



# Aberdeen Local Development Plan Review

## Main Issues Report Response Form 2019

Aberdeen City Council has published a Main Issues Report (MIR) which is part of the process of preparing a new Local Development Plan. It is designed to gather views on specific proposals and sets out options for dealing with the key planning matters facing Aberdeen over the next 20 years such as the location of new housing and employment development, the future of retailing and the City Centre, housing needs and tackling climate change. It also includes a number of potential new policies which would be used in the determination of planning applications.

The MIR has been published alongside a Monitoring Statement and Environmental Report. Copies are available to view at Marischal College, Broad Street, Aberdeen. These, and other supporting documents, are available at: - [www.aberdeencity.gov.uk/aldp2022](http://www.aberdeencity.gov.uk/aldp2022)

Everyone now has the chance to comment on the report and associated documents. All comments received will be considered and used to inform the preparation of the Proposed Aberdeen City Local Development Plan. There will be a further opportunity to comment on the Proposed Plan when it is published in early 2020.

**The consultation runs from 4 March 2019 to 13 May 2019.**

Responses to the published documents can be:

- made online at:- <http://consultation.aberdeencity.gov.uk/planning/mir2019>;
- emailed to:- [ldp@aberdeencity.gov.uk](mailto:ldp@aberdeencity.gov.uk); or
- by post to:- Local Development Plan Team, Strategic Place Planning, Aberdeen City Council, Business Hub 4, Ground Floor North, Marischal College, Broad Street, Aberdeen, AB10 1AB.

**Completed response forms should be with us no later than 13 May 2019.**



## YOUR DETAILS

Name	SCOTT LEITCH
Organisation (if relevant)	HALLIDAY FRASER MUNRO
On behalf of (if relevant)	ANM GROUP LTD
Address	
Postcode	
Telephone	
E-mail	

Thank you for taking the time to complete this response form. If you wish to be added to the LDP e-mailing list to be kept informed of our progress in producing the next Local Development Plan, please tick here



If yes, please provide an e-mail address

### PRIVACY STATEMENT

As part of the review of the Local Development Plan, Aberdeen City Council (ACC) will offer you several opportunities to submit your views and comments. These opportunities will range from the current consultation stage, the Main Issues Report, where we will ask you to comment on specific proposals and alternatives to the Proposed Plan stage where the set view of ACC has been established.

ACC are legally required to consult at this stage and at Proposed Plan stage. This is set out in the Town and Country Planning (Scotland) Act 1997 (as amended) and supporting regulations. The Environmental Assessment (Scotland) Act 2005 also requires us to consult on a Strategic Environmental Assessment Environmental Report.

By submitting a response to the consultation, you understand that ACC can use the information provided in this form, including personal data, as part of the review of the Aberdeen City Local Development Plan. ACC will not share or disclose any personal data about you to any organization or person unless it is authorized or required to do so by law.

The data controller for this information is ACC. We understand our legal basis for processing this information as Article 6(1)(c) of the General Data Protection Regulation as this is an activity we are legally required to carry out under the Town and Country Planning (Scotland) Act 1997 (as amended) and supporting regulations and The Environmental Assessment (Scotland) Act 2005. The data on the form will be used to inform the preparation of the Proposed Aberdeen City Local Development Plan 2022. At the end of the consultation, where contact details have been provided, the Local Development Plan team will provide you with a respondent number. You may also be contacted about the comments you have made and, as obliged by the Town and Country Planning (Scotland) Act 1997 (as amended) and supporting regulations, the Local Development Plan team will contact you to inform you of the publication of the proposed Aberdeen Local Development Plan in early 2020. If you chose not to provide your contact details, your comments will still be valid but we will not be able to contact you in the future.

Responses will be collated, redacted, summarised and stored electronically or in locked cabinets in Marischal College. All redacted responses will be published, alongside the respondents name (if provided), on the Aberdeen City Local Development Plan website. Contact details will not be made public, but your name and respondent number will be published.

