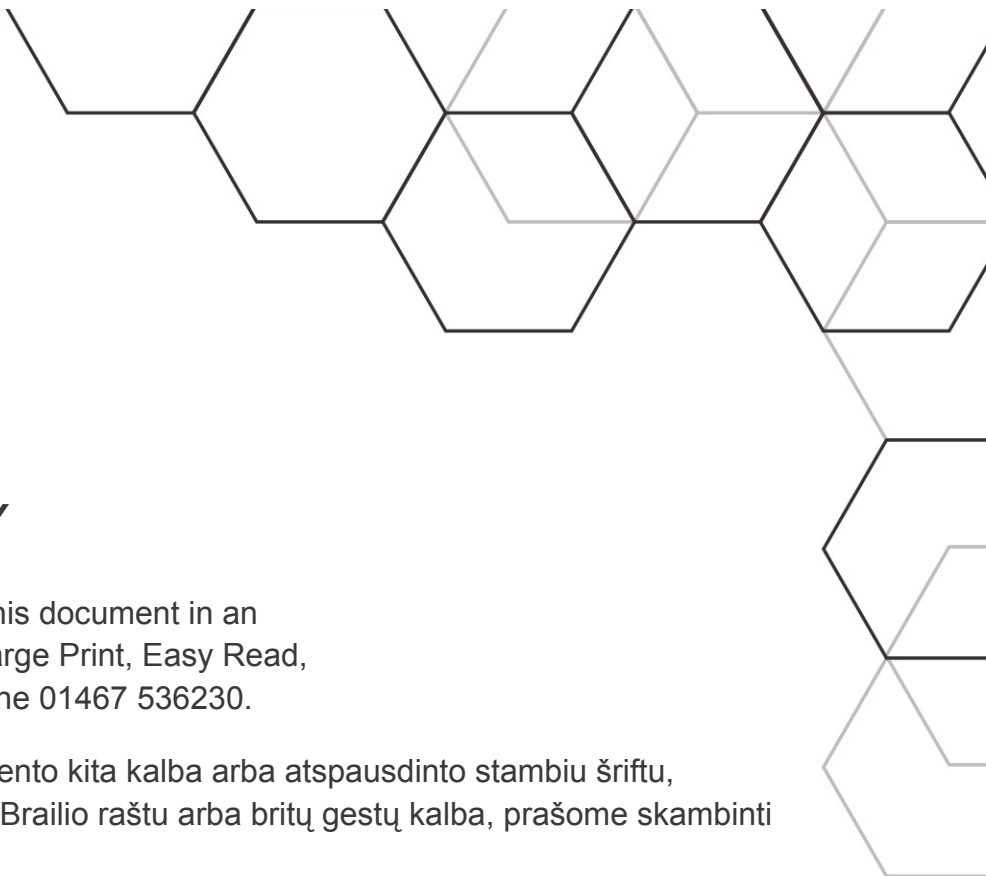
This is the only remaining opportunity to comment on the Proposed Plan. The reasons for any requested changes will be analysed and reported to Scottish Ministers. They will then appoint a person known as a Reporter to conduct a public examination of the Proposed Plan, focusing particularly on any unresolved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

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

Please email comments to [ldp@aberdeenshire.gov.uk](mailto:ldp@aberdeenshire.gov.uk) or send this form to reach us by 31 July 2020\*.

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

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



## ACCESSIBILITY

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

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

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

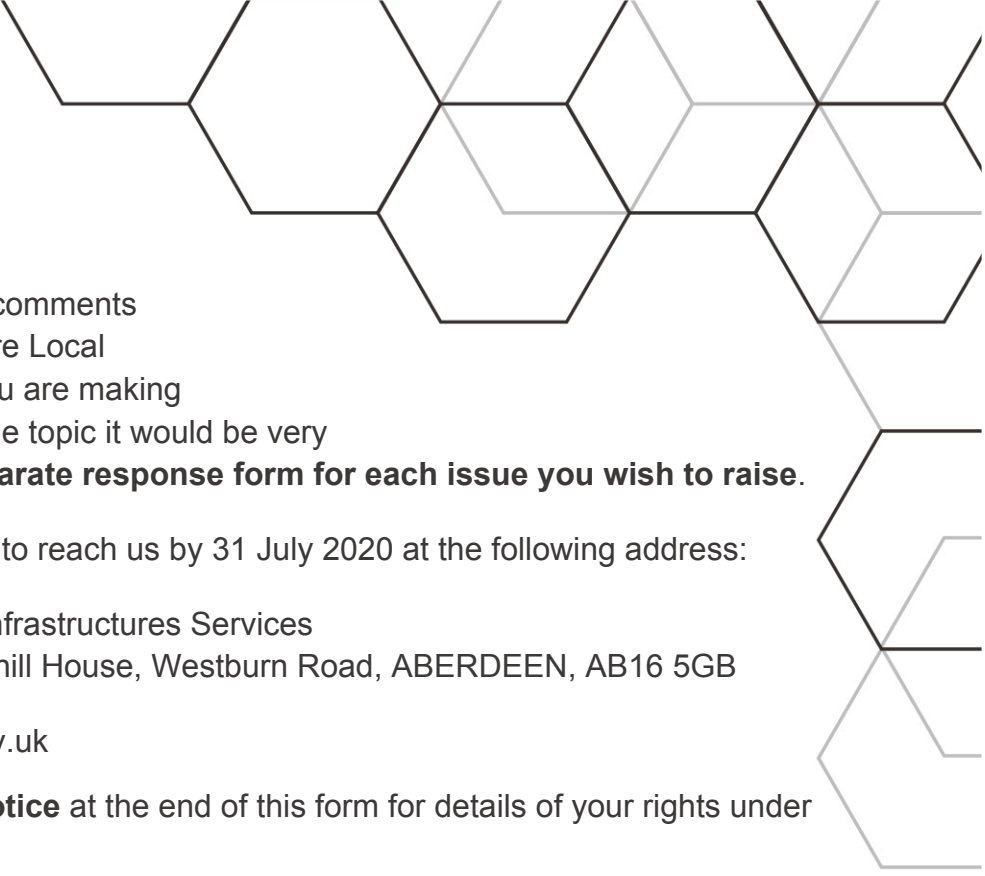
Jeśli potrzebowali będą Państwo informacji z niniejszego dokumentu w innym języku, pisanych dużą czcionką, w wersji łatwej do czytania, w alfabecie Braille'a lub w brytyjskim języku migowym, proszę o telefoniczny kontakt na numer 01467 536230.

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

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

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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 31 July 2020 at the following address:

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

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

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

## YOUR DETAILS

Title:	Mr
First Name:	Ewan
Surname:	Maclean (Emac Planning)
Date:	30.07.20
Postal Address:	[REDACTED]
Postcode:	[REDACTED]
Telephone Number:	[REDACTED]
Email:	[REDACTED]

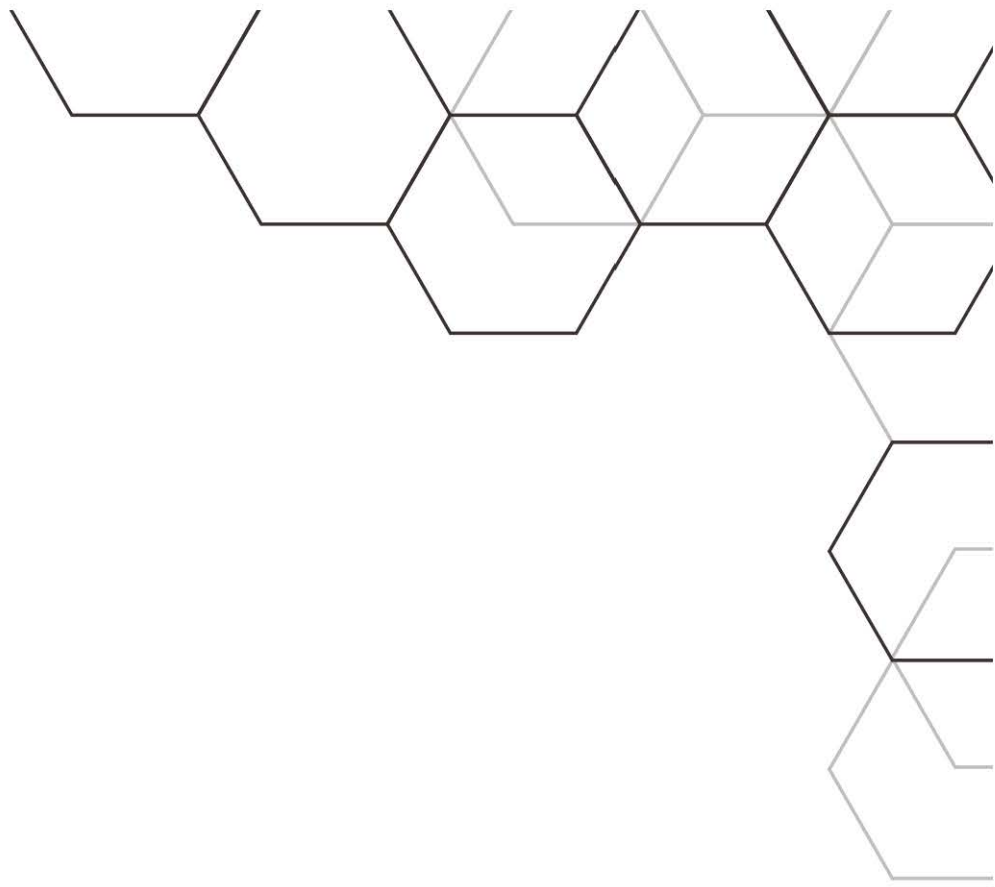
Are you happy to receive future correspondence only by email?  Yes  No

Are you responding on behalf of another person?  Yes  No

If yes who are you representing?

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):

Land to the South of OP1, Newtonhill.

**Reason for change:**

Please see attached Statement and Masterplan Report.

