

PP1308

PROPOSED ABERDEENSHIRE LOCAL DEVELOPMENT PLAN 2020 RESPONSE FORM

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

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

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

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

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

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

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

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

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



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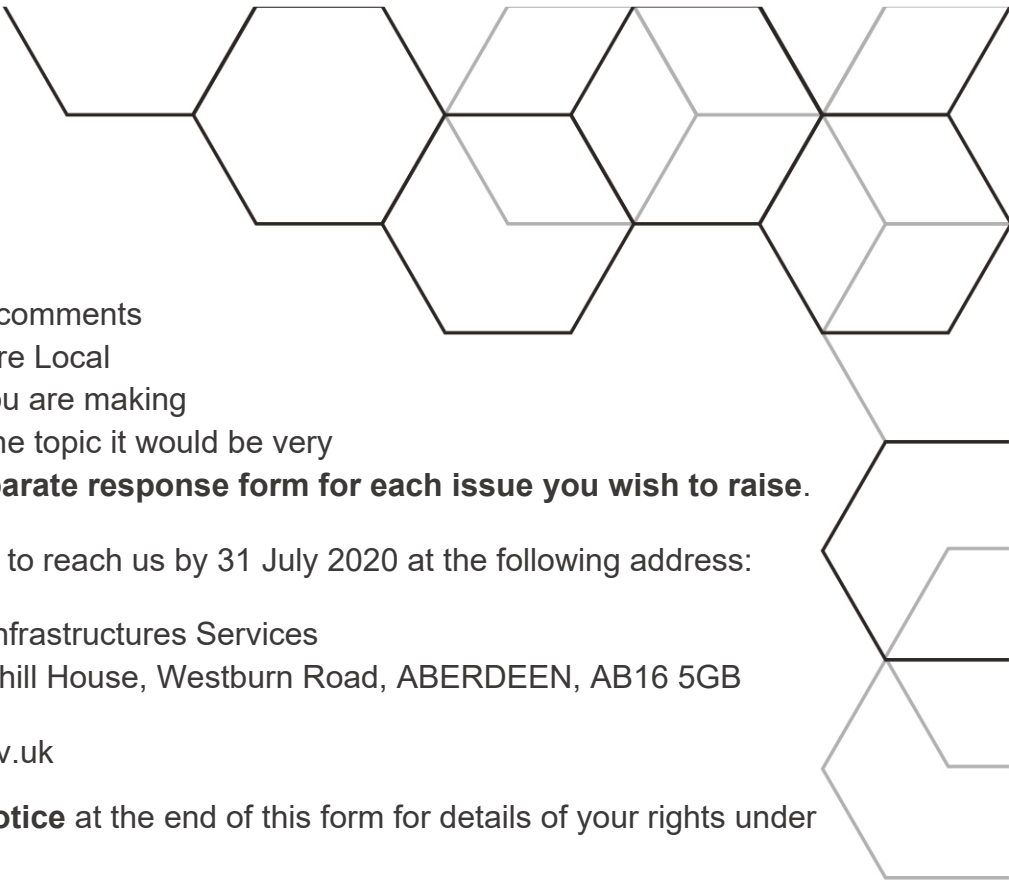
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Aberdeenshire Local Development Plan
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Please use this form to make comments on the Proposed Aberdeenshire Local Development Plan 2020. If you are making comments about more than one topic it would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

Please email or send the form to reach us by 31 July 2020 at the following address:

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

Email: ldp@aberdeenshire.gov.uk

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

YOUR DETAILS

Title:	Ms
First Name:	Christine
Surname:	Dalziel
Date:	30.7.20
Postal Address:	Barton Willmore, [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?

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

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

YOUR COMMENTS

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

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

Appendix 7D – Settlement Statements, Garioch, Westhill should be amended to include:

- The land at Strawberry Fields, Westhill (Site GR032) should be allocated for 180 units and the Westhill settlement boundary altered accordingly.

Appendix 6, Table 1 should be amended to allocate more effective housing land and remove constrained sites

Reason for change:

Please see attached representation for full details of the justification for the changes sought.

We do not consider that the PLDP has identified sufficient land for residential development in sustainable areas close to Aberdeen. In particular, Westhill – as recognised within the PLDP itself – is an established economic hub within close to the city and it is considered that the proposed level of development over the plan period does not truly reflect the strategic importance of this settlement. The Council have failed to allocate sufficient land for housing in this sustainable settlement.

The number of sites identified in the PLDP which were identified as constrained in the 2019 Housing Land Audit (HLA) and which are carried forward from previous LDPs is concerning. We would seek further evidence as to why these sites are now considered to be effective and evidence that these sites will come forward within this plan period when they have not done so previously.

The Westhill Settlement Strategy identifies a total of 111 homes within the PLDP, of which 48 have extant planning permission and 63 are affordable homes. Therefore, no new sites have been identified for open market housing in Westhill over the next plan period. This is particularly concerning in the context of the failure to deliver units within the existing plan period. Site OP2 within the PLDP has had planning consent since 2008 and has not delivered any housing since 2014. There is no evidence of a bid having been submitted for this site, and therefore it is questioned why the site has been allocated for development.

Whilst it is appropriate to promote Westhill as a successful employment centre, new homes are required to support these employment uses in order to meet the sustainability requirements of SPP and the SDP. New homes will encourage people to relocate to Westhill and will in turn reduce the need to travel. The traffic concerns raised by officers is unsubstantiated and it is therefore unreasonable to constrain new development on this basis.

It is maintained that – in line with the Westhill Capacity Study and the Reporters conclusions of the 2017 LDP Examination (December 2016) – the land at Strawberry Fields remains the most suitable area to accommodate future expansion in Westhill. Fundamentally, in the context of the acknowledgement within the PLDP of the importance of Westhill, it is unclear why no additional open market housing sites have been identified.

Westhill continues to be an area of strong market demand and offers the most appropriate location for development in the Local Growth Diversification Area. The settlement lies immediately adjacent to Aberdeen with its own facilities and services as well as having sustainable travel option to Aberdeen and the wider area via the Kingswells Park and Ride.

Site GR032

As demonstrated within the SEA, the site has scored well against the majority of identified topics and is deemed to have a neutral or positive effect against numerous criteria. The topics in which the site has scored negatively are not considered to be a barrier to development and can be appropriately addressed.

The proposed site at Strawberry Fields provides the opportunity to deliver a logical extension to Westhill located in a sustainable location within close proximity to employment opportunities and facilities and will deliver much needed affordable homes in an area of acute need.

The land is controlled by SMH who have a proven track record of housing delivery in this location which demonstrates – unlike other sites identified for development in the PLDP – that the site is effective and will be delivered. This, along with the absence of infrastructure constraints, will ensure short term delivery of housing to assist the Council in meeting their housing target and support the aims of the LDP and objectives of the Westhill settlement strategy.

The site is considered to be suitable and deliverable for housing development, as it:

- Represents a logical ‘rounding off’ of the western boundary of Westhill, and will complement the recently completed Broadshade development on the northern side of Old Skene Road;
- The site is sustainable, accessible, and is located in an area of strong market demand;
- Will not compromise areas important for their qualities in respect of landscape, or natural and built environment;
- Is effective and free of constraints;
- Will comply with the principles of Scottish Planning Policy (SPP) with regards to promoting sustainable new growth and increasing generosity and flexibility in the housing land supply;
- Is deliverable within 5 years; and
- Scored well against the SEA topics to inform the PLDP.

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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:

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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.

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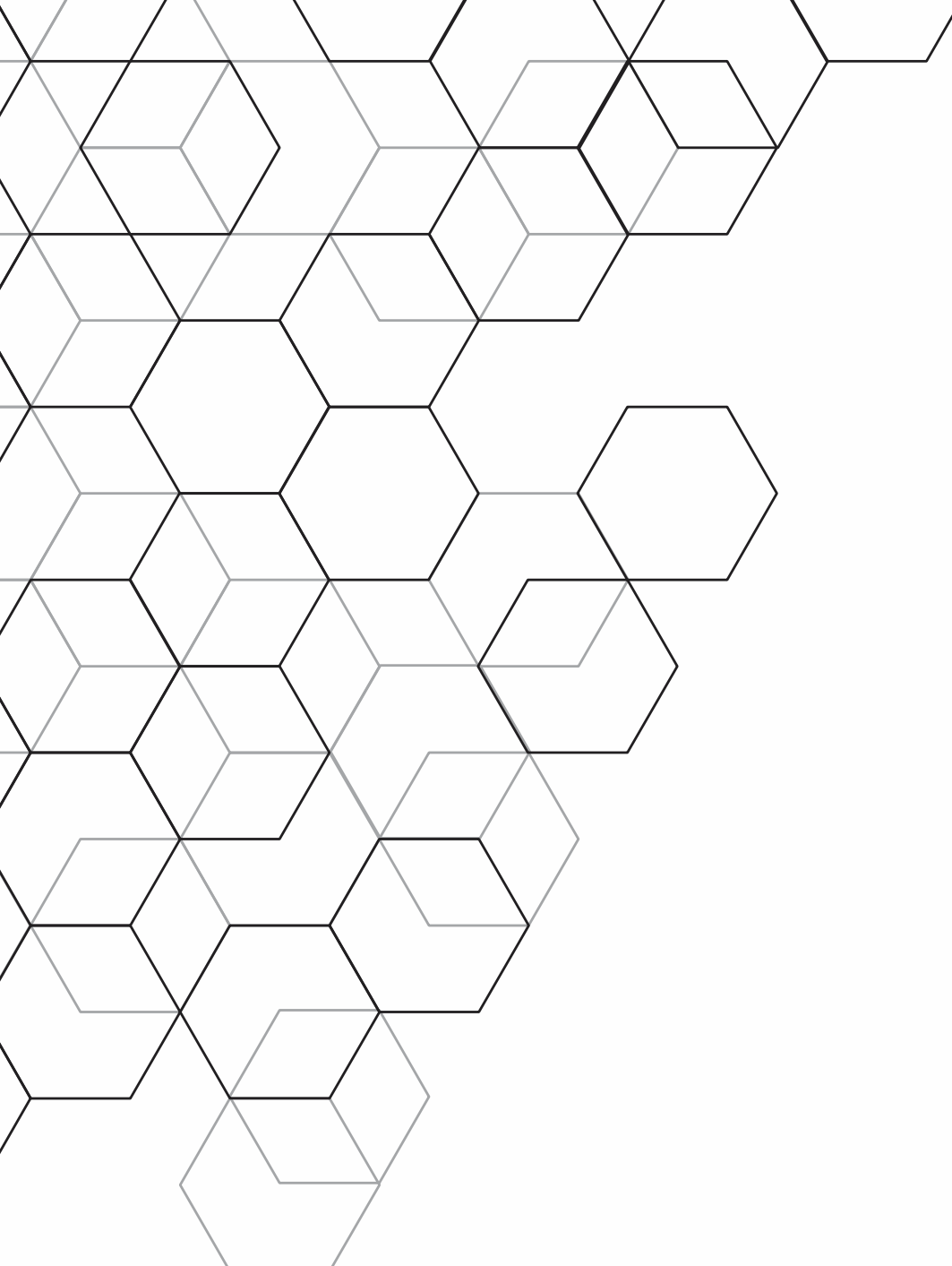
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Strawberry Fields, Westhill

