

SUBMISSION No.	054	8,3
ISSUES RAISED	3,8	1
		6
SUPPORTING DOCS		

MAIN ISSUES REPORT ADDENDUM RESPONSE FORM

As part of the development of the Proposed Local Development Plan a "Main Issues Report" was published in October 2013. This contained 19 questions, the responses to which we are using to inform the content of the new plan. Importantly the 2013 Main Issues Report was based on a draft Scottish Planning Policy document, which was published by Scottish Ministers in April 2013.

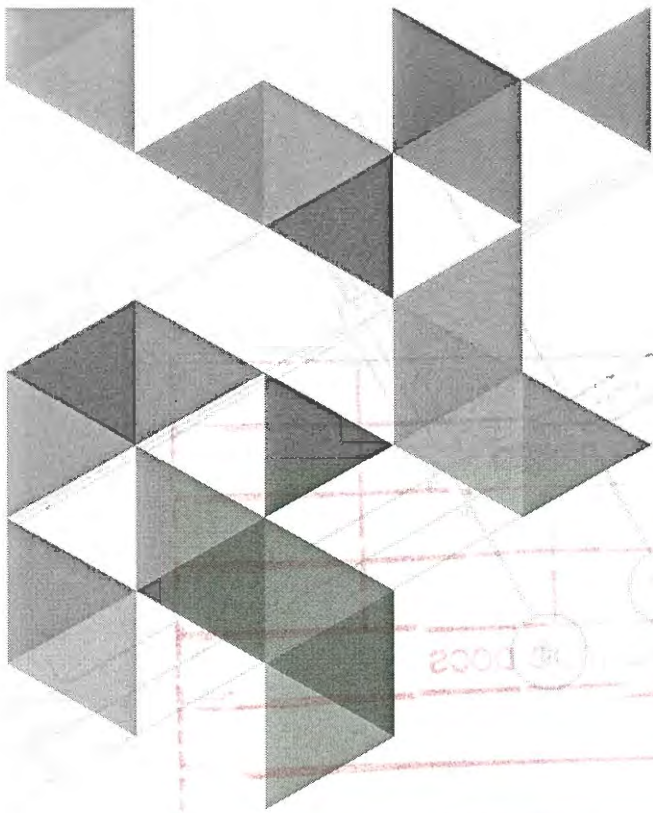
The publication of the final Scottish Planning Policy in June 2014 raised a very small number of new issues on which we would welcome your views. Because of this we have chosen to publish an addendum to the Main Issues Report to highlight possible local interpretations of Scottish Planning Policy.

We are not reopening consultation on the range of other issues that were considered as part of the 2013 Main Issues Report, and ask that you only consider the limited number of additional issues set out in the Main Issues Report Addendum in any response you make.

Please note that further comments on any of the other issues that were included in the 2013 Main Issues Report will not be considered at this stage.

All comments received will be carefully assessed and will be used to inform the preparation of the Proposed Aberdeenshire Local Development Plan. There will be a further opportunity to comment on the specific proposals contained in this plan when it is published, in January 2015.

**Please email to
ldp@aberdeenshire.gov.uk
or send this form to reach us
by 19th September 2014.**



Please use this form to make comments on the Aberdeenshire Local Development Plan Main Issues Report Addendum 2014. If you are making comments about more than one topic it would be very helpful if you could fill in a separate form for each comment.

Please email or send the form to reach us by 19th September 2014 at the following address:

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

Email: ldp@aberdeenshire.gov.uk

YOUR DETAILS

Title _____

First name _____

Surname _____

Date 19 September 2014

Postal Address _____

Postcode _____

Telephone Number _____

E-mail _____

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 _____

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

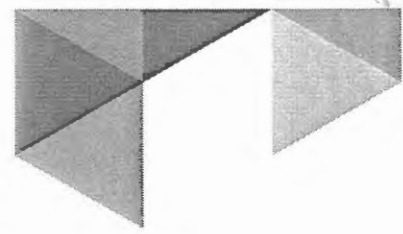
YOUR COMMENTS

Please provide us with your comments below ensuring you highlight the issue you are commenting on. Please feel free to add any extra pages you may require, ensuring you highlight the issue. We will summarise long 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.

Are you answering a question? Yes / No

Question Number being answer

Please see the attached letter.



FAIR PROCESSING NOTICE

The Data Controller for this information is Aberdeenshire Council.

The data on the form will be used to inform the content of the Proposed Aberdeenshire Local Development Plan.

This data will potentially be disclosed worldwide (via publication on Internet). We will not publish any address information, but may publish the name of the person completing the form.

By completing and submitting this form, you are consenting to the above processing.