# 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:

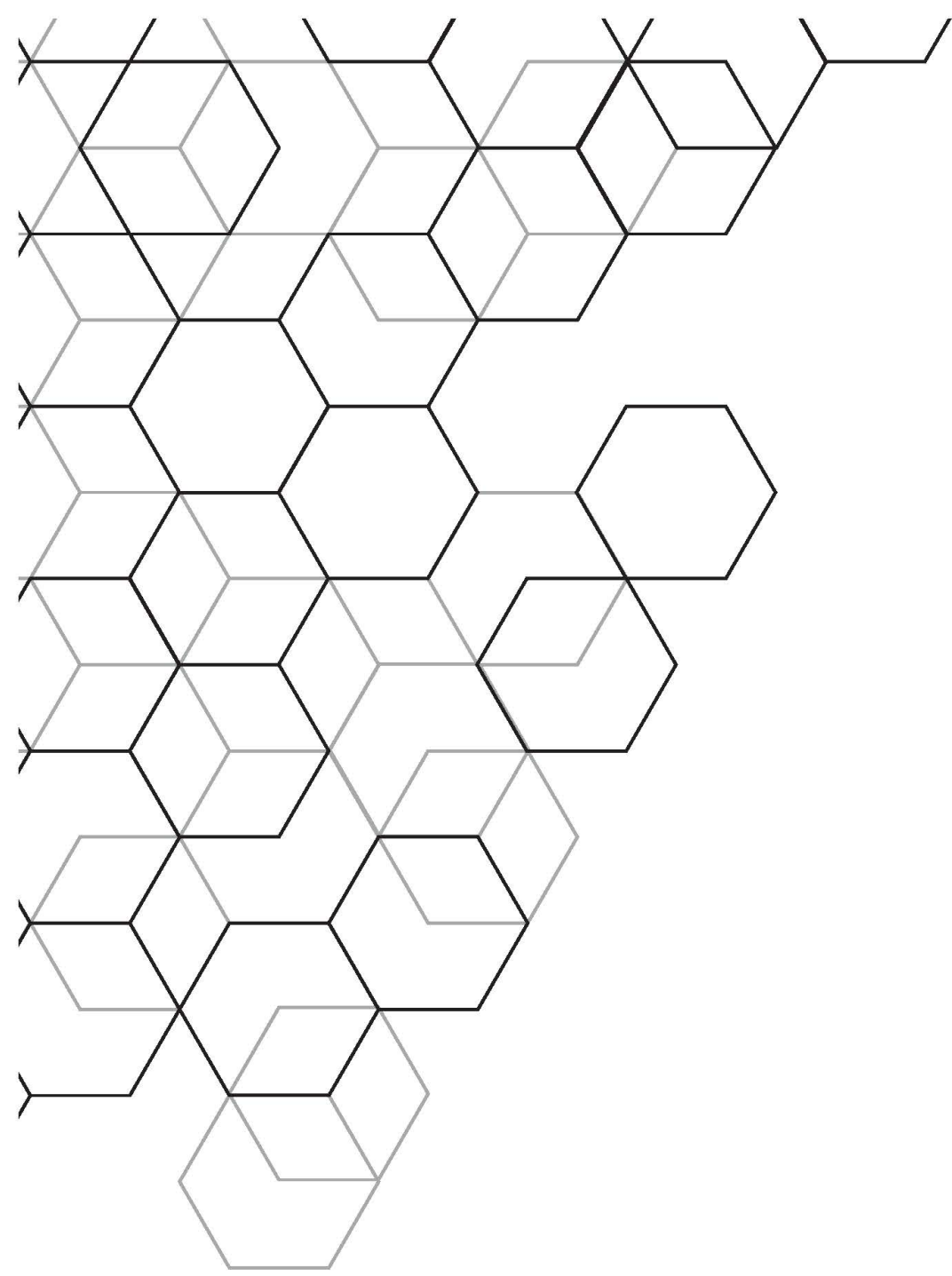
Aberdeenshire Council will only keep your personal data for as long as is needed. Aberdeenshire Council will retain your response and personal data for a retention period of 5 years from the date upon which it was collected. After 5 years Aberdeenshire Council will review whether it is necessary to continue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

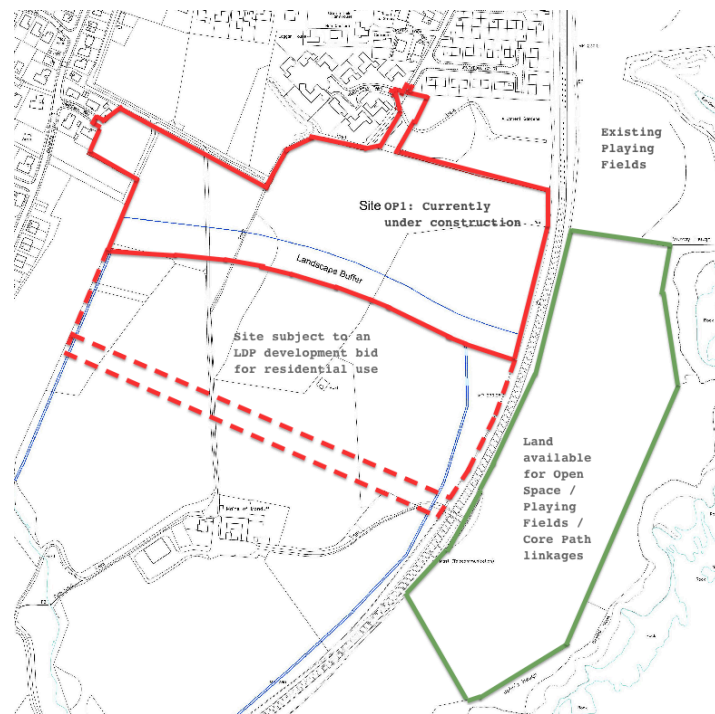
The following automated decision-making, including profiling, will be undertaken:

Not applicable.

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- 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.





## **Aberdeenshire Local Development Plan 2021**

**Proposed Plan 2020: Submissions on behalf of Polmuir Properties (Newtonhill) Limited**

**Land to the South of OP1, Newtonhill**

**July 2020**



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## 1.0 Introduction and Executive Summary

- 1.1 Polmuir Properties (Newtonhill) Limited (PPNL) recognise that the Proposed Local Development Plan 2020 is a key stage in the preparation of the Aberdeenshire Local Development Plan 2021 as it represents the Council's "settled view" as to what the final adopted content of the Local Development Plan should be.
- 1.2 PPNL therefore welcome the opportunity to comment on the Proposed Plan and the following reaffirms the company's position on an individual site bid on land on the southern edge of Newtonhill.
- 1.3 PPNL controls the subject land, which lies directly to the south of Newtonhill residential allocation OP1. The site is considered appropriate for allocation for residential and playing field uses in the Aberdeenshire Local Development Plan 2021 (LDP 2021). The subject land is identified in Appendix 1.
- 1.4 Historically, PPNL have acknowledged that the settlement strategies of the Local Development Plan 2017 generally reflect the requirements of the Strategic Development Plan (SDP). However, along with much of the development industry, we continue to have serious reservations regarding the delivery of the overall required housing land supply and the failure of the Plan to conform to the Strategic Development Plan (SDP) and Scottish Planning Policy (SPP) specifically regarding delivery.
- 1.5 We therefore continue to promote the position that there is a requirement to compensate for ineffective sites and large sites that are being delivered at a slower rate of progress than anticipated, primarily due to long lead in times and consumer demand for range and choice. Most locally to Newtonhill, within the southern growth corridor, we of course refer to Chapelton.
- 1.6 It is therefore respectfully requested that the subject land directly to the south of OP1 be allocated for the next phase of residential development in the LDP period of 2020 – 2025 with an indicative capacity of approximately 120 houses. Release of the site to be included within the development programme to commence when OP1 has been substantively completed, currently anticipated by late 2022. The proposed playing fields / open space areas to the east of the railway line to be delivered in tandem with the proposed residential development.

- 1.7 To facilitate a clear understanding of the site and its context, a Masterplan report has been prepared to support the proposals. The document continues to expand on the quality and character of the approved development site, OP1, directly to the north and illustrates how proposed design principles comply with required criteria to guide clear development principles associated with the site. PPNL recognise that, as with the approved OP1 site, the promotion of good design is an integral part of the planning process. The main purpose of the submitted Masterplan report is therefore to ensure that the principles of good design are embodied within the future development of the site.
- 1.8 In summary, this proposal presents a further development in accordance with the approved and currently under construction layout for OP1, i.e. to provide a cohesive and well-integrated development delivering both mainstream and affordable homes. Indeed, when considering the content of the OP1 Masterplan, Aberdeenshire Council specifically requested that vehicular and pedestrian access to the south be facilitated to allow for potential future allocation of the subject land. This has therefore been included within the Council agreed document and further confirmed through the planning permission for OP1, approved on appeal and currently under construction.
- 1.9 The appropriate time to consider the allocation of a further site for housing purposes and further recreation land is of course through this review of the Local Development Plan.
- 1.10 It is material that through the previous LDP Main Issues Report (MIR), see Appendix 5 below, Aberdeenshire Councils assessment of the previous development bid identified the site to the south of OP1 as a partial officer's preference and the site remains logically located for a natural extension to the village with minimal landscape impact. For clarification, a "partial officer's preference" was where the officers liked some but not all of the elements of a bid. It is clear that the Housing Land Audit process masks and does not provide an accurate assessment of housing land supply deficiencies in the Kincardine and Mearns area and the only way to resolve this is through the allocation of additional sites of a suitable scale that are capable of early and incremental delivery to ensure that housing is delivered within the periods specified by the LDP.
- 1.11 We would therefore respectfully request that the subject land is identified for approximately 120 houses, with a requisite level of affordable housing, currently 25%; or identified as a future opportunity site for review in 2026.

## 2.0 Aberdeenshire Local Development Plan 2021

### Proposed Local Development Plan 2020

- 2.1 The Proposed Plan sets out the policies and proposals that will be used to assess planning applications and identifies development opportunities across Aberdeenshire for the Plan period.

### Consistency with the Strategic Development Plan: Strategy

- 2.2 The Aberdeenshire Local Development Plan 2021 requires to be consistent with the Strategic Development Plan (SDP). The Council states, Proposed Plan para 5.6, that they are comfortable that they will be able to achieve the housing land obligations set by the SDP. Paragraph 5.7 confirms that, as required by the SDP, development will remain focussed on the Strategic Growth Areas of the SDP, using the pattern of development as set out in the *"...Aberdeenshire LDP 2017 as a base, and seeking to augment this with new allocations"*.
- 2.3 Newtonhill of course lies within the 'Aberdeen to Laurencekirk Strategic Growth Area' and the 2017 LDP allocated land to the south of the settlement for residential development, i.e. residential allocation OP1. At the time of preparation of the 2017 LDP, the Council specifically noted at the MIR stage that there may be merit in additional development to the south of OP1 at a scale commensurate with the settlement boundary directly to the west, however at that time there was considered to be sufficient residential land within the Strategic Growth Area and therefore no requirement to allocate further land. When considering the issue of residential sites at South Newtonhill, the LDP Reporter also made two key observations.
- 2.4 The first observation was, in response to locals who wished to see it deleted, that site OP1 was an effective and deliverable site and contributed to the range and choice of locations available for development within the strategic growth area. The second observation was that, in response to representations promoting the land to the south of OP1, the Council had concluded within their MIR that there may be merit in further development at this location. At that time, the LDP Reporter, whilst noting that there was some justification for including additional sites that are relatively unconstrained and in marketable locations where they would bolster housing completion rates, concluded that there was no overriding imperative at that time to identify additional housing land.

- 2.5 To be consistent with the pattern of development as set out in the 2017 LDP, it would be reasonable to expect that the Council would have again considered, through the preparation of this LDP, augmenting the land supply through a further residential allocation at South Newtonhill. Indeed the Strategic Environmental Assessment again points to the fact that the subject land has very similar and positive development characteristics to the current OP1 allocation. Noting the merits of OP1 and that the subject land directly abuts OP1, it is therefore somewhat surprisingly no such allocation was recommended.
- 2.6 In our submission, we contend that the Council's position seems untenable, as the clear strategy of the Plan is to expand upon existing deliverable allocations with further incremental expansion directly adjacent. Indeed paragraph 5.8 of the Proposed LDP confirms *"expansion around existing settlements, which has been considered through the development plan, is essential to deliver a sustainable settlement pattern"*. Paragraph 5.8 goes on to further confirm that the Council has used core criteria to govern where development should be allowed, including future capacity of schools and that each prospective development site has been tested through a Strategic Environmental Assessment exercise and subjected to appraisal under the Habitats Regulations to ensure that the objectives of the National Performance Framework have been met. Furthermore, the Proposed Plan clearly recognises that in addition to the need to promote the use of previously developed land, i.e. "brownfield" land; development to meet required needs would not come forward if it were restricted to brownfield land only. Most sites in the Proposed Plan are therefore greenfield sites and crucially, these should be deliverable in the timescale required if the SDP requirement is to be met. Whilst there is a review of allocations planned in 2026, the correct time to identify effective and deliverable sites is through the preparation and adoption of the LDP 2021.

