

PROPOSED ABERDEENSHIRE LOCAL DEVELOPMENT PLAN 2020 RESPONSE FORM

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

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

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

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

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

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

Please email comments to ldp@aberdeenshire.gov.uk or send this form to reach us by 17 July 2020.

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



ACCESSIBILITY

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

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

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

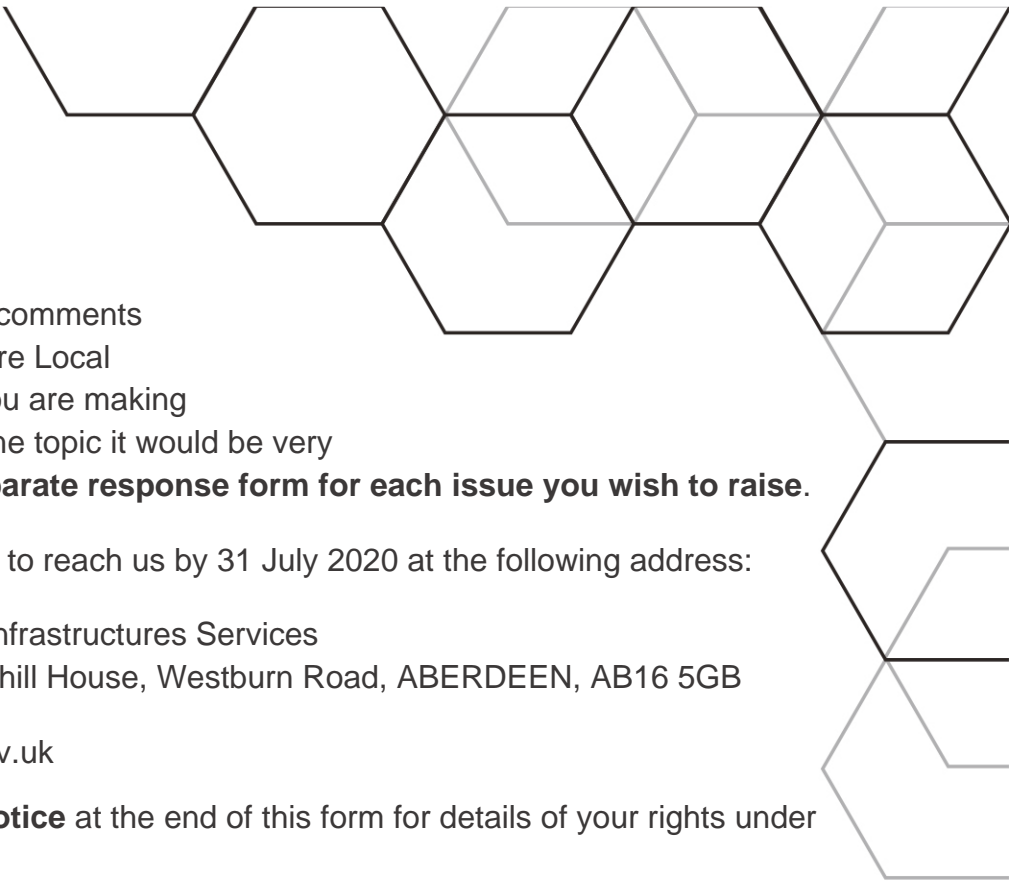
Jeśli potrzebowali będą Państwo informacji z niniejszego dokumentu w innym języku, pisanych dużą czcionką, w wersji łatwej do czytania, w alfabecie Braille'a lub w brytyjskim języku migowym, proszę o telefoniczny kontakt na numer 01467 536230.

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

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

Tel: 01467 536230
Email: ldp@aberdeenshire.gov.uk
Web: www.aberdeenshire.gov.uk/ldp
Follow us on Twitter @ShireLDP

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



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

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

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

Email: ldp@aberdeenshire.gov.uk

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

YOUR DETAILS

Title:	Mr
First Name:	Michael
Surname:	Westwater
Date:	29 July 2020
Postal Address:	████████████████████
Postcode:	██████
Telephone Number:	██████████
Email:	████████████████

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

Are you responding on behalf of another person? Yes No

If yes who are you representing? BARRATT NORTH SCOTLAND

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):

1. Allocate KN121 within the Aberdeenshire Local Development Plan for the development of up to 750 new homes and supporting mixed uses (local retail/commercial/service facilities);
2. Amend Appendix 6 (Housing Land Allocations - page 172) to include this new allocation and to remove units included in the LDP 2021 allocations which are already complete.
3. Amend Appendix 7E (Settlement Statements Kincardine and Mearns) Stonehaven (pages 744-756) to include this new allocation.

Reason for change:

We have prepared a separate report "ABERDEENSHIRE PROPOSED LOCAL DEVELOPMENT PLAN 2020 - RESPONSE TO PROPOSED LOCAL DEVELOPMENT PLAN - LAND AT MILL OF FOREST, STONEHAVEN - KN121" with supporting information and setting out in more detail the proposed modifications to the PLDP including the reasons for these.

PRIVACY NOTICE

LOCAL DEVELOPMENT PLAN PUBLIC COMMENT

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

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

Email: dataprotection@aberdeenshire.gov.uk

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

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

Your information is:

Being collected by Aberdeenshire Council	X
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The Legal Basis for collecting the information is:

Personal Data	
Legal Obligations	X

Where the Legal Basis for processing is either Performance of a Contract or Legal Obligation, please note the following consequences of failure to provide the information:

It is a Statutory Obligation under Section 18 of the Town and Country (Scotland) Act 1997, as amended, for Aberdeenshire Council to prepare and publish a Proposed Local Development plan on which representations must be made to the planning authority within a prescribed period of time. Failure to provide details requested in the 'Your Details' section of this form will result in Aberdeenshire Council being unable to accept your representation.

Your information will be shared with the following recipients or categories of recipient:

Members of the public are being given this final opportunity to comment on the Proposed Aberdeenshire Local Development Plan. The reasons for any changes that the Council receives will be analysed and reported to Scottish Ministers. They will then appoint a person to conduct a public examination of the Proposed Plan, focusing particularly on the unresolved issues raised and the changes sought.

Your name and respondent identification number (provided to you by Aberdeenshire Council on receipt of your

submission) will be published alongside a copy of your completed response on the Proposed Local Development Plan website (contact details and information that is deemed commercially sensitive will not be made available to the public).

In accordance with Regulation 22 of the Town and Country (Development Planning) (Scotland) Regulations 2008 where the appointed person determines that further representations should be made or further information should be provided by any person in connection with the examination of the Proposed Plan the appointed person may by notice request that person to make such further representations or to provide such further information.

Your information will be transferred to or stored in the following countries and the following safeguards are in place:

Not applicable.