Aberdeen City Council will only keep your personal data for as long as is needed. Data will be kept until the emerging Local Development Plan is itself replaced – this is likely to be around 5 years following its adoption in 2022 – so 2027. Following this, data will be disposed of in a secure manner.

### YOUR DATA, YOUR RIGHTS

You've got legal rights about the way ACC handles and uses your data, which include the right to ask for a copy of it, and to ask us to stop doing something with your data. Please contact the Council's Data Protection Officer by e-mailing [DataProtectionOfficer@aberdeencity.gov.uk](mailto:DataProtectionOfficer@aberdeencity.gov.uk) or writing to Data Protection Officer, Aberdeen City Council, Governance, Level 1 South, Marischal College, Broad Street, Aberdeen, AB10 1AB. More information is available at: - <https://www.aberdeencity.gov.uk/your-data>

## YOUR COMMENTS

<p>Which document(s) are you commenting on?</p>	<ul style="list-style-type: none"><li>• Main Issues Report</li><li>• Strategic Environmental Assessment Environmental Report</li><li>• Monitoring Statement</li></ul>	<input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
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Please indicate the document and the specific Issue, Question, Site, Policy, Map or Table you are commenting on. Please provide your comments below and explain your reason for supporting, opposing or commenting on this specific part of the document.

**Please find attached response to the Main Issues Report in respect of development bid B0926 Huxterstone and the Employment Land Strategy.**

**YOUR COMMENTS CONTINUED**

**ABERDEEN CITY LOCAL DEVELOPMENT PLAN  
RESPONSE TO MAIN ISSUES REPORT  
HUXTERSTONE  
KINGSWELLS  
B0926**

**MAY 2019**

On behalf of  
ANM Group Ltd



HALLIDAY FRASER MUNRO  
CHARTERED ARCHITECTS & PLANNING CONSULTANTS



**HALLIDAY FRASER MUNRO**

CHARTERED ARCHITECTS & PLANNING CONSULTANTS

## **CONTENTS**

- 1. Introduction and Bid Summary**
- 2. MIR Bid Assessment Summary**
- 3. Employment Land Strategy**
- 4. Conclusion**



# HALLIDAY FRASER MUNRO

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## 1. Introduction and Bid Summary

- 1.1. This report has been prepared by Halliday Fraser Munro, Town Planning Consultants and Chartered Architects, on behalf of ANM Group Ltd. It is written in response to the Aberdeen City Local Development Plan Main Issues Report 2019 (MIR).
- 1.2. ANM Group Ltd are one of the north east's largest and long established businesses. Inspired by the innovative spirit of the pioneering farmers who established the original business in 1872, ANM Group is acknowledged today as one of the most dynamic, progressive and forward-looking businesses serving the UK farming, commercial and industrial sectors and playing a major role in the Scottish economy.
- 1.3. The development of modern auction centres, the pioneering of electronic and video auctions, diversification into non-agricultural auctions and the move into the high-quality catering and hospitality market are examples of the innovative approach which has made ANM Group one of the most successful farmer-owned businesses in the UK, with annual throughput of £150 million, an asset base of around £30 million and shareholder capital of £6.5million.
- 1.4. ANM Group has already been involved in the successful development of the Thainstone Business Park and the ongoing development at Thainstone Park in Aberdeenshire.
- 1.5. At the 'Call for Sites' stage in May 2018, a development bid was lodged for an area of 17.7 ha of land at the corner of the A944 and the C89 Cults Road at Huxterstone, Kingswells, Aberdeen. The land is occasionally used for livestock grazing but is largely redundant. It is directly opposite the Prime Four Business Park and bound on two sides by key transportation routes.
- 1.6. The site is proposed to be allocated as a Healthcare Village and commercial uses as an appropriate next phase of commercial development in the Kingswells area, with the Healthcare elements serving a wider Aberdeen and Aberdeenshire population from a highly accessible, strategic location.
- 1.7. The now operational South Kingswells junction (A944 / AWPR) and the AWPR just 580m to the west improves connectivity to the Huxterstone site and provides a well-connected, strategic location for future development.
- 1.8. In addition to the site's proximity to Prime Four, 420m south east of the Huxterstone land is the OP38 Countesswells site, allocated in the LDP for 3,000 houses and 10 ha of employment land and under construction at present. The character of the area is therefore changing through the delivery of large-scale development and infrastructure.
- 1.9. This provides the background context and justification for future employment land allocations at Huxterstone to be reflected in the Proposed Local Development Plan.





