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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.

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Which document(s) are you commenting on?	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

This submission has been submitted on behalf of Dunecht Estates in response to Aberdeenshire’s Main Issues Report (MIR) which was published in January 2019 and also responds to the draft Local Development Plan (LDP). Our client submitted a site through the Council’s call for sites in 2018, this was KN108 at Dunnottar for the development of a visitor centre and enabling development.

It was concluded within the assessment that there is a current policy framework that would be supportive to the development of the visitor centre without the need for an allocation in the LDP. This position is welcomed as it is likely that an application for this development will come forward as an application for planning permission in advance of the adoption of a replacement LDP.

There are comments made within the assessment of the proposal that this submission makes comment on. It is also considered that whilst there will be further detail required to justify enabling development it would be appropriate to identify the site within the LDP.

Location

It was noted that the housing element is not within easy walking distance of Stonehaven and its services. It is acknowledged that the site is not directly connected the edge of the settlement, but the site is not far from Stonehaven and to its benefit is not separated by a dual carriageway. The site is 2.5km from the town centre, which is a similar distance to the developments to the north at Ury. There is a bus stop 400m from the site providing access to bus services with links to Stonehaven, Aberdeen and Peterhead to the north and to Perth to the south.

Aberdeenshire Coast Special Landscape Area

The assessment identifies that the proposal lies within the southeast Aberdeenshire Coast Special Landscape Area and the houses would have a significant landscape and visual impact when viewed along the A92 and would affect the setting of Dunnottar Castle.

The Special Landscape Area designation is set out within Supplementary Guidance to assist in assessing the potential impact of development. The statements of importance supporting each of the Special Landscape Areas outline the qualifying interests protected by Policy E2 of the LDP. The presence of the site within the SLA alone does not mean that it is inappropriate, but that in determining the acceptability the judgement will be influenced by the qualifying interests.

The following factors are relevant for consideration of development at this location.

- Maintain the focus of development within existing coastal settlements.
- Respect the coastal character of existing settlements.
- Protect the sense of place associated with the coastal cliffs.
- Protect panoramic views including view over the sands at St Cyrus, and views from Dunnottar Castle.
- Assess the potential impact on the sea views from significant roads, paths and visitor sites.

Figure 1 below identifies the location for the development towards the edge of the SLA. The enabling element of the development will be clustered around the existing farm buildings at Mains of Dunnottar on the west side

of the coastal tourist route. This location is not visually connected to the Castle or the expansive views out to sea and the use of landscaping will ensure that there is no detrimental impact as a result of the development. The development is separated from the cliffs by the Coastal Tourist Route and agricultural fields as shown in Figure 1. Views north and south along the cliffs will not be obscured or viewed in association with the development. Overall the proposed location for the enabling development is sensitively located and the design response will ensure that there is no detrimental effect on the SLA key characteristics.