The retention period for the data is:

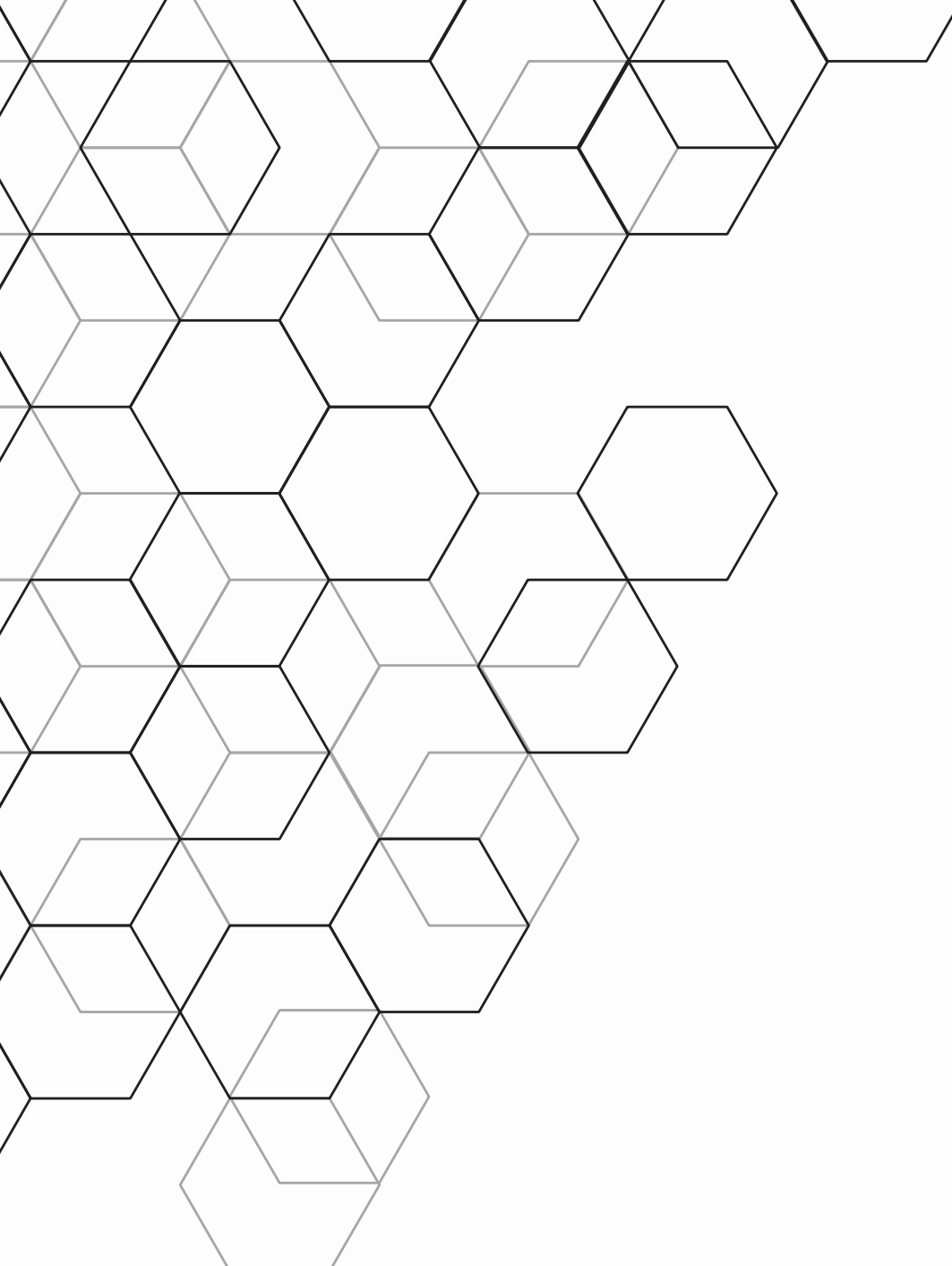
Aberdeenshire Council will only keep your personal data for as long as is needed. Aberdeenshire Council will retain your response and personal data for a retention period of 5 years from the date upon which it was collected. After 5 years Aberdeenshire Council will review whether it is necessary to continue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

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

Not applicable.

Please note that you have the following rights:

- to withdraw consent at any time, where the Legal Basis specified above is Consent;
- to lodge a complaint with the Information Commissioner's Office (after raising the issue with the Data Protection Officer first);
- to request access to your personal data;
- to data portability, where the legal basis specified above is:
 - (i) Consent; or
 - (ii) Performance of a Contract;
- to request rectification or erasure of your personal data, as so far as the legislation permits.





HALLIDAY FRASER MUNRO

CHARTERED ARCHITECTS & PLANNING CONSULTANTS

ABERDEENSHIRE PROPOSED LOCAL DEVELOPMENT PLAN 2020

RESPONSE TO PROPOSED LOCAL DEVELOPMENT PLAN

LAND AT MILL OF FOREST, STONEHAVEN

KN121

JULY 2020

On behalf of
Barratt North Scotland



HALLIDAY FRASER MUNRO

CHARTERED ARCHITECTS & PLANNING CONSULTANTS



HALLIDAY FRASER MUNRO

CHARTERED ARCHITECTS & PLANNING CONSULTANTS

1. Introduction
2. Development opportunity
3. Landscape and environmental impacts
4. Conclusions

Appendix 1 – LDP Bid Submission

Appendix 2 – LDP MIR Submission



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1. Introduction

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

1.2. This representation specifically relates to site:

- KN121 – Residential led mixed-use allocation for circa 750 homes with supporting local retail/commercial/service facilities.

1.3. The site Mill of Forest, Stonehaven was the subject of development bid (KN121) in response to the ‘pre- MIR consultation’ for a residential led mixed - use allocation, identified three varying scales of potential development options for the site. It was not included in the Proposed Local Development Plan because there is ‘a lack of justification for the development of this scale’ and ‘associated landscape impacts’. The response seeks modification of the plan to include KN121. This is outlined in detail below:

Modifications sought:

1. Allocate KN121 within the Aberdeenshire Local Development Plan for the development of up to 750 new homes and supporting mixed uses (local retail/commercial/service facilities);
2. Amend Appendix 6 (Housing Land Allocations - page 172) to include this new allocation and to remove units included in the LDP 2021 allocations which are already complete.

				<i>Existing Supply 2019</i>		<i>Allowances 2020-2032</i>		
	<i>Site Code</i>	<i>LDP 2017 Allocation</i>	<i>Built by Jan 2019</i>	<i>Effective 2019</i>	<i>Constrained 2019</i>	<i>Strategic Growth Area</i>	<i>Local Growth AHMA</i>	<i>LDP 2021 Allocation</i>
Kincardine & Mearns						Portlethen-Stonehaven		
Stonehaven	OP7					750		750



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3. Appendix 7E (Settlement Statements Kincardine and Mearns) Stonehaven (pages 744-756) as follows:

OP7: Land at Mill of Forest

Allocation: 750 homes

This is a newly allocated site. As a new site, a Masterplan will be required including a site brief/strategic framework for biodiversity, open space and active travel provision.

Future development should ensure that appropriate access is gained for the site and this should be considered in consultation with the Council's Transportation Service. Public transport services should be delivered in accordance with the site-wide Public Transport Strategy.

A buffer strip will be required adjacent to the watercourse, which should be integrated positively into the development. Strategic landscaping will be required along the southern and eastern boundary and will be defined through use of a landscape strategy prepared with any masterplan taking full account of the ancient woodland on the site. Scottish Water has also indicated that a Drainage Impact Assessment will be required.

It is expected that the site will contribute towards affordable housing in line with Policy H2 Affordable Housing. This should be delivered as part of the early phases of development and be integrated into the design of the development to provide a mix of house types and sizes to meet local need.



