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

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please phone us on 01467 536230.

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

Objections to the MIR in respect of: Land at Hirm, Banchoy & Housing in the Countryside Policy.

See attached statement.

LDP 2022

RESPONSE TO MAIN ISSUES REPORT

Objection to MIR in respect of : Proposed Development at Hirn MR 079, and Proposed Development in the Countryside Policy

Introduction

This objection relates to the bid which was lodged seeking the allocation of a site between South Hirn Farm and Hirn Cottages, the former council houses to the east of the farm. The response suggested that the site was unacceptable as a development opportunity site, but that some development might be possible in terms of the emerging Development in the Countryside Policy. This note accordingly responds to that suggestion.

Objection to Text of MIR

The MIR states that the bid is out of proportion to its surroundings, and with no services available locally, it would lead to increased car dependency. However, looking at the bid site it can be seen that there is as much developed area as undeveloped, within it. There are already 10 houses within the bid site, and in addition, an artist's studio, and the extensive curtilage of South Hirn Farm.

Service deliveries (postman etc) already attend the site, and it is well within cycling range of Banchory – particularly the east end, where there is a Tesco supermarket, church, restaurant, arts centre, and playing fields. Further retail facilities are planned adjoining the Tesco site. To write it off as an unsustainable location is accordingly difficult to support.

The MIR concludes that the development needs of the community could be better delivered through the rural development policy.

However, as noted above, given the scale of development already present, the 'gaps' among this site has always been seen as logical infill. The bid for 10 houses was certainly not seen as excessive.

That notwithstanding, progressing development opportunities in accord with Countryside Policy will be dependent on the terms of the Policy. It has to be said however that the revised Policy set out in the Draft Proposed ALDP 2021 (which was published along with the MIR), does not appear to be very user friendly, readily understandable, or indeed helpful to the layman.

Policies should generally start by giving a description of what is permissible, then move to any caveats which might apply. Proposed Policy R2 (Development Elsewhere in the Countryside) appears to start by indicating (R2.2) that nothing other than what is permissible in the green belt or coastal zone will be allowable. Further, it makes no allowance for any distinction between development in the Aberdeen HMA or the Rural HMA.

It then moves on to list a series of sub-considerations (R.2.3 – R.2.13), which in part seem to over-ride the principle set out in R2.2 .

It is suggested that the outwardly complicated text requires to be reconsidered, and a more open understandable format for the Policy is required.

In addition, it is noted that several of the sub-considerations appear to be far more restrictive than the current policy. This will certainly mitigate against development by small builders, which it was understood that the policy review was directed at assisting.

The only welcome addition to the policy is the acknowledgement that large brownfield sites can accommodate more than the current upper limit of 3 homes.

Particular attention should be given to the changes to the 'retiring farmers' policy. At the moment it only seems to be applicable to 'family succession', but there are many farmers who do not have a family member to succeed them - yet are still deserving of the opportunity to reside close to where they have spent their working life.

For all these reasons it is suggested that the Housing in the Countryside Policy as currently produced in Draft, should be thoroughly reviewed, and focused more closely to the genuine needs of small developers and farmers.