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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

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- 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 commenting 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**

Paragraph 119 of SPP requires that Planning Authorities, in allocating sites, should be confident that land can be brought forward for development within the plan period and that the range of sites allocated will enable the housing target to be met.

The expression of confidence must be founded on a realistic appraisal of each allocation and, in particular, when proposing to carry forward an allocation from a previous plan the historic response to that allocations in terms of developer interest or planning applications / consents.

The emerging Strategic Development Plan requires the existing unbuilt allocations to be augmented to provide the ability of the LDP to deliver an maintain the minimum five year effective land supply until the end of the plan period.

The Main Issues Report has failed to interrogate the existing established supply on a site by site basis and, as a consequence, has continued to include numerous sites which have been constrained for many years without developer interest or evidence on the part of the landowner of any intention to bring forward development through a planning permission application.

These sites are listed in the attached table. All sites included in the attached Table should be deleted from the LDP and alternative effective allocations identified within the RHMA. Due to the magnitude of the deficit which is in addition to those constrained sites from previous local development plans which are proposed to be deleted (according to the recommendation in the MIR) it may well be necessary to transfer the required allocations to the neighbouring Aberdeen Housing Market Area. The 2018 housing land audit advises that 64 sites in the RHMA with a total capacity of 3,781 houses were constrained by marketability compared with just 6 sites with a total capacity of only 78 houses in the Shire part of the AHMA.

This substantial mismatch between development plan supply and actual demand has dogged all previous local development plans since re-organisation in 1996 and is now so marked that the necessary justification for transferring allocations from the RHMA to the the neighbouring AHMA cannot be ignored.

The total capacity of the sites identified in the attached Table is 1189 houses.



**Your comments (continued)**

See Table attached

Settlement	Audit Reference	Current LDP reference	No of houses	Date of entry into audit	Justification for removal from local development plan
Caimbulg / Inverallochy	B/CI/H/009	OP1	85	pre 1996 - 2006	The western part of the site was in a previous local plan predating the 1996 re-organisation and has a ransom strip access constraint. No attempt has been made to obtain planning permission for development on any part of the site. There is no basis to express confidence that the site will come forward and deliver housing during the plan period and the site should be deleted. Included in the long term constrained appendix to the 2018 housing land audit
Crudie	B/CR/H/003	OP1	7	2003	Long term constrained site with serious marketability constraint. Planning permission for 9 houses was initially the subject of a withdrawn application (APP/1999/2411). A subsequent application was approved in July 2002 and a further application for 9 houses approved in April 2005. While the consent has been implemented with a single house having been completed in 2008 there has been no market interest in the site over the past decade.
	B/CH/H/005	OP1	6	2006	No planning application thus no growth project to overcome WWTP capacity constraint. No change in status over 13 years.
Fordyce	B/FD/H/002	OP1	5	2006	While there has been a bid made to retain this site in the emerging LDP it has not attracted a developer or a planning application in the past 13 years. The 2018 audit states that the site is marketability constrained and that it is unknown when the marketability constraint will be removed. There can be no confidence that the site will come forward during the plan period and it should be deleted. Organic growth of settlement policy should replace the allocation.
Gardenstown	B/GD/H/007	OP1	25	2004	The planning application referred to in the MIR was submitted in 2014 and the file has been dormant since Councillors signed off the planning officer's report of handling on the 19th April 2016. The length of time that the application has been in process confirms that this constrained site is unlikely to become effective and it should be deleted from the LDP.
	B/GD/H/006	OP2	11	2006	This site like those elsewhere in this table has been carried forward from earlier local development plans. While the owner of the site lodged an application for 11 houses in August 2009 and obtained consent in
Portsoy	B/PS/H/017	OP1	10	2011	There has been no market reaction to this allocation over the past 9 years and no confidence therefore that this allocation can or will become effective during the lifetime of the emerging LDP. It should be deleted as an allocation. If development interest does arise during the plan period the site lies within the settlement boundary and policy will support development as a windfall site.
	B/PS/H/018	OP2	6	2011	ditto
Rosehearty	B/RH/H/011	OP4	10	1990	This is a long term constrained site which should not be included as an allocation as there can be no confidence that it will deliver housing having been available for that purpose for the past 29 years.
Sandend	B/SE/H/001x	OP1	31	1995	This is a long term constrained site which should not be included as an allocation as there can be no confidence that it will deliver housing having been available for that purpose for the past 24 years. Organic growth policy should be applied to this settlement.
Auchnagatt	U/AG/H/001	OP2	31	1995	This is a long term constrained site which should not be included as an allocation as there can be no confidence that it will deliver housing having been in the audit for 24 years without development.
Crimmond	U/CM/H/005	OP1	25	1995	This is a long term constrained site and should not be included as an allocation as there is no confidence that it will deliver housing having been in the audit for 24 years without development. Organic growth policy should apply to this settlement.

