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I also agree that following the end of the consultation, i.e. after 8 April 2019, my name and respondent identification number (provided to you by Aberdeenshire Council on receipt of your submission) can be published alongside a copy of my completed response on the Main Issues Report website (contact details and information that is deemed commercially sensitive will not be made available to the public).

The data controller for this information is Aberdeenshire Council. The data on the form will be used to inform a public debate of the issues and choices presented in the Main Issues Report of the Aberdeenshire Local Development Plan 2021. It will inform the content of the Proposed Aberdeenshire Local Development Plan.

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- Mr Andrew Lawson, Data Protection Officer, Aberdeenshire Council, Business Services, Town House, 34 Low Street, Banff, AB45 1AY

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Which document(s) are you committing on?	Main Issues Report	<input checked="" type="checkbox"/>
	Draft Proposed Aberdeenshire Local Development Plan	<input checked="" type="checkbox"/>
	Strategic Environmental Assessment Interim Environmental Assessment	<input type="checkbox"/>
	Other	<input type="checkbox"/>

Your comments

Representations to the Main Issues Report on behalf of Stewart Milne Homes in relation to Site Ref: KN034, Site A, East of Drumoak.

On behalf of Stewart Milne Homes, objection is taken to the failure of the Main Issues Report (MIR) to identify Site Ref: KN034, Site A, East of Drumoak for residential development in the proposed Local Development Plan (LDP) 2021. The site, or part of it, should be preferred for development in the first Plan period with the balance reserved for future development following a mid-term review of the LDP. This representation requires to be considered in the context of the Development Bid submitted at the pre-MIR stage and having regard to the objection submitted in respect of Site Ref: KN128, Land South of Deeview Gardens, Drumoak, identified as an Officer's preference in the MIR.

The MIR Settlement Statement acknowledges that Drumoak is an area of high demand for housing and recognises that development has occurred to both the north and south of the A93. It further recognises the range of services available within the village and the importance of sustaining those services to maintain the overall sense of place in the village. It concludes that further development could be supported in an effort to sustain local services and identifies, as an Officer's preference, land to the South of Deeview Gardens for the development of 49 homes. The Development Bid submitted for that site, KN128, sought the development of 35 homes, but Officers consider it capable of accommodating a higher density of development. In identifying the site for development it must, therefore, be assumed that sufficient capacity in primary and secondary education, as well as drainage provision, is available to accommodate at least 49 homes. Consequently, it is important to consider this representation in respect of Site KN034 in that context.

Stewart Milne Homes submitted three Development Bids in respect of land under their control in and around Drumoak. Those Bids related to this site Ref: KN034, Site A East of Drumoak; Site KN035, Site B, South of Drumoak; and, Site KN036, Site C, West of Drumoak. The latter included an element of retail and commercial use as well as residential. A Strategic Masterplan submitted with each of the Bids provided indicative phasing for each of the sites. It is considered that all of the sites are capable of development, with each having their own merits. This was acknowledged by the Reporter following the Examination in Public into the 2017 Local Development Plan through which the sites were also promoted. He considered that the sites in Drumoak were "...not without merit" and considered that all three sites could, in the main, be developed without giving rise to unacceptable impacts upon the landscape and setting of the village.

It is recognised, given the size of the existing settlement, that not all of the sites could be brought forward through the emerging LDP 2021. However, the Development Bids submitted for each of the sites, along with the accompanying Strategic Masterplan, demonstrate the capacity of Drumoak to accommodate long term strategic growth. The LDP 2021 provides an opportunity to secure the planned long term growth of the settlement through the selection of a preferred site for development in the initial Plan period with land reserved for future development following a mid-term review of the LDP. The balance would remain for longer term development. Ultimately, it is for the LDP process to determine the direction of that growth facilitated by the Development Bids submitted.

The MIR assessment of Site KN035 accepts that it is well located in relation to the settlement and in close proximity to the primary school. It also sits to the north of the A93 on the same side as the primary school. Crossing the A93 has previously been perceived by the Council as an issue for the development of land to the south, albeit this issue could be addressed through the installation of a light controlled pedestrian crossing on the A93. Notwithstanding, should it remain a concern to the Council options are available for development to the north of the A93 on the same side of the road as the primary school.

