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

Your comments

Please see attached report.



Your comments (continued)

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CHARTERED ARCHITECTS & PLANNING CONSULTANTS

**ABERDEENSHIRE LOCAL DEVELOPMENT PLAN
RESPONSE TO MAIN ISSUES REPORT
GR132 LAND AT MAINS OF KEIR, SOUTH EAST OF B979, WESTHILL**

APRIL 2019

On behalf of
The Margaret Mitchell Discretionary Trust



HALLIDAY FRASER MUNRO
CHARTERED ARCHITECTS & PLANNING CONSULTANTS



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1. Introduction

- 1.1. This report has been prepared by Halliday Fraser Munro Chartered Architects and Planning Consultants in response to the Main Issues Report (MIR) stage of the forthcoming Aberdeenshire Local Development Plan 2021.
- 1.2. On behalf of the Margaret Mitchell Discretionary Trust Halliday Fraser Munro submitted a bid at the 'Call for Sites' stage of the LDP process for land at Mains of Keir, south east of B979, Westhill for around 90 homes.
- 1.3. The development bid set out layouts for two adjacent parcels of land east and west of the 'Mains of Keir' farm located 300 metres north of the current Westhill settlement boundary and around 0.5 miles east of Kirkton of Skene. The site is in an attractive rural setting on the northern edge of Westhill and comprises the 'Mains of Keir' farmhouse, a collection of farm buildings and dwelling houses. Part of the site, south of Mains of Keir was formerly the Skene Caravan Park. The operation of the site as The Skene Caravan Park ceased in 2006 and is presently derelict and vacant previously used brownfield land. The site gently slopes up towards the east. Mains of Keir is accessed from the minor public road which runs north-south between the B979 and Old Skene Road. The two parcels of land are located to the east and west of the road.
- 1.4. Bid Site GR132 has not been supported in the Main Issues Report as an Officer's Preference at this stage. Reasons given for this include the site being situated outwith the settlement of Westhill, the development could have adverse impact on the setting of the Keir Hill Scheduled Monument and much of the site lies within the Health and Safety Executive's pipeline consultation zone. However, the MIR does not rule out future development of the site noting that the eastern part of the site could come forward on the basis that bid Site GR064 to the south was supported.
- 1.5. The vacant Skene Caravan park forms part of the site and has lain derelict and disused in its entirety for a number of years. There is an existing approval (APP/2017/2059) for a single dwellinghouse on part of the former caravan park site. This situation, along with the adjacent greenfield land and its proximity and relationship to the recent growth north west of Westhill ensures the land at Mains of Keir is an excellent opportunity for a future residential development allocation that is deliverable and the site benefits from established defensible boundaries.
- 1.6. This report sets out the reasons and justification for including GR132 as a future 'reserved' residential allocation.



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2. Westhill Summary

- 2.1. The market has proven that Westhill is a popular place and somewhere successful development can be delivered. Westhill provides a high number of quality jobs partly thanks to being known as the 'Global Centre for Subsea Excellence'. It operates as a self-sustaining town with an effective public transport network, core paths and an established and well used town centre.
- 2.2. All substantive allocations in Westhill made in the last LDP have been built out and additional housing allocations are needed to sustain supply. Additional measured future development is needed to sustain the towns role as a key employment centre and sustain shops and services.
- 2.3. The settlement vision for Westhill in the MIR notes that the lack of affordable homes is an issue for the local community. The current strategy for delivery of affordable homes is as part of allocated housing sites which are required to deliver 25% of the site as affordable. If no additional housing land is made available there will be no provision of new affordable housing in Westhill and this issue will remain despite Westhill being able to accommodate future measured housing development.
- 2.4. The Westhill Capacity Study Update (Aberdeenshire Council 2014) has identified a lack of housing diversity and choice in the Westhill housing market. Residential areas are dominated by owner occupied private family dwellings and there is a limited provision of flats and small homes. The current housing provision does not cater to a wide range of needs and does not meet market demand. To address this, future residential allocations are required that allow diversity in the housing market.