IF YOU HAVE ANY QUERIES REGARDING THE COMPLETION OF THIS FORM, OR REQUIRE FURTHER ASSISTANCE, PLEASE CONTACT:

Aberdeenshire Council,
Planning Policy Team
Tel: 01224 664221

This is the Main Issues Report and associated documents of the **Aberdeenshire Local Development Plan 2016**.

If you have difficulty understanding this document and require a translation, or would like a copy in larger print, please phone us on 01224 665168.

Aberdino sīrijies 2016 metų Vietos plėtros plano Pagrindinių klausimų sprendimo pranešimas ir su juo susiję dokumentai. Jei jums yra sunku suprasti šį dokumentą ir norėtumėte šio dokumento verstos kopijos, ar Dideliu šriftu, prašau kreipkitės telefonu 01224 665168.

Это - Отчет по основным вопросам и документы, связанные с Местным планом развития области Аббердиншир до 2016 г. Если у вас имеются трудности в понимании этого документа, и если вы нуждаетесь в его переводе или в копии укрупненным шрифтом, просим позвонить по телефону 01224 665168.

To jest Sprawozdanie na temat Głównych Zagadnień Lokalnego Planu Rozwojowego Aberdeenshire 2016 i powiązane z nimi dokumenty. Jeśli mają Państwo trudności ze zrozumieniem tego dokumentu i wymagają tłumaczenia, lub chcieliby otrzymać odpis w dużym druku, proszę się z nami skontaktować pod numerem telefonu 01224 665168.

Šis ir Aberdīnšīras 2016. gada Vietējās attīstības plāna Galveno jautājumu pārskats un ar to saistītie dokumenti. Ja jums ir grūtības saprast šo dokumentu un jums vajadzīgs tulkojums, vai arī ja jūs gribētu saņemt tā eksemplāru lielākā drukā, lūdzu, piezvaniet mums pa tel. 01224 665168

这是2016年阿伯丁郡当地发展计划的主要问题报告及相关文件。如果你难以理解该文件而需要翻译的版本，或者如果你需要大号字体印刷的文件，请你拨电话01224 665168联系我们。

Aberdeenshire Local Development Plan

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Planning Policy Team
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21682/A3/ST/1m
19 September 2014

Dear Sir/Madam

**ABERDEENSHIRE LOCAL DEVELOPMENT PLAN 2016
MAIN ISSUES REPORT ADDENDUM**

We write in response to the above and welcome the opportunity to make further representations in light of the emergence of new planning policy set out by the Scottish Government in Scottish Planning Policy (SPP – July 2014).

Our client, Stewart Milne Homes, control land at Mains of Cowie, Stonehaven upon which they propose a mixed use development comprising up to 4,000m² convenience retail and up to 400 homes alongside other associated uses including a Primary School, petrol filling station and landscaping/open space.

Stonehaven is one of the most popular settlements to live in within the region. Its town centre is popular with locals and visitors and enjoys higher levels of occupancy than comparable town centres around the country. This is in spite of the lack of suitable convenience retail provision which sees expenditure and footfall sent out of town. Demand for housing is high, evidenced by affordability issues being particularly acute and considerable pressure from the development industry in and around the town. The town will soon see the arrival of the Fastlink to the north, connecting to the AWPR.

Yet rather than build upon the success of the town, it is evident that the current and now emerging LDP strategy is concentrating elsewhere, with little regard to the future needs of the town and its continued success. The strategy continues to be overly focussed on large scale releases, in particular that at Elsick, while established communities such as Stonehaven have been largely overlooked.

The MIR proposes only 390 new units within Stonehaven during the plan period. This figure is made up solely from undelivered allocations carried over from the adopted LDP and 230 of these are in the form of enabling development for Ury House some distance to the north of the town, which, are not connected to and arguably do not form part of Stonehaven.

The search for a much needed solution to stem the flow of retail activity outwith Stonehaven has yet again been placed on hold, with the unsuitable and still yet undeveloped Spurryhillock allocation identified in the adopted LDP again being carried over. In the absence of an agreed solution it is the Council's intention that convenience retail needs will ultimately be met in Elsick. Yet this will do nothing to preserve or enhance the fortunes of Stonehaven town centre and will lead to unsustainable travel patterns.

The result is a development strategy which ignores the current and future needs of Stonehaven and offers no strategic vision for this key settlement within Aberdeenshire.

It is evident that community of Stonehaven wish to see the town adapt to meet its current and future needs, with high demand for new retail foodstore provision and lack of affordable housing being recurring themes during consultation events and the local Stonehaven Town Partnership (STP) making suggestions for new strategic mixed-development within the town.