### **Consistency with the Strategic Development Plan: Housing Land Requirement**

- 2.7 Section 16(6) of the 1997 Act (as amended) requires local development plans to be consistent with the Strategic Development Plan (SDP) where it is in an SDP area. Preparation of the SDP is at an advanced stage having been through examination. We therefore agree with the Council that the LDP should be planned to be consistent with it. We also agree and endorse the Homes for Scotland strategic response submitted on these matters, in particular we agree with and endorse the 'Table 1: Summary of Land Supply Position' below.

- 2.8 The draft SDP, under the heading ‘How to Meet the Targets’, states:  
“Both Councils will make land available for housing through Local Development Plans in line with the Spatial Strategy and Table 3 of this Plan.”
- 2.9 Table 3 sets out allowances of new land that are required to be allocated. Local Developments Plans are to maintain a 5-year supply of effective land for housing at all times. These were altered by the Reporter at the SDP Examination. These allowances are set out in Table 1 of the PLDP. How the PLDP will meet these allowances is relegated to the Appendices 6 and 7A-F. Given that ensuring enough housing land is made available is a key priority for the PLDP we consider this should be contained within the main document itself.
- 2.10 Table 1 of Appendix 6 of the PLDP sets out the land supply which the Council has identified to address the allowances. It claims a modest surplus of 80 dwellings in the Aberdeen Housing Market Area (AHMA) and a larger surplus of 577 dwellings in the Rural Housing Market Area (RHMA), giving an overall claimed surplus of 657 in Aberdeenshire. We do not consider this is an accurate summary of the Council’s land supply situation and consider that shortfalls exist in both HMA’s and across Aberdeenshire.
- 2.11 SPP states that *“House building makes an important contribution to the economy.”* (para. 109). It adds that the planning system should, amongst other things, *“have a sharp focus on the delivery of allocated sites embedded in action programmes, informed by strong engagement with stakeholders.”* (para. 110). This focus on delivery informs SPP policy on Local Development Allocations.
- “Local development plans in city regions should allocate a range of sites which are effective or expected to become effective in the plan period to meet the housing land requirement of the strategic development plan up to year 10 from the expected year of adoption. They should provide for a minimum of 5 years effective land supply at all times. In allocating sites, planning authorities should be confident that land can be brought forward for development within the plan period and that the range of sites allocated will enable the housing supply target to be met.”* (para. 119).
- 2.12 We do not consider that the PLDP and its supporting documents focus sufficiently on ensuring that new allocations are effective and will be deliverable over the PLDP period. Our analysis shows that many of the new allocations identified as

contributing to the allowances are either sites which are constrained in the current land supply or new / enlarged allocations where the potential for the sites to become effective is doubtful.

2.12 The focus on understanding what will become effective was a key consideration at the SDP Examination. The Reporter supported the HFS approach.

*“The approach used by Homes for Scotland where the programming of sites is extrapolated beyond the period stated in the housing land audit is well-evidenced with tables showing each site in each authority and market housing area. There will be instances where sites perform better and some which deliver less than the extrapolated method shows but it reasonably carries forward the last known (and agreed) programme of delivery on each site into the future. Therefore, I consider that it can be effectively used to predict the amount of the established supply that is considered to become effective during the periods 2027 to 2032 and 2033 to 2040.”* [Issue 14, para. 26]

2.13 This focus on deliverability is included in some of the text in the PLDP, paragraph 5.4 is positive.

*“We need to be confident that land can be brought forward for development within the Plan period, and that the range of new sites allocated alongside the existing effective supply will maintain a housing land supply that is sufficient. While some long-term constrained sites may come forward, there has to be some uncertainty associated with this. We cannot have confidence that long term constrained sites will be brought forward for development, and we have removed many of these to ensure that the Spatial Strategy is both sustainable and deliverable as advised by Scottish Planning Policy 5. Both major allocations and smaller self contained allocations are required.”*

2.14 Unfortunately, this is not reflected in the approach taken to new allocations. Of the sites identified to meet the allowances across Aberdeenshire, 23% of these, measured by indicative capacity, appear to be wholly or in part sites identified as constrained in the 2019 HLA. For the reasons outlined above in para. 5.4 of the PLDP, we do not consider that constrained sites should be counted towards the allowances. They cannot be relied upon to deliver new homes and were excluded from the land supply by the SDP Reporter.

2.15 When adjustments are made to remove non-effective sites there is a shortfall in allocations across Aberdeenshire and both HMAs. In our analysis, we have

removed constrained sites in the 2019 HLA, which have not been demonstrated to be effective and additional new/enlarged allocations which we do not consider to be capable of becoming effective. The impact of this upon the land supply situation is summarised in Table 1.

2.16 These are significant shortfalls and we consider that it is essential they are remedied by including additional effective housing land. Without this action the PLDP will not be consistent with the SDP.

*Table 1 Summary of Land Supply Position*

	<b>SDP Allowance</b>	<b>Aberdeenshire Claimed Supply</b>	<b>Aberdeenshire New / Surplus / Shortfall</b>	<b>HFS Position on Supply</b>	<b>HFS Surplus / Shortfall</b>
<b>Aberdeenshire</b>	5107	5764	657	3363	-1744
<b>Rural HMA</b>	2042	2619	577	781	-1261
<b>Aberdeen HMA</b>	3065	3145	80	2582	-483

2.17 In addition to this detailed critique of the new allocations to meet the allowances we consider that there are some more general issues with the housing land supply. Not enough of the new allocations in the AHMA are focused in the strategic growth corridors, where the market is strongest and the location generally more likely to be sustainable. The PLDP acknowledges this through the ongoing and required identification of the Aberdeen to Laurencekirk Strategic Growth Corridor, but does not reflect it in the allocations made.

### **Aberdeen to Laurencekirk Strategic Growth Area**

2.18 The Proposed LDP recognises that the substantial allocations at Laurencekirk and Chapelton have been extremely slow. The Plans states that this is due to ongoing discussions regarding the grade separated junction at Laurencekirk and we agree that is the reason for delay at that location. The Plan also states however that at Chapelton the rate of growth has been unexpectedly slow although offers no reason for that slow rate, other than to proffer that due to its slow rate of progress other “significant” (Proposed Plan para 5.13) levels of development in the corridor should be restricted.



2.19 Our view remains that the Chapelton delays are due entirely to the strict design code associated with the new settlement and the market restrictions that places on the completion rate. That design code will not and should not change but that approach to the bespoke new settlement should not be allowed to artificially stifle the delivery of other appropriately scaled mainstream allocations within the strategic growth corridor. At 120 homes, the subject land does not offer a threat to Chapelton, which the Councils conjectures might happen with a “significant level of development” (Proposed Plan para 5.13) but rather offers a deliverable site with an appropriate market mix of private and affordable units. Indeed Proposed Plan para 5.13 confirms that in the Councils view, the OP1 Newtonhill allocation of 120 houses is considered a “small additional allocation”. At a very similar scale, the subject land would also therefore presumably be classified by the Council as a small additional allocation and would not be a threat to Chapelton completion rates.

### **Land to the South of OP1**

2.20 The subject land is not allocated for development purposes within the Proposed Plan. The subject land is however proposed to be covered by Green Belt and also partially includes a new P8 designation “To protect the area as forming part of the green-blue network”.

2.21 The correct time to review all green belt and environmental designation boundaries is through a review of the Local Development Plan. The SDP informs that Green Belt is “*An area of countryside where strict planning controls are in place to protect the landscape setting of the city, maintain the identity of places and provide land for recreation*”. A review of the subject lands position shows that it does not protect the landscape setting of the city; is not required to maintain the identity of Newtonhill as there has already been land developed further south, i.e. the housing at Michael Tunstall Way; and through responsible development it can provide land for recreation. The subject land should not therefore be retained as Green Belt. Lying west of the railway line, neither is it considered to contribute towards the Special Landscape Area, which mostly lies to the east of the railway line and seeks to preserve the coastal setting.

2.22 It is also material that the “green network” has already been accommodated within the masterplanning exercise for OP1 and there is no reason that this principle cannot be accommodated within the proposed further allocation, i.e. whether the new P8 designation remains or otherwise.

- 2.23 Within the Proposed Plan, the area of the subject land that is located to the east of the railway line has no such protected designation. Noting however that the land directly to the north, i.e. the playing fields, is allocated as *“P3: To protect the recreation ground as an amenity for the settlement and forming part of the green-blue network”*, this designation, should the subject be included within the LDP, can be extended to reflect any such allocation of further playing fields.
- 2.24 It is also material that through previous discussions, Officers have been clear that whilst there is currently little support for a “large” south Newtonhill residential development, i.e. as far south as the Pheppie Burn, in principle, should there be a strategic or local requirement for further residential development, at their suggestion, an appropriate southern boundary would be one that matched the settlements current southern boundary to the west. The bid site KN101 showed the logic of this boundary and it is therefore again respectfully requested that the subject land be allocated for residential use, with the Officers preferred boundary being utilised as the southern extent of the proposal.
- 2.25 In summary, the logical planning considerations that led to the allocation and subsequent granting of planning permission, on appeal, for site OP1 are consistent with the subject land, the land to the south.

### **Strategic Environmental Assessment (LDP 2017)**

- 2.26 The SEA prepared and adopted for the 2017 LDP assessed the OP1, previously H1, Newtonhill allocation and concluded that the *“Site has positives in terms of improving air quality and reducing climate change, the site is next to a settlement, will have pedestrian access and is in a transport corridor and the site is close to existing open space”*. [SEA page 260]. A very positive analysis and based on clear criteria for a proposed development site located within a strategic growth corridor.

### **Strategic Environmental Assessment (LDP 2020)**

- 2.27 The updated SEA is now at its fourth stage in the process of preparation, i.e. the Council have prepared an Environmental Report, which accompanies and informs the Proposed Plan. The SEA seeks to show how the Council assess the effects of the Plan on the environment; how they could address those effects through a process called mitigation; and how they will monitor those effects on the environment. The SEA covers and assesses the topics of Air; Water; Climate

Factors; Soil; Biodiversity (Flora and Fauna); Landscape; Material Assets; Population; Human Health; and Cultural Heritage.

2.28 The SEA assesses both the current OP1 allocation (MIR site KN100) and the further proposed site directly to the south (MIR site KN101), i.e. the subject land. Appendix 4 provides the relevant extracts of both.

2.29 As would be expected for sites directly adjacent to one another, the reporting on most of the topics, i.e. Air; Water; Climatic Factors; Soil; Biodiversity; Population; Human Health; and Cultural Heritage is exactly the same and reports a post mitigation neutral or positive effect for both sites.

2.30 On matters relating to Landscape; and Material Assets, there is however a divergence of reporting of the relative merits of the two sites.

#### *Landscape*

2.31 Whilst the OP1 allocation (KN100) is correctly reported as having a neutral landscape effect, the proposed southern allocation, KN101, is reported as being a large-scale development that breaks the skyline and promotes “urban creep towards Muchalls”. It also notes that the site is in the green belt “which is designated to prevent coalescence between Newtonhill and Muchalls”. The text also however usefully recognises that mitigation in the form of a landscape buffer would effectively mitigate any impacts.

2.32 Our view on a southern landscape buffer remains that, as delivered with the OP1 designation, such an approach would be entirely consistent with the approach taken throughout the Plan at the edge of settlements locations and would effectively form a new southern settlement edge. There would not therefore be any “urban creep” towards Muchalls.