3. Response to the MIR

- 3.1. Site GR132 is not an Officer's Preference in the MIR. The reasons given for not supporting the bid are set out here: ***The proposed site is situated outwith the settlement of Westhill. It is not considered that the western part of the bid is unsuitable for development in order to avoid coalescence with Kirkton of Skene. The eastern part of the site could only come forward in principle on the basis that bid site GR064 was supported. However, it is also considered that development could have an adverse impact to the setting of Keir Hill Scheduled Monument. Additionally, much of the site lies within the Health and Safety Executive's pipeline consultation zone.***
- 3.2. The Officer's view and associated issues can be broken down and will be examined in more detail below, however it is worthwhile to note that the only identified development



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constraint is the pipeline which can be easily addressed. This assessment places the land in an ideal situation as a future residential land opportunity.

It is not considered that the western part of the bid is unsuitable for development in order to avoid coalescence with Kirkton of Skene.

- 3.3. The terminology used in the above statement around coalescence with Kirkton of Skene does not provide a coherent argument around what the issue specifically is and suggests some development is supported by Officers. Even so, we do not consider that the western part of Site GR132 would result in coalescence between Westhill and Kirkton of Skene and as shown in Figure 2 the site is a suitable distance from Kirkton of Skene. The value of the countryside between Westhill and Kirkton of Skene is recognised and the role it has in preventing coalescence is acknowledged, hence the bid for Site GR132 not proposing any development that would result in coalescence between the two places.

The eastern part of the site could only come forward in principle on the basis that bid site GR064 was supported.

- 3.4. Site GR132 is being presented as a future reserve site after development at GR064. GR132 east would be developed first followed by GR132 west. This would present a measured extension to Westhill and allow planned future growth of the settlement. Site GR064 received similar feedback to GR132 in the MIR with the only identified constraint one that can be easily addressed. It would therefore seem reasonable that GR064 will come forward and GR132 could follow as a strategic reserve. The allocation of future reserved sites is a common approach to many settlements set out in the MIR.

The proposed site is situated outwith the settlement of Westhill.

- 3.5. The MIR notes that the site would be situated outwith the settlement of Westhill. This could be addressed by the settlement boundary being redrawn to include Site GR132. The site is only 300 metres from the Westhill H1 site at Broadshade which was allocated for up to 190 houses and is complete. GR132 is well placed to benefit from the new facilities provided by this development. The erection of a community hall and church on Old Skene Road confirms the creation of a new neighbourhood at the west end of the town to support the existing developments, as does access to a bus service. New development at Mains of Keir would be strongly related to these facilities. New Core Path linkages from the Broadshade area northwards to Mains of Keir also assist in strengthening this relationship. The land at Mains of Keir represents an excellent residential development opportunity for allocating a logical and sustainable extension to Westhill which could also deliver a range of quality housing with very good access to an array of local services and employment opportunities. Additionally, the Westhill Capacity Study Update (Aberdeenshire Council 2014) reported that development to the west of the settlement would be suitable.



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Much of the site lies within the Health and Safety Executive’s pipeline consultation zone.

3.6. We note the MIR comments regarding the site lying within the Health and Safety Executive’s (HSE) pipeline consultation zone. The pipeline is located south east of GR132 and the HSE Planning Web App does not indicate that the sites lies within the consultation zone as shown in Figure 1, therefore this is not considered a constraint to development. Information from HSE indicates that in 2009 a section of the pipeline was diverted and laid with thick wall pipe at Broadshade. As a result of these modifications, the consultation zone distances associated with this pipeline are significantly smaller than those which apply to the rest of the pipeline.