Settlement	Audit Reference	Current LDP reference	No of houses	Date of Entry into audit	Justification for removal from local development plan
Longhaven	U/LH/H/001	OP1	30	2011	This is a constrained site which contrary to the MIR which suggests that a road has to be upgraded is physically divorced from the main road by a row of houses. It is physically constrained in the 2018 audit and should be removed as an allocation as there can be no confidence that the access issue can be resolved and the site rendered effective.
New Pitsligo	U/NP/H/003	OP1	12	1991	These are long term constrained sites which have previously been deleted from the housing land audit for that reason. Assurances from three landowners that the sites will come forward within the next plan period have to be seen in the context that there has been no interest in any of the three sites for between 24 - 28 years. There is insufficient confidence that these sites will now deliver housing and they should not be allocated in the next LDP.
	U/NP/H/006	OP2	10	1995	
	U/NP/H/007	OP3	10	1995	
Inverbervie	K/IN/H/026	OP1	200	2012	This is an extremely large allocation for a settlement that has only modest demand. It has not attracted any support for development in the past 7 years and no bid was submitted to secure its retention in the emerging LDP. No confidence that the site will come forward in the lifetime of the emerging LDP and on that basis it should not be allocated in the plan.
Huntly	M/HT/H/037	OP1	485	2014	The MIR recommends that these four allocations removed and reserved for later development. The allocations have been made in successive LDPs to satisfy the spatial strategy in the strategic development plans. There is no possibility of any of the sites being developed because of insurmountable physical impediments. To gain access to the site from Huntly the only viable road connection point is Eastpark Street from which a new bridge over the valley of the River Bogie would give access to the OP3 site for 31 homes. The cost of the bridge would render the OP3 site commercially unviable. To access the OP2 site would require a new bridge over the Aberdeen - Inverness railway line but this would only provide access for up to an additional 18 houses as beyond that level of development an additional access would be required. The nearest public road would be around 1000 metres away (A97). Again these access costs would render the OP2 site commercially unviable. The OP1 site would require two further bridges over the Aberdeen - Inverness railway line which, together with infrastructure costs associated with the provision of WWTP capacity, sewers, water supply etc none of which can or will be contemplated unless and until a planning consent has been granted render OP1, OP2 and OP3 incapable of supporting commercially viable residential developments. OP4 is inaccessible from any public highway due to visibility and junction issues.
	M/HT/H/030	OP2	105	2006	
	M/HT/H/023	OP3	31	2000	
	M/HT/H/026	OP4	40	2004	
Muir of Fowls	M/MF/H/003	OP1	6	2006	While this site was the subject of an application in 2007 which was conditionally approved in 2011 development has never been advanced beyond the technical implementation of the consent. If a site with the benefit of a planning consent cannot attract a developer or a purchaser of an individual plot within a period of 8 years then it is appropriate to delete it as an allocation on the basis that there can be no confidence it will deliver housing during the lifetime of the emerging LDP. The organic growth policy should be applied to this settlement.
Ruthven	M/RV/H/001	OP1	8	1991	This is a long term constrained site which should be deleted from the emerging LDP. The organic growth policy should be applied to this settlement.
<b>Total number of houses</b>			<b>1189</b>		