2.33 Regarding the green belt, the “green network”, as stated above, has already been accommodated within the masterplanning exercise for OP1 and there is no reason that this principle cannot be accommodated within the proposed further allocation. The correct time to review all green belt and environmental designation boundaries is through the review of the Local Development Plan.

2.34 The SDP informs that Green Belt is “An area of countryside where strict planning controls are in place to protect the landscape setting of the city, maintain the

*identity of places and provide land for recreation*". A review of the subject lands position shows that the site does not contribute towards protecting the landscape setting of the city; is not required to maintain the identity of Newtonhill as there has already been land developed further south, i.e. the housing at Michael Tunstall Way; and through responsible development it can provide land for recreation. The subject land should not therefore be retained as Green Belt as it does not form a green belt function. Lying west of the railway line, neither is it considered to contribute towards the Special Landscape Area, which mostly lies to the east of the railway line. Indeed the subject land cannot be seen from east of the railway line.

2.35 Regarding the somewhat casual reference that development "*breaks the skyline*", it is clear from the submitted masterplanning exercise that a form of development can be accommodated which respects the local topography and ties in with the current open space areas to the north and the proposed landscape buffer to the south. With the benefit of this further analysis, we are of the opinion that the SEA consideration of this matter would revert from a significant **negative** effect to a post mitigation **neutral** effect, the same categorization as the OP1 designation.

#### *Material Assets*

2.36 The SEA lists the post mitigation effect of the subject land as "uncertain" in relation to education capacity.

2.37 We can however confirm that there is currently sufficient education capacity at both Newtonhill Primary and Portlethen Academy. Subject to the site being allocated, at the time of application for planning permission, the current capacities would be assessed and if there was no longer sufficient capacity, in line with current procedures, developer obligations would be requested by the Council at a level commensurate with Council policy at that time.

2.38 As way of useful background regarding the question of education capacity within the catchment area, the Council acknowledge that the Chapelton development is largely responsible for the temporarily increased roll at Newtonhill Primary and Portlethen Academy, however the Council anticipated this scenario as long ago as 2013 when it granted planning permission for the Chapelton development. By way of summary, the Chapelton development must reserve land for 3 primary schools and 1 secondary school and there are mechanisms for delivery as required at certain trigger points of the development. In short, when the evidence demonstrates that there is a need for new schools at Chapelton, then the Council

has the power through the Chapelton Section 75 Agreement to ensure they are delivered. For these reasons, we submit that any concerns in connection with education are simply misplaced.

2.39 The same position applied to the current OP1 allocation, which is now under construction, and the SEA listed the post mitigation impact, along with the delivery of a *“much needed secondary access to park Place and Cairnhill Drive by linking them together”*, as a positive. The required link road is indeed being delivered by the OP1 consent and it would be perverse now that this infrastructure improvement has been put in place, to not maximise its use through further appropriate residential development.

2.40 With reference to the post mitigation effect of Material Assets being listed as positive for OP1, KN100, this should also therefore be the logical conclusion for the subject land, KN101.

2.41 With the two clarifications for Landscape and Material Assets in place, there is therefore no material difference in the Councils SEA analysis of both the previously allocated OP1 housing site, now under construction, and the promoted subject land.

### **Newtonhill Settlement Statement**

2.42 Whilst not allocating the subject land for the promoted residential and playing field uses, the Proposed Plan makes some changes to the ‘Vision’ for the settlement and to other designated land uses within the settlement statement map.

2.43 With specific reference to the vision, the Proposed Plan states that the identified *“future opportunity housing site”* OP1 can help contribute to housing choice in the Strategic Growth Area. Whilst we can agree that it will indeed lead to choice as an effective housing site, we fail to understand why the Council refer to the site as a future opportunity site. OP1 is clearly an LDP 2017 allocation, benefits from detailed planning permission, granted on appeal, and is currently under construction. To describe the site as a future opportunity site is to simply misinform, as there are in fact no future housing opportunities identified for the settlement. With a projected completion of OP1 within the first five years of the 2017 Plan, i.e. by 2022, a settlement such as Newtonhill requires another housing allocation in order to fulfill its function within the Aberdeen Housing Market Area and the Strategic Growth Area.

2.44 The 'Vision' also refers to the local community seeking the provision of further recreation facilities for teenagers. The proposed allocation can deliver that provision in the form of additional open space within the site and playing fields to the east of the railway line. Indeed, the Council has confirmed, through Live Life Aberdeenshire (LLA) that they are supportive of the proposal to create grass pitches in the location shown within our submissions. In correspondence, the Council has further agreed that the pitches should have the necessary drainage infrastructure and provision of storage / pavilion space within the local environs. With no other locations available for playing field in or around Newtonhill, the proposed to be allocated site is therefore the only location that is deliverable and has the support of LLA for the provision of further local recreation facilities. As way of background for the Reporter, LLA is an innovative body tasked with delivering Sports and Cultural Services on behalf of Aberdeenshire Council.

2.45 Policy RD2: Developer Obligations advises that a developer of residential land may be required to make provision for appropriate infrastructure. Contributions are required to be fair and to reasonably relate to the scale of development proposed in order to make the development acceptable in planning terms. We can confirm that the proposed development can accommodate this position; with the significant offer of additional land for the proposed playing fields. The delivery of the land for playing fields can of course also facilitate the opportunity for any outstanding financial contributions from OP1 and other relevant developments to be utilised / spent locally. Indeed, the OP1 Section 75 agreement specifically prioritises the spending of playing fields contributions within Newtonhill prior to considering other locations. The land to the east of the railway line is the Councils preferred location for new playing fields.

2.46 In and around the subject land, there are also other recently updated and indeed requiring to be updated designations. P5 and P8 are new "Protected Land" designations. P5 is the SUDS area associated with the housing development directly to its north and although the plan seeks to protect this area, it is already protected by its very use. P8 is an area of gorse, very similar to the gorse which characterised most of the OP1 allocation and indeed land directly to its west, which has no such protective designation.

2.47 Within the LDP background documents, we can find no reference as to why these protected land designations have been included or the justification for them. There seems to be nothing meritorious of the Plans reference to P8 in particular "forming

part of the green-blue network”. The characteristics of the land appear very similar to many areas of gorse that are commonly found in this coastal environment. Indeed, when analysing the site merits and reporting these to the Kincardine and Mearns Area Committee, Officers reported that whilst this land, along with other land to the south of the settlement, may have some value for wildlife, it was recognised that the subject land is not of a standard that can be protected by additional Local Nature Conservation Site (LNCS) status. Notwithstanding, the proposed Masterplan seeks to provide a context for this P8 area within its overall landscape / topographical analysis of the proposed site.

2.48 Another “Protected Land” anomaly exists on P2, where the approved vehicular access to OP1 has not been shown. Now that the access has been constructed, this anomaly should be corrected to properly reference the physical feature.

2.49 Whilst we cannot locate any rationale behind the inclusion of the newly identified P8 protected land designation, we also note the comments from SNH that, if the site were to be allocated for development purposes, a site brief / Masterplan should be required to include adequate biodiversity, open space, suitable active travel provision and seek to utilise the core path as a cycle link between Muchalls and Newtonhill. The applicant agrees with and is confident the above matters can indeed be incorporated into an agreed development brief / Masterplan, a proposed draft of which is included within Appendices 2 & 3.

### **3.0 Conclusion**

3.1 This proposal presents a further phased development in accordance with the approved and currently under construction layout for OP1, i.e. to provide a cohesive and well-integrated development delivering both mainstream and affordable homes. Indeed, when preparing the OP1 Masterplan, Aberdeenshire Council specifically requested that vehicular and pedestrian access to the south be facilitated to allow for potential future allocation and development of the subject land. This was therefore included within the Council agreed OP1 Masterplan and further confirmed through the planning permission, granted on appeal.

3.2 The appropriate time to consider the allocation of a further site for housing purposes is of course through this review of the Local Development Plan.

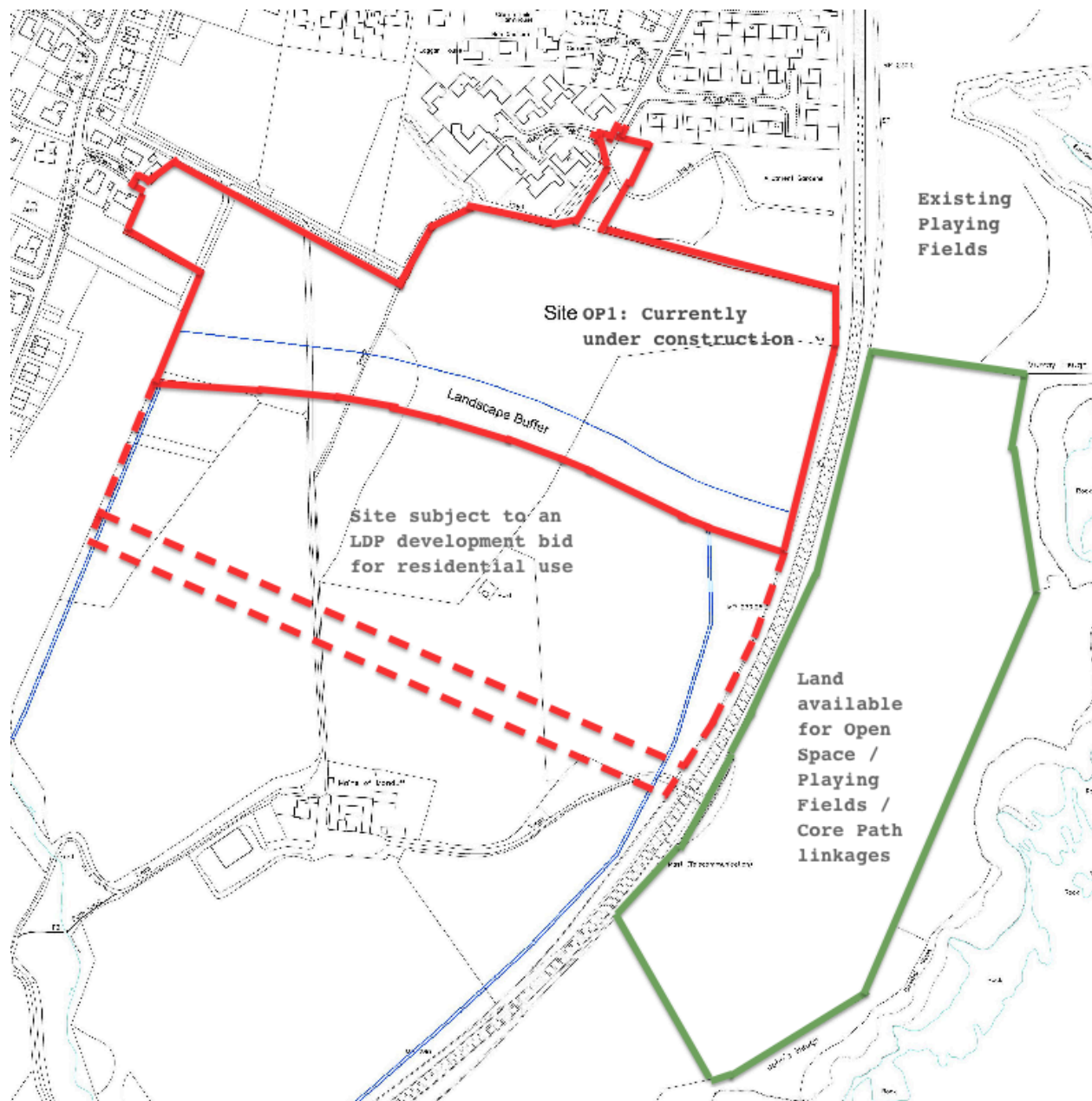
3.3 Through the previous LDP MIR, Aberdeenshire Councils assessment of the previous development bid identified the site as a partial officer’s preference and the

site remains logically located for a natural extension to the village with minimal landscape impact. For clarification, a “partial officer’s preference” was where the officers liked some but not all of the elements of a bid.