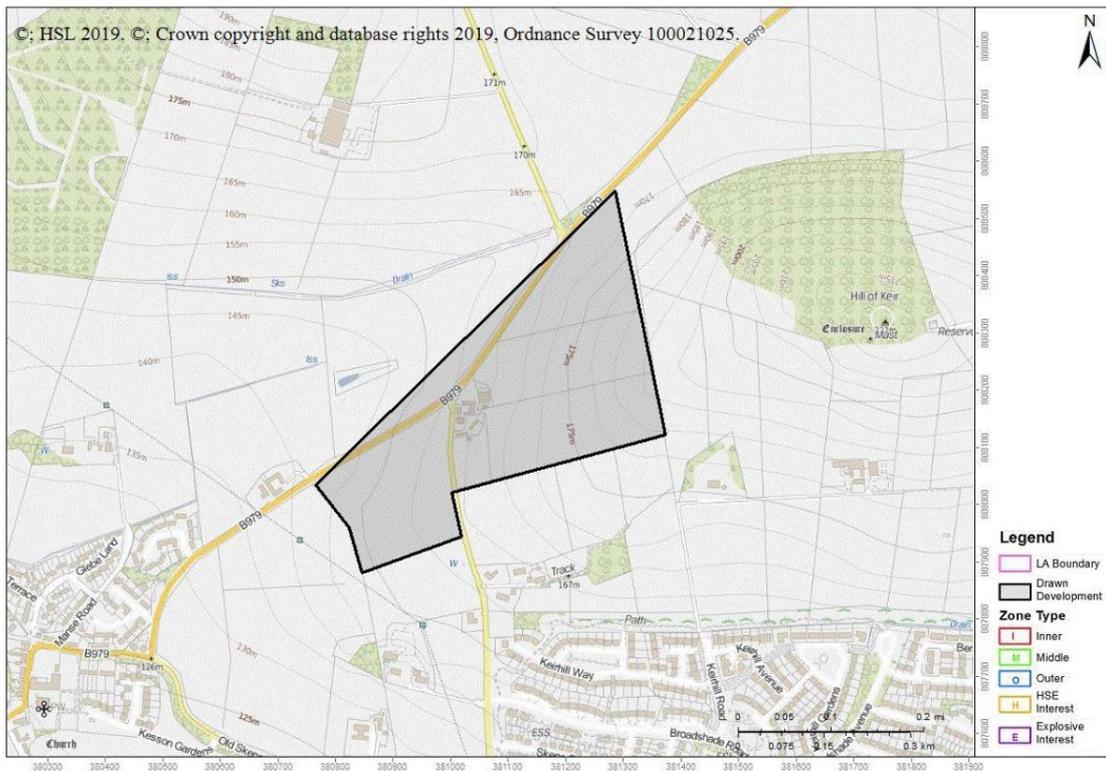


Figure 1: HSE Map showing site is not within a pipeline consultation zone.



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It is also considered that development could have an adverse impact to the setting of Keir Hill Scheduled Monument.

- 3.7. Development at Site GR132 will have very little visual impact on the setting of the Scheduled Monument at Hill of Keir. The bid site comprises flat land at 160 metres before sloping upwards to 220 metres to Hill of Keir and the Scheduled Monument that lies at the top of the hill as shown in Figure 2 below. The boundary of GR132 is 400 metres from the Scheduled Monument which we consider demonstrates that development would not have an adverse impact.