## HALLIDAY FRASER MUNRO

CHARTERED ARCHITECTS & PLANNING CONSULTANTS

1.10. Conversely however, the B0926 Huxterstone bid site is not an Officer's preferred option in the Main Issues Report. This is considered in more detail below.

### 2. MIR Bid Assessment Summary

2.1. The Main Issues Report (officer's summary and assessment of bid) states:

*'B0926 Huxterstone, Kingswells*

*The site is located in the Green Belt between the Kingswells settlement and the City's administrative boundary with Aberdeenshire Council, and the Westhill settlement. The site is sloping with a northerly aspect but there are **few other physical constraints**. It sits on a prominent slope facing onto the A944 and it would be widely seen from this gateway. The A944 provides a very strong and easily identifiable green belt boundary in this location which clearly separates Prime Four and Kingswells from the countryside to the south. It should therefore remain as green belt.*

2.2. The Officers' view and associated issues can be broken down and will be examined in more detail below, however it is worthy of note that the site is described in positive terms as being free from physical constraints with the exception of a north facing slope. This places the land in an ideal situation as a future employment development opportunity.

2.3. ***'The site is located in the Green Belt between the Kingswells settlement and the City's administrative boundary with Aberdeenshire Council, and the Westhill settlement ...'***

This comment refers to the current zoning of the site in the 2017 Local Development Plan. In short, this zoning is a result of the land not being a current development allocation. The land shares its northern boundary with the A944 key transport corridor, Prime Four Business Park and Kingswells Park and Ride. From a Green Belt perspective it does not contribute to the setting of the City, therefore its zoning for development would not harm the form and function of the Green Belt. Development would be seen as a southern extension to Prime Four. Given its situation east of the AWPR, we do not consider the site has a strong relationship with the City boundary or Westhill, that lie 2.1km to the west. We do not therefore see that the current Green Belt zoning of the site represents a reason not to allocate the land for future development.

2.4. ***'The site is sloping with a northerly aspect but there are few other physical constraints. It sits on a prominent slope facing onto the A944 and it would be widely seen from this gateway.***

The site does include an element of north facing slope, however the proposed development area benefits from the backdrop of Kingshill Woods and rising landform to the south. The slope decreases in the western part of the site. It is agreed that the site is free from physical constraints, and the features of drystone dykes and woodland boundaries provide character to the site, these would be retained and enhanced through development, similar to the approach taken at Prime Four.



## HALLIDAY FRASER MUNRO

CHARTERED ARCHITECTS & PLANNING CONSULTANTS

We do not consider that this is an 'important gateway into Aberdeen', the land is situated at the busy C89 / A944 junction adjacent to major commercial development that has been extremely successful in this location. The AWPR and South Kingswells junction lies just 580m to the west, the character of the area being linear commercial development along the A944.

We do not therefore see that the site's slope or northerly aspect represent reasons not to allocate the land for future development.

- 2.5. ***'The A944 provides a very strong and easily identifiable green belt boundary in this location which clearly separates Prime Four and Kingswells from the countryside to the south. It should therefore remain as green belt.'***

We do not agree with this statement. The A944 now has the form of a development 'corridor' that has capacity to support development to both the north and south. The 'countryside' to the south referred to includes the OP38 Countesswells new community, and has the form of green space between development areas, rather than 'countryside'. We do not see any compelling reasons for the Huxterstone land to remain as Green Belt.