- 3.4 It is clear that the Housing Land Audit process masks and does not provide an accurate assessment of housing land supply deficiencies in the Aberdeen Housing Market Area and specifically in the Kincardine and Mearns area / Aberdeen to Laurencekirk growth corridor and the only way to resolve this is through the allocation of additional sites of a suitable scale that are capable of early and incremental delivery to ensure that housing is delivered within the periods specified by the LDP.
- 3.5 It is also clear that the Councils Strategic Environmental Assessment could and should properly assess the merits of the subject land as equal in standing to the conclusions found for allocated site OP1.
- 3.6 We would therefore respectfully request that the subject land is identified for approximately 120 houses, with a requisite level of affordable housing, currently 25% or identified as ‘FOP’, a future opportunity site; with the land to the east of the railway line identified for open space / playing field purposes.



## Appendix 1: Site Plan



## Appendix 2: Masterplan



## **Appendix 3: Masterplan Report (Submitted by separate email)**

## **Appendix 4: Strategic Environmental Assessment: Newtonhill Extracts**

# Strategic Environmental Assessment of New Allocated Sites and Alternative Bid Sites – Kincardine and Mearns

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## NEWTONHILL

### Preferred Sites

Site Ref: OP1 (KN100) Park Place		Proposal: 121 homes	
SEA Topics	Effect	Comments Effects should be assessed in terms of <ul style="list-style-type: none"> <li>• reversibility or irreversibility</li> <li>• risks</li> </ul>	Effect – post mitigation
Air	0	<ul style="list-style-type: none"> <li>○ For the most part, air quality is likely to have short to medium-term temporary insignificant effects. Good access to the bus service and shops.</li> </ul>	0
Water	0	<ul style="list-style-type: none"> <li>○ Nigg WWTW has capacity, but local sewer reinforcement and DIA may be required. Invercannie and Mannofield WTW has capacity, but local water reinforcement may be required.</li> <li>○ Some localised impacts on watercourses would occur during the development phase of this site i.e. change in water table, stream flows, silt deposition and water-borne pollution. The impact is likely to be short-term.</li> </ul>	0
Climatic Factors	-	<ul style="list-style-type: none"> <li>○ There would be an increase in CO<sub>2</sub> emissions from traveling, but the effect could be mitigated as the site near several bus routes and shops.</li> </ul>	0
Soil	0	<ul style="list-style-type: none"> <li>○ The proposed development is likely to have short-term adverse effects on soil through soil erosion, desegregation, compaction and pollution during construction phases.</li> </ul>	0
Biodiversity	-	<ul style="list-style-type: none"> <li>○ The development of a greenfield site is likely to have long-term irreversible adverse impact on biodiversity through the loss of habitats and/or habitat fragmentation and/or disturbance to species that use the site as a habitat, namely birds.</li> <li>○ However, this will be offset by the landscape buffer.</li> </ul>	0
Landscape	-	<ul style="list-style-type: none"> <li>○ Large scale development that would impact on the landscape experience of the area in the long term - openness, scale, colour, texture, visual diversity, line, pattern, movement, sound, solitude, naturalness.</li> <li>○ However, the site gently undulates, with the exception towards the train line, and would appear to be a logical extension to the settlement, as it would facilitate a link road between Park Place and Cairnhill Drive and provide secondary access to these parts of the settlement.</li> <li>○ The impact would be mitigated by a landscape buffer, as identified as site P4 in the 2017 LDP. In 2018, a masterplan has been agreed for the site.</li> </ul>	0
Material Assets	+/-	<ul style="list-style-type: none"> <li>○ The proposal will increase pressure on the primary school, which is forecast to be at 113% capacity by 2022. This calculation includes this bid site, as it is currently allocated in the 2017 LDP.</li> <li>○ Consultation with relevant infrastructure providers will be required to identify mitigation measures, and if allocated, the Settlement Statement will specify how to mitigate against these effects.</li> <li>○ Will provide a much-needed secondary access to Park Lane and Cairnhill Drive by linking them together.</li> </ul>	+

<b>Population</b>	+	o Mix of house types is proposed resulting in a housing choice for all groups of the population.	+
<b>Human Health</b>	-	o It would result in loss of open space, but new areas will be provided. The core path will be protected and enhanced. o Provision of new housing in conformity with new building standards can enhance good health and social justice for people with no previous access to housing. o Population not at risk from hazardous developments.	0
<b>Cultural Heritage</b>	0	o Unlikely to have any effects on the historic environment. The Sites and Monuments note there was once a croft in the area, but it has since been destroyed.	0
<b>Key</b>	+ = positive effect   ++ = significant positive effect - = negative effect   -- = significant negative effect 0 = neutral effect   ? = uncertain effect		

<b>Site Ref: OP2 (KN056), Land West of the A90, Newtonhill</b>		<b>Proposal: 12.1ha employment land</b>	
<b>SEA Topics</b>	<b>Effect</b>	<b>Comments</b> Effects should be assessed in terms of <ul style="list-style-type: none"> <li>• reversibility or irreversibility</li> <li>• risks</li> <li>• duration (i.e. permanent, temporary, long-term, short-term and medium-term)</li> </ul>	<b>Effect – post mitigation</b>
<b>Air</b>	0	o A proposal of this scale will lead to a decrease in air quality, but Newtonhill does not have air quality issues. Effects are likely to be medium/long-term. o The site is located in close proximity to Newtonhill and Chapelton. Opportunities to enhance and encourage active transport would lessen carbon emissions related to vehicle use and would help offset any negative air quality impact.	0
<b>Water</b>	0	o Nigg WWTW has capacity, but local sewer reinforcement and DIA may be required. Invercannie and Mannofield WTW has capacity, but local water reinforcement may be required.	0
<b>Climatic Factors</b>	-	o The site does not contain an area known to be at risk of fluvial or pluvial flooding. o A proposal on this scale has the potential to cause an increase in concentrations of CO <sub>2</sub> emissions through increased car travel. Effects are likely to be medium-term and will be lessened given the site is adjacent to Newtonhill.	-/0
<b>Soil</b>	0	o The proposed development is likely to have short-term adverse effects on soil through soil erosion, desegregation, compaction and pollution during construction phases	0
<b>Biodiversity</b>	0	o The site is currently farmland and is unlikely to have a long-term adverse impact on biodiversity. o No measures to enhance biodiversity have been identified, but LDP policy requires all development to include open space and biodiversity enhancement.	0/+
<b>Landscape</b>	-	o Significant scale development that would further alter the character of the area. However, the site is relatively flat and would appear to be a logical extension to the settlement. The site is currently allocated in the LDP as site OP2. The impact could be mitigated by strategic landscaping, and if it is continued to be allocated, this will be stated as part of the development requirements for the site.	-/0



<b>Material Assets</b>	+	o The development is unlikely to have a significant impact upon local infrastructure, but given its scale the site could provide biodiversity enhancement (e.g. trees).	+
<b>Population</b>	+	o Provide employment land near where people live in Newtonhill and Chapelton.	+
<b>Human Health</b>	+	o It would not result in loss of open space/core paths. o Poor air quality is likely to have a long-term effect on human health. o Provision and promotion of sustainable transport modes would have a positive impact on human health.	+
<b>Cultural Heritage</b>	0	o Unlikely to have any effects on the historic environment.	0
<b>Key</b>	+ = positive effect   ++ = significant positive effect - = negative effect   -- = significant negative effect 0 = neutral effect   ? = uncertain effect		

### Alternative sites

<b>Site Ref: KN101 Site Directly South of OP1, North of Mains on Monduff, Newtonhill</b>		<b>Proposal: 120 homes</b>	
<b>SEA Topics</b>	<b>Effect</b>	<b>Comments</b> Effects should be assessed in terms of <ul style="list-style-type: none"> <li>• reversibility or irreversibility</li> <li>• risks</li> <li>• duration (i.e. permanent, temporary, long-term, short-term and medium-term)</li> </ul>	<b>Effect – post mitigation</b>
<b>Air</b>	<b>0</b>	o For the most part, air quality is likely to have short to medium-term temporary insignificant effects. Good access to the bus service and shops.	0
<b>Water</b>	<b>0</b>	o Nigg WWTW has capacity, but local sewer reinforcement and DIA may be required. Invercarnie and Mannofield WTW has capacity, but local water reinforcement may be required. o Some localised impacts on watercourses would occur during the development phase of this site i.e. change in water table, stream flows, silt deposition and water-borne pollution. The impact is likely to be short-term.	0
<b>Climatic Factors</b>	<b>-</b>	o There would be an increase in CO <sub>2</sub> emissions from travelling, but the effects are mitigated as the site is near bus routes and shops.	0
<b>Soil</b>	<b>0</b>	o The proposed development is likely to have short-term adverse effects on soil through soil erosion, desegregation, compaction and pollution during construction phases.	0
<b>Biodiversity</b>	<b>-</b>	o The development of a greenfield site is likely to have a long-term irreversible adverse impact on biodiversity through the loss of habitats and/or habitat fragmentation and/or disturbance to species that use the site as a habitat, namely birds. o However, this will be offset by the landscape buffer.	0
<b>Landscape</b>	<b>--</b>	o The site is located within the Southeast Aberdeenshire Coast Special Landscape Area and the Aberdeen green belt.	--

		<ul style="list-style-type: none"> <li>○ Large scale development that breaks the skyline and would impact on the landscape experience of the area in the long-term - openness, scale, colour, texture, visual diversity, line, pattern, movement, sound, solitude, naturalness.</li> <li>○ Urban creep towards Muchalls. The site is in the green belt, which is designated to prevent coalescence between Newtonhill and Muchalls.</li> <li>○ Mitigation in the form of a landscape buffer would partially mitigate the impacts, it would threaten the green belt's integrity by increasing coalescence with Muchalls.</li> </ul>	
<b>Material Assets</b>	-	<ul style="list-style-type: none"> <li>○ The proposal will increase pressure on the primary school, which is forecast to be at 113% capacity by 2022. There will be capacity issues until the Chapelton Primary school is built.</li> <li>○ Consultation with relevant infrastructure providers will be required to identify mitigation measures, and if allocated, the Settlement Statement will specify how to mitigate against these effects.</li> </ul>	?
<b>Population</b>	+	<ul style="list-style-type: none"> <li>○ A mix of house types is proposed resulting in a housing choice for all groups of the population.</li> </ul>	+
<b>Human Health</b>	-	<ul style="list-style-type: none"> <li>○ It would result in loss of open space, but new areas will be provided. The core path will be protected and enhanced.</li> <li>○ Provision of new housing in conformity with new building standards can enhance good health and social justice for people with no previous access to housing.</li> <li>○ Population not at risk from hazardous developments.</li> </ul>	0
<b>Cultural Heritage</b>	0	<ul style="list-style-type: none"> <li>○ Unlikely to have any effects on the historic environment.</li> </ul>	0
<b>Key</b>	+ = positive effect   ++ = significant positive effect - = negative effect   -- = significant negative effect 0 = neutral effect   ? = uncertain effect		