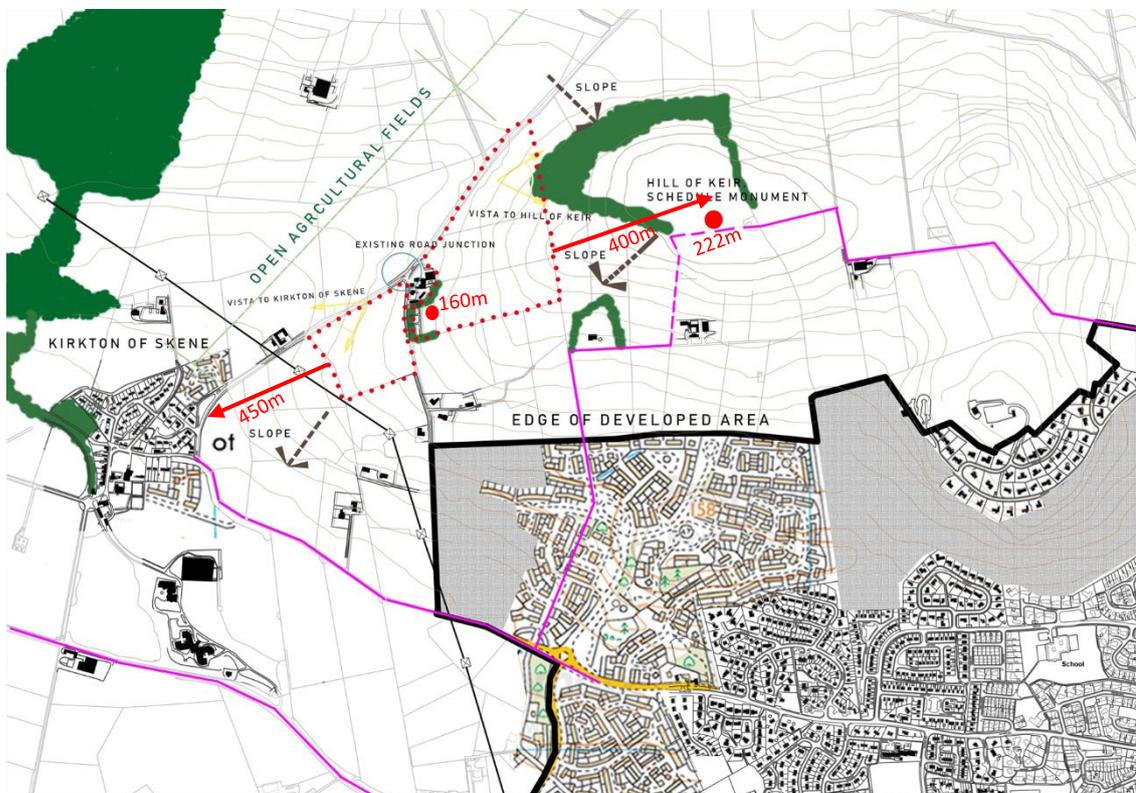


Figure 2: Map indicating contour height showing land sloping upwards to Hill of Keir and distance between development boundary and Kirkton Skene showing development will not result in coalescence.

- 3.8. The submitted bid set out the vision for Mains of Keir: *“To create a measured residential extension of Westhill northwards, adjacent to existing housing, defined by the landscape setting of the Hill of Keir, with open views to the east and south”*. The development would achieve this without coalescence between Westhill and Kirkton of Skene, without impacting on the setting of the Keir Hill Scheduled Monument and in a safe manner not constrained by the gas pipeline.



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3.9. The following fundamental points have been identified in regards the landscape and visual impact of proposed development at Mains of Keir and any development would be well informed by:

- Retention, protection and enhancement of existing landscape features, complemented by new strategic planting and masterplanning to strengthen the landscape setting. This would ensure no adverse effects to the countryside, ecology, skyline and in particular the Scheduled Monument, whilst also avoiding coalescence with Kirkton of Skene and enhancing the existing green network and local landscape to provide a cohesive framework that links with the character of existing provisions.
- Provide sufficient open green space and links to existing core paths, road networks, recreational opportunities and community facilities.
- Apply high quality urban design/vernacular architecture to ensure that the proposed built development is visually appealing and aligns with the local natural and distinctive sense of space and appeal.

3.10. In summary we do not believe that any of the issues raised through the MIR assessment of Site GR132 represent robust reasons not to allocate the site.

4. Housing Strategy

4.1. The housing strategy contained within the Main Issues Report relies heavily on existing allocated sites, a generic densification across sites within the Aberdeen Housing Market Area, and some limited small-scale allocations across the area to meet Strategic Development Plan (SDP) housing requirement.

4.2. This approach raises serious concerns on the range and scale of housing that can be delivered on the back of that do-minimum strategy, the practicality of delivering significantly increased density on certain sites, and the relationship between that strategy, the SDP in its final form when approved later in 2019 and national policy on delivering more housing and a range of housing more effectively.

4.3. The size of GR132 fits with the proposed SDP which notes that allocations should be small scale in nature.

4.4. Additional allocations, in appropriate locations, particularly in established locations within the AHMA such as Westhill are required to deliver the SDP's housing requirement. Bid site GR132 at Mains of Keir presents such a deliverable opportunity.



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5. Conclusion

- 5.1. Westhill has an identified need for a diverse range of house types and tenures to meet market demand and the needs.
- 5.2. We consider Site GR132 represents a measured, phased expansion of Westhill to the north west and should be designated as a strategic reserve to come forward after GR064. There are no absolute constraints to development and the site is laid out in a manner that ensures there will be no adverse impacts on the setting of Kirkton of Skene, which appears to be acknowledged by Officers in the MIR, or the Hill of Keir Scheduled Monument. The site can be well connected to Westhill through extension of the core path network and community facilities on the west side of Westhill.
- 5.3. Having regard to the information set out in this response to the Main Issues Report, we respectfully request that this site be supported in the LDP as a strategic reserve residential allocation.