Site GR032

Representation to Aberdeenshire
Proposed Local Development Plan 2020

Prepared on behalf of Stewart Milne Homes

July 2020

Strawberry Fields, Westhill

Site GR032

Representation to Aberdeenshire
Proposed Local Development Plan 2020

Prepared on behalf of Stewart Milne Homes

Project Ref:	30338/01	30338/01	30338/01
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Date:	July 2020	July 2020	July 2020
Prepared by:	█	█	█
Checked by:	█	█	█
Authorised by:	█	█	█

Barton Willmore



Tel: █

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Ref: 30338/01

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CONTENTS

1.0	Introduction	1
2.0	Response to PLDP	3

Appendix 1: Representation to the Aberdeenshire Main Issues Report 2019 – Site GR032

1.0 INTRODUCTION

- 1.1 This representation has been prepared by Barton Willmore on behalf of Stewart Milne Homes (SMH) in respect of the land at Strawberry Fields, Westhill (Site GR032), in response to the Aberdeenshire Proposed Local Development Plan (PLDP) 2020.

Modifications Sought

- 1.2 Following the points discussed within this submission, we seek the following modifications:
- The PLDP should be modified to allocate more effective housing land and remove constrained sites;
 - Additional sites within the AMHA should be identified in areas of demand and in close proximity to Aberdeen – Westhill is the most appropriate location;
 - The land at Strawberry Fields, Westhill (Site GR032) should be allocated for 180 units;
 - The settlement boundary of Westhill should be altered to include the site.

Background

- 1.3 The site has been promoted through previous development plan reviews. The outcomes of the 2017 Examination of the now adopted Aberdeenshire LDP have informed the indicative Masterplan for the site, which has been the subject of an iterative design process.

- 1.4 Within the Report of Examination of the 2017 LDP, the Reporter concluded that:

'I find no reason to differ from the conclusions of the Westhill Capacity Study which identify the area as most suitable to accommodate any future expansion needs in Westhill''

'The site is relatively accessible to public transport and to employment. It's relatively constrained setting would enclose effective integration with the urban area.'

- 1.5 Most recently, a representation was made to the Main Issues Report (MIR) 2019 which has been appended to this submission for completeness.

- 1.6 The site is considered to be suitable and deliverable for housing development, as it:

- Represents a logical 'rounding off' of the western boundary of Westhill, and will complement the recently completed Broadshade development on the northern side of Old Skene Road;
- The site is sustainable, accessible, and is located in an area of strong market demand;
- Will not compromise areas important for their qualities in respect of landscape, or natural and built environment;
- Is effective and free of constraints;

- Will comply with the principles of Scottish Planning Policy (SPP) with regards to promoting sustainable new growth and increasing generosity and flexibility in the housing land supply;
- Is deliverable within 5 years; and
- Scored well against the SEA topics to inform the PLDP.

2.0 RESPONSE TO PLDP

- 2.1 This representation seeks the allocation of the land at Strawberry Fields, Westhill (Site GR032) in the LDP. As demonstrated through this representation and the response to the Main Issues Report (MIR) (attached as Appendix 1) clearly demonstrates that the site can offer an appropriate, high quality residential development which will integrate effectively with the surrounding urban form. The proposal will also deliver much needed affordable housing and offer a choice of housing types within an area of strong market demand, and will support the level of employment land which is present within Westhill.
- 2.2 The Examination of the 2017 LDP concluded that although the site should not be allocated at the time, the site is *'most suitable to accommodate any future expansion needs in Westhill'* and that the *'future status of the site is more appropriately reconsidered through the next development plan'*. It is maintained that housing sites are required in Westhill to maintain a 5-year effective housing land supply, particularly in the context of housing land shortfall identified by Homes for Scotland.
- 2.3 Given the identification of the site as 'most suitable' for development through the Westhill Capacity Study and by the Reporters through the previous Examination, the land at Strawberry Fields should be allocated for residential development.
- 2.4 In line with evidence of the importance of private sector development to the delivery of affordable homes, it is crucial that the LDP identifies appropriate and deliverable housing sites to ensure the aspirations of the LDP and the Westhill Settlement Strategy objectives are met. Westhill continues to be an area of strong market demand and offers the most appropriate location for development in the Local Growth Diversification Area.
- 2.5 Accordingly, it is requested that the site be included within the settlement boundary of Westhill and allocated for residential development within the Proposed LDP.

Section 3: Vision for the Plan and its Purpose

- 2.6 The Local Vision as set out in Section 3 of the PLDP is supported and we agree with the intentions of Paragraph 3.11 which states:
- 'The area around Aberdeen City continues to be the powerhouse of economic activity in the region and so the land allocations made in the settlements around Aberdeen City reflect this.'*
- 2.7 Whilst we fully endorse this statement, we would question if this is fully reflected within the allocations identified in the PLDP. In particular, Westhill – as recognised within the PLDP itself – is an established economic hub within close to the city and it is considered that the proposed level of development over the plan period does not truly reflect the strategic importance of

this settlement. The Council have failed to allocate sufficient land for housing in this sustainable settlement.

2.8 The strategic location of the settlement has been enhanced as a result of the opening of the AWPR (A90 Trunk Road). Westhill also has a number of public transport links with bus services running at least 15-minute intervals to Aberdeen via Kingswells Park and Ride (with connecting services to employment areas in Altens and Dyce). In addition, the settlement has an excellent network of footpaths and cycleways with the majority of Westhill being within a 12-minute cycle zone. In addition to this strategic cycle path runs parallel to the A944 connecting to Aberdeen and the Kingswells Park and Ride. As the availability of employment uses has increased 25% of residents now live and work in the town compared to 5% historically. Westhill is therefore a sustainable edge of City location and should be a focus for new development in the forthcoming plan period.

2.9 Indeed Paragraph 3.13 notes that the LDP helps promote Aberdeenshire as:

'An area that promotes sustainable development that reduces the need to travel, reduces reliance on private cars and promotes safe and convenient active travel opportunities.'

2.10 It is therefore questioned why a settlement such as Westhill, which provides employment opportunities, a thriving town centre and public transport links with Aberdeen, has not been identified for further development.

2.11 It is particularly pertinent to identify effective sites in sustainable locations in the context of the recommendations of the Examination of the Strategic Development Plan (SDP). This is considered further below.

Section 5: The Spatial Strategy

2.12 We echo the concerns raised by Homes for Scotland regarding the apparent reliance that the PLDP places on constrained sites to deliver new homes in the plan period. This does not reflect the intentions of Paragraph 5.4 which states that the Council *'need to be confident that the land can be brought forward for development within the Plan period'*.

2.13 We wholly agree with this statement and the need to identify effective sites, so it is therefore concerning to note the number of sites which have been identified in the PLDP which were identified as constrained in the 2019 Housing Land Audit (HLA) and which are carried forward from previous LDPs. We would seek further evidence as to why these sites are now considered to be effective and evidence that these sites will come forward within this plan period when they have not done so previously.

2.14 Paragraph 5.3 notes that: *'While the Local Development Plan can allocate land for housing it cannot guarantee that the development industry will act to make it become part of the effective*

land supply'. The PLDP identifies sites which have already been identified as constrained in the 2019 HLA and whilst the Council consider that it is for the development industry to 'make' land effective, it is the role of the PLDP to identify the most appropriate sites when assessed against sound planning merits and ability to deliver units to meet required targets. It is therefore questioned why the Council have not concentrated more sites within the areas of strong market demand. As noted above, Paragraph 3.11 acknowledges the importance of the Aberdeen Housing Market Area (AHMA) to the regional economy, but this has not translated to the housing sites allocated for development given the limited housing land identified close to the City.

- 2.15 We endorse the outcomes of Homes for Scotland's analysis which removes non-effective sites in line with the outcomes of the SDP Examination. The Reporter in this instance stated (Issue 14, paragraph 26):

'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.'

- 2.16 In line with these conclusions, Homes for Scotland have adjusted the PLDP housing allocations to remove sites which are identified as constrained within the 2019 HLA and those new/increased allocations which are unlikely to become effective. This exercise demonstrates that there are significant shortfalls in both housing market areas, including a shortfall of 468 units in the AHMA.
- 2.17 In order to remedy this shortfall, it is submitted that effective, sustainable sites – such as Strawberry Fields (GR032) – within a strong market area, should be identified for development.