Our LDP bid submission and latterly our response to the Main Issues Report set out a long term vision for the strategic growth of Stonehaven, providing much needed and sought after convenience retail alongside family

housing at a location that is close to the town centre and ideally positioned to take advantage of the introduction of the Fastlink. The introduction of this key piece of infrastructure presents opportunity and should serve as a catalyst for new development.

This vision of continued investment and improvement, achieved through new development is not dissimilar to that presented by the STP with new housing, retail and leisure, as close to the town centre as is possible forming the heart of their proposals for land at and around Cowie Caravan Park. This is in line with SPP which confirms (Paragraph 29) that planning policies and decisions should support delivery of accessible housing, business, retailing and leisure development.

However, that particular site faces issues to delivery due to ownership and availability, amongst other potential constraints such as flood risk. SPP is clear that (Paragraph 48) that "Strategic and local development plans should be based on spatial strategies that are deliverable, taking into account the scale and type of development pressure and the need for growth and regeneration."

Mains of Cowie, on the other hand, is deliverable and also responds to development pressure and the need for growth in an accessible location. The STP's site assessment for future development scores Mains of Cowie 4th, with those sites scoring higher either unavailable or, in the case of Spurryhillock, acknowledged as unsuitable. It is therefore the highest scoring deliverable site.

Our client could deliver many of the components of the STP proposals at Mains of Cowie and Stewart Milne Homes are willing to sit down with STP to work with them to assist in realising their vision.

The direction of new retail development to Mains of Cowie represents the best opportunity to facilitate the required level of retail provision as close as possible to the town centre, in turn having the least impact when compared to other sites within the town, and especially so when compared to reliance on remote retail development at Elsick. This would meet the requirements of SPP as regards:

- Development plans, decision-making and supporting successful town centres (Paragraph 60)
- Applying a sequential approach to the location of new retail (Paragraph 66)
- Optimising the use of existing infrastructure (Paragraph 270) and
- Reducing the need to travel (Paragraph 270).

Council officers and Members recognise some of the arguments in support of our proposals. That an Officer's Preference was set out in the MIR which proposed out of centre retail but with a critical mass of new housing is evidence of understanding of the scale of retail need and benefits of coupling this with neighbouring development. However, that particular proposal was clearly an undesirable and unsustainable pattern of development, contradicting several of the other stated objectives for the town and several key components of SPP.

Councillors of the Kincardine and Mearns Area Committee moved to include an allocation for retail development at Mains of Cowie, in recognition of both need and it being the most appropriate location.

The proposal to accompany new retail development with housing within walking distance to the town centre presents an immediate footfall for the retail development and for Stonehaven's existing retail offer. It would also go some way to assisting in the provision of a range of sites for housing development, as required by SPP (Paragraph 110). Ryden has submitted a separate assessment of the MIR Addendum's assertions, on behalf of Stewart Milne Homes, in relation to housing land. This clearly demonstrates a need for additional land for housing development in order to provide a generous supply throughout the lifetime of the plan, which the MIR at present does not plan for. Stewart Milne Homes is also a member of Homes for Scotland and support their submission to the MIR Addendum.

Equally importantly is the lack of planning for the future of Stonehaven generally. The emerging LDP should set a vision for the continuation of Stonehaven's success and its future expansion, in line with SPP's key aim of achieving sustainable economic growth.

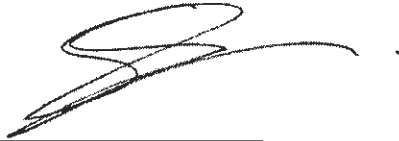
In the absence of such a strategy in the LDP, and in particular the absence of a solution to the retail issues facing the town, SPP's presumption in favour of development that contributes to sustainable development will apply. In this scenario, we consider that Mains of Cowie scores most favourably of any of the deliverable sites which may come forward.

We will be engaging further with the local community and demonstrating the affinity between the Town Partnership ideas and our own thoughts for Mains of Cowie. While our client has a Proposal of Application

Notice lodged with the Council, we are committed to progressing these proposals through the plan led system.

We would ask you once again to reflect upon the obvious natural locational strengths of this site and the possibility of working together to carefully phase retail and residential development on this site to achieve the sustainable economic growth of this fantastic place.

Yours sincerely



Partner

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CARDIFF	NEWCASTLE
GLASGOW	NOTTINGHAM
LEEDS	PLYMOUTH
LIVERPOOL	READING
MANCHESTER	SHREWSBURY
NEWCASTLE	STAMFORD
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PLYMOUTH	TOTTENHAM
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WALSLEY	
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