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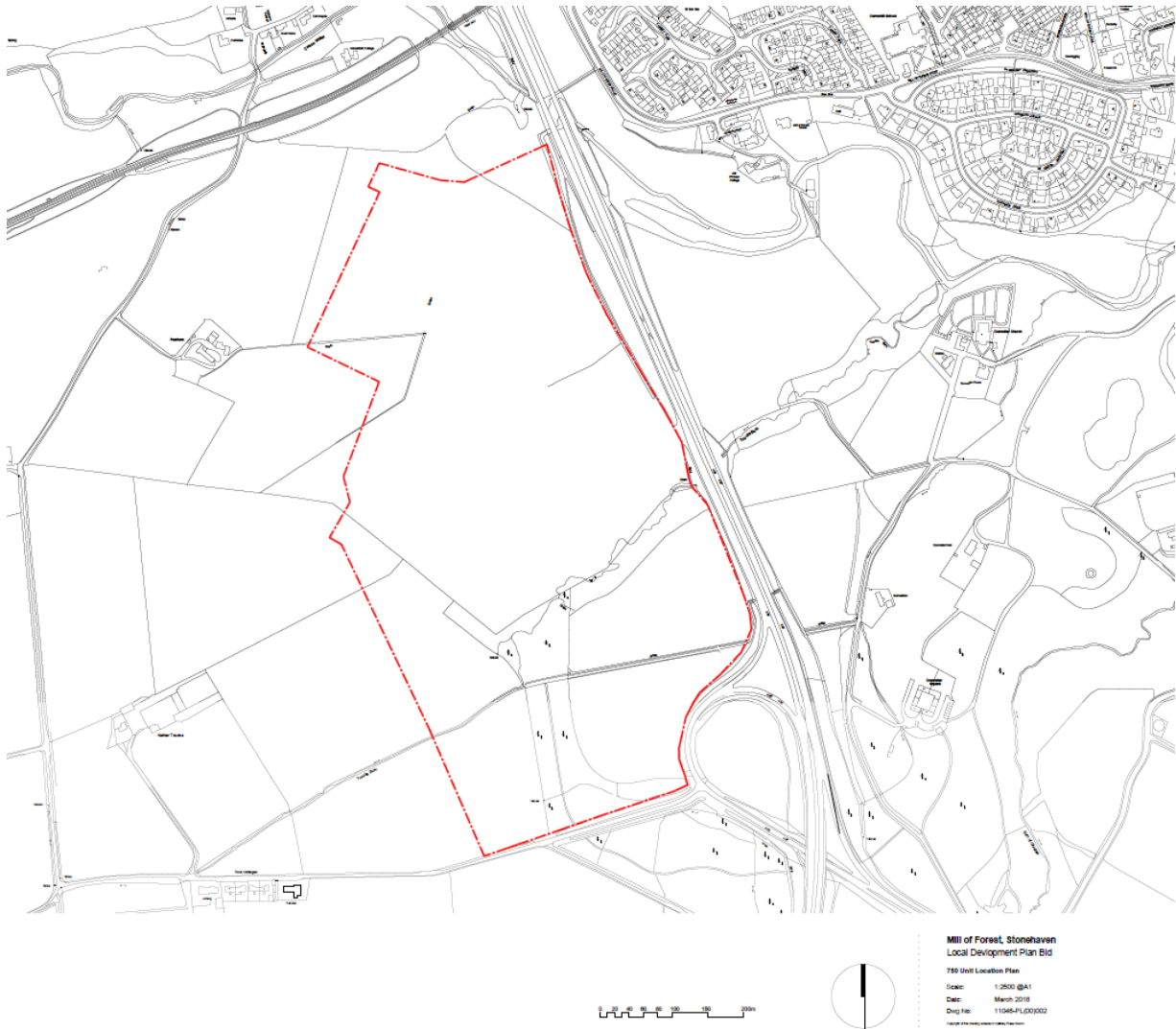


Figure 1 - Proposed allocation location plan

Reasons for change: There is a need to allocate additional housing land within the Aberdeen to Laurencekirk Strategic Growth Area to support housing land requirements and improve rates of housing delivery. There is also a high demand for housing in Stonehaven which has excellent transport infrastructure and quality of life for residents. The town is also the largest settlement within the Strategic Growth Area and is an important service centre that has capacity for additional growth. The principle of extending Stonehaven beyond the A90 has already been established by development at Ury Estate. The development of other sites currently allocated in the town are not delivering at the pace required to address growth pressures and demand for housing. There are no significant constraints that would prevent the delivery of the site at Mill of Forest early in the plan period and the proposed site is of an appropriate scale for the size of Stonehaven, in a Strategic Growth Area. We expand on these reasons in the remainder of this report.



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2. Development opportunity

- 2.1. Stonehaven is a popular place to live and is the largest settlement within the southern portion of the city region with a strong demand for new housing development, investment in community facilities and affordable housing. Located in a Strategic Growth Area within the Aberdeen Housing Market Area, the sub-regional service centre offers an important role in delivering strategic housing allowances, with allocations expected to be the main delivery mechanism for both private and affordable housing in southern Aberdeenshire. Given the demand for housing locally but also across the wider city region, there is a need to identify land for new housing at Stonehaven. **In a separate submission on behalf of Barratt North Scotland, we have specifically reviewed the delivery rates for sites across the wider strategic growth area and have evidenced a slow pace of delivery of new housing than is required for the area that is preventing the Council from achieving its housing targets and requirements.**
- 2.2. The 40.4 ha proposed site at Mill of Forest has previously been subject of planning applications (Ref: APP/2015/3583) (Ref: APP/2010/3646). Both were refused only because the site was not allocated in the LDP and included a major supermarket in the proposal. The supermarket element is no longer proposed for this site. Mill of Forest has been promoted in several LDP cycles. KM21 and KM22 was a previous officer's preference in the Main Issues Report 2013. In the 2016 Main Issues Report the site was an officer's preference once all aspects were considered (balancing housing need and site-specific issues). The Full Council (30th June 2016) commented, "the proposal is well thought out and designed to a high standard. If the application was located on an allocated site for the types of development proposed within the LDP, then it is likely that the Planning Service would be in a position to recommend approval of the application."
- 2.3. The development to the northwest of the town at Ury Estate (OP2, 3 5 & 6) extends the settlement boundary beyond the A90. This sets an important precedent for future outward expansion of Stonehaven which is constrained by its existing coastal setting. The proposed site, like Ury Estate, lies beyond the dual carriageway, but has physical and visual connectivity with the western edges of the town. Given that the A90 is set within a cutting there is little visual or perceptual severance between the site and the settlement. This proposed expansion area therefore offers a sense of continuity with Stonehaven that can respond meaningfully to the physical constraints associated with the outward expansion of the town.
- 2.4. The proposed site benefits from the proximity to strategic transport networks with the Glaslaw junction connecting the A92 and the A90, providing access to Stonehaven town centre via the A957. Like the development of Mains of Ury a proposed new bridge over the A90 would enhance physical connections ensuring the site is well connected to Stonehaven. Whilst this would not be needed to facilitate a development of circa 750 housing units, if a larger scale and longer term expansion were supported at Mill of Forest, then a new road and pedestrian/ cycle bridge link over the A90 to Carron Den Road and Mill of Forest Road would be built. Such a link would connect the site to Mill of Forest Primary School and a route to Stonehaven rail station which, allows residents access to local and National networks. Bus services in and around Stonehaven could also be extended to the site, encouraging further sustainable forms of travel. Improving



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and building infrastructure promotes viability of other services within the development area, and the delivery of the proposed site could act as a catalyst to support a larger scale development (as proposed in Bid KN122). That however should not preclude the allocation of a reduced development scale such as this which would contribute to speedier housing land delivery in the area. This ensures mitigation of air pollution, emissions reductions and will help limit the effect on the climate.

