



Garioch Area Committee Report – 19 June 2018

Reference No: APP/2018/0428

Description: Full Planning Permission for Erection of Abattoir and Meat Production Facility with Associated Roads, Infrastructure and Landscaping at Thainstone Business Park, Inverurie, Aberdeenshire, AB51 5GT

Applicant: Scotbeef Inverurie Limited
Agent: Nimmo & Partners LLP

Grid Ref:	E:377008 N:818014
Ward No. and Name:	W12 - East Garioch
Application Type:	Full Planning Permission
Representations:	8
Consultations:	14
Relevant Proposals Map	SR2, within Inverurie and Port Elphinstone
Designations:	Settlement
Complies with Development Plans:	Yes
Main Recommendation:	Grant



NOT TO SCALE

Reproduced from Ordnance Survey mapping with the permission of the Controller of Her Majesty's Stationery Office © Crown copyright and database rights. Ordnance Survey Licence Number 0100020767.

1. Reason for Report

- 1.1 The Committee is able to consider and take a decision on this item in terms of Section B.9.1 of Part 2A List of Committee Powers and Section C.2.1 of Part 2C Planning Delegations of the Scheme of Governance as the application is for major development.
- 1.2 The Head of Finance and Monitoring Officer within Business Services have been consulted in the preparation of this report and had no comments to make and are satisfied that the report complies with the Scheme of Governance and relevant legislation.

2. Background and Proposal

- 2.1 Full planning permission is sought for the erection of an abattoir and meat production facility with associated roads, infrastructure and landscaping at Thainstone Business Park, Inverurie. The site is located within the settlement boundary of Inverurie and Port Elphinstone, to the south west of the site designated as SR2 in the Aberdeenshire Local Development Plan 2017. SR2 refers to 17ha of strategic reserve employment land (2027-2035), however, planning permission in principle was granted on this site in January 2018 by DPEA for commercial development to include class 4, 5 and 6 uses with associated infrastructure and landscaping under APP/2015/3793. A subsequent Matters Specified in Conditions application for the Thainstone Business Park extension is currently pending consideration, under APP/2018/0140. The proposed abattoir would replace the one currently located on North Street, Inverurie.
- 2.2 The application site comprises an area of approximately 3.9ha of land currently in agricultural use. The site is bound to the north and east by agricultural land, also designated as SR2 land and to the west and south by further unallocated agricultural land. It is noted that OP13 lies to the north east of the site, OP13 is designated in the Aberdeenshire Local Development Plan 2017 as 10ha of employment land. The site itself accommodates Camie's Stone, which is located in the centre of the site and under APP/2018/0140, this archaeological feature is proposed to be relocated elsewhere within the wider Thainstone Business Park. A number of dwellinghouses lie in close proximity to the site, 1 and 2 Braeside Cottages lie to the north west with Braeside Farmhouse and farming unit further west, the dwellinghouse at Clovenstone Farm lies to the south east of the site.
- 2.3 The proposed site would accommodate the following:
 - Cattle Delivery Yard;
 - Effluent Treatment Area;
 - Truck Wash Area;
 - Lairage Shed (not part of this application, will be considered under a separate application);
 - Abattoir and Meat Production Facility;
 - Holding Chills;
 - Butchery;
 - Packaging Area;
 - Staff & Visitor Parking;
 - Loading Dock;

- Gatehouse; and
 - Landscaped Area.
- 2.4 With regards to the abattoir and meat production facility itself, this is a large industrial style building which measures approximately 12.7m in height at its tallest part and 11.8m elsewhere along the ridgeline, 151m in length and 49m in width. The building would accommodate a number of rooms on the ground floor including but not limited to the waste area, numerous chill rooms, blast freezer, packaging, butchery and dispatch areas. Other areas include a reception, office, toilets, lockers/laundry, staff and visitor areas amongst others. The first floor of the building has a further office and staff area as well as other stores relating to the proposed facility.
- 2.5 The gatehouse, comprises a single storey building, which measures approximately 3.2m in height, 11m in length and 4.2 m in width and would accommodate a meeting room, vestibule, security control room and WC.
- 2.6 Access to the site would be taken from the distributor road, approved under APP/2015/3748 which comes from the existing Business Park and will provide access to the site along its east boundary. The existing Drove Road is to be diverted along the southern boundary of the site and will allow for a second to the site and it has been suggested that this will allow for access to the cattle holding shed and grazing land where appropriate, however, it should be noted that the entirety of the road is not within the red line boundary and therefore the Planning Service is only accessing the access to the site under this current application. In terms of vehicle movements to and from the site 50-60 movements are expected daily (25-35 of these are expected to be dispatch movements) and the following information has been submitted in relation to opening times/vehicle movement times:

Dispatch traffic:

- Monday to Friday – all movements will have ceased by 17.00hrs (19.00hrs occasionally)
- Saturday – vehicles will leave between 05.00 and 12.00hrs
- Sunday – no dispatch movements

Cattle receipt:

- Monday to Friday – 07.00 to 19.00hrs
- Saturday – no cattle receipt
- Sunday – 09.00 to 13.00hrs

Butchery staff:

- Monday to Friday – 05.30 to 14.30/16.00hrs (depending on role)
- Saturday – 04.30 to 12.00hrs
- Sunday – not applicable

Cleaners:

- Monday to Friday – 16.00 to 01.00hrs
- Saturday – 12.00 to 20.00hrs
- Sunday – not applicable

Office staff:

- Monday to Friday – 09.00 to 17.00hrs
- Saturday & Sunday – not applicable

2.7 The applicant intends to connect to the public water and drainage network. Details have been provided regarding surface water drainage.

2.8 The relevant planning history relating to this site is as follows:

APP/2018/0140 – Approval of Matters Specified in Conditions 1 (a) Phasing, (b) Levels, (c) Strategic Landscaping, (d) Drainage Connection, (e) Public Access Plan, (f) Travel Plan, 3 (Archaeological WSI), 5 (Camie's Stone Method Statement), 13 (Public Transport Accessibility) of Planning Permission in Principle Ref. APP/2015/3793 – Pending Consideration.

APP/2015/3748 – Full Planning Permission - Formation of Access Road, Drainage Infrastructure and Associated Works – Granted 23 September, 2016 at Garioch Area Committee.

APP/2015/3755 – Full Planning Permission - Installation of Drainage Infrastructure and Associated Works – Refused at Garioch Area Committee on 23 August 2016 – Granted on appeal by Scottish Ministers on 13 June, 2017.

The above applications provide strategic infrastructure to serve the site. APP/2015/3748 provides the main spine road through the current site and links into Camiestone Road. APP/2015/3755 provides drainage infrastructure for the current site.

APP/2015/3793 – Planning Permission in Principle for Commercial Development to include Class 4, 5 And 6 Uses with Associated Infrastructure and Landscaping – Refused at Garioch Area Committee on 23 August, 2016 – Granted on Appeal by Scottish Ministers 16 January, 2018.

2.9 An EIA screening for the erection of an abattoir and meat production facility with associated infrastructure was carried out under ENQ/2015/1871, it was confirmed that an Environmental Statement was not required for this application.

2.10 A Proposal of Application Notice was agreed for the erection of an abattoir and meat production facility with associated infrastructure on 15 December 2018 under ENQ/2015/1870.