The MIR Site Assessment highlights that a national grid transmission pipeline crosses the site and refers to Scottish Planning Policy, which advises that allocations should avoid risk. The presence of the pipeline, however, is not a reason to oppose development on this site. As advised in the Development Bid, the pipeline is capable of being realigned. This is an issue that can be addressed in detail with the pipeline operators and the Health & Safety Executive and does not prevent the principle of development being established. Indeed, the same pipeline was diverted in Westhill, by Stewart Milne Homes, allowing the Broadshade development to proceed. Furthermore, other sites, which lie within pipeline corridors, for example in Stonehaven, have been identified as Officer's preference for development.

It is not accepted, as contended in the MIR, that the proposal would have a significant impact on the local landscape and setting of the settlement thus resulting in over-development. The Development Bid, and accompanying Strategic Masterplan, was clear as regards the potential for phasing the development which would, in effect, address any concerns regarding over-development and ensure that the site was developed as part of the planned growth of Drumoak and at a pace similar to the previous incremental growth of the settlement. That phasing, allowed for the development of the site in tranches of 50 units, which reflect Officers' own preference for development in Drumoak.

As regards the landscape and setting, a strong landscape framework is provided by the shelter belts to the east and west of the site whilst the woodland belt, which crosses the site from east to west, provides containment to development and disrupts distant views of the site. The Development Bid and Strategic Masterplan recognised that the site forms a gateway into the village on the approach from Aberdeen. It advised that this would be respected and the shelter belt to the east strengthened and expanded to provide containment to the development whilst providing a gateway feature to the village. That shelter belt to the east will also form a long term defensible boundary to the settlement. The containment afforded to the site by the existing shelter belts to the north and east is clearly evident from the settlement plan contained within the MIR and within the draft Proposed Local Development Plan.

Whilst the Site Assessment acknowledges that the southern section of the site connects well to the settlement with linkages via School Brae, it advises that the northern part of the site feels slightly isolated due to the lack of road connections and no second emergency access. However, the scale of development proposed in that area would not require an emergency access. Furthermore, the northern portion of the site is relatively secluded, screened by the existing tree belt which forms its southern boundary. Also, there is existing housing to the west and the northern limit of Drumoak, which is defined by that development to the west, would not be breached by the development of the northern portion of this site. Notwithstanding, should the Council have concerns regarding the development of the northern portion of the site, the extent of development could be restricted, limiting it to the land to the south of the tree belt. This would allow for the development of around 110 homes with 50 allocated in the first Plan period and the balance of the site reserved for development following a mid-term review of the LDP. This approach is entirely within the gift of the Council in allocating sites for development through the emerging LDP.

The proximity of Drum Castle and the potential impact on its setting is also highlighted as an issue by the MIR. The castle and its designed landscape are some distance to the north of the proposal site and are not inter-visible due to topography and existing landscape features. The impact is therefore likely to be negligible. Nevertheless, were the Council minded to exclude the northern portion of the site there would be no impact whatsoever on the setting of the castle as the southern portion of the site sits at a lower level and is entirely contained by the existing tree belts to the north and east.

Education and drainage capacities are highlighted as further issues which are considered to limit the development potential of the site. However, there are no grounds for discounting the development of this site on the basis of those constraints when the MIR identifies an Officer's preference to the south west of Drumoak for 49 homes. It is clear, therefore, that there is capacity to accommodate that scale of development within the settlement.

It is evident from the above that Bid Site KN034 is capable of accommodating a phased development to allow for the planned growth of Drumoak at a pace consistent with previous growth and timed to ensure sufficient capacities in education and drainage provision. Unlike the Officer's preferred site, KN128, it does not fall within an area protected from development by the extant LDP 2017.

The proposal site is contained within a strong landscaped framework with shelter belts to the east and north. As such, there would be minimal impact on the setting of Drumoak through the development of this site. Should the Council's concerns regarding the northern portion of the site prevail this could be excluded with only the southern portion of the site allocated for development in two phases to accommodate around 110 homes.

On the basis of all of the above it is respectfully requested that Site KN034 be allocated in the proposed LDP 2021 for the development of 50 homes with the balance of the site reserved for future development following a mid-term review of the Plan.