- 2.5. We acknowledge that there is a rising roll for local school capacity in the current catchment area. Developer contributions from this proposed development could provide for appropriate expansion of existing schools to support growth. In the event a larger allocation is identified in the LDP, a new primary school could be delivered (as identified in proposed BID KN122) that would provide additional primary school capacity. Mackie Academy will need improved or replaced in due course and therefore a mechanism for dealing with education requirements is fully achievable and should not be a reason to reject the site as all development sites in the area would be subject to the same constraint. Certainly, the larger the development, the more there is an opportunity for a genuine mixed-use development providing a range of services and facilities in this location.
- 2.6. Appendix 6 within the LDP includes completed units (Built by January 2019) giving a false impression of the scale of proposed development. We believe that only remaining effective units should be allocated within the 2021 LDP, to provide a more accurate picture of the number of houses proposed from the adoption date onwards. A full review of Appendix 6 should be undertaken to consider the impact of this. Our review of Appendix 6 in relation to those sites allocated in Stonehaven shows 91 units completed prior to 2019 which could be allocated elsewhere to address housing shortfall. This is set out in the following table:

Ref	Appendix 6			A+B	LDP 2021 Over-Allocation
	A	B	C		
	Effective/ Constrained	New Allocation	LDP 2021 Allocation		
OP1	146		155	146	9
OP2	108	33	212	141	71
OP3	51	48	99	99	0
OP4	37	1	50	38	12
OP5		60	60	60	0
OP6		91	91	91	0
TOTALS	342	233	667	575	92



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3. Landscape and environmental impacts

3.1. There were officer concerns of landscape impacts with the setting, the loss of ancient woodland, and flooding from the proposed development. The LDP Strategic Environmental Assessment identified potential negative effects on; biodiversity, air quality, climatic factors and landscape post migration. We covered these concerns in some detail within our submissions at MIR stage identifying they can all be effectively and meaningfully addressed through the preparation of a masterplan and supporting technical assessments for the site. Furthermore:

1. Most sites allocated in this part of Aberdeenshire are located on prime agricultural land. Allocating this site would be no different than those already allocated.
2. Any development of the scale proposed will be seen within the landscape. This site is the least sensitive in the Stonehaven setting and can be designed to create a sense of continuity with the existing town. Existing landscape features can be respected, and new landscape treatments included to reduce any perceived landscape issues. A robust landscape solution would address concerns about ancient woodland in and adjacent to the site and set out strategic tree planting requirements.
3. The site's context and location offer an opportunity to significantly improve biodiversity habitats, as the area is presently limited in this respect. The exact nature of improvements can be considered at the detailed design stage.
4. Sustainable flooding and drainage infrastructure would be adopted, along with a flood risk assessment to address the concerns of flooding. Under planning application reference APP/2015/3583 the Council's Flood Prevention Unit had no objection to the proposed development of this site subject to full SUDS design, surface water network calculations and buffer strips in relation to the Toucks Burn and River Carron.

4. Conclusions

4.1. The inclusion of this site for development is considered to be a matter of strategy rather than detail or significant technical constraint. The lack of housing delivery is a significant and strategic issue in Aberdeenshire that needs to be meaningfully addressed through the allocation of a broader range of sites. This site is in a Strategic Growth Area and the Aberdeen Housing Market Area which is pressured for development. The site has previously been an officers' preference as an LDP allocation in 2013 (sites KM21 and KM22) and 2016, promoting the site's viability.

4.2. The proposed site offers proximity to strategic transport links, has good connectivity to public transport, walking and cycling and to road networks. These permeable routes provide sustainable and active travel options to reduce air pollution and limit emissions, promoting a modal shift. With access to local services the site could act as a catalyst for a larger scale longer-term sustainable development, providing opportunity for mixed-uses with a range of services and facilities. That however should not preclude the allocation of a smaller and immediately deliverable development site like this, which would contribute to necessary private and affordable housing land delivery in the Laurencekirk – Stonehaven Strategic Growth Area.



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- 4.3. From the A90 the site within the same visual envelope as Stonehaven and will be seen as an extension to the town. Sensitive and careful masterplanning would ensure a good landscape fit that respect the existing woodland and contribute to biodiversity enhancement. The previous planning application process has proven that all technical issues could be overcome.
- 4.4. The proposed site would be of an appropriate scale and setting where any perceived landscape impacts could be properly mitigated. The development for new housing on the land at Mill of Forest will provide a reasonable and realistic opportunity to serve current or future housing needs in the area.

Local Development Plan 2021

Call for Sites Response Form



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

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

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

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

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

All forms must be submitted by 31 March 2018.

1. Your Details

Name	[REDACTED]
Organisation (if applicable)	Halliday Fraser Munro
Address	[REDACTED]
Telephone number	[REDACTED]
Email address	[REDACTED]
Do you wish to subscribe to our newsletter?	Yes

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

Name	[REDACTED]
Organisation (if applicable)	Barratt North Scotland
Address	[REDACTED]
Telephone number	c/o agent
Email address	c/o agent

3. Other Owners

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

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

4. Site Details

Name of the site (Please use the LDP name if the site is already allocated)	Mill of Forest
Site address	Mill of Forest, Stonehaven
OS grid reference (if available)	NO 85825 84757
Site area/size	100 acres / 40.4 ha
Current land use	Agriculture
Brownfield/greenfield	Greenfield
Please include an Ordnance Survey map (1:1250 or 1:2500 base for larger sites, e.g. over 2ha) showing the location and extent of the site, points of access, means of drainage etc.	

5. Ownership/Market Interest

Ownership (Please list the owners in question 3 above)	Joint owners
Is the site under option to a developer?	Yes
	If yes, please give details Barratt North Scotland
Is the site being marketed?	No, already under control of a developer
	If yes, please give details

6. Legal Issues

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

7. Planning History

Have you had any formal/informal pre-application discussions with the Planning Service and what was the response?	Yes
	If yes, please give details This site has been subject to substantial pre and during application discussions with the planning authority.
Previous planning applications	Please provide application reference number(s), description(s) of the development, and whether planning permission was approved or refused: APP/2015/3583- refused, essentially as the site was not allocated in the LDP and as a result of the inclusion of a supermarket. The latter is no longer proposed as part of this bid.

Previous 'Call for sites' history. See Main Issues Report 2013 at www.aberdeenshire.gov.uk/ldp	Please provide Previous 'Call for sites'/'Bid' reference number: KM21 and KM22 – officer's preference
Local Development Plan status www.aberdeenshire.gov.uk/ldp	Is the site currently allocated for any specific use in the existing LDP? No
	If yes, do you wish to change the site description and or allocation?

8. Proposed Use

Proposed use		Housing/employment/mixed use/other (please specify): Housing and local retail/commercial/service facilities
Housing	Approx. no of units	750
	Proposed mix of house types	Number of: <ul style="list-style-type: none"> • Detached: TBC dependant on market conditions. • Semi-detached: TBC dependant on market conditions. • Flats: TBC dependant on market conditions. • Terrace: TBC dependant on market conditions. • Other (e.g. Bungalows):
		Number of: <ul style="list-style-type: none"> • 1 bedroom homes: TBC dependant on market conditions. • 2 bedroom homes: TBC dependant on market conditions. • 3 bedroom homes: TBC dependant on market conditions. • 4 or more bedroom homes: TBC dependant on market conditions.
	Tenure (Delete as appropriate)	Private.
	Affordable housing proportion	25%
Employment	Business and offices	Indicative floor space: NA
	General industrial	Indicative floor space: NA
	Storage and distribution	Indicative floor space: NA
	Do you have a specific occupier for the site?	NA
Other	Proposed use (please specify) and floor space	Local Retail Local Services Local food & drink Floor spaces of these to be confirmed but intended to serve local needs.
	Do you have a specific	No, users to be identified during the development

	occupier for the site?	process.
Is the area of each proposed use noted in the OS site plan?		Yes

9. Delivery Timescales

We expect to adopt the new LDP in 2021. How many years after this date would you expect development to begin? (please tick)	0-5 years	√
	6-10 years	
	10+ years	
When would you expect the development to be finished? (please tick)	0-5 years	
	6-10 years	√
	+ 10years	
Have discussions taken place with financiers? Will funding be in place to cover all the costs of development within these timescales	Barratt are funded centrally and have the resources to deliver development sites within the timescale stated, without the requirement for external finance.	
	If yes, please give details (e.g. bank facility, grant funding, secured loan etc.) See above	
Are there any other risk or threats (other than finance) to you delivering your proposed development	No	
	If yes, please give details and indicate how you might overcome them:	