Westhill Settlement Strategy

- 2.18 To maintain the unique success of the town and identify appropriate locations for sites within the AHMA to address the shortfall identified above, new development sites are required and failing to identify appropriate new locations for housing development will only exacerbate the pressure and demand for housing in towns such as Westhill.
- 2.19 As a reason against growth in the town, the Council suggest that traffic congestion remains an issue in town particularly along Hays Way and around the town centre and that *'these constraints mean that development within the Plan period will be focussed primarily on meeting*

local needs and maintaining Westhill's function as a successful employment centre'. We do not accept that these local needs are being addressed through the Proposed Plan.

- 2.20 The Westhill Settlement Strategy identifies a total of 111 homes within the PLDP, of which 48 have extant planning permission and 63 are affordable homes. Therefore, no new sites have been identified for open market housing in Westhill over the next plan period. This is particularly concerning in the context of the failure to deliver units within the existing plan period. Site OP2 within the PLDP has had planning consent since 2008 and has not delivered any housing since 2014. There is no evidence of a bid having been submitted for this site, and therefore it is questioned why the site has been allocated for development.
- 2.21 Whilst it is appropriate to promote Westhill as a successful employment centre, new homes are required to support these employment uses in order to meet the sustainability requirements of SPP and the SDP. New homes will encourage people to relocate to Westhill and will in turn reduce the need to travel. The traffic concerns raised by officers is unsubstantiated and it is therefore unreasonable to constrain new development on this basis.
- 2.22 By effectively placing a moratorium on any new private housing development in the town for the next ten years, the pressure for homes in this strong market area will only increase, resulting in continuing inflated house prices and a failure to maintain the success of this sustainable mixed community. This will also have a direct impact on the delivery of affordable homes in the town, which is a key issue identified within the Westhill Settlement Statement.
- 2.23 As acknowledged by the Aberdeenshire Affordable Housing Forum, 75% of the affordable housing delivered in Aberdeenshire is through the affordable housing policy which highlights the vital contribution that the private sector makes to the delivery of homes in the region. With no substantial new housing sites identified in Westhill through the forthcoming LDP period and the uncertainty surrounding the funding for affordable homes after 2021, the LDP is failing to give due consideration to the opportunities for sustainable growth in line with the requirements of SPP.
- 2.24 Page 662 of the PLDP identifies a number of services and infrastructure interventions that new development in Westhill will be required to contribute to. These include footway extensions, community facilities, sports recreation and waste infrastructure. As two of the three housing sites identified in the PLDP already have planning permission and the third is for 100% affordable units, it is clear that there will be no ability to seek contributions towards these service and infrastructure improvements unless additional sites are allocated.
- 2.25 In the context of the 468 units shortfall in the AHMA identified by Homes for Scotland, further sites are required to be allocated. Given the importance of Westhill to the region, the PLDP's reliance on sites which already have extant planning permission is not an appropriate approach

and that further housing land should be allocated in the town due to the employment opportunities and infrastructure investment to date.

- 2.26 It is maintained that – in line with the Westhill Capacity Study and the Reporters conclusions of the 2017 LDP Examination (December 2016) – the land at Strawberry Fields remains the most suitable area to accommodate future expansion in Westhill. Fundamentally, in the context of the acknowledgement within the PLDP of the importance of Westhill, it is unclear why no additional open market housing sites have been identified.
- 2.27 Westhill continues to be an area of strong market demand and offers the most appropriate location for development in the Local Growth Diversification Area. The settlement lies immediately adjacent to Aberdeen with its own facilities and services as well as having sustainable travel option to Aberdeen and the wider area via the Kingswells Park and Ride.

Site Assessment of GR032

- 2.28 The Strategic Environmental Assessment (SEA) undertaken to inform the PLDP has been reviewed and our response is set out below under the SEA Topics used to consider the site.
- 2.29 Against the SEA topics, the site 'scored' mostly neutral on the post-mitigation effects. As discussed below, where the site scored negatively, it is not considered that such a score was justified as demonstrated below.

Air

- 2.30 The SEA analysis states that the development would increase traffic flow through Westhill, although acknowledges that the site is near a busy bus route and scores a negative/neutral effect post-mitigation.
- 2.31 Whilst it is acknowledged that there will be an increase in traffic movements as a result of new development, in the consideration of development opportunities within the plan period it should be noted that Westhill is in a unique position by virtue of the employment opportunities located within the town. Due to the proximity of the site close to regular bus routes and cycle routes, and the ease of access to services and facilities, the reliance on the private car is reduced.

Climatic Factors

- 2.32 As noted within the SEA assessment, the site is located within close proximity to public transport routes and is within walking/cycling distance of the town centre and employment land to the south of Westhill.
- 2.33 In respect of the minor watercourse which lies to the north of the site, it is considered that appropriate measures can be adopted to ensure that development will not be at risk from

flooding. As such, it is considered that the post mitigation effect should be neutral and not negative/neutral as scored within the SEA.

Biodiversity

- 2.34 It is agreed - as identified within the SEA - that the site is unlikely to have any long-term adverse impact on biodiversity and that development on this site will deliver biodiversity enhancements. It is considered therefore that a more appropriate post-mitigation score would be positive rather than neutral.
- 2.35 The development parameters plan (as contained with the MIR Response in Appendix 1) has allocated approximately 4ha of land to informal open space and landscape buffer. The proposed development will provide an attractive, robust and legible landscape setting to the proposed built form. This will include a range of native, locally appropriate tree species, as well as wildflower grassland and ornamental shrubs. Key landscape principles relating to this, include:
- Retain and enhance, where possible, existing trees, shrub and hedgerows;
 - Provide a cohesive open space framework that links with and extends the existing open space provision and provides recreational opportunities;
 - To provide an attractive and local characteristic landscape setting to the proposed built form; and
 - To provide ecological amenity enhancement through the introduction of new tree planting, hedgerows and meadow areas linked to the reinforcement of existing landscape features wherever possible.

Landscape

- 2.36 It is agreed that there will be an overall neutral impact on the landscape character as a result of development on the site.
- 2.37 As demonstrated within Appendix 1, the site has been subject to a detailed landscape and visual appraisal in accordance with recognised best practice and policy and is considered suitable to accommodate built development, incorporating existing landscape features and landscape mitigation measures where required.
- 2.38 The site is set within the indented settlement edge of Westhill, which wraps the site to the north, east and south and upon viewing the site on an aerial view, it is clear that the site forms an appropriate and cohesive addition to the western edge of the settlement.
- 2.39 The site is not subject to any landscape designations and its location immediately adjacent to the existing settlement edge provides a clear opportunity for future development.

Population

- 2.40 We agree that there will be a positive effect on the population by virtue of the delivery of a range of housing for all sectors of society.
- 2.41 This is particularly pertinent in the context of the Westhill Settlement Strategy which states that: *'the lack of smaller and affordable homes is an issue for the local community'*. Given that the reliance on the delivery of affordable housing lies with the private sector, it is unclear why a sustainable site which will deliver affordable housing and scored well in the SEA was not considered a preferred site and allocated in the forthcoming plan.

Human Health

- 2.42 It is noted that the site was identified as having a negative effect on human health which is assumed to be by virtue of its location within the Health and Safety pipeline consultation zone. It is submitted that the suggestion there will be an impact on human health as a result of the pipeline has been overstated.
- 2.43 Indeed, the majority of the existing Broadshade development area also sits within this zone and the SEA does not take cognisance of the fact that works that have been undertaken to the pipeline by SMH. These upgrade works have reduced the stand-off distance to six metres which has been acknowledged within the design approach adopted. The existence of the pipeline does not preclude development on this land.
- 2.44 The location of the pipeline has remained the same since the publication of the 2013 MIR and the 2017 LDP Examination and the presence of the pipeline has not been identified previously as a restriction. Furthermore, through the Westhill Capacity Study area of land was identified as being the most suitable location for future development.
- 2.45 It is maintained that the land is suitable for the delivery of residential development and will not have a negative impact on human health.

Summary

- 2.46 As demonstrated within the SEA, the site has scored well against the majority of identified topics and is deemed to have a neutral or positive effect against numerous criteria. The topics in which the site has scored negatively are not considered to be a barrier to development and can be appropriately addressed.
- 2.47 The proposed site at Strawberry Fields provides the opportunity to deliver a logical extension to Westhill located in a sustainable location within close proximity to employment opportunities and facilities and will deliver much needed affordable homes in an area of acute need.

2.48 The land is controlled by SMH who have a proven track record of housing delivery in this location which demonstrates – unlike other sites identified for development in the PLDP – that the site is effective and will be delivered. This, along with the absence of infrastructure constraints, will ensure short term delivery of housing to assist the Council in meeting their housing target and support the aims of the LDP and objectives of the Westhill settlement strategy.

STRAWBERRY FIELDS

Westhill

SITE GR032

Representation to Aberdeenshire Main Issues Report 2019

APRIL 2019

**BARTON
WILLMORE**

STEWART
Milne
HOMES 



Contents

Introduction	01
Wider Context Assessment	07
Site Assessment	11
Development Parameters	17
Indicative Masterplan	19
Technical Matters	21
Conclusion	22

Introduction

SCOPE & CONTENT

This Representation has been prepared and submitted by Barton Willmore, on behalf of Stewart Milne Homes (SMH) in respect to the land at Strawberry Fields, Westhill (Site GR032), in response to the Aberdeenshire Local Development Plan (LDP) 2021 Main Issues Report (MIR).

This Representation sets out the response to the Aberdeenshire MIR, demonstrating that the site can accommodate an appropriately scaled residential development in an area of high market demand.

The site has been subject to a detailed landscape and visual appraisal in accordance with recognised best practice and policy and is considered suitable to accommodate built development, incorporating existing landscape features and landscape mitigation measures where required.