2.11 The following information was submitted in support of this application:

- Design and Access Strategy, TA and DIA, submitted 26 February, 2018
- Drainage Strategy Report, submitted 26 February, 2018
- DSSR Ventilation and Odour Control Statement, submitted 26 February, 2018
- Pre-application Consultation Report, submitted 26 February, 2018
- Drainage Strategy Report Revision A, submitted 8 May, 2018
- Visibility with the Landscape Report, submitted 8 May, 2018
- Acoustic Report, submitted 11 May, 2018
- Odour Control Report. submitted 11 May, 2018
- Ventilation and Odour Control Statement, submitted 11 May, 2018
- Lighting Details, submitted 15 May, 2018
- External Lighting Schedule, submitted 15 May, 2018
- Design and Access Statement, submitted 15 May, 2018
- Ecological Impact Assessment, submitted 22 May, 2018

- Noise Impact Assessment, submitted 30 May, 2018
- Amended Pre-application Consultation Report, submitted 05 June 2018

2.12 The following amended plans have been received for this application:

- Acoustic Report - Location Plan, received 11 May, 2018
- Amended Site Plan, received 15 May, 2018
- Planting Plan, received 15 May 2018
- External Lighting Layout, received 22 May, 2018
- Amended Site Plan, received 31 May 2018

3. Representations

3.1 A total of 8 valid representations (8 objections) have been received as defined in the Scheme of Governance. All issues raised have been considered. The letters raise the following material issues:

- *Bounds special landscape area*
- *Flood risk to other sites*
- *Impact of water run-off from the site*
- *Impact on badgers*
- *Impact on Camie's Stone*
- *Increase in traffic*
- *Lack of drainage information*
- *Lack of infrastructure information*
- *Lack of information on job creation*
- *Lack of information relating to hours of operation*
- *Lack of masterplan*
- *Lack of public transport provision*
- *Landscape impacts*
- *Lighting impacts*
- *No EIA submitted*
- *Noise impacts*
- *Non-compliance with SPP*
- *No justification for not re-using the existing site/another brownfield site*
- *Odour impacts*
- *Relationship to existing properties*
- *Siting of development*
- *Visual impacts*
- *Wider road issues*

4. Consultations

4.1 **Infrastructure Services (Archaeology)** has confirmed that although there are ongoing archaeological mitigations requirements for this site, it has been highlighted that some areas within the site require further excavation. Therefore, while not objecting to the development, the Service will require a Programme of Archaeological Works condition to be attached.

4.2 **Infrastructure Services (Economic Development)** has confirmed that it is in support of this proposal for the following reasons:

1. This proposal will help provide the necessary infrastructure required for developing a long-term sustainable future for the beef processing sector;
2. The proposed abattoir development is absolutely pivotal for the future of livestock farmers in the NE and indeed further afield. A new, resource-efficient plant operating to the highest accreditation standards, will secure access to premium meat markets for local beef farmers, who are dependent upon a very fragile agricultural processing sector. Around 40% of Scotland's beef cattle are slaughtered in NE Scotland so this project is of national significance;
3. The loss of local processing facilities in poultry and dairy have had a devastating impact on these sectors in the NE. It is vital that the new abattoir is allowed to progress in order that beef farming does not follow a similar fate;
4. The relocation of the abattoir to Thainstone will help future proof the long-term viability of Scotbeef here in the North East. It will provide an excellent strategic fit with the agricultural hub that already exists at Thainstone;
5. It was intimated that the new abattoir will employ, approximately, an additional 20 employees compared to the existing facility in Inverurie. It is estimated the current facility employs about 130 employees.

- 4.3 **Infrastructure Services (Environment)** has confirmed that the current landscaping proposals are sufficient, however, full details of the landscaping should be conditioned. The Service also confirms that the Ecological Impact Assessment is acceptable as are the recommendations it puts forward, due to the findings of this assessment some conditions are proposed.
- 4.4 **Infrastructure Services (Environmental Health)** has assessed the application in terms of noise, odour and lighting and can confirm that it has no objection to the development as proposed. The Service has requested a condition be attached in relation to noise.
- 4.5 **Infrastructure Services (Flood Prevention Unit)** has confirmed that the Service is satisfied with the level of information submitted in relation to flood risk and has no further comments to make.
- 4.6 **Infrastructure Services (Planning Policy)** has confirmed that it has no objection to the proposed development. The consultee considers the proposed development to be in compliance with Policy B1 of the Local Development Plan, given that it would be located on employment land and would create employment opportunities. It is further considered that there is a justified economic need to relocate the existing abattoir and that the proposed location of the abattoir is acceptable given its location within the Thainstone Business Park, an area focused on supporting the agricultural sector.
- 4.7 **Infrastructure Services (Roads Development)** initially objected to the application due to lack of parking provision. Further information relating to this aspect has been submitted and the Service has confirmed that it is satisfied with the provision of 105 spaces shown on the amended plan with the additional 24 spaces being provided if necessary. In addition, all disabled parking has now been provided. In light of this, the Service has no objection to the proposal subject to conditions.

- 4.8 **Infrastructure Services (Transportation)** has confirmed that while it has no objection to the proposed development, it requires a number of conditions be attached if the application is to be approved, these conditions relate to the upgrade of the Port Elphinstone roundabout and the submission of a Travel Plan.
- 4.9 **Kintore and District Community Council** has been consulted, but has not commented at the time of writing.
- 4.10 **National Grid** has highlighted that the Scottish Gas Network may be impacted upon as a result of this development, as a result the Scottish Gas Network has been consulted.
- 4.11 **Scottish Environmental Protection Agency (SEPA)** initially objected to the development due to lack of information on drainage, specifically on the areas that discharged to the surface water drainage system. A revised Drainage Assessment has been submitted and SEPA has advised that it is satisfied with the information subject to conditions.
- 4.12 **Scottish Gas Network** has responded with no objection, but has provided information regarding safety measures to avoid injury and damage to gas pipes.
- 4.13 **Scottish Water** has confirmed that there is sufficient capacity at the Invercarnie Water Treatment Works and the Inverurie Waste Water Treatment Works. Scottish Water has noted that a water main and truck main run through this site, therefore the applicant will need to refer to Scottish Water regarding relocation. This is outwith the remit of the planning application and therefore will be dealt with via an informative.
- 4.14 **Transport Scotland** has confirmed that it has no objection to the development subject to conditions regarding improvements to the Trunk Road.

5. Relevant Planning Policies

5.1 Scottish Planning Policy

The aim of the Scottish Planning Policies is to ensure that development and changes in land use occur in suitable locations and are sustainable. The planning system must also provide protection from inappropriate development. Its primary objectives are:

- to set the land use framework for promoting sustainable economic development;
- to encourage and support regeneration; and
- to maintain and enhance the quality of the natural heritage and built environment.

Development and conservation are not mutually exclusive objectives; the aim is to resolve conflicts between the objectives set out above and to manage change. Planning policies and decisions should not prevent or inhibit development unless there are sound reasons for doing so. The planning system guides the future development and use of land in cities, towns and rural areas in the long term public interest. The goal is a prosperous and

socially just Scotland with a strong economy, homes, jobs and a good living environment for everyone.

5.2 Aberdeen City and Shire Strategic Development Plan 2014

The purpose of this Plan is to set a clear direction for the future development of the North East. It promotes a spatial strategy. All parts of the Strategic Development Plan area will fall within either a strategic growth area or a local growth and diversification area. Some areas are also identified as regeneration priority areas. There are also general objectives identified. In summary, these cover promoting economic growth, promoting sustainable economic development which will reduce carbon dioxide production, adapt to the effects of climate change and limit the amount of non-renewable resources used, encouraging population growth, maintaining and improving the region's built, natural and cultural assets, promoting sustainable communities and improving accessibility in developments.

5.3 Aberdeenshire Local Development Plan 2017

Policy B1 Employment and business land

Policy P1: Layout, siting and design

Policy P4 Hazardous and potentially polluting developments and contaminated land

Policy E1 Natural heritage

Policy E2 Landscape

Policy HE1 Protecting historic buildings, sites and monuments

Policy C1 Using resources in buildings

Policy C4 Flooding

Policy RD1 Providing suitable services

5.4 Other Material Considerations

The early drawdown of the SR2 site, which was granted on appeal is considered to be a material consideration.

6. **Discussion**

- 6.1 The main issues to consider with the proposal are the principle of development and the potential impact of the development on the character, landscape and amenity of the surrounding area, as well as access to and servicing of the development.

Principle

- 6.2 As noted in paragraph 2.2 of this report, the site is located on the SR2 site, which is strategic reserve for employment development. The early drawdown of the SR2 site has already been established in light of the granting of planning permission in principle for commercial development to include class 4, 5 and 6 uses with associated infrastructure and landscaping, under APP/2015/3793. Therefore the principle of development on this site has already been established.
- 6.3 While it is noted that an abattoir does not fall under class 4, 5 or 6 use and would be considered sui generis, it is accepted that this development would generate employment, therefore this site is an acceptable location for this type

of development. In addition, this site is considered to be a preferred location given its proximity to the existing Mart and Thainstone Business Park rather than the site currently located in the centre of Inverurie.

- 6.4 In light of the above it is considered that this development would be an appropriate development to have within the Business Park, as such, it is considered that this development is in compliance with Policy B1 Employment and business land.