10. Natural Heritage

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

	<p>If yes, please give details of how you plan to mitigate the impact of the proposed development:</p> <p>The site will be carefully designed to avoid impacts on the adjacent/site woodland.</p>	
Biodiversity enhancement		
<p>Please state what benefits for biodiversity this proposal will bring (as per paragraph 194 in Scottish Planning Policy), http://www.gov.scot/Resource/0045/00453827.pdf) by ticking all that apply. Please provide details.</p> <p>See Planning Advice 5/2015 on Opportunities for biodiversity enhancement at: www.aberdeenshire.gov.uk/media/19598/2015_05-opportunities-for-biodiversity-enhancement-in-new-development.pdf</p> <p>Advice is also available from Scottish Natural Heritage at: https://www.snh.scot/professional-advice/planning-and-development/natural-heritage-advice-planners-and-developers and http://www.nesbiodiversity.org.uk/.</p>	Restoration of habitats	Yes
	Habitat creation in public open space	Yes
	Avoids fragmentation or isolation of habitats	Yes
	Provides bird/bat/insect boxes/Swift bricks (internal or external)	Yes
	Native tree planting	Yes
	Drystone wall	Yes, if appropriate
	Living roofs	Yes, if appropriate
	Ponds and soakaways	Yes, if appropriate
	Habitat walls/fences	Yes, if appropriate
	Wildflowers in verges	Yes, if appropriate
	Use of nectar rich plant species	Yes, if appropriate
	Buffer strips along watercourses	Yes
	Show home demonstration area	Yes, if appropriate
	Other (please state):	
<p>Please provide details:</p> <p>Site context and location offer and opportunity to significantly improve biodiversity habitats on a site that is presently limited in this respect. The exact nature of that improvement will be considered at the detailed design stage.</p>		

11. Historic environment

Historic environment enhancement		
<p>Please state if there will be benefits for the historic environment.</p>	No, not applicable	
	If yes, please give details:	
<p>Does the site contain/is within/can affect any of the following historic environment assets? Please tick any that apply and provide details. You can find details of these designations at:</p>	Scheduled Monument or their setting	No
	Locally important archaeological site held on the Sites and Monuments Record	No

<ul style="list-style-type: none"> • http://historicscotland.maps.arcgis.com/apps/Viewer/index.html?appid=18d2608ac1284066ba3927312710d16d • http://portal.historicenvironment.scot/ • https://online.aberdeenshire.gov.uk/smrpub/master/default.aspx?Authority=Aberdeenshire 	Listed Building and/or their setting	No
	Conservation Area (e.g. will it result in the demolition of any buildings)	No
	Inventory Gardens and Designed Landscapes	No
	Inventory Historic Battlefields	No
	If yes, please give details of how you plan to mitigate the impact of the proposed development	

12. Landscape Impact

<p>Is the site within a Special Landscape Area (SLA)? (You can find details in Supplementary Guidance 9 at www.aberdeenshire.gov.uk/ldp)</p>	<p>No</p> <p>If yes, please state which SLA your site is located within and provide details of how you plan to mitigate the impact of the proposed development:</p>
<p>SLAs include the consideration of landscape character elements/features. The characteristics of landscapes are defined in the Landscape Character Assessments produced by Scottish Natural Heritage (see below) or have been identified as Special Landscape Areas of local importance.</p> <ul style="list-style-type: none"> • SNH: Landscape Character Assessments https://www.snh.scot/professional-advice/landscape-change/landscape-character-assessment • SNH (1996) Cairngorms landscape assessment http://www.snh.org.uk/pdfs/publications/review/075.pdf • SNH (1997) National programme of landscape character assessment: Banff and Buchan http://www.snh.org.uk/pdfs/publications/review/037.pdf • SNH (1998) South and Central Aberdeenshire landscape character assessment http://www.snh.org.uk/pdfs/publications/review/102.pdf 	<p>If your site is not within an SLA, please use this space to describe the effects of the site's scale, location or design on key natural landscape elements/features, historic features or the composition or quality of the landscape character:</p> <p>The location, layout and design of development and the landscape treatment can be detailed once allocated. Existing landscape features will be respected and new landscape treatments included to reduce any perceived landscape issues. Any development of the scale proposed will be seen within the landscape. This site is least sensitive in the Stonehaven setting and will be seen within the same visual envelope as existing housing, helping to create a sense of continuity with the existing town.</p>

13. Flood Risk

<p>Is any part of the site identified as being at risk of river or surface water flooding within SEPA flood maps, and/or has any part of the site previously flooded?</p> <p>(You can view the SEPA flood maps at http://map.sepa.org.uk/floodmap/map.htm)</p>	<p>Yes</p> <p>If yes, please specify and explain how you intend to mitigate this risk:</p> <p>Surface water flooding only along edges of Toucks Burn. Under planning application reference APP/2015/3583 the Council's Flood</p>
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	Prevention Unit has no objection to the proposed development subject to full SUDS design, surface water network calculations and buffer strips in relation to the Toucks Burn and River Carron.
Could development on the site result in additional flood risk elsewhere?	No If yes, please specify and explain how you intend to mitigate or avoid this risk:
Could development of the site help alleviate any existing flooding problems in the area?	No If yes, please provide details:

14. Infrastructure

a. Water / Drainage

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

b. Education – housing proposals only

Education capacity/constraints https://www.aberdeenshire.gov.uk/schools/parents-carers/school-info/school-roll-forecasts/	Please provide details of any known education constraints. Is additional capacity needed to serve the development? A rising roll for local schools is being considered in a current catchment area review. A site for a new primary school is indicated in this larger bid which could cover primary school capacity. Mackie Academy will need improved or replaced in due course. A mechanism for dealing with education requirements is therefore achievable.	
Has contact been made with the Local Authority's Education Department?	No If yes, please give details of outcome:	

c. Transport

If direct access is required onto a Trunk Road	Yes
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(A90 and A96), or the proposal will impact on traffic on a Trunk Road, has contact been made with Transport Scotland?	If yes, please give details of outcome: Under application APP/2015/3583 Transport Scotland were consulted and had no objection.
Has contact been made with the Local Authority's Transportation Service? They can be contacted at transportation.consultation@aberdeenshire.gov.uk	Yes If yes, please give details of outcome: Under application APP/2015/3583 the Council's transportation team were consulted and had no objection.
Public transport	Please provide details of how the site is or could be served by public transport: New or expanded bus services will help serve the proposed development.
Active travel (i.e. internal connectivity and links externally)	Please provide details of how the site can or could be accessed by walking and cycling: A new bridge parallel to the rail bridge will allow easy access to Stonehaven, bus services and the rail station.
d. Gas/Electricity/Heat/Broadband	
Has contact been made with the relevant utilities providers?	Gas: No If yes, please give details of outcome(s):
	Electricity: No If yes, please give details of outcome(s):
	Heat: No If yes, please give details of outcome(s):
	Broadband: No If yes, please give details of outcome(s): BUT broadband is available in Stonehaven up to 76Mbps
Have any feasibility studies been undertaken to understand and inform capacity issues?	No Please specify:
Is there capacity within the existing network(s) and a viable connection to the network(s)?	TBC Please specify: Mains service connection points are available locally. Initial service enquiries have been submitted. Responses awaited.
Will renewable energy be installed and used on the site? For example, heat pump (air, ground or	Yes If yes, please specify the type of renewable energy technology(s), if it is to provide

water), biomass, hydro, solar (photovoltaic (electricity) or thermal), or a wind turbine (freestanding/integrated into the building)	electricity and/or heating (i.e. space heating and/or hot water), and the scale of provision (To supplement off-site connection all the way to 100% energy provision (off-grid)): This will be dependent on the technology and standards at the time – e.g. PV panels.
e. Public open space	
Will the site provide the opportunity to enhance the green network? (These are the linked areas of open space in settlements, which can be enhanced through amalgamating existing green networks or providing onsite green infrastructure) You can find the boundary of existing green networks in the settlement profiles in the LDP	No Please specify: None on site but new links will be integral to the design.
Will the site meet the open space standards, as set out in Appendix 2 in the Aberdeenshire Parks and Open Spaces Strategy? https://www.aberdeenshire.gov.uk/media/6077/approvedpandospacesstrategy.pdf	Yes Please specify: The final layout will meet Council policy in relation to Public Open Space.
Will the site deliver any of the shortfalls identified in the Open Space Audit for specific settlements? https://www.aberdeenshire.gov.uk/communities-and-events/parks-and-open-spaces/open-space-strategy-audit/	Not applicable Please specify:
f. Resource use	
Will the site re-use existing structure(s) or recycle or recover existing on-site materials/resources?	No If yes, please specify:
Will the site have a direct impact on the water environment and result in the need for watercourse crossings, large scale abstraction and/or culverting of a watercourse?	No If yes, please provide details:

15. Other potential constraints

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

Aberdeen Green Belt https://www.aberdeenshire.gov.uk/media/20555/appendix-3-boundaries-of-the-greenbelt.pdf	No
Carbon-rich soils and peatland http://www.snh.gov.uk/planning-and-development/advice-for-planners-and-developers/soils-and-development/cpp/	No
Coastal Zone https://www.aberdeenshire.gov.uk/media/20176/4-the-coastal-zone.pdf	No
Contaminated land	No
Ground instability	No
Hazardous site/HSE exclusion zone	No

(You can find the boundary of these zones in Planning Advice 1/2017 Pipeline and Hazardous Development Consultation Zones at https://www.aberdeenshire.gov.uk/planning/plans-and-policies/planning-advice/ and advice at http://www.hse.gov.uk/landuseplanning/developers.htm)	
Minerals – safeguarded or area of search https://www.aberdeenshire.gov.uk/ldpmedia/6_Area_of_search_and_safeguard_for_minerals.pdf	No
Overhead lines or underground cables	Yes
Physical access into the site due to topography or geography	No
Prime agricultural land (grades 1, 2 and 3.1) on all or part of the site. http://map.environment.gov.scot/Soil_maps/?layer=6	Yes
‘Protected’ open space in the LDP (i.e. P sites) www.aberdeenshire.gov.uk/ldp and choose from Appendix 8a to 8f	Yes, partial only
Rights of way/core paths/recreation uses	No
Topography (e.g. steep slopes)	No
Other	No (please specify)
<p>If you have identified any of the potential constraints above, please use this space to identify how you will mitigate this in order to achieve a viable development:</p> <p>Application reference APP/2015/3583 examined all aspects of the development and confirmed solutions to these to be detailed should the PPP application be consented. Overhead cables are considered a minor issue and large scale allocations of housing land cannot help but impact on agricultural land. The question is that of how to balance housing need with other site specific issues. It’s also worth noting at the 2016 Main Issues Report concluded that this site was an officer’s preferred site once all aspects were considered.</p>	

16. Proximity to facilities

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

17. Community engagement

Has the local community been given the opportunity to influence/partake in the design and specification of the development proposal?	Not yet
	If yes, please specify the way it was carried out and how it influenced your proposals:
	If not yet, please detail how you will do so in the future: Through our previous planning application (APP/2015/3583) we undertook an extensive public engagement exercise including meeting the local Community Council. If allocated the bidder will engage in a Pre-Application Consultation process that will allow the community to influence the design of the proposed development.

18. Residual value and deliverability

Please confirm that you have considered the 'residual value' of your site and you are confident that the site is viable when infrastructure and all other costs, such as constraints and mitigation are taken into account.	I have considered the likely 'residual value' of the site, as described above, and fully expect the site to be viable: Please tick: <input checked="" type="checkbox"/>
<p>If you have any further information to help demonstrate the deliverability of your proposal, please provide details.</p> <p>The viability of this site has been fully considered by Barratt North Scotland. They have proven their commitment to delivering this development via previous LDP bid and a costly planning application exercise.</p>	

19. Other information

<p>Please provide any other information that you would like us to consider in support of your proposed development (please include details of any up-to-date supporting studies that have been undertaken and attach copies e.g. Transport Appraisal, Flood Risk Assessment, Drainage Impact Assessment, Peat/Soil Survey, Habitat/Biodiversity Assessment etc.)</p> <p>See attached indicative masterplan document. This illustrates how the site could be developed.</p> <p>The site benefits from the process carried out to support application reference APP/2015/3583 and the associated consultation exercise. The report of handling for that application confirms:</p> <ul style="list-style-type: none"> • Infrastructure Services (Roads Development, Environmental Health, Contaminated Land, Flood Prevention Unit, Archaeology, Waste Management, Housing and Economic Development) had no objection to the proposed development; • Planning policy and the SDPA objected on the grounds that the site was not allocated
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(hence this bid);

- Education and Learning – indicated that a school catchment review as ongoing;
- External agencies (Scottish Water, SEPA, SNH, Transport Scotland, Network Rail, Historic Environment Scotland, the Forestry Commission) have no objections;
- Retail was a concern - but a supermarket has now been removed from this bid.

The inclusion or otherwise of this site for development is therefore a matter of strategy rather than detail.

The lack of housing delivery is a recognised issue in Aberdeenshire and this site, located in a highly sustainable location with access to the rail network, bus services and strategic road network as well as close to existing local services makes absolute sense.

We reiterate that it has previously been an officers' preference (sites KM21 and KM22). The overview in the MIR report states (for 1,500 houses) "The site has good connectivity to road network, and public transport as a new bridge is proposed. The proposal would create new facilities ... and has good existing access from the Glaslaw Junction. While the site is segregated from the settlement, the site has visual connectivity, as the trunk road sits below an embankment and there is visually no severance between the site and the settlement." And for 700 houses "the site has no major constraints".

This Strategic Growth Corridor and its allocations are expected to be the main delivery mechanism for both private and affordable housing in southern Aberdeenshire. The 2018 HLA however shows that Chapleton, the area's main housing allocation, only delivered 19 housing units last year with no affordable housing delivery.

This site therefore represents a realistic option for a new housing site to serve current or future housing needs in the Shire.

Please tick to confirm your agreement to the following statement:

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



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ABERDEENSHIRE LOCAL DEVELOPMENT PLAN

RESPONSE TO THE MAIN ISSUES REPORT

LAND AT MILL OF FOREST, STONEHAVEN

KN121

MARCH 2019

On behalf of
Barratt North Scotland



HALLIDAY FRASER MUNRO
CHARTERED ARCHITECTS & PLANNING CONSULTANTS



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1. Introduction
2. Bid and MIR Summary
3. Main Issues Report and SEA Comments
4. Housing Land Strategy
5. Conclusion

Appendix 1 – LDP Bid submission



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1. Introduction

- 1.1. This report has been prepared by Halliday Fraser Munro, Chartered Architects and Town Planning Consultants, on behalf of Barratt North Scotland. It is written in response to the Aberdeenshire Local Development Plan Main Issues Report 2019 (MIR).
- 1.2. At the 'Call for Sites' stage in March 2018 development bids were launched for the land at Mill of Forest, Stonehaven identifying three varying scales of potential development options for the site.
- 1.3. This representation specifically relates to MIR site:
 - KN121 – Residential led mixed-use allocation for circa 750 homes and supporting local retail/commercial/service facilities
- 1.4. This report seeks to provide a reasoned and evidence-based justification for the allocation of the site within the proposed plan. Key considerations identified in this report include the specific merits of the site as a viable and deliverable development opportunity, key concerns relating to the officer's assessment of the earlier BID submission and SEA scoring and highlighting concerns to the Council's preferred approach to their housing land strategy and policies going forward. This includes highlighting concerns to Main Issue 10 and to the Homes and Housing section of the MIR.