The site has been promoted through previous development plan reviews. The outcomes of the 2017 Examination of the now adopted Aberdeenshire LDP have informed the indicative Masterplan for the site, which has been the subject of an iterative design process. Within the Report of Examination of the 2017 LDP, the Reporter concluded that:

"I find no reason to differ from the conclusions of the Westhill Capacity Study which identify the area as most suitable to accommodate any future expansion needs in Westhill"

"The site is relatively accessible to public transport and to employment. It's relatively constrained setting would enclose effective integration with the urban area."

Careful assessment of the opportunities and constraints of the wider area has been undertaken and a detailed landscape and visual appraisal has informed the proposals. The indicative Masterplan, which is supplied for illustrative purposes only, provides an indication as to the potential location and form of development within the site and also how this would integrate with the settlement of Westhill and respond to its context.

The allocation of the site for residential development would assist the Council in meeting future housing requirements in an area where there is strong market demand, without compromising areas important for their qualities in respect of landscape and the natural and built environment.

The site is considered to be suitable and deliverable for housing development, as it:

- Represents a logical 'rounding off' of the western boundary of Westhill, and will complement the recently completed Broadshade development on the northern side of Old Skene Road;
- The site is sustainable, accessible, and is located in an area of strong market demand;
- Will not compromise areas important for their qualities in respect of landscape, or natural and built environment;
- Is effective and free of constraints;
- Will comply with the principles of Scottish Planning Policy (SPP) with regards to promoting sustainable new growth and increasing generosity and flexibility in the housing land supply; and,
- Is deliverable within 5 years.

It is therefore respectfully requested that the site be allocated for housing development in the next Aberdeenshire LDP. Barton Willmore would welcome the opportunity to discuss these proposals further with the Council.

RESPONSE TO MIR

Westhill Settlement Strategy

The current Development Plan for the site comprises the approved Aberdeen City and Shire Strategic Development Plan (SDP) (2014) and the adopted Aberdeenshire LDP (2017). Within the SDP, Westhill is identified as being within a Local Growth and Diversification Area and development within these areas 'should relate to local needs' (Page 22). This approach has been carried forward into the forthcoming Development Plan. In the Proposed SDP (August 2018), Westhill continues to be located within the Local Growth and Diversification Area and the Aberdeenshire MIR (January 2019) states that the planning objectives from the town are:

- To maintain opportunities for employment;
- To sustain community facilities and services;
- To identify an appropriate site for a community sports facility; and,
- To avoid coalescence with Kirkton of Skene.

In the context of the progression of the Aberdeenshire LDP, it is important to consider that the SDP is also under review and the Proposed SDP was submitted to the Scottish Government for Examination on 20 March 2019. There are a number of unresolved objections to the Proposed SDP relating specifically to Westhill which will be subject to scrutiny by Scottish Government Reporters.

It is maintained that the spatial strategy – which has been continually promoted since 2009 – should be updated and that Westhill should form part of a Strategic Growth Area (SGA) given its strategic importance as a subsea centre of excellence, connectivity to the City and continuing desirability for residential and commercial development opportunities. This is an issue that is due to be considered through the Examination of the Proposed SDP, however in the context of the LDP 2021 identifying the pattern of development in the region for the next 10 years, we would urge the Council to give due consideration to

the importance of Westhill to the region by identifying appropriate land for development. It is unclear how the identified planning objectives outlined above are to be achieved if only very limited development is to take place within the next 10 year plan period in the context that only two additional sites (and only one housing site for 33 affordable units) have been identified.

In order to maintain the unique success of the town and help meet the four objectives identified in the settlement strategy (above), it is submitted that an appropriate level of new development is required and that failing to identify any new sites for housing development will only exacerbate the pressure and demand for housing in the town. By effectively placing a moratorium on any new private housing development in the town for the next ten years, the pressure for homes in this strong market area will only increase, resulting in continuing inflated house prices and a failure to maintain the success of this sustainable mixed community. This will also have a direct impact on the delivery of affordable homes in the town. As acknowledged by the Aberdeenshire Affordable Housing Forum, 75% of the affordable housing delivered in Aberdeenshire is through the affordable housing policy which highlights the vital contribution that the private sector makes to the delivery of homes in the region. With no substantial new housing sites identified in Westhill through the forthcoming LDP period and the uncertainty surrounding the funding for affordable homes after 2021, the LDP is failing to give due consideration to the opportunities for sustainable growth in line with the requirements of SPP.

MIR Site Assessment

With regard to the Council's assessment of the site in the MIR, a number of inconsistencies are apparent. Within the assessment of the site (Site GR032), the Council states that *'the site does not relate particularly well to the existing residential development and is distant from the town's main commercial centre'*. This is in direct contrast to the Council's own assessment of the site in respect of their previous MIR (November 2013 – Site Ref. Ga048) which

stated that *'This site is well related to the existing residential areas at Broadshade and is within walking distance of an existing bus stop'*. Given that these assessments are considering the same site, it is unclear why the outcomes of the Council's assessment have altered so significantly.

It is maintained that – in line with the Westhill Capacity Study and the Reporters conclusions of the 2017 LDP Examination (December 2016) – the land at Strawberry Fields remains the most suitable area to accommodate future expansion in Westhill. Fundamentally, it is clear that additional appropriate development is required within Westhill.

The issue of coalescence with Kirkton of Skene – as raised within the Council's assessment – has not been considered previously through the assessment of the site (i.e. the 2016 MIR or 2017 LDP Examination) and does not accord with the outcomes of the Westhill Capacity Study which identifies the west of the town as the most appropriate area for future development.

As shown within this Representation, the site at Strawberry Fields has been designed within a strong landscape setting to ensure the delivery of a strong western edge to Westhill. This was acknowledged by the Council themselves through the assessment of the site in the 2013 MIR. At this time, the Council stated that *'landscape impact could be softened by strategic landscaping along its western boundary'*. This is still the case, and the site will serve to consolidate the western boundary of Westhill.

Visual and physical separation between Kirkton of Skene and Westhill will be maintained through undulating landform and the site will be seen in the context of the existing built up edge of Westhill. The Call for Sites submission (March 2018) and this Representation to the MIR include an extensive Landscape and Visual appraisal of the site to inform the development context. There has been no such assessment undertaken or presented by the Council that supports their assertion that the site would lead to coalescence with Kirkton of Skene. Given that the site lies over 500 metres from Kirkton of Skene and is within the building envelope of the western edge of Westhill, it is not the case that this would lead to coalescence and therefore the conclusions of the Council's site Assessment are incorrect.

It is acknowledged that the site lies within the Health and Safety Executive's pipeline consultation zone, as is the majority of the existing Broadshade development area. This is a statement made by the Council, and no further information is provided. The Officer's assessment does not acknowledge the works that have been undertaken to the pipeline by SMH. These upgrade works have reduced the stand-off distance to 6 metres which has been incorporated into the design approach. The existence of the pipeline does not preclude development on this land. The location of the pipeline has remained the same since the publication of the 2013 MIR and the 2017 LDP Examination and the presence of the pipeline has not been identified previously as a restriction. It is maintained that the land is suitable for the delivery of residential development.

MIR Issue 5 - Green Belt

Main Issue 5 relates to the green belt and identifies that the preferred option is to not make any changes to the green belt at this time. We agree with this approach and do not support any extension to the green belt in Aberdeenshire.

Any changes to the green belt in line with the alternative option identified in the MIR requires a comprehensive assessment of the existing and future objectives. This has not been undertaken to date through the preparation of the MIR, or indeed considered to be required at a strategic level through the progression of the SDP. Any changes to the green belt policy has therefore not been considered as part of the Development Plan review process, thus has not been subject to appropriate analysis or scrutiny. Any green belt review at this stage would be retrospective given that a Draft Proposed LDP has already been prepared, and the preparation of a truly comprehensive green belt assessment will undoubtedly be influenced by the content of this document.

In the context of Westhill specifically, any extension to the green belt to the west and north is not supported given existing constraints to the east and south of the settlement which limit the opportunities for future development. The option to extend the green belt around Westhill would result in growth opportunities to be constrained on all edges of the town, which is not supported in this area of strong market demand. It should be recognised that this approach contradicts the outcomes of the Westhill Capacity Study which identifies that the west of the settlement as being the most appropriate direction for future growth. Furthermore, SDP clearly shows Westhill to be outwith the green belt.

Additional Comments on the MIR & Draft Proposed LDP

The MIR does not include specific Housing Supply Target (HST) or Housing Land Requirement (HLR) information in respect of how the proposed allocations in the LDP are to meet the LDP Allowances identified within the SDP. It is therefore not clear how these Allowances have been calculated, or if an appropriate level of housing land has been identified for development within the MIR to meet the HLR or HST. It is noted, however, in the Draft Proposed LDP that sites within the Rural Housing Market Area (RHMA) have stalled and the Council have sought to re-evaluate the approach by increasing allocations within the Aberdeen Housing Market Area (AHMA) (Page 12). This approach is supported, and it has long been submitted that in order to ensure the delivery of homes in places where people want to live, that more housing land should be identified within the AHMA. The Council specifically mention that allocations in the AHMA towns of Pitmedden and Oldmeldrum have been identified in order to redress this balance. It is questioned why – when considering appropriate AHMA towns for further allocations – the largest town in the AHMA outwith an SGA, close to the City, with employment opportunities and extensive public transport connections was not considered to be the most appropriate sustainable location for development opportunities. As acknowledged within the Draft Proposed LDP (Page 12), AHMA towns are more likely to attract growth, and it is maintained that Westhill, more than any other, will deliver appropriate development to make a meaningful contribution to the housing land supply.