Layout, siting and design

- 6.5 Policy P1 Layout, siting and design supports major developments that demonstrate the six qualities of a successful place, which are creating a place with a sense of local identity, that is safe and pleasant, that is visually welcoming, that is adaptable to future needs, that is efficient in terms of resources and that is well connected.
- 6.6 In terms of this development, it is considered that this development meets these criteria as best that it can, given that it will be a working facility. The development has been well thought out in terms of access and the design of the building it considered acceptable for the countryside it lies adjacent to. While the building is considered to be industrial in style, the Planning Service has no concerns with this given that the development would be located in the extension to an existing Business Park. Although the site is located adjacent existing countryside, the applicant has aimed to reduce any visual impact by finishing the building in green so that it blends into the land that surrounds it.
- 6.7 Concerns over the siting of the building has been raised through letters of representation, however the agent confirms that the reason for siting this development to the rear of the Business Park is that it lies directly adjacent agricultural land and because the site is not visible from the A96.
- 6.8 In terms of the potential visual impact, it is considered that it is unlikely that any significant impact will occur, the site and proposed building is well related to both the agricultural land and the associated Business Park. While it is accepted that the site will be visible from the south and west, the applicant has proposed sufficient screening along these boundaries to mitigate any such impact although this will not totally obscure a building of this scale.
- 6.9 In light of the above and the justification put forward by the agent, it is considered that the proposal complies with Policy P1: Layout, siting and design.

Noise, odour and lighting

- 6.10 Given the type of development, noise, odour and lighting are aspects that could potentially cause an impact to the amenity of the residents that surround the OP13 and SR2 allocations. These aspects have also been highlighted through letters of representations. Initially, no information relating to these aspects of the development were submitted for review, but following a request by both the Planning and Environmental Health Service's, the agent provided details of lighting and a noise impact assessment. These documents have been reviewed and are found to be acceptable. The information provided within the Noise Impact Assessment shows that the noise emissions from the proposed chiller units is expected to have a significant adverse impact during

the night-time period due to the low level of the background sound, however, Environmental Health has confirmed that it is requesting a condition be attached, in the event that permission is granted, asking for a noise mitigation scheme to be submitted to the Planning Service for approval. This request is considered acceptable to the Planning Service.

- 6.11 In terms of odour from the proposed development, Environmental Health has had discussions with SEPA and has confirmed that the development will be required to implement statutory controls which will be enforced by SEPA. As such, Environmental Health requires no further information on this aspect of the development. It should be noted that while SEPA has commented on this application, this is on the aspect of drainage not odour, the Planning Service does not require comments from SEPA in relation to odour as it will be controlled by legislation outwith the remit of the Planning Service.
- 6.12 In light of the comments from Environmental Health, the Planning Service is satisfied that the development complies with Policy P4 Hazardous and potentially polluting developments and contaminated land.

Natural heritage

- 6.13 An Ecological Impact Assessment, which was requested by the Environment Team, has been submitted and its conclusions and recommendations are found to be acceptable. The Service confirmed that all recommendations within the report should be implemented in full and a condition regarding the protection of badgers during construction will be attached in the event permission is granted. In light of the above it is considered that the proposal complies with Policy E1 Natural heritage.

Landscape

- 6.14 The site is located within the Central Wooded Estates Landscape Character Areas (LCA) and is approximately 1.3km from the Bennachie Special Landscape Area (SLA). In terms of the LCA, the Central Wooded Estates is described as rolling landform with low hills and wide valleys and this proposed site gradually inclines from the A96 to the east. However, due to the existing screening and Business Park, you are unable to see the site from the A96 Trunk Road. While the site would be visible from the north, given the sites location within the larger Business Park extension, once more buildings are proposed and subsequently constructed, this proposed building would be screened as a result of development in the foreground. In addition, a sufficient level of planting has been proposed to the north to help overcome any negative impact. In terms of the landscape impact from the south and west, while it is accepted that due to the sites location, the building will be somewhat visible within the landscape, it is noted that screening, in the form of planting, is proposed along both boundaries, which is considered sufficient to the Planning Service. This landscaped area is in addition to the landscaping proposed under APP/2018/0140. In addition, the applicant has tried to reduce any negative impact by designing the building in such a way that it would relate well to its agricultural surroundings.
- 6.15 A number of letters of representation also highlight a concern over the impact on the nearby SLA, however, given the separation distances of 1.3km from the site to the nearest SLA boundary, it is considered that no such impact would occur. The building, although of a substantial size, is no bigger than

some of the existing buildings within the Thainstone Business Park, none of which would have any impact on the SLA. In light of this the Planning Service has no concerns over this aspect of the proposal.

- 6.16 In light of the above the proposal is considered to comply with Policy E2 Landscape, in that the development would not have an unacceptable effect, due to its scale, location or design on key natural landscape elements, historic features or the composition or quality of the landscape character.

Historic Monument – Camie’s Stone

- 6.17 As previously stated, it is proposed to relocate Camie’s Stone off-site under APP/2018/0140, the proposed relocation has been assessed by both the Planning and Archaeological Service’s and has been found to be acceptable with an alternative position proposed within the wider Thainstone Business Park. In terms of this development, it is noted that while ongoing archaeological mitigation is required over the whole OP13/SR2 site, further screening of this site will be required if the development is to be approved. As such, Archaeology has confirmed that a condition should be attached, requesting a programme of archaeological works prior to any development taking place.
- 6.18 A concern over the impact on Camie’s Stone has been highlighted through letters of representation, however, given that this archaeological feature is to be relocated, it is considered by the Planning Service that no such impact exists. The Planning Service has no concerns over this aspect of the development nor with the comments put forward by Archaeology. Therefore, it is considered that the proposal complies with Policy HE1 Protecting historic buildings, sites and monuments.

Access and Servicing

- 6.19 In terms of access, as detailed in paragraph 2.6, access would be taken from the approved distributor road located to the north east of the site, this access point will allow access and egress to and from the site. The Drove Road located along the southern boundary will provide a second access to the site. Parking has also been provided within the site for staff and visitors. In terms of parking and access the proposal has been reviewed by Roads Development and the Service has confirmed that it has no objection to make but has recommended that a number of conditions be attached to the decision, if permission is granted. This is deemed to be acceptable to the Planning Service.
- 6.20 The proposal has also been reviewed by the Council’s Transportation Team and Transport Scotland. Transportation has commented in relation to the Transport Assessment and Travel Plan and while the documents do not contain a lot of information, they have detailed some information on traffic movements and the Service is also able to use the information submitted in the Transport Assessment for the Matters Specified in Conditions application, APP/2018/0428. In light of this information, a number of conditions are proposed in relation to infrastructure works, an agreement for the Port Elphinstone improvements works and a travel plan. Transport Scotland has also confirmed that it has no objection to the development subject to conditions.

- 6.21 Concerns in relation to this aspect of the development relate to the following:
- Increase in traffic,
 - Lack of infrastructure information,
 - Lack of public transport provision, and
 - Wider road issues.
- These issues have been considered by Roads Development, Transportation and Transport Scotland, none of whom find the arrangements to be unacceptable, therefore it is considered that these concerns have been addressed.
- 6.22 In terms of water supply and drainage, the applicant proposes to connect to the public supply. The Planning Service has no concerns with this aspect and Scottish Water has also confirmed that it has no objection.
- 6.23 With regards to the discharge of surface water, further details of this aspect have been submitted in a revised Drainage Strategy. This has been reviewed by SEPA and it has confirmed that it is satisfied with the details within the assessment. As such, SEPA has no objection to the development subject to conditions.
- 6.24 Concerns over water run-off from the site and lack of drainage information has been highlighted through letters of representations, however, revised documentation was submitted and the information contained within that was found to be acceptable to SEPA, therefore, the Planning Service considers these issues have been resolved.
- 6.25 In light of the above, the Planning Service is satisfied that in terms of access and servicing, the proposed development site is acceptable and therefore complies with Policy RD1 Providing suitable services.

Other Material Considerations and Letters of Representation

- 6.26 Policy C1: Using Resources in Buildings of the Aberdeenshire Local Development Plan 2017, based on Scottish Planning Policy, requires a certain standard of carbon neutrality and energy efficiency to be achieved in certain proposed developments. This is required in this case and may be demonstrated through the submission of an energy statement, subject to a condition in the event that permission is granted.
- 6.27 In relation to flood risk, the proposed development has been reviewed by the Council's Flood Prevention Unit and the Service has confirmed that it is satisfied with the information provided in this application and has no comments to make. It is noted that concerns over flood risk has been highlighted by members of the public, but the Planning Service is satisfied that the application has provided sufficient information relating to this aspect. In addition, Flood Prevention Unit has no objection to this development. As such, it is considered that the proposal complies with Policy C4 Flooding.
- 6.28 While a number of the material planning consideration raised through letters of representation have been addressed throughout this report, there are a number of others that will now require to be addressed:
- Lack of information relating to hours of operation – details have now been provided to the Planning Service with regards to this aspect and these details have been highlighted in Section 1 of the report.