- 2.6. In summary we do not believe that any of the issues raised through the MIR assessment of the B0926 site represent robust reasons not to allocate it.
- 2.7. The MIR includes a bid assessment summary, with the B0926 site being awarded a score of 48 out of a possible 63. We have reassessed the bid using the Council's criteria and would suggest that a scoring of 56 would be more appropriate. The detailed narrative and reasoning are contained in Appendix 1.

### **3. Employment Land Strategy**

- 3.1. The employment land strategy contained within the Main Issues Report states that:

*'The 2017 Employment Land Audit shows that there is around 222ha of marketable employment land in Aberdeen. There is a good spread of employment land, with larger allocations to the north at Findlay Farm and the Core/Berryhill/Cloverhill, to the west at Dyce Drive, Rowett North and Prime Four Kingswells and south at Altens and Peterseat. Because of this healthy position, we do not consider it necessary to identify any further employment land in the next LDP.'*

- 3.2. We believe this is a rather blunt and overly simplistic approach to future employment land allocations. Additional allocations, in appropriate successful places, particularly in accessible established locations such as Kingswells and the A944 corridor. A number of the existing employment allocations in Aberdeen are however in less established areas such as Murcar (described in the MIR as Findlay Farm and the Core/Berryhill/Cloverhill), resulting in less certainty regarding their delivery. It is noted that the Murcar LDP allocations were the subject of LDP bids to change the land to residential zoning, supporting this view.



## HALLIDAY FRASER MUNRO

CHARTERED ARCHITECTS & PLANNING CONSULTANTS

- 3.3. We would therefore suggest that the measured allocation of suitable employment land in suitable locations should be considered in addition to the existing employment land allocations referred to in the MIR. The B0926 land at Huxterstone represents such an opportunity.
- 3.4. The proposed Healthcare Village on the site would also allow the zoning of the land for this use in addition to an employment allocation.

#### **4. Conclusion**

- 4.1 As set out in the preceding sections and the original Development Bid, the allocation of the land at Huxterstone put forward as bid site GB0926 as a measured future employment land / healthcare opportunity represents a deliverable development in an already successful established employment hub area. The proposal is a natural extension to the key employment and commercial hub that already exists at Kingswells / Prime Four and is in line with the development in the area focussed around the A944. Development in this location also takes advantage of the upgraded road network in the area, including the AWPR, South Kingswells junction and the existing A944 infrastructure, including the Kingswells Park and ride and Core Path network. We believe there are no constraints to development, any concerns raised through the MIR assessment are unfounded and the land should be considered an appropriate, effective opportunity in the 2022 Local Development Plan. There is no evidence available to suggest that this should not be done.
- 4.2 We would respectfully request that the land put forward as bid site B0926 at Huxterstone, Kingswells is included in the Proposed LDP as a healthcare and employment land allocation.



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## APPENDIX 1

Criteria	Officers' Score	MIR Scoring Justification	Proposed Score	Justification
Exposure	2	Bound to the north by A944 road and PrimeFour Business Park	2	Existing woodland screening to south and east.
Aspect	1	North-facing; Kingshill Wood / King's Seat located south-west	2	Area subject to bid sits below highest and most exposed land (see below)
Slope	2	Located on lower slopes of Kingshill. 12% (1:8) slope from north-south.	2	Agreed.
Flood Risk	3	No flood risk shown.	3	Agreed.
Drainage	3	Site appears to be well drained	3	Agreed.
Built/Cultural Elements	3	Prime Four business park located north, some dispersed properties in proximity.	3	Agreed, development would integrate well with Prime Four.
Natural Conservation	2	Site located in Green Belt/ Green Space Network. Woodland outside the boundary is identified as SNH Ancient Woodland. Bat survey may be required, Designated Species recorded in proximity (Kestrel, Red Squirrel)	3	Site does not include Ancient Woodland or Protected Species sighting. Most new development allocations will be Green Belt/ Green Space in the earlier LDP. The site does not contribute to the strategic setting of the city, it is designated Green Belt as it is not zoned for development. There is scope to enhance GSN within the development. This should not be seen as a constraint to development.
Landscape Features	2	Kingshill Wood to the south provides a green wooded backdrop. Business park to the north, and main road running east-west to City. There are some stone walls through the site.	3	Agreed that these features provide character to the site, these would be retained and enhanced through development, similar to Prime Four.
Landscape Fit	1	Within West Aberdeen Character Area. Sits on a prominent slope north-facing onto the A944. It would be widely seen from this important gateway into Aberdeen. The	2	We do not consider that this is an 'important gateway into Aberdeen', the land is situated at the busy C89 / A944 junction adjacent to major



