



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/alp2022

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; 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	Alexa Martin
Organisation (if relevant)	Halliday Fraser Munro
On behalf of (if relevant)	New Forest Homes
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 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">• Main Issues Report• Strategic Environmental Assessment Environmental Report• Monitoring Statement	<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 see the attached response for Bid B0316, Land at Smiddybrae, Kingswells on behalf of New Forest Homes.



HALLIDAY FRASER MUNRO

CHARTERED ARCHITECTS & PLANNING CONSULTANTS

**ABERDEEN CITY LOCAL DEVELOPMENT PLAN RESPONSE
RESPONSE TO MAIN ISSUES REPORT**

SITE B0316, LAND AT SMIDDYBRAE, KINGSWELLS

MAY 2019

On behalf of
New Forest Homes



HALLIDAY FRASER MUNRO

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1. Introduction and Bid Summary

- 1.1. This report has been prepared by Halliday Fraser Munro, Planning Consultants and Chartered Architects, on behalf of New Forest Homes. It is a written response to the Aberdeen City Local Development Plan (LDP) Main Issues Report (MIR).
- 1.2. At the 'Call for Sites' stage in May 2018, a development bid was lodged for the site at Smiddybrae for a commercial development as a diversification from its existing use Classes 4 and 5 to a higher amenity use, given its strategic location at the junction of the A944 and the AWPR/Kingswells South junction. Commercial use, such as small business units, hotel, petrol station and roadside services, are considered appropriate given the sites location on this strategic transport route.
- 1.3. The Smiddybrae site at Kingswells lies on the south side of the A944 dual carriageway, between Kingswells and Westhill occupying a prominent location on the A944. It extends to 0.7ha.
- 1.4. The site is presently zoned as Green Belt in the in the 2017 Aberdeen Local Development Plan. This places a restriction on future development. We consider that the brownfield commercial nature of the site would be more appropriately reflected as a commercial land allocation in the forthcoming LDP.
- 1.5. The condition of the site has changed considerably since the LDP bid was submitted. There was a substantial fire at the site in April 2019 and the buildings on site are now in a derelict state. Complete redevelopment of this now brownfield site is required.



Figure 1: View to the site from the north showing fire damaged buildings.



Figure 2: View of derelict buildings on site.

- 1.6. The now operational South Kingswells junction (A944/A90 AWPR) and the AWPR 250m to the east improves connectivity to the Smiddybrae site and provides a well-connected, strategic location for further development.
- 1.7. At a wider scale, there are several major development strategic areas around the bid site playing a key role in shaping the character and operation of this western part of Aberdeen. This includes the Prime Four Business Park, Kingsford Industrial Units, forthcoming Kingsford Stadium and Arnhall Business Park. The Smiddybrae site is brownfield land central to the aforementioned areas with a prominent frontage onto the A944 road.
- 1.8. The proposed development at Smiddybrae offers an alternative to the large scale business parks which dominate the employment land allocations, especially in the Kingswells area. The proposed development could provide small units attractive to small and medium sized enterprises, especially for those not suited to town centre locations.
- 1.9. The potential future uses are entirely appropriate for this brownfield site. The site has good connectivity to existing commercial and residential sites. The site is well placed to capitalise on passing trade given its proximity to the A944 and the AWPR. The site can be easily accessed from the A944 and has excellent connectivity to Core Paths. For these reasons we consider there is scope for medium-scale business development at an appropriate density on this prominent brownfield site.



2. MIR Bid Assessment Summary

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

'B0316 Smiddybrae, Kingswells

The site is fairly open with limited shelter from northerly winds. It is currently in industrial/business use and is zoned as Green Belt in the extant LDP. It is bound by the A944 to the north. The site proposes a mix of uses most of which are for business/employment use, as well as retail and hotel uses. The proposed Strategic Development Plan states that there is no need to identify any further employment land in Aberdeen. In addition, there are several allocations of employment land within close proximity of the site at Prime Four (OP29), the Prime Four Extension (OP63) and East Arnhall (OP34), as well as developments in Westhill. Allocation of the site for retail uses is also considered to be inappropriate as it would be contrary to the sequential approach of taking into account the existing retail hierarchy and would potentially result in additional traffic on the A944. It is considered that the site is best retained as Green Belt. Green Belt policy allows for development associated with existing activities, including businesses, to be permitted'.

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 east facing slope. This places the land in an ideal situation for an employment redevelopment opportunity.

2.3. The MIR includes a BID assessment summary, with the B0316 site being awarded a score of 47 out of a possible 63. We have reassessed the bid using the Council's criteria and would suggest that a scoring of 58 would be more appropriate. The detailed narrative and reasoning are contained in Appendix 1.