<b>Site Ref: KN132 Land at Cammachmore, Newtonhill</b>		<b>Proposal: 10 homes</b>	
<b>SEA Topics</b>	<b>Effect</b>	<b>Comments and mitigation measures</b> Effects should be assessed in terms of <ul style="list-style-type: none"> <li>• reversibility or irreversibility</li> <li>• risks</li> <li>• duration (i.e. permanent, temporary, long-term, short-term and medium-term)</li> </ul>	<b>Effect - post mitigation</b>
<b>Air</b>	0	For the most part, air quality is likely to have short to medium-term temporary insignificant effects.	0
<b>Water</b>	0	<ul style="list-style-type: none"> <li>○ Nigg WWTW has capacity, but local sewer reinforcement and DIA may be required. Invercannie and Mannofield WTW has capacity, but local water reinforcement may be required.</li> <li>○ Some localised impacts on watercourses would occur during the development phase of this site i.e. change in water table, stream flows, silt deposition and water-borne pollution. The impact is likely to be short-term.</li> <li>○ The site is adjacent to a watercourse and a buffer strip would be required to mitigate against any effects. If allocated, this mitigation would be stated as a development requirement of the opportunity site.</li> </ul>	0

<b>Climatic Factors</b>	0	<ul style="list-style-type: none"> <li>○ The development is small scale and not likely to have significant impacts.</li> <li>○ The development is in an area identified at risk from surface water flooding and is likely to have a long-term effect on climate and the water environment. Parts of the site found to be at risk from flooding could form part of the open space provision, also a Flood Risk Assessment (FRA) may be required. If allocated, these mitigations would be stated as part of the development requirements for the site.</li> </ul>	0
<b>Soil</b>	0	<ul style="list-style-type: none"> <li>○ The proposed development is likely to have short-term adverse effects on soil through soil erosion, desegregation, compaction and pollution during construction phases</li> <li>○ There is potential soil contamination on site and development presents an opportunity for soil remediation.</li> </ul>	0/+
<b>Biodiversity</b>	0	<ul style="list-style-type: none"> <li>○ Development will include field areas with low biodiversity value and development including planting is likely to lead to biodiversity improvement (although small scale).</li> <li>○ Greenspace network close by and linkages are possible.</li> </ul>	0
<b>Landscape</b>	-	<ul style="list-style-type: none"> <li>○ The site is located within the Aberdeen green belt.</li> <li>○ The nature of land use in the area will be changed and displaced. The relationship between landforms and land use; field pattern and boundaries as well as buildings and structure will change, with long-term effects.</li> <li>○ The location of development within a green belt area threatens its integrity through coalescence of settlements. There are no measures available to mitigate against this.</li> </ul>	-
<b>Material Assets</b>	0	<ul style="list-style-type: none"> <li>○ The small-scale proposal of 10 homes will not lead to any significant pressure on local infrastructure. However, Portlethen Secondary School is overcapacity.</li> <li>○ Consultation with relevant infrastructure providers will be required to identify mitigation measures, and if allocated, the Settlement Statement will specify how to mitigate against these effects.</li> </ul>	0
<b>Population</b>	0	<ul style="list-style-type: none"> <li>○ A mix of houses is possible, small scale enhancement within existing cluster of houses.</li> <li>○ However, proposals must accord with the design policies in the LDP and include a mix of house types.</li> </ul>	+/0
<b>Human Health</b>	0	<ul style="list-style-type: none"> <li>○ It would not result in loss of open space/core paths.</li> <li>○ Provision of new housing in conformity with new building standards can enhance good health and social justice for people with no previous access to housing.</li> </ul>	0
<b>Cultural Heritage</b>	0	<ul style="list-style-type: none"> <li>○ Unlikely to have any effects on the historic environment.</li> </ul>	0
<b>Key</b>	+ = positive effect   ++ = significant positive effect - = negative effect   -- = significant negative effect 0 = neutral effect   ? = uncertain effect		

Site Ref: KN133 Land at Michael Tunstall Place & Cairnhill Drive, Newtonhill		Proposal: 150 homes	
SEA Topics	Effect	Comments Effects should be assessed in terms of <ul style="list-style-type: none"> <li>• reversibility or irreversibility</li> <li>• risks</li> <li>• duration (i.e. permanent, temporary, long-term, short-term and medium-term)</li> </ul>	Effect – post mitigation
Air	0	<ul style="list-style-type: none"> <li>○ For the most part, air quality is likely to have short to medium-term temporary insignificant effects. Good access to the bus service and shops.</li> </ul>	0
Water	-	<ul style="list-style-type: none"> <li>○ Nigg WWTW has capacity, but local sewer reinforcement and DIA may be required. Invercarnie and Mannofield WTW has capacity, but local water reinforcement may be required.</li> <li>○ Some localised impacts on watercourses would occur during the development phase of this site i.e. change in water table, stream flows, silt deposition and water-borne pollution. The impact is likely to be short-term.</li> <li>○ The site is adjacent to Pheppie Burn and a buffer strip would be required to mitigate against any effects. If allocated, the development requirements of the opportunity site would include a statement, e.g. “A buffer strip will be required adjacent to the Pheppie Burn and should be integrated as positive feature of the development. A Flood Risk Assessment may also be required.”</li> </ul>	0
Climatic Factors	--	<ul style="list-style-type: none"> <li>○ There would be an increase in CO<sub>2</sub> emissions from traveling, but the effects are mitigated as the site is near bus routes and shops.</li> <li>○ The development is in an area identified at risk from fluvial flooding and is likely to have a long-term effect on climate and the water environment. Part of the site found to be at risk from flooding will not be included within an allocation and could form part of the open space provision. If allocated, the development requirements for the site would state that a FRA will be required.</li> </ul>	0
Soil	0	<ul style="list-style-type: none"> <li>○ The proposed development is likely to have short-term adverse effects on soil through soil erosion, desegregation, compaction and pollution during construction phases.</li> </ul>	0
Biodiversity	-	<ul style="list-style-type: none"> <li>○ The development of a greenfield site is unlikely to have long-term adverse impact on biodiversity through the loss of habitats and/or habitat fragmentation and/or disturbance to species that use the site as a habitat. Part of the site is farmed.</li> <li>○ Mitigation measures, such as a buffer strip next to Pheppie Burn would reduce potential negative effects and provide biodiversity enhancement opportunities.</li> </ul>	0
Landscape	--	<ul style="list-style-type: none"> <li>○ The site is located within the Southeast Aberdeenshire Coast Special Landscape Area and the Aberdeen green belt.</li> <li>○ The nature of land use in the area will be changed and displaced. The relationship between landforms and land use; field pattern and boundaries as well as buildings and structure will change.</li> <li>○ The landscape experience is likely to change - openness, scale, colour, texture, visual diversity, line, pattern, movement, sound, solitude, naturalness, historical and cultural associations will change.</li> </ul>	--

		<ul style="list-style-type: none"> <li>○ The built form of Newtonhill would move towards Muchalls, leading to potential impacts on the setting.</li> <li>○ The site is in the green belt, which is designated to prevent coalescence between Newtonhill and Muchalls.</li> <li>○ Mitigation in the form of a landscape buffer would partially mitigate the impacts and provide a better settlement treatment for the southern boundary of Newtonhill, but it would threaten the green belt's integrity by increasing coalescence with Muchalls.</li> </ul>	
<b>Material Assets</b>	-	<ul style="list-style-type: none"> <li>○ There are a number of infrastructure constraints associated with the site, namely education provision, which could have a long-term effect.</li> <li>○ The proposal will increase pressure on the primary school, which is forecast to be at 113% capacity by 2022. There will be capacity issues until the Chapelton Primary school is built.</li> <li>○ Consultation with relevant infrastructure providers will be required to identify mitigation measures, and if allocated, the Settlement Statement will specify how to mitigate against these effects.</li> </ul>	?
<b>Population</b>	+	<ul style="list-style-type: none"> <li>○ An adequate mix of house types is proposed resulting in a housing choice for all groups of the population, including up to 37 affordable homes.</li> </ul>	+
<b>Human Health</b>	0	<ul style="list-style-type: none"> <li>○ It would not result in loss of open space/core paths.</li> <li>○ Provision of new housing in conformity with new building standards can enhance good health and social justice for people with no previous access to housing.</li> <li>○ Population not at risk from hazardous developments.</li> </ul>	0
<b>Cultural Heritage</b>	-	<ul style="list-style-type: none"> <li>○ Would result in Newtonhill settlement boundary edging very close to Muchalls Conservation Area, and potential coalescence of settlements.</li> <li>○ The strip of strategic landscaping is unlikely to fully mitigate against this impact.</li> </ul>	-
<b>Key</b>	+ = positive effect   ++ = significant positive effect - = negative effect   -- = significant negative effect 0 = neutral effect   ? = uncertain effect		

## Appendix 5: Background to Site Promotion (Call for Sites and MIR)

### 1.0 Background to site promotion through the 'Call for Sites' and 'MIR' stages of LDP Preparation.

### 2.0 Call for Sites (March 2018)

2.1 As background, for when these documents are forwarded to the Reporter(s), it is relevant to note that during the 'Call for Sites' stage, PPNL submitted comprehensive development bids for the retention of OP1 and the allocation of land directly to the south, setting out a detailed justification as to why PPNL considered that OP1 should continue to be allocated for residential development and also why land directly to the south be identified for further development purposes in the new LDP, including the local benefits that long term planning can bring to Newtonhill.

### 3.0 Main Issues Report / Draft LDP (2019)

3.1 Within the MIR, the site bids were referenced as **KN100**, OP1, and **KN101**, land to the south of OP1.

3.2 **KN100** was identified as an officers preference with two key changes proposed from the existing OP1 allocation. In accordance with the bid, the indicative site capacity was increased from 70 houses to 120 houses. This was therefore supported. The second proposed change was to reflect the fact that land outwith the bid that was currently allocated, i.e. within the 'paddock' was not being carried forward as there was no developer interest. That change was also supported.

3.3 **KN101**, i.e. land to the south of OP1, was not identified as an Officers Preference and PPNL objected to the sites exclusion as either an allocation or as 'FOP', a future opportunity site. Through the detailed consideration of **KN101**, the MIR then presented various summaries to back up the position of 'non allocation' and we responded as follows:

3.3.1 *"The proposed site is well located in relation to the settlement, but it has a number of constraints".*

**Response:** We agree that the site is well located in relation to the settlement and all previous analysis by the Council had shown this to be the case. Furthermore,

there are no constraints that can override this physical fact as there are no constraints that are insurmountable, i.e. as set out below.

3.3.2 ***“It includes land that forms part of the green network, contains semi natural habitats, and is entirely within the Aberdeen City green belt and the Southeast Aberdeenshire Coast Special Landscape Area”.***

**Response:** The “green network” had already been accommodated within the masterplanning exercise for OP1 and there was / is no reason that this principle cannot be accommodated within the proposed further allocation. The correct time to review all green belt and environmental designation boundaries is through the review of the Local Development Plan. The SDP informs that Green Belt is “An area of countryside where strict planning controls are in place to protect the landscape setting of the city, maintain the identity of places and provide land for recreation”. A review of the subject lands position shows that it does not protect the landscape setting of the city; is not required to maintain the identity of Newtonhill as there has already been land developed further south, i.e. the housing at Michael Tunstall Way; and through responsible development it can provide land for recreation. The subject land should not therefore be retained as Green Belt. Lying west of the railway line, neither is it considered to contribute towards the Special Landscape Area, which mostly lies to the east of the railway line.