# HALLIDAY FRASER MUNRO

CHARTERED ARCHITECTS & PLANNING CONSULTANTS

		A944 provides a very strong and easily identifiable green belt boundary in this location which clearly separates Prime Four and Kingswells from the countryside to the south.		commercial development that has been extremely successful in this location. The AWPR and South Kingswells junction lies just 580m to the west, the character of the area being linear commercial development along the A944.
Relationship to existing settlement	1	Site is located south west of Kingswells and south of Prime Four but separated from both areas by the busy A944. It would therefore be severed from the built up areas to the north.	2	The site would be well-related to the Prime Four Business Park, there is an existing signalised pedestrian crossing across the A944.
Land Use Mix / Balance / Service Thresholds	2	Located adjacent to business park and close to Kingswells residential areas, some community facilities in Kingswells and Westhill (Aberdeenshire Council).	2	Agreed.
Accessibility	3	Road access from main transport route into City (A944). Limited pavements/ cycle lane.  Closest bus stop is within Kingswells P&R at Prime Four north, within walking distance (service no's 218, 777, X17).	3	Agreed, the site benefits from excellent connectivity and proximity to public transport services.
Proximity to facilities / shopping / health / recreation	1	Site is located near Kingswells and Westhill (Aberdeenshire Council). Kingswells Medical Practice is 1 mile/ 1.6km north.  Closest shops are located in Westhill (2 miles/ 3.2km) east.	2	Proximity to services is less of an issue due to the site being promoted for commercial and healthcare use. Employees will be able to access facilities on site and at Prime Four, which contains a range of catering, leisure and retail opportunities.



# HALLIDAY FRASER MUNRO

CHARTERED ARCHITECTS & PLANNING CONSULTANTS

Direct footpath / cycle connection to community and recreation facilities and resources	2	Core Path no.91 (Westhill Road to Queens Road) runs along A944. Footpath connections into Kingswells possible but crossing A944 is problematic.	3	The site is connected to the A944, and a safe, signalised pedestrian crossing to the Core Path 91 linking the area with Aberdeen, Kingswells, Prime Four and Westhill.
Proximity of employment opportunities	3	PrimeFour at Kingwells and Arnhall Business Park in Westhill for general employment opportunities. Some limited employment opportunities within Deeside settlements at medical practices, schools, etc	3	Agreed.
Contamination	3	None shown	3	Agreed.
Land Use Conflict	3	Currently allocated as Green Belt/ Green Space Network. The proposed uses are unlikely to conflict with existing surrounding uses	3	Agreed. The proposal would be complimentary to existing commercial uses, and suitable landscape buffers would be included as part of the development.
Physical Infrastructural Capacity	3	Proposer claims there is capacity.	3	Agreed.
Physical Infrastructure Future	3	Proposer claims there is capacity.	3	Agreed.
Service Infrastructure Capacity	3	Airyhall PS – 2019 92%, 2020 95%, 2021 95%, 2022 94% Hazlehead Academy – 2019 89%, 2020 93%, 2021 101%, 2022 106% School provision at Countesswells to be delivered longer term.	3	Agreed, given that commercial development is proposed, pupils will not be generated. It is also likely that Primary School provision would be at Kingswells rather than Airyhall, but most likely Countesswells.
Other Constraints	2	Class 1 Radon potential. Pylons run through the east of the site.	3	A landscaped 'no development' area is indicated close to the pylons.
	<b>48</b>		<b>56</b>	