2.4. ***'The site is fairly open with limited shelter from northerly winds'.***

We do not consider that the open nature of the site and northerly winds are of great importance for the proposed commercial uses for the site. An open site is advantageous for commercial development as it increases visibility of the businesses.

2.5. ***'It is currently in industrial/business use and is zoned as Green Belt in the extant LDP. It is considered that the site is best retained as Green Belt'.***

This comment refers to the current zoning of the site in the 2017 Local Development Plan. The site is zoned as Green Belt despite operating with business and commercial uses. From a Green Belt perspective, it does not contribute to the landscape setting of the city, nor is it important from the perspective of preventing coalescence between Kingswells and Westhill, therefore its zoning for development would not harm the form and function of the Green Belt.



Policy NE2 – Green Belt in the Aberdeen LDP 2017 states:

'No development will be permitted in the Green Belt for purposes other than those essential for agriculture; woodland and forestry; recreational uses compatible with an agricultural or natural setting; mineral extraction/quarry restoration; or landscape renewal.

The following exceptions apply to this policy:

1. *Proposals for development associated with existing activities in the Green Belt will be permitted but only if **all** of the following criteria are met:*
 - a. *The development is within the boundary of the existing activity;*
 - b. *The development is small-scale;*
 - c. *The intensity of activity is not significantly increased; and*
 - d. *Any proposed built construction is ancillary to what exists.*

Our client is concerned that this policy will prevent the redevelopment most appropriate to the Smiddybrae site. Replacing like with like is not the best redevelopment strategy. Policy NE2 is restrictive and does not provide flexibility as the aim of the policy is to protect the Green Belt. Due to its location the site is considered suitable for a range of commercial development opportunities. Class 4 and 5 are the site's existing uses and comprised a workshop, office and yard. We consider that in addition to Class 4 and 5 Class 1 retail, Class 6 Storage or Distribution and Class 7 Hotel use should be permitted. Policy NE2 will not allow this diversification therefore we require the sites zoning to be amended through this LDP process.

Using the Green Belt as a constraint to development and a reason for not allocating the site is not considered justifiable as the vast majority of sites outwith the city and main urban areas are Green Belt until they are rezoned.

2.6. **Landscape Fit and Exposure**

The sites current state as derelict buildings in the Green Belt does not fit well into the landscape. The proposed development at Smiddybrae will be of a high-quality design appropriate to the site and the surrounding area.

The landscape of the A944 is becoming increasingly populated with commercial premises and recent planning approval (REF: 181366/DPP) for drive-thru facilities north-east of the AWPR is further altering the landscape in the area. We would consider that the redevelopment of Smiddybrae is in keeping with this changing landscape and is an appropriate addition to this western development corridor as a brownfield redevelopment opportunity.

We consider that a degree of exposure is beneficial to commercial premises as it improves their visibility which can attract custom particularly on a busy transport corridor such as the A944. We therefore do not consider this to be a constraint to development.

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



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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.
- 3.3. The MIR housing strategy relies heavily on brownfield sites with the majority of housing allocations being on brownfield sites. The employment land strategy has not followed the same approach, however, we consider that brownfield sites are appropriate for employment land and think that the brownfield site at Smiddybrae presents an ideal location for an employment land allocation.
- 3.4. 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 B0316 land at Smiddybrae represents such an opportunity.

4. **Conclusion**

- 4.1. As set out in the preceding sections and the original Development Bid, the allocation of the land at Smiddybrae put forward as bid site B0316 as a measured employment land opportunity is a deliverable development on a site with an already established commercial use. The recent fire has significantly altered the character of the site and it would now benefit from a redevelopment in which a greater variety of uses is permitted.
- 4.2. Development in this location 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.
- 4.3. 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 to suggest that this should not be done.
- 4.4. We would request that the land put forward as bid site B0316 at Smiddybrae, Kingswells is included in the Proposed LDP as an employment land allocation.



Appendix 1: Development Options Assessment Report

Development Options Assessment Report on the Pre-Main Issues Submissions 2018 (Appendix 3 to the Main Issues Report