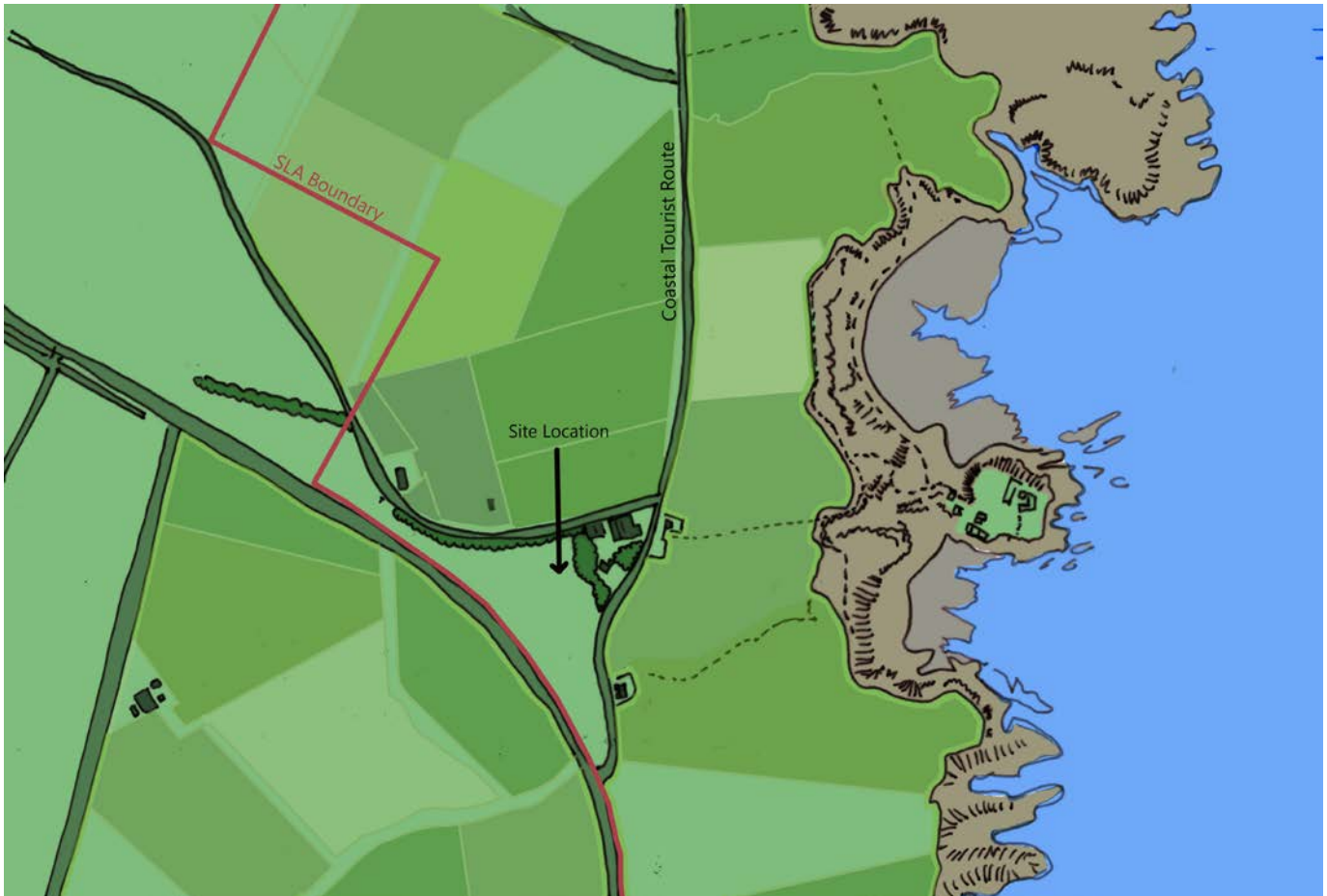


Figure 1: Site Location within SLA

Funding Options

The assessment requests that funding alternatives are explored prior to enabling development. In progressing this project there has been detailed consideration of how the project will be financed including a review of the business plan for its operation and the value of the potential revenue of the facility. The costs of the development currently identify a shortfall in finance that is available from traditional sources and there has been exploration of alternative options. This has involved discussions with Aberdeenshire Council Economic Development. The grant options considered include:

- Scottish Rural Development Programme / LEADER
- Aberdeenshire Grants
- Heritage Lottery Fund

Unfortunately it transpires that this venture would not be able to attract significant grant funding. Heritage lottery funding has been explored and an application submitted, but it must be led by a not-for-profit organisation and the proposal would not be eligible for funding. Aberdeenshire Council have advised that LEADER funding opportunity is coming to an end. There have been no other available grants from Aberdeenshire Council identified.

Enabling Development

It is stated that "as Dunecht Estates owns more land than is proposed within this bid the need for houses in this unsuitable location is not justified." Enabling development by definition is development that would not be given planning permission in other circumstances. The intent of enabling development is that the uplift in the value of the land resulting from approval will secure a wider public benefit. The amount of enabling development requires to be the minimum amount necessary in order to address the deficit. If enabling development is deemed to be acceptable in principle there will require to be conditions to ensure the works or development being enabled can be enforced and that the funds to enable the works are released as early as possible in the course of the enabling development.

It was noted in the assessment that a cost benefit analysis and the number of homes required has not been provided. This information will require to be provided at the time of the application as costs and values can change over time. At this stage, prior to review of the detailed appraisal, it is considered that an indication for intent could be provided within the Development Plan subject to the consideration of the detailed costs. Enabling development is to be tested against the needs of the place and project, not the owner. A lack of or presence of other resources is not part of the consideration or material to this proposal.

In most cases any appropriate enabling development should be materially linked to the site of the development being enabled. The exception to this is if development at the site would be inappropriate or that there is not sufficient land owned at the location. The theory of the enabling development requires to prevail and there must be an associated increase in land value created through the permission to effectively enable to proposal.

It is considered that this location is not so sensitive that it would not be appropriate for a small scale development. In proximity to the site for the visitor centre it is considered that in clustering a residential development with the existing buildings, bound by trees that this is the optimal location for this development in landscape terms.

Prime Agricultural Land

It is noted that the houses are located on prime agricultural land. The site is located on a small area of Class 3.1 land, with a maximum extent of 1.2ha identified.

The alternative to avoid the loss of prime agricultural land would be to locate the development to the east of the coastal tourist route, where the land has a classification of 3.2. However, the site as proposed will be more sensitive in landscape terms as it sits well within the cluster of agricultural buildings and landscape features.

It is considered that the small loss of agricultural land would be offset by the benefits created through the development of the visitor centre.

Conclusion

This response provides feedback on the assessment of the proposal for KN108 as described within the MIR. The proposal submitted was for a visitor centre and enabling development by Dunecht Estates. The support for the visitor centre within the MIR is welcomed. In relation to the enabling development it is submitted that with appropriate mitigation the constraints identified would be outweighed by the benefits created by the development of the visitor centre. Further detail at the application stage will provide confirmation on the extent of development that is necessary to enable the visitor centre.

It is requested that the Council give further consideration to the proposal and identify the visitor centre and enabling development within the Local Development Plan.