- Lack of masterplan – no requirement of a masterplan has been detailed within the settlement statement for this allocation, therefore, the Planning Service has not requested one.
- No EIA submitted – as detailed in Section 1 of this report, an EIA screening was carried out for this site and it was concluded that no EIA was required.
- No justification for not re-using the existing site/another brownfield site – the Planning Service do not require justification for not re-using the existing site. It is considered that the existing abattoir site within Inverurie is no longer fit for purpose and demolition has already begun. The Planning Service will not comment on the merits of another site, but must assess the application in front of them.
- Non-compliance with SPP – it is considered that the proposed development is in compliance with SPP, in that the development increases economic activity while safeguarding and enhancing the natural and built environments as national assets, is a diverse need for the rural area and due weight has been given to the net economic benefit of proposed development as confirmed by Infrastructure Services (Economic Development).
- Lack of information on job creation – the Planning Service is aware that the applicant has had discussions with the Council's Business Development Executive Service, whom have confirmed that an addition 20 jobs would be created. The Service has confirmed their support for this development in relation to this point and a number of others highlighted in paragraph 4.2 of this report.

6.29 A number of other concerns have been raised but these are not considered to be material planning considerations, these are:

- Lack of information relating to transport of the animals – this information has also been received and is highlighted in Section 1 of this report, but is not considered to be a material planning consideration.
- Loss of functionality at proposed Abattoir – while the proposed abattoir would be for cattle only, the sister abattoir at Bridge of Allan accept alternative livestock. The agent has confirmed that given the current market, better prices will be obtained as will access to international markets.
- Loss of agricultural land used by the mart – this site is allocated as employment land within the current Local Development Plan, which was brought forward from the 2012 Local Development Plan, as such Thainstone Mart has always been aware that the loss of this land was inevitable and are likely to have alternative arrangements in place, however, this is not a material planning consideration for this application.

Conclusion

6.29 In conclusion, it is considered that this development is acceptable in terms of Policy B1 Employment and business land, as it is considered that this site is a suitable location for this type of employment development. In addition, it is considered that this proposal complies with all other relevant policies, in that it is unlikely that this development will cause any adverse amenity impacts on the surrounding area nor will this development impact the character or landscape of the area. In light of the above, it is therefore recommended that planning permission be granted.

7. Area Implications

- 7.1 In the specific circumstances of this application there is no direct connection with the currently specified objectives and identified actions of the Local Community Plan.

8. Implications and Risk

- 8.1 An Equalities Impact Assessment is not required because the proposed development is not considered to give rise to any differential impacts on those with protected characteristics.
- 8.2 There are no staffing and financial implications.
- 8.3 There are no risks identified in respect of this matter in terms of the Corporate and Directorate Risk Registers as the Committee is considering the application as the planning authority in a quasi-judicial role and must determine the application on its own merits in accordance with the Development Plan unless material considerations justify a departure.

9. Sustainability Implications

- 9.1 No separate consideration of the current proposal's degree of sustainability is required as the concept is implicit to and wholly integral with the planning process against the policies of which it has been measured.

10. Departures, Notifications and Referrals

10.1 Strategic Development Plan Departures

None

10.2 Local Development Plan Departures

None

- 10.3 The application is not a Departure from the Local Development Plan or Strategic Development Plan and no departure procedures apply.
- 10.4 The application does not fall within any of the categories contained in the Schedule of the Town and Country Planning (Notification of Applications) (Scotland) Direction 2009 and the application is not required to be notified to the Scottish Ministers prior to determination.
- 10.5 The application would not have to be referred to Infrastructure Services Committee in the event of the Area Committee wishing to grant permission for the application.

11. Recommendation

11.1 GRANT Full Planning Permission subject to the following conditions:-

1. No works in connection with the development hereby approved shall commence unless a noise mitigation scheme has been submitted to and approved in writing by the planning authority in consultation with

Environmental Health. The scheme shall set out the appropriate measures to be implemented to reduce noise emissions from the chiller units to acceptable levels. The development shall not become operational unless the mitigation measures outlined in the approved noise mitigation scheme have been implemented in full and retained in perpetuity.

Reason: To ensure that noise from the development does not result in undue loss of amenity for surrounding properties.

2. The development hereby approved shall be carried out in strict accordance with the recommendations outlines in the approved Ecological Impact Assessment (Northern Ecological Services) dated 22 May 2018.

Reason: In the interests of protecting the biodiversity of the environment.

3. No works in connection with the development hereby approved that would involve the creation of trenches or culverts or the presence of pipes shall commence unless measures to protect badgers from being trapped in open excavations, pipes or culverts have been submitted to and approved in writing by the planning authority. The measures shall include:
 - (a) open trenches or pits shall incorporate sloping escape ramps for badgers, which may be achieved by edge profiling of trenches/excavations or by using planks placed into them at the end of each working day; and
 - (b) all open pipework (stored or laid) being blanked off at the end of each working day and
 - (c) any access holes or entrances into machinery that are accessible to badgers should be suitably blocked when the machinery is not in use; and
 - (d) escape ramps, trenches and pipework must be checked at the beginning of each day for potential entrapments, any subsequent events involving a trapped badger should be referred to the Scottish Society for the Prevention of Cruelty to animals (SSPCA).

The development shall be carried out in complete accordance with the approved badger protection measures.

Reason: In the interest of safeguarding the habitat of a protected species.

4. No works in connection with the development hereby approved shall commence unless a Lighting Design Strategy for Biodiversity for the site, as a whole, has been submitted to and approved in writing by the planning authority. The strategy shall:
 - (a) identify the areas or features on the site that are particularly sensitive for badgers and identify the aspects of the development that would be likely to cause disturbance in or around the breeding sites and resting places of badgers or along important routes used to access key areas of their territory; and

- (b) show how and where all the proposed external lighting will be installed and demonstrate (through the provision of appropriate lighting contour plans and technical specifications) that those areas to be lit will not disturb or prevent the above species using their territory or gaining access to their breeding sites, resting places and foraging areas.

All external lighting shall be installed in accordance with the specifications and locations set out in the approved strategy, and no other external lighting shall be installed without prior express consent from the planning authority.

Reason: In the interests of protecting and enhancing the biodiversity of the environment.

- 5. No works in connection with the development hereby approved shall commence unless a scheme of hard and soft landscaping works has been submitted to and approved in writing by the planning authority.

Details of the scheme shall include:

- a) Existing and proposed finished levels.
- b) The location of new trees, shrubs, hedges and grassed areas.
- c) A schedule of planting to comprise species, plant sizes and proposed numbers and density.
- d) The location, design and materials of all hard landscaping works including walls, fences and gates.
- e) A programme for the implementation, completion and subsequent management of the proposed landscaping.

All soft and hard landscaping proposals shall be carried out in accordance with the approved planting scheme and management programme. Any planting which, within a period of 5 years from the completion of the development, in the opinion of the planning authority is dying, being severely damaged or becoming seriously diseased, shall be replaced by plants of similar size and species to those originally required to be planted. Once provided, all hard landscaping works shall thereafter be permanently retained. Reason: To ensure the implementation and management of a satisfactory scheme of landscaping which will help to integrate the proposed development into the local landscape in the interests of the visual amenity of the area.

- 6. No works in connection with the development hereby approved shall commence unless an archaeological written scheme of investigation (WSI) addendum (following on from the original WSI submitted for APP/2015/3793) has been submitted to and approved in writing by the planning authority and a programme of archaeological works has been carried out in accordance with the approved WSI. The WSI shall include details of how the recording and recovery of archaeological resources found within the application site shall be undertaken, and how any updates, if required, to the written scheme of investigation will be provided throughout the implementation of the programme of

archaeological works. Should the archaeological works reveal the need for post excavation analysis the development hereby approved shall not be brought into use unless a post-excavation research design (PERD) for the analysis, publication and dissemination of results and archive deposition has been submitted to and approved in writing by the planning authority. The PERD shall be carried out in complete accordance with the approved details.

Reason: To safeguard and record the archaeological potential of the area.