2. Bid and MIR Summary

- 2.1. The site at Mill of Forest has been promoted over a number of LDP cycles, at one point gaining some support from officers (former references KM21 and KM22) before the majority of the growth corridor housing provision was allocated to the major allocation at Chapelton of Elsick. The Mill of Forest site has also been subject of a planning application (Ref: APP/2015/3583) which was refused primarily on the basis that the site was not allocated in the LDP but also as a result of the inclusion of a major supermarket in the proposals. To be clear the provision of a large-scale supermarket is no longer proposed as part of the mixed uses of the site under the current proposals. Certainly the concluding remarks of the report to Full Council (30th June 2016) acknowledged that "the proposal is considered to be well thought out, and designed to a high standard. If the application was located on an allocated site for the types of development proposed within the LDP, then it is likely that the Planning Service would be in a position to recommend approval of the application."
- 2.2. Bid KN121 is not currently a 'preferred' development option. The Officers' view and associated issues will be examined in more detail in section 3 of this report, however as none of the three development scale options submitted as bids for the site are preferred by officers we are concerned



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that there is a reluctance to allow for appropriate development in Stonehaven, despite the strong demand for new housing development in the area.

- 2.3. The Mill of Forest site provides the opportunity to create a sensitive and measured extension to Stonehaven, reflecting the setting and landscape character of the area, but acknowledging and responding meaningfully to the physical constraints associated with the expansion of the town.
- 2.4. The MIR recognises Stonehaven as an important sub-regional service centre for this part of Aberdeenshire. It also recognises that the town has an important role in delivering strategic housing allowances and the strong levels of demand for development linked to the settlement's location within a defined Strategic Growth Area and the Aberdeen housing market area.

3. Main Issues Report and SEA Comments

- 3.1. In this section we consider the officers summary and assessment of the BID which states:

"The proposed site is disconnected from Stonehaven and has a number of constraints, including poor connectivity and visual impact. It relates poorly to the town, and although a new bridge is proposed across the A90, land for the bridge is in separate ownership and details of it, which includes crossing the Carron Den Road to site OP1, are uncertain. Therefore, the deliverability of this site is in doubt.

There are also concerns with the loss of prime agricultural land, ancient woodland, flood risk, impact on education provision (no school is proposed on the site) and the setting of Stonehaven unless mitigated, and the lack of a decent sized park."

- 3.2. The submitted bid (attached as Appendix 1 to this report) considered the character and context of Stonehaven and the subject site setting out a range of provisions that would allow a development to be considered sustainable and deliverable in this location. We are concerned that a number of important elements of this bid have not been meaningfully considered by officers when assessing the merits of development on the Mill of Forest site. The bid also considered the level and location of development that has taken place in recent years in and around Stonehaven. We have concerns about the inconsistency of approach to assessing development proposals in and around Stonehaven and generalisations that have been made by officials.
- 3.3. The Mill of Forest site is in a highly sustainable location that benefits from proximity and access to the strategic rail and road network as well as being close to existing local services and facilities. It benefits from close proximity to the Glaslaw junction which connects the A92 and the A90 as well as providing access towards Stonehaven's town centre via the A957. The delivery of this site could support further improvements to the connectivity including improved walking and cycle routes into Stonehaven and providing easier access for southbound traffic on the A90 via upgrades to the local road.



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- 3.4. The delivery of this site could support a new road and pedestrian/cycle bridge link over the A90 connecting to Carron Den Road and Mill of Forest Road. This would further improve the connectivity into Stonehaven and provide direct access towards Mill of Forest Primary School and Stonehaven Rail Station which is located on the East Coast Main line providing sustainable transport on the local and National network. Barratt North Scotland have agreed access rights for securing the land appropriate to allow the implementation of this important link. There are several potential options being explored for the location and connectivity of this bridge link. We would highlight however that the development at New Mains of Ury is also reliant on a new bridge and faces similar issues to the site at Mill of Forest despite that site being considered appropriate for development.
- 3.5. Whilst the site is physically segregated from the settlement by the dual carriageway, the site has visual connectivity, as the trunk road sits below an embankment and there is visually no severance between the site and the settlement. There is a precedent already set by other developments around Stonehaven, for example the new housing being delivered at Ury Estate has already breached the A90. Certainly, of all the sites proposed in and around the settlement, this site is least sensitive in the Stonehaven setting and would be seen within the same visual envelope as existing housing, helping to create a sense of continuity with the existing town.
- 3.6. Regarding concerns around the loss of prime agricultural land, we would argue that almost all sites identified and allocated within the Mearns area of Aberdeenshire are located on prime agricultural land. This begs the question of how officers are differentiating between sites in making provisions for other site allocations affecting prime agricultural land, given there is effectively no choice if allocations are to be taken forward. We are aware that this has been questioned as a reason for non-inclusion by the Councillors and we have concerns about the credibility of this element as a reason to reject sites in this location.
- 3.7. The officer's concerns relating to the potential loss of ancient woodland and breaking the continuity of trees to the south of the site are noted. Certainly, in the absence of any detailed design it is understandable at this stage for there to be some concerns. However, given woodland covers a small portion of the site, this can be addressed through careful design and masterplanning. This is also relevant to the concerns about the lack of a decent sized park on the site. All new developments present an opportunity for biodiversity enhancement and open space provision, in line with Planning Advice. We believe that with further detail and supporting information and through careful design, impacts on ancient woodland can be appropriately mitigated and a robust and quality open space and landscape solution could be adopted for the site to address these concerns. We therefore do not believe that these are robust or credible reasons against the allocation of the site.
- 3.8. Equally, the concerns around a small part of the site being at risk of flooding can also be addressed through the provision of sustainable flooding and drainage infrastructure on the site. There is some surface water flooding only along edges of Toucks Burn. Under planning application reference APP/2015/3583 the Council's Flood Prevention Unit had no objection to the proposed development of this site subject to full SUDS design, surface water network calculations and buffer strips in



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relation to the Toucks Burn and River Carron. We therefore do not accept that this should be a reason to reject allocation of the site within the proposed plan.

- 3.10 On the points concerning school capacity and a lack of onsite provision, we are aware that the rising roll for local schools is being considered in a current catchment area review. A site for a new primary school is indicated in the larger bid (KN122) which could cover primary school capacity. Certainly, the larger the development, the more there is an opportunity for a genuine mixed-use development providing a range of services and facilities in this location. Mackie Academy will need improved or replaced in due course and therefore a mechanism for dealing with education requirements is fully achievable and should not be a reason to reject the site as all development sites in the area would be subject to the same constraint. Given there are preferred sites that would also affect education capacity in the same way we cannot agree that rejecting a site based upon availability of education capacity is sensible or credible as a solution will have to be found to accommodate the growth needs of the area. We understand that more clarity on this will be provided at a later stage in the LDP preparation process.
- 3.11 The Strategic Environmental Assessment (SEA) identifies potential negative effects on air quality, soil, biodiversity, material assets and landscape, post mitigation. A number of these elements are already addressed earlier in this representation. However on air quality, it is suggested that “effects could be mitigated if the Stonehaven bus service could be extended to this site and Grade separated junction allows traffic to avoid the town centre.” We believe that improving connectivity to the site via new walking and cycle routes would also reduce the impact on air quality and that this should be reflected. Any impact on landscape is applicable to any of the bid proposals in and around Stonehaven and we would argue that of all the sites this site is least sensitive in the Stonehaven setting and would be seen within the same visual envelope as existing housing, helping to create a sense of continuity with the existing town. Equally we would have to query the application of scoring and consistency of approach to sites affecting prime agricultural land in an area dominated by it and which affects the majority of sites allocated in the Mearns area.
- 3.12 We believe that with further detail and supporting information and through careful design, impacts on ancient woodland and biodiversity can be appropriately mitigated and a robust and quality landscape solution could be adopted for the site. All new developments present an opportunity for biodiversity enhancement and we believe that the SEA scoring could better reflect that. Equally, with regards to flooding concerns highlighted in climatic factors we believe that there are suitable drainage solutions that could be adopted to mitigate surface water issues in and around the site.
- 3.13 Regarding the scoring for material assets, and particularly the impact on local schools, given there are preferred sites that would also affect education capacity in the same way we cannot agree that scoring this site negatively, based upon availability of education capacity, is fair, as increases in capacity will have to be found to accommodate the growth needs of the area.