It is noted that within the Draft Proposed LDP a split of circa. 60% / 40% is identified between Housing Land Allowances in the Aberdeenshire part of the AHMA and the RHMA. It is submitted that this does not go far enough and that this split should be increased. Indeed, the SDP has sought to increase the split between the AHMA (including Aberdeen City) and the RHMA to an 80% / 20% split and unresolved objections to the Proposed SDP seek to increase this split further. This matter will be Examined by the Scottish Government, and the Council should consider how they will address any changes in respect of these splits. It is questioned if – in the context of the Aberdeen MIR having been published in March 2019, some 4 months after the Aberdeenshire MIR – the Council have fully assessed the RHMA / AHMA split across the two local authority areas, and if the LDP Allowances comply with the HST and HLR set within the SDP.

Evidence has continually identified that sites within the RHMA are constrained and are not being delivered and the SDP Housing Methodology Paper identifies that 45% of the identified housing supply within the RHMA is constrained and that 67% of these identified sites have a marketability issue. This is a clear indication that there is a delivery issue with sites within the RHMA. In order to ensure that there is a continual supply of effective housing sites throughout the lifetime of the Plan, more deliverable sites in marketable locations should be allocated for development.

The proposed site at Strawberry Fields provides the opportunity to deliver a logical extension to Westhill located in a sustainable location within close proximity to employment opportunities and facilities and will deliver much needed affordable homes in an area of acute need. The land is controlled by SMH who has a proven track record of housing delivery in this location. This, along with the absence of infrastructure constraints, will ensure short term delivery of housing to assist the Council in meeting their HLR to support the aims of the LDP and objectives of the Westhill settlement strategy.

SITE LOCATION & DESCRIPTION

The site is located on the western edge of Westhill, a growing town located within Aberdeenshire. Westhill is approximately 12 kilometres due west of the city of Aberdeen, and approximately 8 kilometres south west of Aberdeen Airport.

Westhill has undergone gradual expansion since 1964 when its status as a Garden Suburb was confirmed. In recent years major housing expansion has taken place at Elrick and to the west of Westhill. The settlement has also seen significant growth in employment with the town considered to be a global subsea centre of excellence.

The site is located to the west of Westhill, surrounded by existing development to the north, south and east, and agricultural land to the west. Old Skene Road abuts the northern boundary and provides an east west connection from Kirkton of Skene in the west through to Westhill town centre in the east. The town centre is less than 2 kilometres east from the site and provides a large range of facilities including; local shops, bars, cafés and access to the expansive local nature reserve park.

The site comprises an area of land which extends to approximately 10 hectares of arable fields.

The land falls from 130 metres AOD in the north east corner of the site to approximately 120 metres AOD toward the west, creating a gentle slope of approximately 1:20 across the site.

The site is bounded on three of its four sides by existing development.

The site can be accessed off Old Skene Road to the north and Strawberry Field Road to the east.

There are no Core Paths running through the site, however Core Path 411.01 runs along the north side of Old Skene Road, parallel to the northern boundary of the site.

An overhead powerline crosses the site in a north south direction. A pipeline crosses the western corner of the site.

There is a minor watercourse located to the north of the site, outwith the boundary.



Figure 1 : Wider Site Location Plan



Figure 2 : Site Location Plan

Wider Context Assessment

LANDSCAPE ASSESSMENT

As illustrated on Figure 2, the site is set within the indented settlement edge of Westhill, which wraps the site to the north, east and south. Kirkton of Skene lies over 0.5km to the west and pockets of ancient woodland and mature vegetation surround the settlement and contribute to the sense of separation between Kirkton of Skene and Westhill.

Pockets of ancient woodland encircle Kirkton of Skene to the west and south, and there are numerous Listed Buildings and Ancient Monuments in the wider landscape setting. The closest to the site is located approximately 212m to the north-west : Proctor's Orphanage including Steading, which are Category C listed buildings. Mature trees surround the buildings and there is a distinctive avenue of trees along the approach. Approximately 400m to the west, Kirkton House and its Walled Garden are Category B listed buildings, which are set within significant mature trees and woodland. The Scheduled Monument on the summit of the Hill of Keir: Berryhill, is located approximately 1.1km to the north-east.

The topography of the area is strongly undulating and there are a number of local hills and ridgelines surrounding the site. The site is located on gently rising ground that extends between approximately 115m and 130m AOD. Westhill extends across the undulating landform, varying between approximately 115m and 200m AOD. To the west, Kirton of Skene lies between 115m and 130m AOD. Kirkton House and Whitestone Farm are located to the west and south-west of the site, at 115m and 105m respectively.

The agricultural land to the west of Westhill is predominantly used for pasture, with field boundaries generally defined by dry stone walls and post and wire fences. There are substantial woodlands and deciduous forests to the south, north and west of Westhill. The structural vegetation in and around the site is an important feature of the local landscape, and reinforces the containment and screening of the undulating landform.

The site is not subject to any landscape designations, and lies outwith the Green Belt and immediately adjacent to the existing settlement edge of Westhill.

LANDSCAPE CHARACTER APPRAISAL

The landscape character assessment of South and Central Aberdeenshire (no. 102) was published in 1998. This acknowledges that development within towns relieves the intensity of pressure for housing in the countryside. Whilst it acknowledges that this can present dilemmas for the landscape which include disruption to existing urban character and settlement shape; possible erosion of setting, the visual relationship between a town and its surroundings; and encroachment into greenfield areas and loss of landscape resources; however ad hoc development in the countryside has become the most significant force for change affecting the landscape of Aberdeenshire.

The site lies within the Agricultural Heartlands Landscape Type and Landscape Character Area 12: Central Wooded Estates. Key characteristics of the LCA include:

- Rolling landscape of low hills and wide valleys.
- Strong woodland structure associated with numerous estate policies, adding rich and diverse texture.
- Clumps of trees atop mounds and hillocks, often bounded by circular stone walls; mature shady beech avenues; conifer plantations distributed amongst broadleaves.
- Mixed farmland with varying size and pattern of fields.
- Mosses within lowland hollows where birch and Scots pine predominate.
- Numerous and varied archaeological features, including henges, carved stone balls, recumbent stone circles and pictish monuments.
- Numerous towns and villages, many subject to recent residential expansion.
- Frequent settlement with a variety of sizes and styles of architecture; local vernacular stone buildings with conversions and extensions, modern bungalows and houses.
- Long views across open farmland contrast with sudden enclosure by woodland as one passes through area.

The Assessment recognised the significant pressures for new built development on the LCA, as has been evidenced over the 21 years since it was published. Guidance for this LCA include conserving the wooded character and setting of estates and archaeological features and to integrate new development into the landscape.

Proposed measures to integrate new development in the landscape include:

- Native broadleaf trees may be used to integrate and contain new housing estates and soften the edge of urban developments.
- In exposed locations, simple styles and forms of housing are more appropriate, especially where they may compete with views of more distinguished landmarks; development should avoid exposed locations especially where such visual conflict might occur.
- Use (or re-use) of local stones can help to integrate buildings in the landscape

The site comprises of degraded agricultural land on the urban edge of Westhill, contained by the Hill of Keir to the north. There are few landscape features within the site, with the main feature being dry stone dykes that subdivide and enclose the fields. The high voltage overhead powerlines are prominent features within the site.

SETTLEMENT CHARACTER APPRAISAL

Westhill is a planned new town that was created in 1964 as an overspill town for Aberdeen out of the existing villages of Westhill and Elrick and extending over land that was previously agricultural land interspersed with small farmhouses and barns.

The settlement character is described as being quite uniform and distinct due to the relatively new and deliberate development of Westhill. The town has no historic core and the style of residential development is generally consistent, comprising small, curvilinear developments. There are some open spaces and green areas that act as buffers between housing developments, with employment uses typically clustered to the south of the A944.

VISUAL APPRAISAL

On the basis of the visual appraisal, the site was found to relate well to the existing built up edge, with development located to the north, south and east. Intervisibility between Kirkton of Skene and Westhill is limited due to the intervening landform and mature vegetation. In general, the nature of the surrounding landform, vegetation and built form result in relatively limited views towards the site from points of public access.

Typically views are limited to views from local roads and houses in the immediate vicinity and from the newly constructed footpaths to the north of the site, which have a residential context. Views of the site and western edge of Westhill from Straik Road and Old Skene Road are dominated by the high voltage overhead power lines.

When the site is seen in longer distance views to the south-west, it is seen in the context of the existing built up edge of Westhill which extends up onto the rising ground beyond, as illustrated in Figure 3: View from Unnamed Road, taken from over 1.25km to the south-west of the site, near to Gask Cottage.

Elevated long-distance views into the site from the Hill of Keir are largely obscured by the intervening topography and built form. Where the site can be seen, it is seen in the context of Westhill, which surrounds it to the north, south and east.



Figure 3 : View from Unnamed Road, near Gask Cottage, looking north east.

FACILITIES & ACCESSIBILITY

There are a range of facilities within Westhill as described below.

Retail

Westhill has a wide range of retail facilities, both in the town centre, less than 2 kilometres east of the site, and at Arnhall Business Park adjacent to the A944. There are three hotels, five supermarkets, a number of bars, restaurants, takeaway food shops and several other locally run shops.

Health

There is one Medical Centre located within Arnhall Business Park which includes a Dental Practice. A second Dental Practice can be found on Old Skene Road, less than 400 metres from the proposed development. A further two dental practices can be found within Westhill, one at the shopping centre and another at Abercrombie Court.

Education

There are three primary schools in Westhill; Westhill Primary School, Crombie Primary School and Elrick Primary School, as well as Westhill Academy, the secondary school. These schools are between 1 and 2 kilometres from the site and can be accessed through safe walking and cycling routes.

The site is located within the catchment of Elrick Primary and Westhill Academy, both of which are forecast to operate under capacity to 2022 (Aberdeenshire Council 2017 School Roll forecasts).