Criteria	Officers Score	Officers Justification	Proposed Score	Proposed Justification
Exposure	1	Site is open; very windy on site visit. Some vegetation/trees present on site but not much. Site sits on a hill, so is quite exposed.	2	Backdrop of rising land form to the south. Existing mature tree belt to the west will be retained. Some landscaping along the northern boundary. Visible location next to strategic transport route is valuable for future commercial use.
Aspect	1	North east facing.	2	The site will not be negatively affected by facing to the north east. There is scope to orientate buildings to have some south facing windows.
Slope	2	Gentle slope.	2	Gentle slope will not constrain development.
Flood Risk	3	According to SEPA Indicative Flood Risk Map, there is no risk of flooding present on site. There have been no past flooding incidents recorded on site and there are no watercourses present on the site.	3	Agree with justification, there is no flood risk on site.
Drainage	3	Site appears freely drained.	3	Agree with justification, the site is not constrained by drainage.
Built/Cultural Elements	3	There are no listed buildings or scheduled monuments identified on or near the site. There is one Site and Monuments record just encroaching slightly on the northern boundary of the site; site of a smithy depicted on historic OS maps (Kingsford).	3	Agree with justification.
Natural Conservation	3	There are no significant natural conservation features	3	Agree with justification. The site will not impact on the priority habitats located to the south.



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		located on the site. There are two priority habitats located to the south east outwith the site.		
Landscape Features	2	The site currently has commercial buildings on it. Some trees/vegetation exist on site. The site sits close to the A944. Visible views to Kingswells.	3	The commercial buildings currently on site will be replaced with buildings of a higher design quality and will respect the setting and landscape character of the area. Redevelopment will enhance the area as the site is currently dominated by the derelict fire damaged buildings.
Landscape Fit	2	Much of the land in use in the surrounding area is for industrial and business uses. The site lies on the A944 next to its junction with the AWPR – providing a strategic location for commercial development. However, development near the AWPR junctions is undesirable, especially for retail development as it is likely to cause increased traffic at the junction and potentially on the AWPR.	3	New development may be undesirable next to AWPR junctions but this is a redevelopment rather than a new development. Retail development will serve existing populations and the surrounding uses on site therefore it is not considered that retail development will cause increased traffic at the junction or on the AWPR.
Relationship to existing settlement	1	The site would not be related to any existing settlement. The presence of the A944 and AWPR adds further severance from other places and to a sense of isolation.	3	The site relates well to Kingswells and Westhill. The site is 1.5 miles from the centre of both. The site is close to Countesswells where 3000 homes are to be delivered.
Land Use Mix / Balance / Service Thresholds	3	On the site itself, the proposed land use will be of a flexible commercial development contributing to	3	Agree with justification and agree that the area will benefit from the increased number of land uses.



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		increase of land uses within the area.		
Accessibility	1	The nearest bus stop is located 910m from the site on the A944 (First Services N17 and Stagecoach 777).	2	The site is on a strategic road network benefitting from its proximity to the A944 and the AWPR. The Kingswells park and ride links to the site via Core Path 91 meaning the site can be easily accessed on public transport. Core Paths 48 and 91 also mean the site has excellent cycle connectivity.
Proximity to facilities / shopping / health / recreation	1	Shopping facilities are located at the Tesco Superstore 1.7km from the site, however the site proposes to develop retail use. Health facilities are located 1.6km from the site at Skene Medical Group and Westhill Clinic. The site sits within the catchment areas of Interim Westhill Primary School (2km away from site) and Interim provision at Westhill Academy (2.3km away from site).	3	Proximity of services is less of an issue due to the site being promoted for commercial development. Employees will be able to access facilities on site and at Prime Four which contains a range of catering, leisure and retail opportunities. Proximity to education and health facilities is of little importance for commercial development.
Direct footpath / cycle connection to community and recreation facilities and resources	3	Core Path No. 48 (Gairnhill Wood to Kingsford) is located just to the east of the site. Core Path No. 91 (Westhill Road to Queens Road) and Cycle Network Dual use (Skene Road: Kingswells Roundabout to Six Mile House) are located just north of the site along the A944.	3	Agree with justification.
Proximity of employment opportunities	3	Employment opportunities are at Prime Four which is within 1.6km of the	3	Agree with justification.



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		site. The site proposes employment uses.		
Contamination	2	Most of the site is identified as being potentially contaminated land (East Kingsford works)	3	The site is presently employment land and is not constrained by contamination.
Land Use Conflict	3	No known land use conflict.	3	Agree with justification.
Physical Infrastructural Capacity	3	No known constraints.	3	Agree with justification.
Physical Infrastructure Future	2	According to Think Broadband, there are no Broadband or Fibre services available in the area. However, given the general urban nature of the area this is likely to be easily available were development to go ahead.	3	Digital Scotland indicate that Fibre Broadband is available for the site.
Service Infrastructure Capacity	3	Nature of development means that school catchment areas will not be affected.	3	Agree with justification.
Other Constraints	2	Site sits within the Middle Zone (Shell-Natural Gas Liquids) of the Oil and Gas Pipelines	2	The site is presently employment land and is not constrained by the pipelines.
	47		58	