7. No development in connection with the permission hereby granted shall commence and the access hereby approved shall not be brought into use unless visibility of 59 metres in both directions along the channel line of the [public road] has been provided from a point 2.4 metres measured at right angles from the existing edge of the carriageway surface along the centre line of the approved new access in accordance with the Council's Standards for Road Construction Consent and Adoption. The visibility splays shall be physically formed on the ground and any existing fences, walls, hedges or other means of enclosure or obstructions within the splays shall be removed and relocated outwith the splays in accordance with the approved plans. Once formed, the visibility splays shall be permanently retained thereafter and no visual obstruction of any kind shall be permitted within the visibility splays so formed.

Reason: To enable drivers of vehicles using the access to have a clear view of other road users and pedestrians in the interests of road safety.

8. No works in connection with the development hereby approved shall commence unless the vehicular and pedestrian accesses and all parking and turning areas have been provided and surfaced in accordance with the approved details. Each access shall be constructed to the Council's Standards for Road Construction Consent and Adoption and shall:
 - a) have entry radii of 10.7 metres;
 - b) have a minimum width of 6 metres;
 - c) be surfaced in bituminous macadam or asphalt for the first 15 metres from the road; d) not exceed 1:20 gradient for the first 10 metres from the edge of the public road;
 - d) be internally drained and formed in such a way to prevent any flow of surface water either onto or from the public road.

Once provided, all accesses, parking and turning areas shall thereafter be permanently retained as such.

Reason: To ensure the provision of a means of access to an adequate standard in the interests of road safety.

9. Prior to the occupation of any of the consented development, the proposed alterations to Thainstone Roundabout, generally as illustrated in Fairhurst's Drawing No. 105574/SK7004, approved under APP/2015/3793 shall be completed to the satisfaction of the planning authority, after consultation with Transport Scotland TRBO.

Reason: In order to deliver mitigation on the Trunk Road network.

10. Prior to the occupation of any of the consented development, the proposed alterations to Port Elphinstone Roundabout, generally as illustrated in Fairhurst's Drawing No. 105574/SK7007, approved under APP/2015/3793 shall be completed to the satisfaction of the planning authority, after consultation with Transport Scotland TRBO.

Reason: In order to deliver mitigation on the Trunk Road network.

11. Prior to any works commencing on site a Formal Minute of Agreement for the proposed alterations to Port Elphinstone Roundabout shall be obtained from Transport Scotland. Details of this a Formal Minute of Agreement shall be submitted to the planning authority.

Reason: In order to ensure the delivery of mitigation on the Trunk Road network.

12. No part of the development shall be occupied until a comprehensive Travel Plan that sets out proposals for reducing dependency on the private car has been submitted and approved in writing by the planning authority, after consultation with Transport Scotland, as the Trunk Roads Authority. The Travel Plan shall include details already outlined in the Business Park Framework Travel Plan and shuttle bus service approved under APP/2018/0410. In particular this Travel Plan shall identify measures to be implemented, the system of management, monitoring, review, reporting and the duration of the plan.

Reason: In the interests of encouraging a more sustainable means of travel to and from the proposed development.

13. No development shall commence until a site specific Construction and Environmental Management Plan (CEMP) has been submitted to, and approved in writing by, the planning authority in consultation with SEPA. The CEMP shall include details of the potential pollution prevention, environmental management and waste management issues related to construction of the proposed development. All works on site must be undertaken in accordance with the approved CEMP unless otherwise agreed in writing with the Planning Authority.

Reason: In order to minimise the impacts of construction works on the environment.

14. The proposed development shall be connected to the public water supply as indicated in the submitted application and shall not be connected to a private water supply without the separate express grant of planning permission by the planning authority.

Reason: To ensure the long term sustainability of the development and the safety and welfare of the occupants and visitors to the site.

15. Waste water from the proposed development, including any vehicle wash bays which may be located on the site, shall be disposed of via the public sewer as indicated in the submitted application and shall not be

disposed of via private means without the separate express grant of planning permission by the planning authority.

Reason: To ensure the long term sustainability of the development and the safety and welfare of the occupants and visitors to the site.

16. No development hereby approved shall be brought into use unless the proposed surface water drainage system has been provided in accordance with the approved plans and the Drainage Strategy Report Revision A, Struer, dated 22 May 2018. The surface water drainage system shall be permanently retained thereafter in accordance with the approved maintenance scheme.

Reason: In order to ensure that adequate drainage facilities are provided, and retained, in the interests of the amenity of the area.

17. No individual building hereby approved shall be erected unless an Energy Statement applicable to that building has been submitted to and approved in writing by the planning authority. The Energy Statement shall include the following items:

- a) Full details of the proposed energy efficiency measures and/or renewable technologies to be incorporated into the development;
- b) Calculations using the SAP or SBEM methods which demonstrate that the reduction in carbon dioxide emissions rates for the development, arising from the measures proposed, will enable the development to comply with Policy C1 of the Aberdeenshire Local Development Plan 2017.

The development shall not be occupied unless it has been constructed in full accordance with the approved details in the Energy Statement. The carbon reduction measures shall be retained in place and fully operational thereafter.

Reason: to ensure this development complies with the on-site carbon reductions required in Scottish Planning Policy and Policy C1 of the Aberdeenshire Local Development Plan 2017.

11.2 Reason for Decision

The proposed development is considered to comply with all relevant policies of the Aberdeenshire Local Development plan 2017 and is therefore considered acceptable.

Stephen Archer
Director of Infrastructure Services
Author: Aoife Murphy (Senior Planner)
Date: 31 May 2018

Comments for Planning Application APP/2018/0428

Application Summary

Application Number: APP/2018/0428

Address: Thainstone Business Park Inverurie Aberdeenshire AB51 5GT

Proposal: Erection of Abattoir and Meat Production Facility with Associated Roads, Infrastructure and Landscaping

Case Officer: Aoife Murphy

Customer Details

Name: Mr Kenneth McEwen

Address: Savik Hill Of Balbithan, U68c B977 Near Waterside To C68c At Beechfield Cottage, Kintore, Aberdeenshire AB51 0UQ

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: The site of the proposed abattoir on the extended Thainstone Business Park is a prominent high-level site which forms the foreground to most visitors' first views of Bennachie and the Mither Tap as they travel the A96 from Aberdeen.

The National Geographic Society has said that Bennachie is possibly "Britain's most-loved hill".

I was happy to see that the proposed finish of the building is dark green with natural wood finishes. However, I think the landscape significance of this site should be subject to a landscape impact assessment or study to examine ways to further minimise its impact on such an important landscape.

The importance of what is currently open farmland was recognised in a landscape study in 1998 which opposed any development on Thainstone Hill above the existing business park. It is also close to the boundary of the proposed special landscape area for Bennachie.

When we have a landscape feature with the national and international significance of Bennachie, it is surely worth examining the best techniques to further minimise the landscape impact of the proposed abattoir.

Comments for Planning Application APP/2018/0428

Application Summary

Application Number: APP/2018/0428

Address: Thainstone Business Park Inverurie Aberdeenshire AB51 5GT

Proposal: Erection of Abattoir and Meat Production Facility with Associated Roads, Infrastructure and Landscaping

Case Officer: Aoife Murphy

Customer Details

Name: Mr Gary Wilson

Address: Walker House, Clovenstone, Kintore Inverurie

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: We live near the proposed building and while I would prefer it was not permitted I understand that it is within an already granted commercial development.

The use of this building is very specific and raises issues of noise and potential odours both of which would seem to have been all but ignored in the application.

Neighbours of this development should be protected from noise, odours and also the visual intrusion of large scale buildings.

Enchantment of the landscape belt to the South of the development and the introduction of acoustic planting would be beneficial in this regard.

Comments for Planning Application APP/2018/0428

Application Summary

Application Number: APP/2018/0428

Address: Thainstone Business Park Inverurie Aberdeenshire AB51 5GT

Proposal: Erection of Abattoir and Meat Production Facility with Associated Roads, Infrastructure and Landscaping

Case Officer: Aoife Murphy

Customer Details

Name: Mr Gary Wilson

Address: Walker House, Clovenstone, Kintore Inverurie

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment:As a Local Resident living 'down-slope' of the development it is very concerning to read in the holding objection from SEPA that the Surface Water drainage has not been designed in accordance with SEPA's current guidance.

Our concerns arise from the fact that the run off from existing land operated by Thainstone Marts regularly affects our access road and the design team's disregard of current guidance from SEPA is concerning.