3.3.3 ***“It would rely on access from site OP1 and its potential impact on the A92 trunk road (formerly the A90) is a concern”.***

**Response:** At the request of the Council, the approved Masterplan, and subsequently approved layout, through appeal, for OP1, all specifically accommodate two points of access to the land to the south, i.e. **KN101**. Any proposals on the subject land would also require a full Transport Assessment. However, it is relevant that our highway consultants are at this time unaware of any unspecified and potentially adverse impacts that would occur on the A92 trunk road as a result of this proposed development. If the Council has any detailed information regarding concerns of adverse impact on the A92 these should have been provided within the MIR and indeed within any subsequent documents. None have been forthcoming.

3.3.4 ***“The site would be visually prominent, and its scale and location will negatively affect how it relates within the landscape, as it would break the skyline and continue towards Muchalls”.***

**Response:** Generally, the majority of the site lies at a lower level than most of the current residential areas of Newtonhill and cannot be considered to be visually prominent. The submitted Masterplan has been designed around any high points and suitable landscaping accommodated in line with normal Council standards and this Masterplan can be refined in liaison with Council officials to facilitate the context for an appropriate form of development.

3.3.5 ***“The site is also constrained in terms of education provision”.***

**Response:** There is currently sufficient education capacity at both Newtonhill Primary and Portlethen Academy. Subject to the site being allocated, at the time of application for planning permission, the relevant capacities would be re-assessed and if there was no longer sufficient capacity, in line with current procedures, developer obligations would be requested by the Council at a level commensurate with Council policy at that time.

As way of background, the Council acknowledges that the Chapelton development is largely responsible for the increased roll at Newtonhill Primary and Portlethen Academy, however the Council anticipated this scenario as long ago as 2013 when it granted planning permission for the Chapelton development. By way of summary, the Chapelton development must reserve land for 3 primary schools and 1 secondary school and there are mechanisms for delivery as required at certain trigger points of the development. In short, when the evidence demonstrates that there is a need for new schools at Chapelton, then the Council has the power through the Chapelton Section 75 Agreement to ensure they are delivered. For these reasons, we submit that any concerns in connection with education are simply misplaced.

3.3.6 ***“The proposal is considered to be contrary to community aspirations, most notably that new development avoids coalescence with Muchalls”.***

**Response:** The Community Council have made clear their opposition to the principle of **any** further development in the Newtonhill and Muchalls area, including the currently under construction OP1 site, not just on this site. That position is simply not tenable for a settlement that lies within a strategic corridor, i.e. the SDP informs that’s where the majority of development should be focused. The proposed site would not result in coalescence with Muchalls and is indeed further away from Muchalls than the existing Newtonhill settlement boundary further to the west at



Michael Tunstall Place.

#### **4.0 Aberdeenshire Local Development Plan (LDP) 2017: Context**

- 4.1 There has been a clear failure of the extant LDP to deliver the housing land requirements set by the approved SDP. These issues were continually highlighted by various housebuilders, Polmuir Properties (Newtonhill) Limited amongst them, in response to the previous LDP and successive Housing Land Audits.
- 4.2 Scottish Planning Policy (SPP) clearly focuses on the delivery of sustainable development and in particular, the delivery of housing in specified plan periods. Paragraph 115 requires that Plans set out the housing supply target for each functional housing market area based on evidence from the Housing Needs & Demand Assessment. It advises that the housing supply target is a policy view of the number of homes the authority has agreed will be **delivered** in each Housing Market Area over the periods of the Development Plan and the Local Housing Strategy. The subsequent paragraph 116 requires that within the overall housing supply target, plans should indicate the number of new homes to be **built** over the Plan period. In allocating sites paragraph 119 advises that Planning Authorities should be confident that land can be brought forward for development within the Plan period and that the range of sites allocated will enable the housing supply target to be met.
- 4.3 Planning Authorities therefore must ensure that those sites can be delivered and houses built within the plan period. If that cannot be achieved, as is clearly the case in this southern growth corridor, additional sites must be allocated. This is essential to ensure there are no difficulties with delivering housing later in the plan period.
- 4.4 As way of an example close to Newtonhill, the new settlement at Chapelton of Elsick was expected to deliver 1,845 units in the period 2012-2016, but in fact has only delivered 164 up the end of 2018 (Source: HLA 2019). As a consequence, notwithstanding the current shortfall, the remaining houses allocated on that site for the following period also cannot be delivered until the balance of the units from the previous period have been built. Similar scenarios exist throughout the Aberdeen Housing Market Area.
- 4.5 The only way this can be resolved is through the allocation of additional small/medium scale, incremental sites such as South Newtonhill which are

capable of early delivery to ensure that housing is delivered within the time periods specified by the SDP.

- 4.6 The failure of the LDP's large scale sites to deliver the required housing within the specified Plan periods is compounded by an ongoing and increasing demand for small/medium sized, more marketable mainstream housing. This LDP review should therefore promote a strategy of medium scale, i.e. 100-150 unit sites that are of a scale to facilitate a 5 year build programme, i.e. approximately 30 per annum, in strategic growth corridors, and have the necessary infrastructure capabilities to be delivered timeously.
- 4.7 On the basis of the above, and given the focus of SPP on the timeous delivery of housing, there is a compelling case for the allocation of an additional, incremental housing allocation to the south of the existing OP1 allocation at Newtonhill. The site has sufficient infrastructure capacity, is capable of early delivery in the medium range of 100–150 houses and should be allocated in the Local Development Plan 2020 for approximately 120 houses.

## **5.0 Aberdeenshire Local Development Plan (LDP) 2017: OP1 and the 'Bid' Site to the South**

- 5.1 As way of background context for the promotion of the subject land, it is material that the Aberdeenshire Local Development Plan 2017 continued to identify an allocation for housing, OP1, to the south of Newtonhill. That site now benefits from planning permission and is currently under construction by Barratt Homes for 121 houses, including 30 affordable units.
- 5.2 It is also material that the last housing development in Newtonhill, another Barratt Homes development in the southwest of Newtonhill, at Michael Tunstall Place, in difficult market conditions progressed quickly and was completed ahead of programme. Site OP1 has an approved market mix that has been specifically tailored to appeal to the current market. The development can therefore be anticipated to complete within the current plan period, the only historic delays being the requirement to go to appeal to secure the consent and the only recent delay due to the COVID-19 pandemic. The allocation of a further phase of housing directly to the south will therefore allow for a timeous and incremental growth in line with the new LDP base date of 2020.

- 5.3 To date, the approved masterplan and subsequent planning permission for OP1 has resulted in finalised agreement over the form and type of development with no constraints being identified. Indeed, when preparing the OP1 masterplan, Aberdeenshire Council specifically requested that vehicular and pedestrian access to the south be facilitated to allow for potential future allocation of the subject land. These points of potential vehicular access have therefore been included within the Council agreed document and are reflected in the approved layout.
- 5.4 Notably, the subject land is free from any technical or environmental constraints and is in the control of an Aberdeen based developer and is deliverable.
- 5.5 Finally, it should be noted that when allocating OP1, Aberdeenshire Council recognised through detailed site assessment that housing development at South Newtonhill resulted in positive impacts in that it can improve air quality and mitigate against climate change due to proximity to an existing settlement; it is in a transport choice corridor; and has existing and easily accommodated additional pedestrian links. There were no identified negative impacts. Lying directly to the south of this comprehensively considered allocation OP1, we suggest that the subject land similarly benefits from the previous positive contextual analysis.
- 5.6 Through the previous MIR and the responses submitted following the consultation on the MIR, there was in fact a level of support for the bid site and its potential allocation for housing and associated playing fields.
- 5.7 Whilst various 'bids' were submitted around the settlement at that time, the subject land was the most favourably assessed by Aberdeenshire Council and the MIR recognised that if additional development was required then it would be to the south of Newtonhill. Indeed, at a public consultation meeting regarding the emerging plan, it was recognised by Officers that there may be merit in some additional housing allocation, particularly if at a scale and with a southern boundary reflective of the neighbouring Barratt Homes development directly to the west at Michael Tunstall Place. This position was openly expressed by Officers at that public consultation meeting. In summary, the MIR concluded that the site could be partially considered as an officers preference subject to an agreed Masterplan and a reduced scale of development to reflect the line of the current settlement boundary to the west, a line specifically suggested by Officers.
- 5.8 In representation, PPNL noted that the area of the 'bid' site east of the railway line **(KM111)** was identified as an Officers preference for a potential playing field

associated with the larger bid area although, subject to the scale of development allocation, that has to be seen as an integral part of the wider development. The MIR also acknowledged the presence of the LNCS but correctly referred to the ability of this area to accommodate a potential playing field without affecting this designation.

- 5.9 Whilst this MIR ultimately did not support any further residential land releases / allocations at Newtonhill, PPNL very much continue to endorse the Councils preferred direction for growth status of the site south of Newtonhill and again seek its inclusion in the emerging LDP for residential development.

# Newtonhill South: Masterplan Report / Indicative Development Framework

Polmuir Properties (Newtonhill) Limited  
July 2020



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Figure 1: Site Location Plan

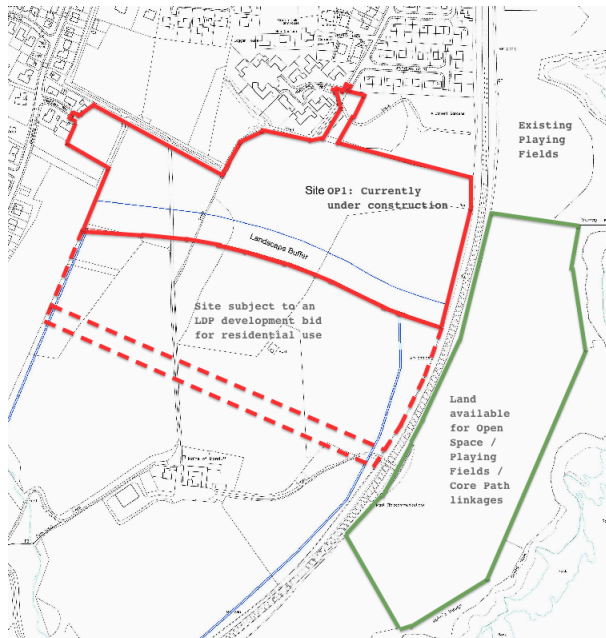
Figure 2: Indicative Development Framework (IDF)

## 1.0 Introduction & Executive Summary

- 1.1 This Masterplan Report and the associated Indicative Development Framework (IDF) have been prepared on behalf of Polmuir Properties (Newtonhill) Limited (PPNL) to inform submissions made promoting residential and open space allocations within the Proposed Aberdeenshire Local Development Plan 2020 on land at South Newtonhill.
- 1.2 PPNL is an Aberdeen based residential developer with a strong track record of delivery and an insistence on the highest development standards. PPNL successfully promoted and delivered, through Barratt Homes, the LDP OP1 residential and open space allocation directly to the north.
- 1.3 The Newtonhill South Indicative Development Framework presented in this document and the report itself, aim to guide key design principles for the subject land and provide guidance on the form and level of development.
- 1.4 The subject land, which lies directly to the south of LDP allocation OP1 is promoted as the next phase of residential development in the LDP period of 2020 – 2025 with an indicative capacity of approximately 120 houses. It is proposed, through separate representations, that the release of the site be included within the LDP development programme to commence when OP1 has been substantively completed, currently anticipated by late 2022. The proposed playing fields / open space areas to the east of the railway line to be delivered in tandem with the proposed residential development.
- 1.5 To facilitate a clear understanding of the site and its context, this Masterplan Report and the Indicative Development Framework have been prepared to support the proposals. This document expands on the quality and character of the approved and under construction Op1 site directly to the north and illustrates how proposed design principles comply with required LDP criteria to guide development of the site.
- 1.6 PPNL recognise that, as with the approved OP1 site, the promotion of good design is an integral part of the planning process and the main purpose of the submitted Masterplan Report is therefore to ensure that the principles of good design are embodied within the future development of the site.
- 1.7 In summary, this proposal presents a further development in accordance with the approved and currently under construction layout for OP1, i.e. to provide a cohesive and well-integrated development delivering both mainstream and affordable homes. Indeed, when considering the content of the OP1 Masterplan, Aberdeenshire Council specifically requested that vehicular and pedestrian access to the south be facilitated to allow for potential future allocation and development of the subject land. This has therefore been included within the Council agreed document and further confirmed through the planning permission for OP1, approved on appeal and currently under construction.
- 1.8 The Indicative Development Framework therefore provides a suitable context to plan for an appropriate allocation providing:
- Approximately 120 houses, including 25% affordable housing;
  - 40% Open Space;
  - Land for Playing Fields and local spend of required Developer Obligation payments from this development and OP1;

- A high level of connectivity within the site;
- Accessible networks and routes to wider facilities;
- The context for a mix of property sizes and a development layout to provide for an encouraged mix of different types of residents;
- A sense of community through easy access to local neighbourhood facilities and an attractive and high quality environment in which all users will have opportunity and be encouraged to walk and be less car dependent.

