

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

## Your comments

### Main Issues Report

The MIR, in respect of **Monymusk settlement**, identifies the need for recent housing development to consolidate and react to the recent level of growth, but nevertheless identifies the Approved Monymusk Masterplan Phase 3 site (Ref: MR074) as a "Reserve" Allocation.

We support this designation and acknowledge the need for recent development to integrate in to the settlement. We acknowledge that this site will remain out with the settlement boundary and not available for any form of development under the LDP 2021 until confirmed by a mid-term review, but that it may be brought forward at that stage if required and appropriate.

In terms of the issues highlighted in the MIR, we would agree that the site forms a 'rounding off' of the development both physically and visually, as envisaged in the Approved Masterplan. We acknowledge that a small area of the site (on the northern boundary) is identified on the SEPA Indicative Flood Map as being at medium to high risk of flooding from the Guillie Burn, however, this will be investigated further through a Flood Risk Assessment at the appropriate time. It is nevertheless anticipated to have a very limited impact on the overall developable area. We note the MIR indicates that this land is Prime Quality Agricultural, however, having checked the Scottish Government Land Capability for Agriculture Mapping (national scale) this land is identified as Grade 3.2 which is not Prime Quality for the purposes of Planning.

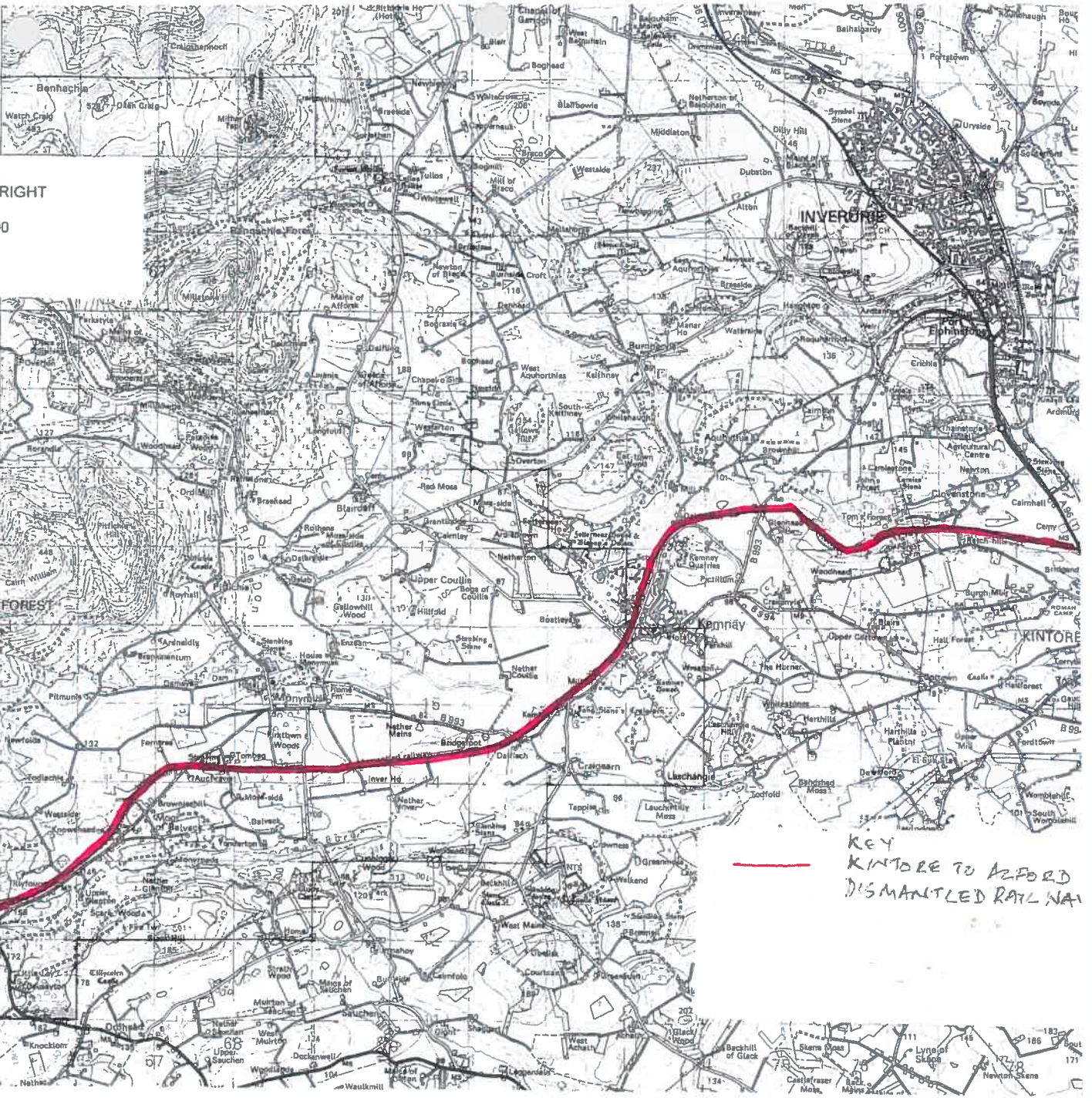
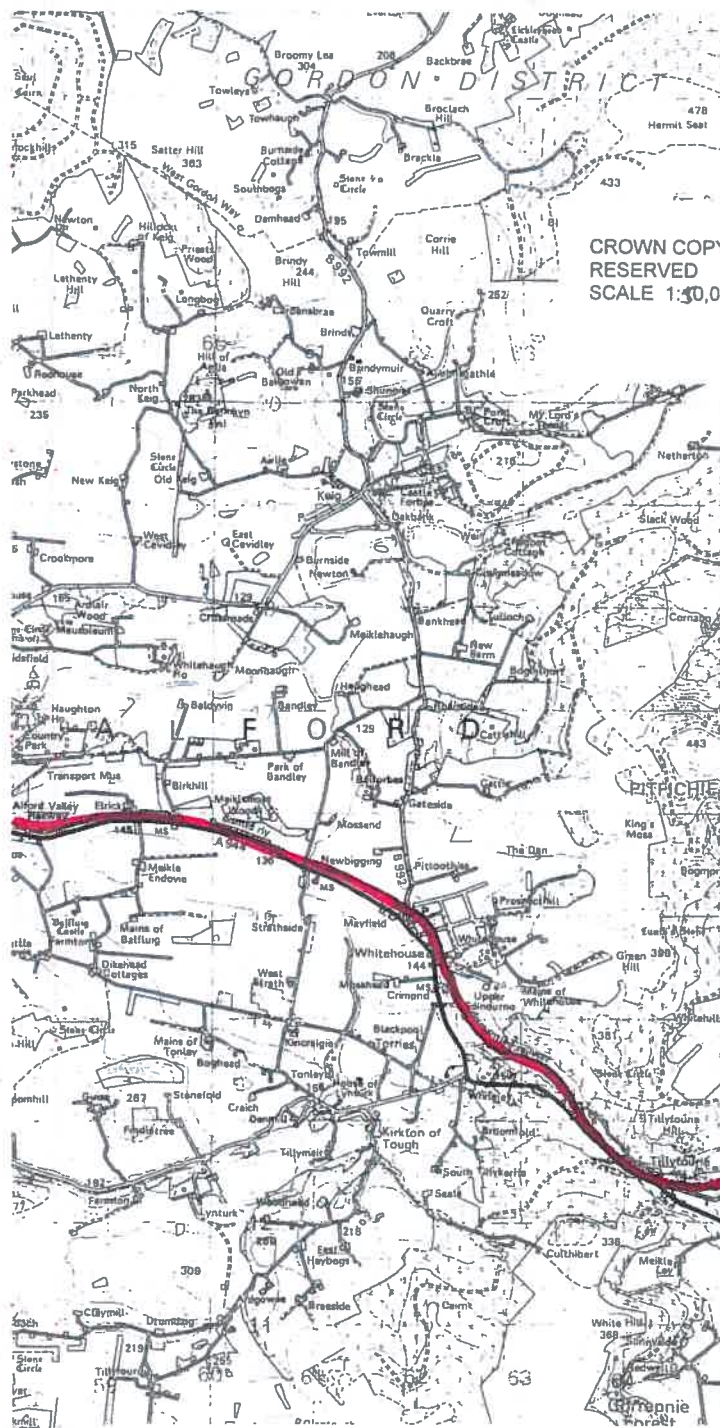
We note the identified mitigation that may be required in respect of the junction with the B993; to resolve education capacity issues; and water and waste water supplies. Whilst we are of the view that these issues can be considered in more detail during the midterm review and mitigation identified at that stage to take in to account the circumstances at the time, we understand that whilst there may be some issues with the local water supply mains the reservoir and pumps have recently been upgraded which limits the additional work required to be undertaken as part of any development. We are also aware that in respect of Waste Water, there is an historic waste water treatment works associated with the Prisoner of War Camp at Monymusk which had capacity for a population of some 22,000 – 25,000 people and may be capable of refurbishment to serve the settlement (subject to further investigation and discussions with Scottish Water). We are nevertheless comfortable that these will not be insurmountable issues and solutions can be identified to mitigate the developments impact.