Employment

Westhill Business Park and Arnhall Business Park are significant employment areas and are located less than 2 kilometres south east of the site.

Prime Four Business Park is located less than 5 kilometres east of the site and Aberdeen city centre is approximately 12 kilometres east of the site.

Leisure and Recreation

There are a wide range of leisure and recreation facilities in Westhill including a swimming pool, golf course, various parks, football fields and a leisure centre.

A multi-purpose playing field is located less than 1 kilometre south of the site.

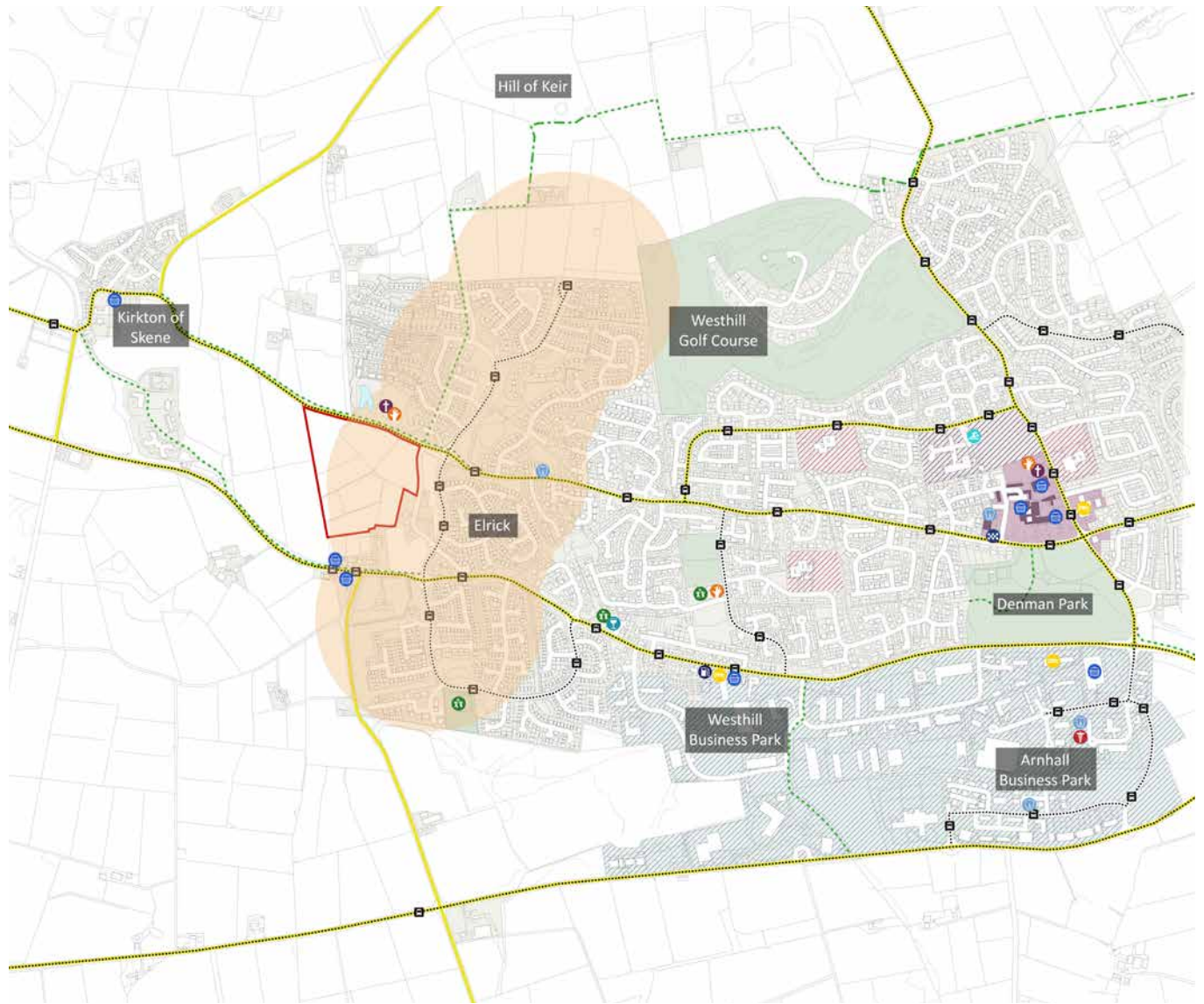
Public Transport

At present there are four bus services which run through Westhill, connecting the town with Aberdeen, Kingswells, Dunecht, Alford, Inverurie, Oldmeldrum and Dyce Airport.

More than three quarter of the site is within 400 metres of a bus stop.

Service no.X17 runs along Old Skene Road, passing the site at a frequency of every 12 minutes. Service no.218 also passes the site along Old Skene Road on a hourly service.

There is a 1,000 space Park & Ride facility approximately 3 miles east of the site at Kingswells, at the junction with the Aberdeen Western Peripheral Route (A90), from which fast and frequent services like the service X17 and 218 operate to and across the city centre via established bus priority routes offering connections to the wider area.



- | | | |
|---|--------------------------------------|------------------|
| Site Boundary | Main Roads/Streets | Community Hall |
| Existing Development | Bus Route and Stops | Place of Worship |
| Business/Industrial Use | Existing Core Path * | Leisure Centre |
| Town Centre | Proposed Core Path * | Swimming Pool |
| Primary School | Local Shops | Police Station |
| Secondary School | Bus Stop Accessibility Radius (400m) | GP Surgery |
| Open Space | Shop | Dentist |
| source: * Aberdeenshire Council, Core Paths Plan:
Consultation Draft Map 43 Westhill | Hotel | Petrol Station |
| | Pub/Restaurant | |

Figure 4 : Accessibility & Facilities Plan

Site Assessment

SITE OPPORTUNITIES & CONSTRAINTS

Consideration of the site's opportunities and constraints have been undertaken based on initial surveys and a review of published information. There are a number of factors which have influenced the location and form of development and these are outlined as follows.

Topography

The land gently falls from 130 metres AOD, in the north east corner of the site, to approximately 117 metres AOD along the western boundary providing an average gradient of 1:27.

Access and Circulation

The site is bounded to the north by Old Skene Road and the east by Strawberry Field Road (which is adopted). Its southern and western edges are bounded by agricultural fields and currently there is a field access to the site from Old Skene Road. There are no Core Paths running through the site, however, Core Path 411.01 as indicated on the Aberdeenshire Core Paths Plan (ACPP), runs along Old Skene Road.

Two new vehicular access points are to be formed off Old Skene Road.

A new footpath/cycleway has been established along the northern side of Old Skene Road which provides links to Westhill town centre to the east and Kirkton of Skene to the west. The site is within a 10 minute cycle of the whole of the Westhill settlement and the adjacent cyclepath links with the dedicated cycle way to Aberdeen city centre.

Vegetation

There is very little tree planting/vegetation on the site, aside from a scattering of trees along the field boundaries and a tree belt to the south of the site.

Ecology

The site is currently used for agricultural purposes. There are no areas of known ecological significance within the site. There is an opportunity through the creation of new habitats to enhance the site's biodiversity.

Heritage

There are no known areas of archaeological significance within the site, however, the stone walls/dykes which enclose some of the fields are locally distinctive.

The C-listed Proctor's Orphanage and associated steading lies 260 metres west of the site.

Buildings

There are no buildings present on the site, however, the immediate surroundings include residential development to the north, south and east. A new church/community facility is located to the north of the site and two shops to the south at Mason Lodge.

