



Doing things digitally is our preference. Tick the box if you are not happy to receive correspondence via email:

Tick the box if you would like to subscribe to the Aberdeenshire LDP eNewsletter:

## Fair processing notice

Please tick to confirm your agreement to the following statements:

By submitting a response to the consultation, I agree that Aberdeenshire Council can use the information provided in this form, including my personal data, as part of the review of the Aberdeenshire Local Development Plan. This will include consultation on the Main Issues Report (including any subsequent Proposed Plan).

I also agree that following the end of the consultation, i.e. after 8 April 2019, my name and respondent identification number (provided to you by Aberdeenshire Council on receipt of your submission) can be published alongside a copy of my completed response on the Main Issues Report website (contact details and information that is deemed commercially sensitive will not be made available to the public).

The data controller for this information is Aberdeenshire Council. The data on the form will be used to inform a public debate of the issues and choices presented in the Main Issues Report of the Aberdeenshire Local Development Plan 2021. It will inform the content of the Proposed Aberdeenshire Local Development Plan.

Aberdeenshire Council will only keep your personal data for as long as is needed. Aberdeenshire Council will retain your response and personal data for a retention period of 5 years from the date upon which it was collected. After 5 years Aberdeenshire Council will review whether it is necessary to continue to retain your information for a longer period. A redacted copy of your submission will be retained for 5 years beyond the life of the Local Development Plan 2021, possibly until 2037

### Your Data, Your Rights

You have got legal rights about the way Aberdeenshire Council handles and uses your data, which include the right to ask for a copy of it, and to ask us to stop doing something with your data.

If you are unhappy with the way that Aberdeenshire Council or the Joint Data Controllers have processed your personal data then you do have the right to complain to the Information Commissioner's Officer, but you should raise the issue with the Data Protection Officers first. The Data Protection Officers can be contacted by writing to:

- Mr Andrew Lawson, Data Protection Officer, Aberdeenshire Council, Business Services, Town House, 34 Low Street, Banff, AB45 1AY

If you have difficulty understanding this document and require a translation, or you need help reading this document (for example if you need it in a different format or in another language), please phone us on 01467 536230.

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

**Your comments**

Banff and Buchan existing and proposed housing allocations require to be considered within the context of the strategic requirements.

The strategic requirements are predicated upon the augmentation of the existing allocations to provide the requisite effective supply necessary to provide and maintain the minimum five year effective land supply at all times during the lifetime of the LDP including up to the 31st December 2031. Having regard to SPP the existing allocations should all be effective or capable of becoming effective within the relevant plan period.

The Main Issues Report identifies existing allocations that are proposed to be deleted from the plan, removed to the reserved status list for potential development out with the plan period or reduced in capacity within the plan period.

These sites are listed on the attached table and the total deficit in housing capacity arising from these proposed modifications must be made up elsewhere with new allocations in addition to those identified to meet the required augmentation of the supply indicated within the Strategic Development Plan.

In the event that this deficit cannot be made up from newly identified sites within the boundary of the RHMA consideration should be given to allocating additional sites in the neighbouring Aberdeenshire part of the AHMA. The 2018 housing land audit identifies 64 sites in the RHMA with a total capacity of 3,781 houses that are marketability constrained whereas in the Aberdeenshire part of the AHMA only 6 sites with a total capacity of 78 houses are classed as marketability constrained. This substantial mismatch between supply and demand is so marked that the necessary justification for transferring allocations from the RHMA to the neighbouring AHMA cannot be ignored.

The total deficit in Banff and Buchan that should be met by identifying new effective allocations in the RHMA or in the AHMA if it proves impossible to identify allocations in the RHMA from the attached table is 499 houses



**Your comments (continued)**

See Table attached

Settlement	LDP Reference	Bid Reference	MIR Recommendation	Deductions from current allocations	Notes
Aberchirder	OP1	NONE	Move to Reserved status	45	First allocated in 2006
	OP2	NONE	Delete	65	First allocated in 2006
Cornhill	OP1	BB001	Decrease capacity	13	First allocated in 2011
Fraserburgh	OP1	BB035	Decrease capacity	190	Reduced completion rate
New Byth	OP1	NONE	Delete	6	First allocated in 2011
Portsoy	OP3	BB028	Delete	125	First allocated in 2013
	OP4	NONE	Delete	9	First allocated in 1995
Rosehearty	OP3	NONE	Delete	40	First allocated in 1991
Tyrie	OP1	NONE	Delete	6	First allocated in 2015
<b>TOTAL</b>				<b>499</b>	

**BANFF AND BUCHAN - REDUCTION IN ALLOCATIONS REQUIRED TO MEET THE STRATEGIC ALLOWANCES IN ABERDEEN CITY AND SHIRE STRATEGIC DEVELOPMENT PLAN 2014 PROPOSED BY THE MAIN ISSUES REPORT**