Furthermore it is evident from SEPA's objection that the required Permit in terms of Pollution Prevention and Control Regulations has not been applied for. These issues are exceptionally important to neighbours of the development and at present they seem to have been ignored.

Comments for Planning Application APP/2018/0428

Application Summary

Application Number: APP/2018/0428

Address: Thainstone Business Park Inverurie Aberdeenshire AB51 5GT

Proposal: Erection of Abattoir and Meat Production Facility with Associated Roads, Infrastructure and Landscaping

Case Officer: Aoife Murphy

Customer Details

Name: Mr John Bruce

Address: Braeriach Ann's Forest Kintore

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: This application beggars belief.

The proposal to relocate the abattoir from one populated area to another is not progressive thinking for the future.

People are upset seeing animals going to slaughter. Good planning would have looked at the need to locate this necessary but unpleasant activity somewhere discreet.

Funneling slow moving tractors from all directions onto an already congested A96 will exacerbate an already difficult route.

In addition it is proposed to be located just below the ridge line showing the iconic view of the Mither Tap. What is a view in Aberdeenshire worth?

Comments for Planning Application APP/2018/0428

Application Summary

Application Number: APP/2018/0428

Address: Thainstone Business Park Inverurie Aberdeenshire AB51 5GT

Proposal: Erection of Abattoir and Meat Production Facility with Associated Roads, Infrastructure and Landscaping

Case Officer: Aoife Murphy

Customer Details

Name: Miss Anna Brand

Address: Johns Forest Farm Thainstone Inverurie

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: While I agree that slaughter houses should be placed where the journey time of the animals going there, often directly from the mart at Thainstone, is as short as possible. However, the idea that a large development should be placed at the top of a hill where there are flood risks in the lower land immediately adjacent to it and that is treacherous at best and impassable at worst during winter months is completely asinine. Considering my desire for short journeys for livestock is based on concern for their welfare, the idea that these animals be transported along such a dangerous road where an unloaded lorry jackknifed very recently due to ice, is completely unacceptable.

There are several unused brown field sites in the surrounding area which would not pose these flooding and transport risks.

Thainstone hill already is suffering greatly from light pollution due to the current business park, adding to this with a large development right on top of the hill seems completely unreasonable.

It is also stated that this abattoir site cannot be seen from the A96 as visitors approach Garioch and Bennachie - I'm afraid that is just a blatant lie, the entire hill up to the tree line is visible to me every single day on my commute home.

I can hardly see that this development is essential, as there has been a recent abattoir developed in the local area, but even if it were, why the council would approve it at this location is beyond me - please use any of the brownfield sites in the surrounding areas.

Comments for Planning Application APP/2018/0428

Application Summary

Application Number: APP/2018/0428

Address: Thainstone Business Park Inverurie Aberdeenshire AB51 5GT

Proposal: Erection of Abattoir and Meat Production Facility with Associated Roads, Infrastructure and Landscaping

Case Officer: Aoife Murphy

Customer Details

Name: Mr Peter Brand

Address: Longacre Thainstone Inverurie

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: There are seven clear reasons this development should not go ahead:

1. The visual impact. There is a statement within the documents attached to the application that the site is not visible from the A96. This is untrue. The site is clearly and easily visible from the A96 at the northern Kintore GSI. One of the most iconic views of Bennachie - from Kintore golfcourse and several square miles around - will be further damaged by this development.
2. Light pollution. There seems to be no mention in the application of how light scatter into the sky at night will be prevented. Viewing the sky, especially the northern lights, is a very popular activity and the more industrial units are set up in the countryside the more impossible this becomes. The site must be planned so that no light will leak outside the buildings at night.
3. The practicality of the site. Building high up on the steep side of a hill on agricultural land when unused industrial land on flatter ground exists nearby surely goes against the definition of the word "planning". Allowing the building of a new abattoir in the area within 7 years of the opening of the last one - which will now need to be shut down - is also an insult to the very concept of "planning". A building like that should have a design life of 30-50 years at least, surely. Access up and down steep hills in winter will be required. It is well known to users of the roads immediately to the west of Thainstone that they can be impassable in winter, and accidents have befallen those who have attempted access. In wintery weather workers at the Thainstone business park routinely leave their cars on the roads at the bottom of the hill and walk up. No deliveries to or from the businesses there can take place safely. This is obviously problematic for any business, but for an abattoir it also becomes a livestock welfare issue.
4. Flooding. The application states that this development is not in an area of known risk of flooding, and will not increase the risk of flood elsewhere. Other information provided casts doubt on the veracity of these statements. Within the documents attached to the application is a map showing there are known flood risks within 100m east of the site and extending in a line south-

eastwards from there for 500m. The creation of the buildings and hardstanding at this site, the assessment estimates, will lead to up to an additional 120 litres per second flowing in that direction. This MUST increase the flood risk in this area of Clovenstone.

5. Noise and odour. Insufficient information is provided to make an assessment, according to the Environmental Health assessment.

6. Planning policy. Section 80 of the 2014 Scottish planning policy states: "Development on prime agricultural land, or land of lesser quality that is locally important should not be permitted except where it is essential: as a component of the settlement strategy or necessary to meet an established need, for example for essential infrastructure, where no other suitable site is available; or for small-scale development directly linked to a rural business;" This is land of lesser quality that is locally important (used as lairage). It is not essential (existing sites and other industrial sites where new buildings could be erected are available in the immediate Inverurie-Kintore area). It is not a small-scale development. This policy therefore rules out the proposed development on the OP13/E3 and SR2 sites. Neither is there a report demonstrating there is no reasonably practical brownfield site to comply with Section 40 of the 2014 Scottish planning policy.

7. Environmental Impact. Such a large development in an area of local landscape significance and archaeological significance surely requires a formal Environmental Impact Assessment. None appears to be provided with the application.

> From: Ian Duthie [<mailto:firrtrees1@tiscali.co.uk>]
> Sent: 12 April 2018 16:28
> To: Karen McDonald <karen.mcdonald@aberdeenshire.gov.uk>
> Subject: App/2018/0428

>

> I wish to object to the above on grounds on why it is being built within a couple of hundred metres of my Clovenstone farmhouse when it could have been placed farther away in the centre of the new business park Noise is going to be an issue as their doesn't seem to be any aqstic barriers on the plan The hours of operation are very vague and will be deemed as night time working before 7am The moving of the drove road which is at present 400 metres from my house and very noisy with staff shouting and vechiles horns will be moved to the back of 6 properties againan noise issue Regds Ian Duthie

>

>

Camiestone Croft
Thainstone
Inverurie
AB51 5NT
12/04/2018

Gordon District Planning
Gordon House
Blackhall Road
Inverurie

Attention Aoife Murphy

Dear Ms Murphy

APP/2018/0428 Thainstone abattoir: erection, roads, infrastructure and landscaping

The area proposed for the abattoir is situated at the SW of the proposed business park on land classed as SR2, and on a highly visible site when viewed from across the other side of the Don Valley and from the A96 coming from Blackburn and into Kintore. It will be very visible from Kintore particularly from the Midmill side. The height of the building at 8M and the size of it added to the elevation of the site makes it very prominent.

It is also in the foreground of views of Bennachie and close to the proposed Special Landscape Area of Bennachie. The high visibility of this site needs to have an independent landscape visibility impact study conducted before planning permission is granted to minimise the impact on the overall landscape and views. An independent study is necessary as the authority deciding this application has a financial interest in the overall business park, having already submitted a Planning Enquiry to move elements of their own business to the Business Park.

The landscape has been a consistent matter of concern to members of the public for many years and as is also stated by the DPEA Reporter Allison Coard in the Scottish Government Examination of Proposed Aberdeenshire LDP 16 on 19 Dec 2016:

37. Site SR2 is another area which is reserved for the longer term post 2027. I agree that this site and the proposed OP13 allocation, as considered below, are a major incursion into the countryside. From my observations on site I consider that development of these areas would have a locally significant landscape impact. Mitigation through appropriate structural landscaping, layout and design will be important in securing the acceptability of development.

38. Had this land been identified to come forward in the timescale of this plan then I would have recommended that text should be included to clarify the need for such mitigation and a master-planned approach. This reflects my conclusions below regarding additional text to be included in relation to OP13. However as this is a safeguarding at this stage. I consider that these matters can be left to be addressed through the next local development plan should the site be required to maintain a sufficient supply of employment land.