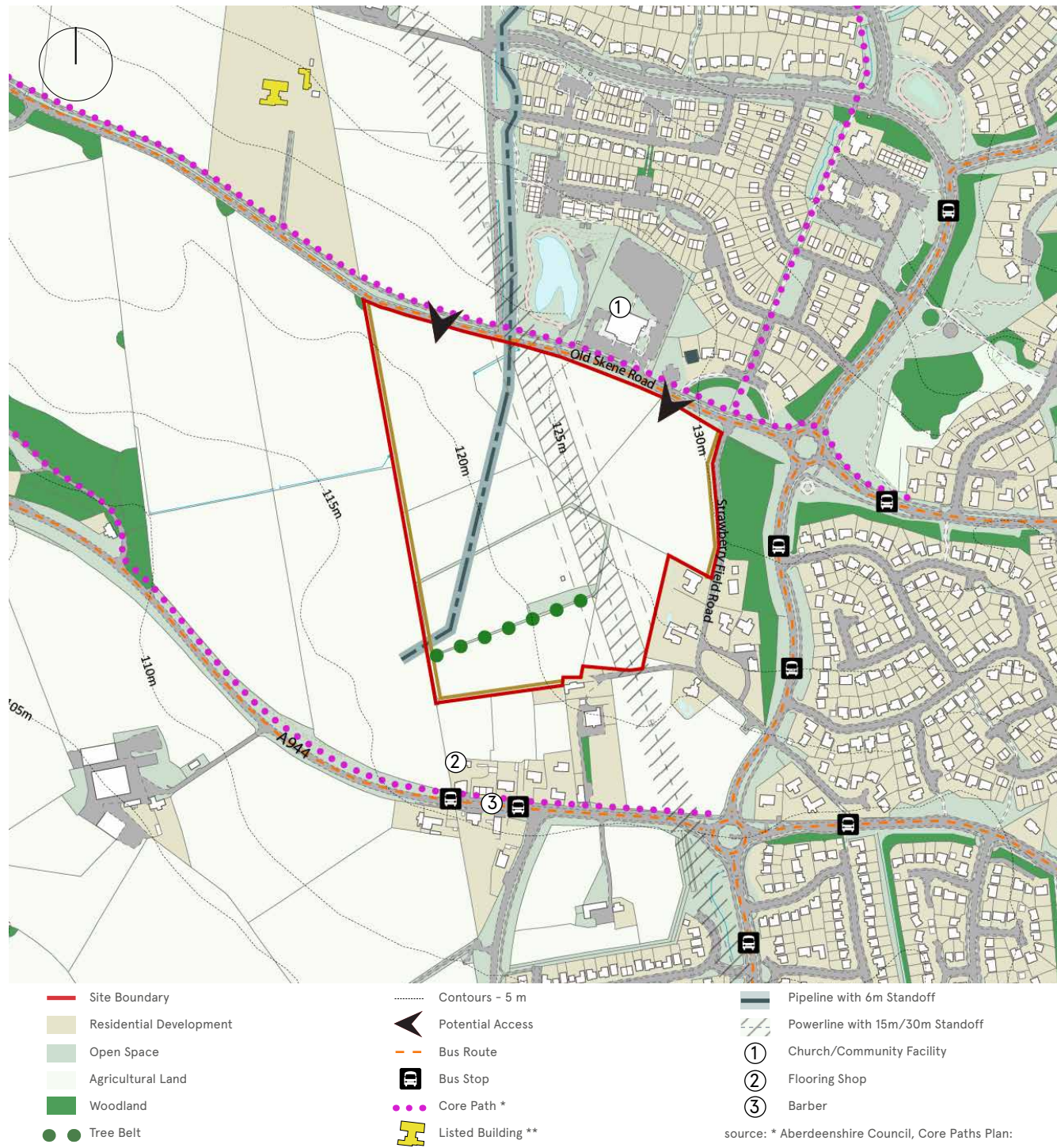


Figure 5 : Opportunities and Constraints Plan



Powerline

An overhead powerline crosses the site in a north south direction. This powerline also bisects recent residential development to the south of the site, where homes lie at varying distances from the centre of the powerline, ranging from 15 to 40 metres. As such, the exact standoff from the powerline would be determined through the application process, but for the purpose of this Representation and initial indicative Masterplan, a varied standoff has been used, ranging from 15 to 30m, to provide a varied approach and create an attractive building line.

Vehicular crossings under the powerline may be created. Landscape treatment within the standoff will be restricted to avoid interference with overhead cables.

Pipeline

A pipeline with a 6 metre standoff crosses the western corner of the site. Development on this space will be in line with LDP 2017 Policy P4: Hazardous and Potentially Polluting Developments and Contaminated Land and HSE Land Use Planning Advice. It is worth noting that the position of the pipeline has not been identified as a constraint through the previous LDP 2017 Examination. No works are required to the pipeline to accommodate development. This is the same pipeline that traverses Broadshade and thus it is not a constraint to development.

Hydrology & Flooding

While there is a minor watercourse to the north of the site, no part of the site is identified as likely to flood on SEPA flood maps.

Summary of Westhill Capacity Study

The Westhill Capacity Study was updated in 2014. The purpose of this document was to inform the 2017 LDP.

The outcome of the study indicates the site is identified as being 'most suitable' for potential development

Strawberry Fields is identified as part of Area 14 in the capacity study. The assessment finds that the site is largely free from constraints to development, unlike any other growth options in Westhill.

The site achieves high scores as a result of its accessibility to employment, education services, town centre and bus routes. It also scores highly as it is considered to physically integrate well with the original town and responds well to the urban grain.



LANDSCAPE & VISUAL CAPACITY

Figure 6 illustrates the development potential of the site, with reference to important landscape features and visual characteristics. This divides the opportunities and constraints for development (in landscape and visual terms) in the following manner:

- Areas suitable for open space and/or mitigation.
- Areas of moderate landscape/visual constraint: suitable for development that includes retention and reinforcement of existing landscape framework to create a sympathetic development edge and respond to local landscape and townscape character.
- Areas of low landscape/visual constraint: suitable for higher density development that retains and enhances the existing landscape framework, where possible.

The landscape strategy that has informed the context and basis for the indicative Masterplan, has also been developed in accordance with the principles set out in Planning Advice Note PAN 44: Fitting New Housing Development into the Landscape.

Key principles identified in the landscape and visual opportunities and constraints mapping that have informed the Masterplan development include:

- To retain, protect and enhance existing landscape features including traditional field boundaries wherever possible;
- To contain the proposed built development areas within the local landform and areas of retained and new strategic planting, to reinforce and strengthen the landscape framework of the site and new settlement edges;
- To provide sufficient open space and links with the wider green network; and,
- To provide an appropriate setting to the proposed built development to create a distinctive sense of place through the quality of the urban design and landscape design and visual appeal.

The site is not subject to any landscape designations and is located on lower lying, flatter land than the existing settlement area to the north.

Although the 2013 MIR settlement analysis acknowledged that the landscape impact of development within the site could be softened by strategic landscape planting along the western boundary; the 2019 MIR considers that the site “does not relate particularly well to the existing residential development” and that the site is not suitable for development “in order to avoid coalescence with Kirkton of Skene”.

The sense of separation between Kirkton of Skene and the western edge of Westhill is reinforced by the landform of Hill of Keir, and residential development within the site would not result in coalescence between the two settlements. In order to reduce the potential visual impact of development within the site, a landscape buffer is proposed along the north-western edge and development along the western edge should respond appropriately to the settlement edge location. The introduction of development into the site with associated structural planting would also help to screen existing views of the high voltage overhead powerlines which are prominent when arriving into Westhill from the west.

The provision of structural landscaping along the western and southern boundaries of the site would reflect the sylvian character of the landscape to the west of Westhill and reinforce the grain of traditional field boundaries, enhancing the approach along Old Skene Road and the A944 from the west, in line with published landscape character guidance.

Whilst the overhead powerlines partially constrain opportunities for large scale tree planting, they do allow for the creation of Green Infrastructure through the centre of the site, which would accommodate access and habitat connections to the open space corridors to the north and south.

Where possible, the proposed development should retain existing tree belts and dry stone dykes and bring them into positive management.



- Site Boundary
- Low Landscape / Visual Constraint
- Moderate Landscape / Visual Constraint
- Areas Suitable for Open Space
- Views toward the site
- Proposed Green Corridor
- Core path
- Reinforce Existing Vegetation
- Proposed Landscape Buffer
- Retain Existing Trees
- Retain Existing Stone Dykes
- Reuse Stone From Remnant Stone Dykes

Figure 6 : Landscape Opportunities & Constraints Plan

Development Parameters

The evaluation of Site opportunities and constraints has informed a set of development parameters through which a Masterplan can be developed.

LAND USE

Residential development is the single use on site and will comprise some 6 ha. Open space will comprise some 2 ha, including formal and informal areas of open space and SUDS.

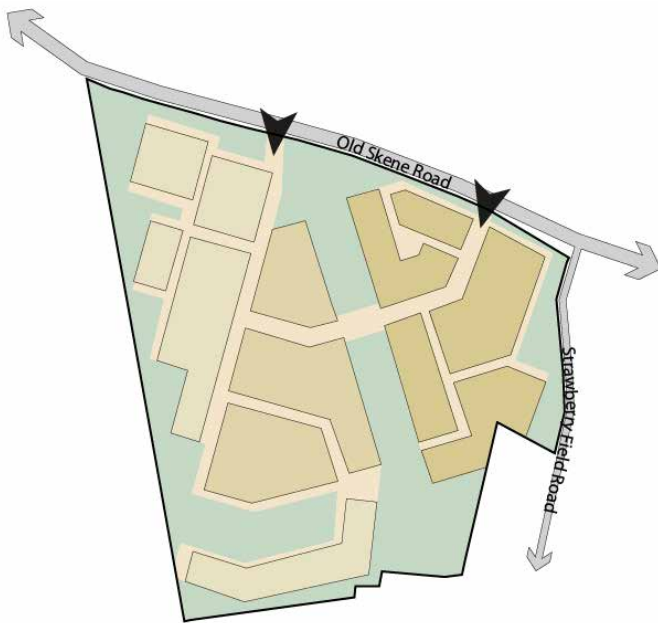
Residential Capacity

It is anticipated that the proposed development will deliver up to 180 dwellings with a mix of house types including affordable homes. Indicative density bands have been shown in response to the site assessment.

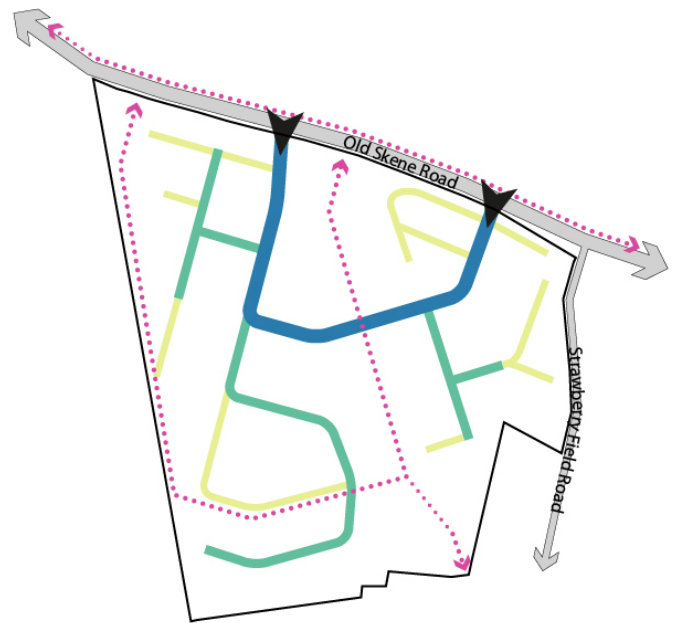
ACCESS & MOVEMENT

The access and movement strategy for the site has been developed in line with current national guidance and wider planning and design guidance such as that set out in Designing Streets. A summary of the key design principles is set out here.

Two vehicular accesses are proposed from Old Skene Road to the north of the site. Pedestrian/cycle paths are proposed within the development which will connect with the existing Core Path along Old Skene Road.