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Certainly, there is merit in considering economies of scale and overall settlement strategy as the larger the development, the more there is an opportunity for a genuine mixed-use development providing a range of services and facilities.

4. Housing Land Strategy

- 4.1. The housing strategy contained within the Aberdeenshire Council Main Issues Report (MIR) relies heavily on existing allocated sites, a generic densification across sites within the AHMA and some limited small-scale allocations across the area to meet expected Strategic Development Plan (SDP) housing requirement. This raises serious concerns on the range and scale of housing that can be delivered on the back of that do-minimum strategy, the practicality of delivering significantly increased densities on certain sites, and the relationship between that strategy, the SDP in its final form when approved later this year and national policy on delivering more housing more effectively.
- 4.2. The MIR itself, in respect of Policy H1, indicates that it sets out to comply with Scottish Planning Policy (SPP), "... especially paragraph 110 that requires development plans to identify a generous supply of land across all tenures and to maintain at least a 5-year supply of effective housing land at all times". More specifically the MIR is very clear that "**a sharp focus on delivery is required**" (p19). There is clear developer industry concern that the Plan as proposed does not provide that sharp focus and will not improve housing delivery across Aberdeenshire.
- 4.3. SPP 2014 relates closely to the requirements of the National Planning Framework 3 which aims to facilitate new housing development, particularly in areas within Scotland's cities network where there is continuing pressure for growth. Figures from the 2018 Aberdeenshire Housing Land Audit show that effective supply and combined housing land supply in the area are lower than anticipated (22,172 compared to 22,994 suggested in the MIR). This equates to over 800 units and it is therefore recommended that additional sites should at least be allocated to address this shortfall.
- 4.4. Furthermore, a review of housing trends across the last four HLAs in Aberdeenshire identified evidence of:
 - Housing delivery on currently allocated sites falling below medium-term HLA predictions;
 - Over-optimism on housing delivery that becomes less accurate the further in the future it predicts; and
 - A need therefore for a greater supply and range of housing allocations to supplement existing allocated sites and help deliver more housing over the life of the Plan.
- 4.5. Barratt North Scotland are also concerned that the blanket approach proposed by the Council to increase densities across allocated and preferred sites is often unrealistic and creates an artificially inflated housing land supply. The principle of the development bids was such that those making the bids considered their sites in some detail, considered context and constraints



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and, in some cases, provided indicative layouts that took all of these into account. Increasing densities across the board in that scenario is unlikely to be achievable and can only suggest, at best, a maximum development capacity which ignores context and site-specific circumstances. The actual development capacity is likely to be significantly less. This, therefore presents an unrealistic housing supply figure which overplays the impact of increasing densities as a policy response.

4.6. The proposed uplift in site capacity by increasing the site density on bid sites amounts to approximately 550 houses, an almost 50% increase in housing numbers over those that were proposed. Barratt North Scotland are concerned that such increases would be unrealistic. On reviewing these bid sites and the indicative bid layouts, it is unclear how the additional houses could be accommodated across these sites. It is also inappropriate that the work undertaken by prospective bidders has been set aside. This uplift in numbers is considered to be undeliverable, resulting in an artificially inflated housing land supply and consequently an artificially low set of housing land allocations. In that scenario the MIR housing allocations will not meet the requirement of the Strategic Development Plan. Between these basic criticisms of the MIR approach there seems to be a potential shortfall of around 4,000 homes based on:

- Difference in effective housing land supply between 2016 Housing Land Audit and 2018 Housing Land Audit = 800 homes;
- Shortfall in projected actual housing delivery when compared to historic trends in HLA medium-term predictions i.e. a realistic view of what will be achieved = 2,765 homes; and
- Impracticality of delivering the MIR proposed theoretical increase in housing density = 550 homes.

4.7. Even accepting that these figures are estimates there is clear evidence that the proposed MIR allocations are very unlikely to provide the sharp focus on delivery that the MIR sets out to achieve. The area clearly needs other credible development options if the Council is serious about addressing housing delivery shortfalls and meeting housing requirements in the area as required by NPF3, SPP and the Strategic Development Plan. The only solution as we see it is to allocate additional sites across the region, including within the Accessible Rural Areas and Aberdeen's Housing Market Area.

4.8. It is also of concern that the Council has added to the Chapelton new settlement allocation with a suggested Strategic Reserve allocation of an additional 4,000 new homes. This has implications for the delivery of housing across the whole Housing Market Area. The intention of this Strategic Reserve is of course to supplement housing supply should it slow down. However, allocating more houses on this large single site that is already failing to deliver will evidently not help address the continuing shortfalls in housing delivery across Aberdeenshire. The 2018 HLA shows that Chapelton only delivered 19 housing units for the year with no affordable housing delivery. In fact, since construction of the new settlement began with the first recorded completions in



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2016 a mean rate of delivery has been only been 34 units per annum. Even in the unlikely event that future HLA predictions miraculously increase to an average of around 80 units per annum being delivered, as is identified in the Aberdeen City and Aberdeenshire Housing Land Audit 2018, it would still take over 50 years to build out that development of 4,000 units.

- 4.9. We are aware that several local Councillors highlighted this at the Kincardine and Mearns Area Committee (9th October 2018) where the MIR was being discussed. They recognise that this allocation is just not delivering at a pace that is needed to meaningfully address the housing shortfall.
- 4.10. It would therefore seem that the ongoing reliance on Chapelton for the future of new homes in this strategic growth corridor is questionable, as is the blanket approach to increasing site densities in the area. Therefore the area clearly needs other credible development options if the Council is serious about addressing housing delivery shortfalls and meeting housing requirements in the area as is required by NPF3, SPP and the Strategic Development Plan.

5. Conclusions

- 5.0 The inclusion or otherwise of this site for development is considered to be a matter of strategy rather than detail. The lack of housing delivery is a recognised issue in Aberdeenshire and this site, located in a highly sustainable location with access to the rail network, bus services and strategic road network as well as close to existing local services. Certainly, the larger the development, the more there is an opportunity for a genuine mixed-use development providing a range of services and facilities in this location.
- 5.1 The site has previously been an officers' preference as an LDP allocation (sites KM21 and KM22). It has been recognised that "The site has good connectivity to road network, and public transport as a new bridge is proposed. The proposal would create new facilities and has good existing access from the Glaslaw Junction. While the site is segregated from the settlement, the site has visual connectivity, as the trunk road sits below an embankment and there is visually no severance between the site and the settlement."
- 5.2 The current Strategic Growth Corridor and its allocations are expected to be the main delivery mechanism for both private and affordable housing in southern Aberdeenshire. The 2018 HLA however shows that Chapelton, the area's main housing allocation, only delivered 19 housing units last year with no affordable housing delivery. The development options for the land at Mill of Forest therefore provide a reasonable and realistic prospect for a new housing site to serve current or future housing needs in the area.