Site OP13 Thainstone [former E3]

64. My conclusions above on site SR2 are also of relevance here. As this site is a current allocation I consider that necessary development principles, as required to secure the acceptability of development, should be reflected in the supporting text. In this respect I recognise the locally significant landscape impact of the site particularly in relation to the established rural setting of the tree lined minor road to the north. The plan references the

importance of strategic landscaping in relation to other sites and I consider this is an equally important consideration for this site. This should take into account existing access routes and established landscape features. My recommendation reflects this "

Allsion Coard in her report above did not foresee the use of the Strategic Reserve SR2 in the current LDP timescale and suggested there should be additional text regarding this site had it been in the current Plan timescale.

The DPEA Reporter on the appeal decision and the Council have completely failed to take on board her comments and made extra conditions for what she regarded as a major incursion into the countryside and have not, since 1988, conducted a thorough Landscape Visibility Impact Assessment which should be carried out by an independent party before permission is granted.

The original application for the Business Park APP/2015/3793 did not contain a screening option nor an EIA, nor does the current one APP/2018/0140. Granted the agent asked the Council for a screening option but received no response, no response should not be assumed as not necessary.

The landscaping of the Business Park as a whole, including this application is totally inadequate as detailed in my objection to application **APP/2018/0140**. The efforts to screen the current buildings are very poor and many years on still do nothing to screen them.

The proposed site of the abattoir includes the location of Camie's Stone, and this, and the surrounding area must be protected. Further archaeological investigations need to be conducted. The preferred option was to leave the stone *in situ* and there are no documents available in the public domain that justify or give reasons for its relocation.

The submitted Design & Access Statement October 2017 indicates that live animals will normally enter via the ANM Marshalling Yard. In such a precise and definitive document, the use of the word "normally" is concerning as it denotes there may be variance. **Clarification of this statement is required before any decision is taken.**

On a daily basis there are estimated to be 45 – 65 movements and, as stated in the document, could be from early morning until late at night. The anticipated plan for access of "clean" and "dirty" traffic movements should be restricted similar to the operating hours restrictions which exist for the premises on the current business park. The noise nuisance caused by HGV traffic coming up the steep distributor road during unsocial hours will be significant.

The egress of vehicles, particularly cattle floats, also needs to be clarified/confirmed to ensure that no exit is available onto the existing farm track thereby causing nuisance.

As a long-term resident (before ANM), I know the issues caused during inclement weather on traffic using the minor road which is of a similar gradient to the proposed distributor road and this will be replicated by the HGVs using this proposed road. It is not uncommon for HGVs to become stuck. The current access to the Business Park is also susceptible to issues during icy weather and on many occasions, traffic has been unable to negotiate the bend and into the business park. This last winter an HGV failed to negotiate the bend when exiting and slid off the road.

On the roads issue I note that Transport Scotland have recommended that the Council attach conditions to any permission they may give. These conditions are roads improvements to both the local roundabouts and a Travel Plan. However, the conditions only specify prior to occupation, given the huge amount of construction traffic for a facility such as this, what plans are in place during the construction phase to mitigate the increase in traffic. A concern is that construction traffic may use the minor unclassified road and gain access along the shared access farm track. Neither the minor road nor the farm track are suitable for large amounts of traffic and would cause considerable nuisance to residents and people who enjoy walking/cycling on the minor road. Conditions should be attached to any permission prohibiting the use of any surrounding access roads to construction traffic.

The site is to be monitored by CCTV and for night time hours this would necessitate the use of quite a few floodlights given the size of the proposed structure and cause a large amount of light pollution on the hillside. I can see no indication that any sort of light pollution control measures has been put in place relevant to this in any of the documents on the website.

The Council's own Environmental Services department have objected to the application as insufficient information has been provided on noise and odour. This is a major concern for residents in the vicinity who have previously suffered for years with the odour from the Knackery at Kintore and have no wish to be in that situation again.

Lack of information on several topics seems to be an issue with this proposal and the overall business park. All information on which an application is to be decided on should be available for public comment prior to any decision being made.

The site is also known as an area where badgers are very active, and the Badger Trust previously advised that badgers travel between setts on land to the SW of the proposed site and those near Thainstone House Hotel passing through the proposed site. Disturbance to their natural behaviour should not be permitted and as a protected species there are specific laws against this.

Moira Moran

Sangara, Fullerton Farm,
Thainstone, Kintore, Inverurie,
Aberdeenshire. AB510YR

12 April 2018

APP/2018/0428 Thainstone abattoir: erection, roads, infrastructure and landscaping

Case Officer: Aoife Murphy

Dear Ms. Murphy,

The submissions made by Scotbeef and ANM do not address landscape impact, statutory nuisance of lighting, road modifications, and Scottish planning policy. The application should be refused unless these issues are properly addressed and resolved satisfactorily.

Is there a need for an abattoir on the Thainstone site at all? The proposed abattoir is to replace the existing Inverurie abattoir which has been on its current site for over a hundred years. The existing Inverurie site was last upgraded in 2011/2, so it must comply with the current EU animal welfare regulations. Residents who complain about living close to the abattoir moved in knowing where the abattoir was, moving into houses that were built with the abattoir in operation. By contrast the proposed abattoir will be located close to several properties which were built before the agricultural mart and the industrial park.

The existing abattoir processes cattle, sheep and pigs, around 110 000 cattle and 750 000 lambs a year. The proposed Thainstone abattoir is only designed to process cattle, thus representing a significant loss of abattoir functionality in the area. Having to make new arrangements to slaughter pigs and sheep will have a significant adverse effect on the local farming community.

The Thainstone site was identified in the LDP as employment land and strategic reserve land. The Council have not commented on the DPEA Reporter's decision to allow ANM's appeal against development approval, and his statement that "the market should decide the rate of development" rather than the LDP, and its consequences. However, it seems to suggest that the whole 27 ha site is now considered as designated as a site to enhance employment in the area. However, when Scotbeef proposed the relocation of the existing Inverurie abattoir in 2012, they stated that "job losses would be minimised". Scotbeef and ANM need to confirm whether this development will create employment or unemployment, or merely retain the status quo of jobs of the current 110 employees.

The developer's case for early release of the strategic release land, endorsed by the DPEA Reporter, because the Council did not question the developer's statements, was:

- The infrastructure costs for developing 10 ha would be the same as for 27 ha
- ANM would be able to plan the 27 ha site better than planning a 10 ha site, followed by a 17 ha site in 2027.

This means that infrastructure, finance and scheduling arrangements are material planning issues for developments on the Thainstone site.

The main sources of finance for the proposed abattoir seem to be the sale of land for housing on the existing Inverurie abattoir site and the £million cash award from the Scottish Government to Scotbeef, as a Food Processing, Marketing and Co-operation grant. The government hand-out is being challenged as it appears to conflict with the EU's anti-competition rules. Should this grant be withdrawn, will Scotbeef continue with their plans, or argue that a cheap and nasty alternative is necessitated? If the abattoir is not viable without support from the taxpayers, this is not "letting the market decide", and should not be supported by Aberdeenshire Council.

At the 2017 ANM AGM, the ANM Chairman said that the abattoir wouldn't go ahead if ANM lost their appeal against the refusal of planning permission for the business park. Was this just an empty threat or does it show ANM's lack of commitment to the proposed abattoir?

APP/2018/0140 Objection

Because of the way in which the overall development was approved, several planning issues have not received the scrutiny they should have had. Although the Reporter's approach to development planning is "let the market decide", Aberdeenshire Council still need to implement council and national planning policies.

One of these is the requirement for a masterplan in accordance with the requirements of the Aberdeenshire Planning advice 7 /2012 *Implementation of policy SG LSD 1: Masterplanning*. A major development requires a masterplan to be placed on the Council's website and be approved by the local area committee. ANM have presented several versions of a single-page map, none of which meet their claims that that the whole 27 ha site is being developed systematically or which meets the requirements of the council policy. Permission should not be given for any part of the overall development until this is done.

In particular, the DPEA Reporter ignored the issue raised regarding specific Scottish planning policies applicable to greenfield development like the proposed abattoir on the Thainstone site.

The existing grazing land is used for lairage, and is integral to the operation of the Mart. Reduction of the mart's lairage by 27 ha will require more intensive use of the remaining fields, which could be a problem in wet weather when they can be quickly churned up and become unsuitable for grazing. The mart need to set out the measures they will make to offset this loss of lairage.