- Site Boundary
- Higher Density c. 25-35
- Medium Density c. 20-25
- Lower Density c. 15-20
- Open Space
- ➔ Indicative Access Location



- Site Boundary
- Primary Residential Street
- Secondary Residential Street
- Tertiary Residential Street
- Core Path / Pedestrian Routes
- ➔ Indicative Access Location

Figure 8 : Land Use Diagram

Figure 7 : Access & Movement Diagram

LANDSCAPE

The proposed development will sensitively incorporate existing landscape features on the site. Additional screen planting is proposed to the north-west, as well as gapping up of the existing hedgerow to the south-west with the introduction of occasional tree planting.

Indicative locations for SUDS have been shown either side of the pipeline but their exact size and location would be determined through an application process.



Figure 9 : Landscape & Open Space Diagram

URBAN FORM

Perimeter blocks provide a clear distinction between public and private space and create a legible and permeable environment. All streets, spaces and paths will be well overlooked. Feature buildings (defined by scale, detailing and materials) will emphasise spaces and routes to support legibility.

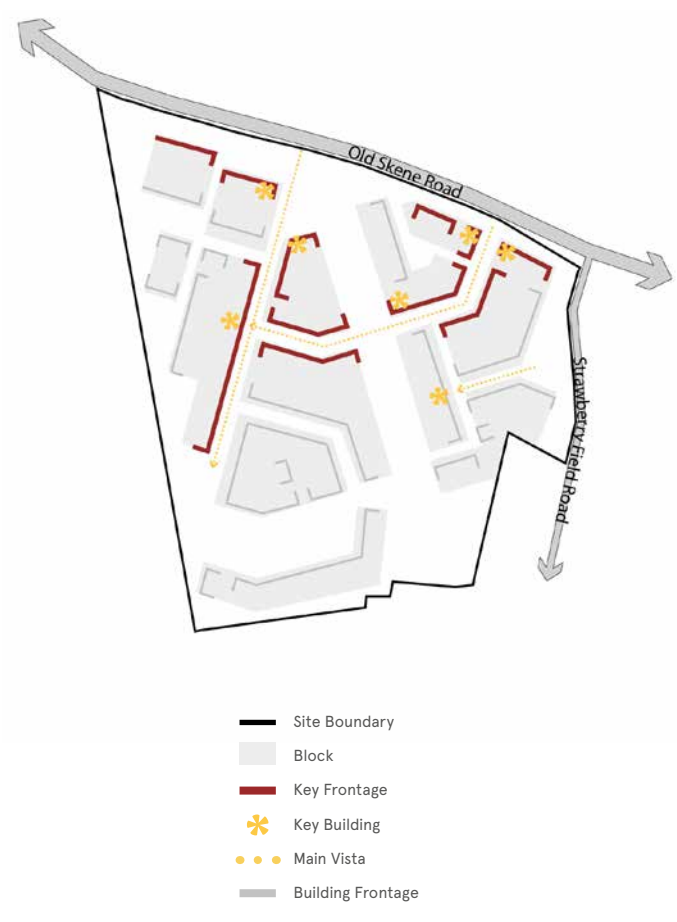


Figure 10 : Urban Form Diagram

Indicative Masterplan

KEY PRINCIPLES

The development of an indicative masterplan for the site is as a result of an assessment of access, topography, boundary conditions, built and landscape context and applying a cohesive and coherent approach to the layout. The Masterplan is both responsive to the conditions present but also creates an appropriate design approach which creates a development of its own character.

The proposed development will positively address Old Skene Road, with housing fronting on to the street. A central area of open space will be located on the site and residential development on either side will address this green corridor. Vehicular access will be taken from the north of the site and pedestrian connections will be created throughout the development to increase permeability and sustainable links to the established core path network.

The landscape strategy for the site’s western edge seeks to provide a substantial green buffer that will further screen of the proposed development and mitigate any potential intervisibility with Kirkton of Skene. The density and arrangement of buildings close to the western edge also responds sensitively to this context.

It is considered that approximately 180 high quality homes can be accommodated on the site. A range of house types and tenures will be orientated to best address the site topography, to front key open spaces and integrate effectively with the existing built form. The design approach, adopted for this Indicative Masterplan, ensures that a high quality residential development will be created that will deliver an attractive and robust western edge to Westhill and integrate successfully with the surroundings.

Quantum of Use	
Residential Land	c. 6 ha
Open Space (Including SuDS)	c. 4 ha
TOTAL	c. 10 ha

OPEN SPACE

The development parameters has allocated approximately 4 ha of land to informal open space and landscape buffer (including SUDS). This is in line with the LDP 2017 Open Space Policy. The provision of play space can be delivered on the site.

The proposed development will provide an attractive, robust and legible landscape setting to the proposed built form. This will include a range of native, locally appropriate tree species, as well as wildflower grassland and ornamental shrubs. Key landscape principles relating to this, include:

- Retain and enhance, where possible, existing trees, shrub and hedgerows;
- Provide a cohesive open space framework that links with and extends the existing open space provision and provides recreational opportunities;
- To provide an attractive and local characteristic landscape setting to the proposed built form; and

To provide ecological amenity enhancement through the introduction of new tree planting, hedgerows and meadow areas linked to the reinforcement of existing landscape features wherever possible.

TREES

Where possible, all existing trees will be retained on site. The exception to this may be where vehicle and pedestrian access is proposed.

Proposed planting around the site edges, in particular the western edge, will follow existing field boundary lines and as such will integrate well with existing vegetation. The site also benefits from its close proximity to core paths and so provides easy access to the wider path and green network.



Figure 11 : Indicative Masterplan

Technical Matters

DRAINAGE

The issue of drainage, including the provision for storm water in extreme weather events has been considered in the development of the Masterplan. Measures to be included within the design approach are set out below:

- Reduce the amount of non permeable surfaces and thereby, run-off specifically on road areas, and maximise the space devoted to gardens.
- Use of permeable paving, where appropriate.
- A Sustainable Urban Drainage system (SUDS) which incorporates the existing watercourses and provides a network of new ditches, swales, wetlands and ponds.

The SUDS is designed to form a highly positive element in the landscape of the development, creating focal points and positive elements in the public realm.

TRANSPORT AND MOVEMENT

The emphasis is on promoting sustainable transport modes offering choice for a wide range of journeys. The modes which can significantly reduce car journeys are:

- Walking and cycling along safe streets and a network of dedicated paths which link with adjoining neighbourhoods and countryside.
- Linking the neighbourhood with the wider settlement.

ECOLOGY

The strategy for the development includes the following measures to protect, enhance and extend biodiversity:

- New habitats will be created, including wetlands and ponds, as an integrated part of the measurements of SUDS areas;
- The landscape treatment of open spaces and parts of the public realm will encourage wildlife through careful selection of plant species and management regime; and,
- Measures to encourage wildlife will be extended to private space and buildings.

PHASING

It is likely that all phases of construction could be complete in six years.

- Phase One extends to approximately 4 hectares, providing approximately 60 units.
- Phase Two extends to approximately 3 hectares, providing approximately 60 units.
- Phase Three extends to approximately 3 hectares, providing approximately 60 units.

These phases are indicative and subject to revision following discussions with Aberdeenshire Council.

Conclusion

This Representation clearly demonstrates that the site can offer an appropriate, high quality residential development which will integrate effectively with the surrounding urban form. The proposal will also deliver much needed affordable housing and offer a choice of housing types within an area of strong market demand, and will support the level of employment land which is present within Westhill.

The Examination of the 2017 LDP concluded that although the site should not be allocated at the time, the site is *'most suitable to accommodate any future expansion needs in Westhill'* and that the *'future status of the site is more appropriately reconsidered through the next development plan'*. It is maintained that housing sites are required in Westhill to maintain a 5-year effective housing land supply, particularly in the context of the unresolved objections of the Proposed SDP.

Given the identification of the site as *'most suitable'* for development through the Westhill Capacity Study and by the Reporters through the previous Examination, the land at Strawberry Fields should be allocated for residential development.

In line with evidence of the importance of private sector development to the delivery of affordable homes and the failure to deliver the required housing supply in the RHMA, it is crucial that the 2021 LDP identifies appropriate and deliverable housing sites to ensure the aspirations of the LDP and the Westhill Settlement Objectives are met. Westhill continues to be an area of strong market demand and offers the most appropriate location for development in the Local Growth Diversification Area.

Accordingly, it is requested that the site be included within the settlement boundary of Westhill and allocated for residential development within the Proposed LDP.

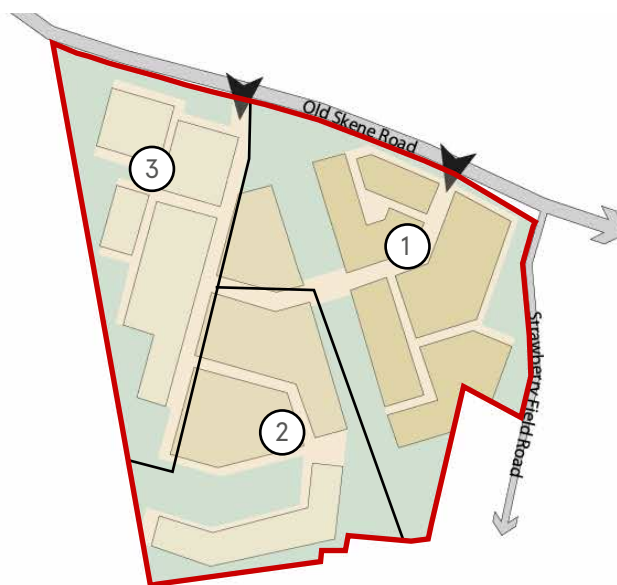


Figure 12 : Phasing Plan



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