Chapter 6 (page 19) deals with Homes and Housing and sets the legislative and policy context for the LDP. Main Issue 11 deals with **Affordable Housing** and identifies the significant percentage of affordable housing of 35% (potentially as much as 48% according to the Housing Need and Demand Assessment) with a requirement in Policy terms of only 25% (to comply with the SDP approach) leaving the Council or others to meet the remaining 10% (or 23%). Whilst we acknowledge the scale and complexity of this issue, changing the benchmark 25% requirement at this stage could leave Developers with agreements on effective sites unable to acquire them due to an increased affordable requirement, and potentially an LDP that is not in accordance with the adopted SDP. Therefore, in this instance, we would support the Alternative Option. However, the uses of this land as temporary Open Space could create problems further down the line in terms of communities viewing it as "amenity open space".

However, in terms of how the 25% is delivered on site we believe that there is a significant issue that needs to be resolved through more detailed research, possibly as part of the Local Housing Strategy, to more accurately identify the affordable need profile of eligible candidates in the qualifying area at the time of the application being considered

to make full use of the full range of affordable housing solutions available through Scottish Planning Policy. There appears to be a mismatch in the range of sizes/types/and tenure of the affordable housing requested by the Housing Service and the actual need within the locality, and in cases where limited need is identified (i.e. less than the onsite provision would be) greater use of commuted sums towards delivery elsewhere should be used. This results, in some cases, in the requested provision being changed at a later date due to lack of take up, and other tenures being agreed post completion to enable low-cost home ownership to allow the development to be completed and fully occupied. Whilst we appreciate this is a level of detail beyond what can be addressed in the LDP, and requires a specific response, but we felt it was worthwhile highlighting this at this stage.

Whilst not deemed to be a Main Issue, the MIR discusses the Policy approach of **Policy PR2 Protecting Important Development Sites**. Whilst we are in support of the thrust of this policy and its intent, and are supportive of the inclusion within its scope of disused railway lines, we believe that it would be beneficial to identify these on the Proposals Map (for the avoidance of doubt, and to provide users of the planning system confidence and certainty). The reinstatement of new local/rural railway services elsewhere in Scotland has been extremely successful and we believe the reintroduction, in particular the Kintore to Alford line (track bed largely intact), of such services in Aberdeenshire could bring significant benefits in terms of the sustainability of rural communities and future development within them. This would also serve to reduce the pressure on the Aberdeen Green Belt by providing attractive alternatives to car based commuting (potentially taking as many as 20,000 car movements per day), and potentially take significant freight movements (potentially 4,000 tonnes of freight per day) off the local road network with associated carbon saving, reduction in congestion and wear and tear on the network.



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