Section 80 of the 2014 Scottish planning policy states: "Development on prime agricultural land, or land of lesser quality that is locally important should not be permitted except where it is essential: as a component of the settlement strategy or necessary to meet an established need, for example for essential infrastructure, where no other suitable site is available; or for small-scale development directly linked to a rural business;" This rules out the proposed development on the OP13/E3 and SR2 sites, but has not been addressed at any point in the process.

Scottish Planning Policy section 151 requires that the drove road be protected and preserved by the planning authority as far as possible in situ.

The abattoir will likely re-employ many staff from the Inverurie abattoir, and therefore increase car-dependant commuting. Scottish Planning Policy section 76 states "it is important to protect against an unsustainable growth in car-based commuting and the suburbanisation of the countryside, particularly where there are environmental assets such as sensitive landscapes or good quality agricultural land."

SPP s. 40 requires decisions should be guided by the policy principle of "considering the re-use or re-development of brownfield land before new development takes place on greenfield sites." The developers should therefore be required to show that it is not reasonably practicable to retain the existing abattoir in use or to relocate it to a brownfield site before the current application can be approved.

SPP s.41 states that development should complement local landscape features, and SPP s.202 states that "the siting and design of development should take account of local landscape character." The proposed abattoir building is totally out of place on the Thainstone ridge location.

SPP s.29 requires that decisions should be guided by the policy principle of "making efficient use of existing capacities of land, buildings and infrastructure". The council need to consider whether replacing the existing abattoir by housing, and replacing the current lairage fields with a new abattoir building is an efficient use of existing lands, buildings and infrastructure. They should also consider the consequences of losing the means to slaughter pigs and sheep.

The key selection criteria for their choice of the mart location, Aberdeen & Northern Marts (ANM) quoted in their application to Gordon District Council in 1986 include:

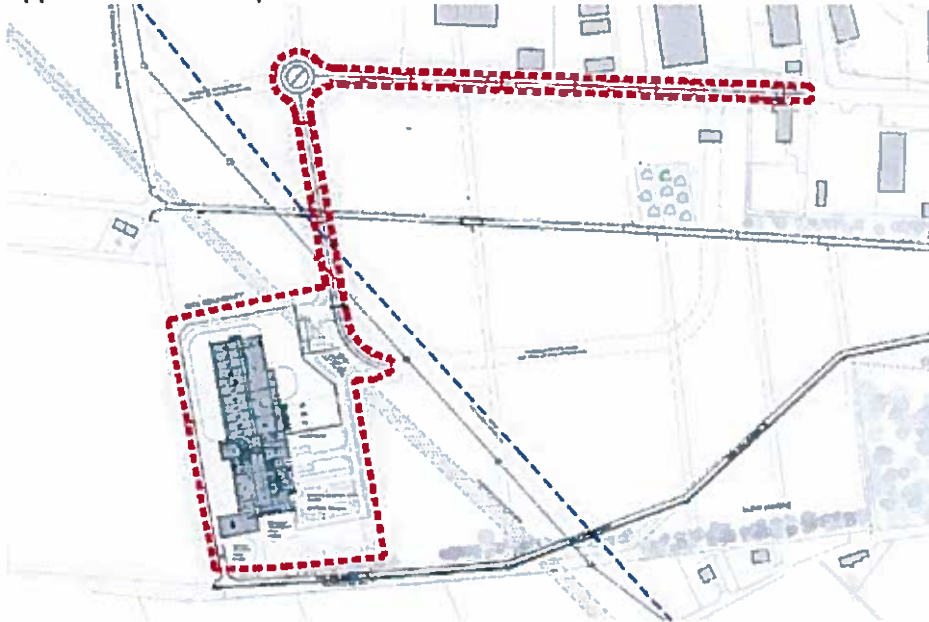
- "...an excellent road infrastructure with easy access to the major stock producing areas of NE Scotland and to the abattoirs in the south..."

APP/2018/0140 Objection

- “The size of the Thainstone farm unit (close to 500 acres) is ideal from the standpoint of lairage and the rationalisation of our existing farms which support the Aberdeen complex. A ready use will be found for the effluent produced by the mart which will be applied to the land and cut fertilizer costs. Winter keep will be available on site which coupled to the fact that we will no longer have double haulage of stock from existing farms to Aberdeen market will present considerable savings. Stock will also outwinter longer because of the sheltered aspect on Thainstone again with corresponding savings.”
- “Central location and relative ease of access to Thainstone for abattoirs both locally and in the South.”
- “Thainstone, while a country site, is still relatively near to Aberdeen.”
- “The production of feed will be mainly from farmlands surrounding the site.”

This suggests that the fields would be better used for lairage and growing feed than accommodating industrial units and an abattoir.

Scotbeef’s Design and Access Statement addresses how they propose to manage traffic to and from the abattoir. This states that the drove road will “be realigned in accordance with ANM’s overall plans”. This is a concern, as are the proposed road developments shown on the application location plan:



The purpose of the proposed road developments and how traffic will be managed are not adequately explained. The drove road is used by mart agricultural traffic, vehicles from the farm, by industrial contractors operating on the two industrial storage areas at the east. It is accessed from the agricultural mart at the east and from the farm track used by local residents and Braeside farm vehicles at the west. Will the drove road diversion retain the same character as the existing drove road? Will the empty cattle transport lorries go back down the drove road to the mart, go onto the industrial site or onto the west part of the drove road? The description of how live animals will be “normally transported” seems to be deliberately vague. All live transport arrangements need to be shown to be compliant with animal welfare regulations.

What is the purpose of the hammerhead extension to the west of the new roundabout? This appears to provide a future connection to the farm track past Camiestone Croft and Braeside farm cottages, which is not suitable for heavy lorries. If ANM plan to tarmac any of these roads, they need to consider measures to apply when they become unusable in icy conditions, which occur regularly on the existing exposed Thainstone hillside roads. This planning application should fully address all issues including specification and construction details of all site roads associated with the abattoir. Planning approval should not be granted until these road issues are properly addressed.

APP/2018/0140 Objection

The Design and Access Statement does not state how far any pedestrians will have to walk to the nearest bus stops. It appears to be over 1 km, up a significant gradient. This is well outside the norms for acceptable length of walking to work. Walking to work on this site is unlikely. SPP s.287 states that "Planning permission should not be granted for significant travel-generating uses at locations which would increase reliance on the car and where ... access to local facilities via public transport networks would involve walking more than 400m."

The proposed abattoir site currently contains Camies' Stone. The developers have not considered the requirement to keep the stone in situ, which is the preferred option of the Council Archaeologists, and a requirement of Scottish Planning Policy para. 150. This issue is also part of the APP/2018.0140 measures. Planning permission should not be granted unless the developer can demonstrate that retaining this local archaeological feature in the location it was intended to be is not reasonably practicable.

The environmental health officer recommended refusal of the application because there was insufficient information provided on odour and noise hazards. There is also no information provided on how to prevent the statutory nuisance of lighting from the abattoir, which would affect the nearby houses. Environmental health and the developers should appreciate that it is extremely difficult to prevent artificial lighting from large buildings on elevated locations like this one being a significant statutory nuisance.

The abattoir is an industrial development greater than 2 ha, located in an area of local landscape and archaeological significance. It is therefore an EIA development requiring an environmental impact assessment. It is also part of the overall Thainstone Business Park development, also clearly an EIA development. The EIA should include a landscape and visual impact assessment as part of the required environmental impact assessment. This requirement is discussed further in my objection to APP/2018/0140. The screening opinion issued by the Planning Dept for the ENQ/2015/1870 application does not consider the potential for damage to our local landscape and archaeological heritage. However, because Aberdeenshire Council are participants in the Thainstone Business Park extension development, Planning Services are not competent to determine this requirement, as the 2017 Town and Country Planning (EIA) (Scotland) Regulations Reg. 52 requires.

The 8 m tall 175 m x 45 m abattoir building will be highly visible along the Don valley to the south east of the site, due to its prominent position on the top of the Thainstone ridge at 127 m elevation. The application should not be approved until suitable screening measures, based on a landscape and visual impact assessment for the whole site, can demonstrate that the impact of this development on this important local landscape have been reduced to as low as reasonably practicable.

It is good that the site plans show that the old trees next to the drove road are being retained.

The submissions from the developer do not appear to provide adequate details of all the infrastructure requirements for the abattoir.

Yours sincerely,

Dr Paul Davison

Ms. Aoife Murphy
Planning Officer
Aberdeenshire Council
Gordon House
Blackhall Road,
Inverurie, AB51 3WA