Figure 1: Site Location Plan





## 2.0 Site Location, Description and Land Use

- 2.1 The site is located on the southern edge of Newtonhill and is characterised by farmland and scrub, largely consisting of gorse. Set on a south-facing slope, the main topographical feature is a centrally based hillock.
- 2.2 The proposed development site extends to around 7.4 hectares, gross, and is bounded by currently under construction residential development to the north; low quality agricultural land, gorse and more mature residential development to the west; and the railway line to the east.
- 2.3 The southern boundary is not strongly defined in visual and landform terms, as indeed was the case with the OP1 site to the north when that was allocated for residential development.
- 2.4 The landform generally falls from the northwest corner of the site to a central hillock, then again more steeply towards the railway line.
- 2.5 The Newtonhill to Muchalls Core Path (no.63) runs through the site.
- 2.6 To the east of the railway line lies further land under the control of PPNL. Currently within agricultural use, this land lies directly to the south of existing playing fields and the Betteridge Community Centre. This land also extends to approximately 7.4 hectares and is offered for playing field use.

## 3.0 Indicative Development Framework

- 3.1 This Masterplan Report defines the influences that have resulted in the submitted Indicative Development Framework (IDF) and supports the design concept and proposed land use parameters to be included within the proposed allocation.
- 3.2 The understanding of relevant context and appropriate design considerations are of course an integral part of the identification of appropriate land use designations. The Masterplan document and IDF is intended to assist in explaining the main design principles and how they have been developed and can be further developed through subsequent application detailing, in response to the proposed site, its wider context and the approved, currently under construction, residential development directly to the north.

### Vision

- 3.3 To create a high quality sustainable residential neighbourhood on the southern edge of Newtonhill, contained within an attractive open space and landscape led setting.
- 3.4 As with the approved development directly to the north, the development will be characterised by an identifiable neighbourhood settlement pattern ensuring a unique sense of place. Overall legibility and townscape cohesion will be achieved through continuing and appropriately evolving the core design principles from the site directly to the north and applying them throughout the whole development area. Located on the southern edge of Newtonhill, the vision for the development would be to also continue the established links between Newtonhill and the new development through

physical accessible design and layout of new houses, open spaces, footpaths and streets.

### **IDF Elements**

- 3.5 In order to achieve the stated vision and timeously deliver the next phase of locally required houses, the following elements and complimentary land uses are proposed:
- Delivery of a mixed range of housing types to meet market demand for families, first time buyers and down sizers;
  - Delivery of 25% of affordable homes within the first phase of development;
  - Utilisations of retained vehicular connections through the currently under construction site to the north;
  - Effective use of the new link formed between Park Place and Cairnhill Way, i.e. providing two points of vehicular access;
  - New footpaths and cycle paths integrated with existing routes;
  - Sustainable Urban Drainage Systems;
  - Provision of 40% on site Open Space;
  - Provision of additional land for playing fields;
  - Creation of a landscape buffer on the southern edge of site, consisting of informal recreation areas and open space linkages;
  - New tree planting;
  - Integration of the site within the wider community by providing links from the site to the wider urban and rural areas;
  - The retention of existing gorse where possible within the LDP P8 area and the southern landscape buffer;

### **The Masterplan Report / IDF Process**

- 3.6 Whilst not a consideration of the Masterplan / IDF process, it should be noted that LDP Policy H1 Housing Land sets out an appropriate policy basis for the assessment of sites allocated for residential purposes. Capacities shown within the LDP are therefore indicative until assessed and justified in detail through a formal application process. This Masterplan Report and IDF are not designed or required by Aberdeenshire Council to go into that detail, although it should be noted that there is sufficient school, infrastructure and highway capacity to support the level of development promoted. Affordable housing will be provided in the first phase of development and the proposed housing will help support local services and amenities.

### **Planning Context: LDP Policies**

- 3.7 Current policies relating to housing densities, require, where practical, housing sites to meet the densities set out in the Aberdeen City and Shire Strategic Development Plan to a minimum of 30 dwellings per hectare thus maintaining finite land resources, creating well designed and sustainable development that sits well within the context of the site. The densities within Newtonhill vary across the settlement with housing situated immediately west of the site being medium density and directly to the north being medium / higher density. The scale of development proposed demonstrates that a range of appropriate densities can be accommodated across the site. With a net residential development area of 4.3 hectares at a required minimum density of 30 dwellings per hectare, it can be reasonably stated that the capacity of the site will be between 120-130 houses, depending on market influences at the time of application. It would therefore be appropriate to state an allocated number of circa 120 units.

- 3.8 LDP Policy P2: Open Space and Access in New Development aims to promote safe, welcoming, distinctive and accessible open space in new developments by complying with the appropriate standards shown within the open space strategy. It advises that in the case of major developments it is expected that 40% of a site will be devoted to open space.
- 3.9 We can confirm that, excluding the landscape buffer to the south, the IDF includes 3.1 hectares of open space and therefore accommodates the requirement for 40% on site open space.
- 3.10 Policy H1: Housing Land supports the development of housing on sites allocated for such purpose and the land is being promoted through the review of the LDP for such an allocation.
- 3.11 Policy H2: Affordable Housing advises that new housing development must contain 25% affordable housing. We can confirm that the land can accommodate this requirement in the first phase of development.
- 3.12 Policy RD2: Developer Obligations advises that a developer of residential land may be required to make provision for appropriate infrastructure. Contributions are required to be fair and to reasonably relate to the scale of development proposed in order to make the development acceptable in planning terms. We can confirm that the proposed development can accommodate this position; with the significant offer of additional land for the proposed playing fields. The delivery of the land for playing fields can of course also facilitate the opportunity for any outstanding financial contributions from OPI and other relevant developments to be utilised / spent locally.

- 3.13 The proposed development is therefore considered to be well placed to conform with current and emerging LDP policies.

#### **Masterplanning / IDF Principles**

- 3.14 'Designing Places' and 'Designing Streets', alongside current and emerging LDP policies, promotes appropriate design, identity and character for new residential areas. Within this context, the subject land site is considered to be well placed to deliver the following defining principles:

#### **Sustainable Development**

- 3.15 The Proposed LDP, paragraph 3.13, states that an intention of its vision is to promote sustainable development that reduces the need to travel, reduces reliance on private cars and promotes safe and convenient active travel opportunities. It also recognises the multiple benefits of local green spaces and networks as an integral component of successful placemaking.

#### **Well Connected**

- 3.16 The initial access roads lead into the development from the north, i.e. from the current and emerging road hierarchy provide a combination of footways with drop kerbs and shared surface areas to accommodate those in wheel chairs, mobility scooters, pushchairs, etc. These principles can be extended into the subject land and the gradients of the new access roads and footways will also be designed to make it easy for mobility impaired users to move around.

### **Distinct**

- 3.17 Reflective of the approved, under construction, site to the north, the proposed block structure will help create character through a combination of house types and streets that follow the topography of the site and will be set out on a permeable and desire line based layout.

### **Safe and Pleasant**

- 3.18 The proposed IDF provides the context for a future detailed layout to promote the Designing Streets principles of respecting pedestrians first. Following the principles set by the approved layout to the north, the road hierarchy and junction orientation will be effective in reducing vehicle speeds through their spacing, geometry and widths. The potential for positioning of homes overlooking the central open space; the landscape buffer to the south; and the landscape area to the east also provides natural surveillance opportunities.

### **Welcoming**

- 3.19 The IDF provides an opportunity for a layout to be developed in line with the principles of 'walkable neighbourhoods' with the street layouts and path networks providing a variety of routes through the site and beyond to urban and rural locations.

### **Adaptable**

- 3.20 It is important, as with the approved site to the north, to retain the semi rural character of the core path by retaining as many as possible its characteristics as it crosses the site.

### **Public Open Space and Landscaping**

- 3.21 The proposed IDF provides 40% public open space. For clarification, this calculation does not include the landscape buffer on the southern edge. The southern landscape buffer additionally provides a visual buffer and forms part of the green network and provides a natural landscape edge between Newtonhill and Muchalls village, i.e. replacing the need for the P4 buffer to the north which will become a green corridor between the 2 development areas.

- 3.22 At the appropriate time, a detailed landscape design will be prepared for the site which will set out treatment of open space, garden frontages, street planting and structure planting areas. The landscape design will be prepared in conjunction with development of the housing and roads layouts to ensure proper integration of the design at the appropriate time of consideration.

- 3.23 Following site completion, all landscaped areas will be the subject of a factoring arrangement which will ensure that the site is fully maintained to a high standard.

### **Density**

- 3.24 In accordance with LDP requirements, the IDF facilitates development parcels that can accommodate a mix of house types and sizes potentially ranging from 1 bed apartments, 2 bed 3 bed semi detached to 3, 4 and 5 bed detached houses. All house types can be proposed to meet housing need both in terms of affordability and market demand.

- 3.25 As stated in paragraph 3.7 above, the scale of development proposed demonstrates that a range of appropriate

densities can be accommodated across the site. With a net residential development area of 4.3 hectares, at a required minimum density of 30 dwellings per hectare, it can be reasonably stated that the capacity of the site will be between 120 -130 houses, depending on market influences at the time of application. It would therefore be appropriate to state an allocated number of circa 120 units.

neighbourhood facilities and an attractive and high quality environment in which all users will have opportunity and be encouraged to walk and be less car dependent.

### **Phasing and Management**

- 3.26 The phasing strategy for the site will logically commence at the site entrances, albeit detailed phasing, within the site, will be influenced by market demand at the time of release. As with OP1, the affordable housing quota will be delivered in the first phase of development.
- 3.27 With reference to previous completion rates within the settlement, it is envisaged that the allocated site will be completed over a period of approximately 4-5 years from commencement, again depending on market mix and demand at time of delivery.

## **4.0 Conclusion**

- 4.1 In summary, the Masterplan report and IDF provide a suitable context to plan for an appropriate allocation providing:
- Circa 120 residential units, including 25% affordable houses;
  - 40% Open Space;
  - Land for Playing Fields;
  - A high level of connectivity within the site;
  - Accessible networks and routes to wider facilities;
  - The context for a mix of property sizes and layouts to provide for an encouraged mix of different types of residents;
  - A sense of community through easy access to local

Figure 2: Indicative Development Framework

