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

Your comments

Representation on the Formartine Settlement Statements

Representation in support of allocation FR089 at Keir Farm

Bancon Homes object to the housing allocations in the Blackdog to Peterhead Strategic Growth Area, on the basis that it does not demonstrate any commitment to delivering the housing requirement in the Strategic Development Plan, but rather continues to identify constrained and limited sites that are unable or unlikely to deliver a fraction of the housing required.

The key allocation that is considered unsuitable is the 500 unit development that forms part of the Menie proposals. This site has been included as a development site in previous Local Development Plans, despite being identified throughout in the Housing Land Audit as constrained. There is no commitment to deliver the site, and Scottish Planning Policy states that sites should be 'effective or expected to become effective' during the plan period. This is categorically not the case, demonstrated by the Housing Land Audit.

In addition to this site, the scale of allocations in Ellon remain a concern, with the 980 unit site at Cromleybank still not started after almost a decade of being allocated in the LDP. Whilst the allocation is not challenged, the expectation that it will deliver 980 houses by 2031 is seriously questioned. However, the approved Housing Land Audit does identify anticipated completion of the site by the end of 2029, so there is not technical basis to supplement the allocation, other than a common sense and precautionary approach.

A further concern, as identified in Bancon Homes' representation on Main Issue 10, is that a number of existing and new allocations, particularly those which are not backed by a volume housebuilder, have been identified for a higher number of housing units than promoted in the bids. It is questioned if these sites are likely to deliver more houses than the landowner or promoter anticipates, based on a blanket density across all sites imposed on sites with greatly varying limitations and market position.

It is therefore submitted that the housing allocations in the Blackdog to Peterhead Strategic Growth Area, particularly sites within the Aberdeen Housing Market Area, are not capable of delivering the housing requirement set in the Strategic Development Plan. Artificially increasing the densities on new allocations is unlikely to meet the housing allowances, as it is reasonable to assume that the bid reflects what is marketable on the site.

It is therefore necessary to identify additional housing land in the Aberdeen housing Market part of this Strategic Growth Area. This should be, as a minimum, sufficient to address the 500 unit shortfall of the constrained Menie site. This shortfall could be met by including the site at Keir Farm, Balmedie (FR089) for immediate release, rather than as a reserved site. Bancon object to the statement in the Main Issues Report that proposals for this site have not been sufficiently thought through to allow them to be allocated for development in the current plan. This is fundamentally the role of the Local Development Plan Review process.

The site at Keir Farm is deliverable, and were it to be allocated it could be brought forward quickly to deliver housing within the plan period. The site could also deliver a much needed replacement primary school for Balmedie, accessible and connected to the existing village via an existing underpass. The site is accessible easily from the newly built road and grade separated junction, with the western extent of the site formed neatly by the new road.

The aerial image overleaf shows the site in relation to the new road, junction, underpass and the existing village. The existence of this infrastructure means that the potential future settlement, including the FR089 site, would function as successfully as any settlement of this size. Many settlements, for example Oldmeldrum (similar in size to Balmedie) has a bypass, that in practice is little different in terms of the movement of traffic.

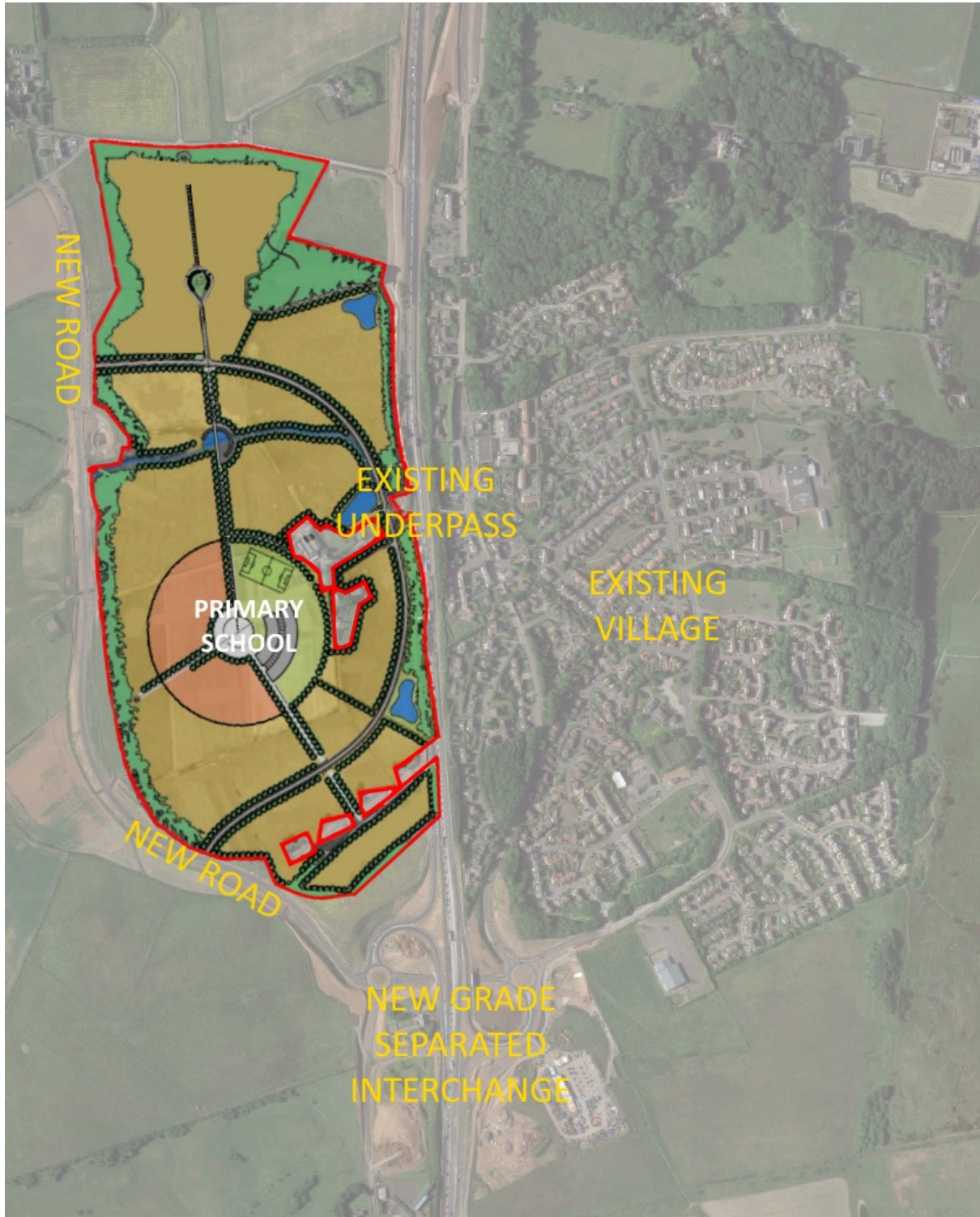
The new road will provide a long term defensible western boundary for Balmedie, and contain an appropriate amount of development to support and assist in the delivery of a much needed replacement Primary School. This would be located in the centre of the FR089 site, allowing convenient access to all new housing, and via the existing underpass for the existing village population.

A draft high level masterplan has been prepared, which shows that the development could revolve around a central core that includes the primary school and other services and facilities, with a central pedestrian core and a peripheral vehicular route. This demonstrates that the site is suitable for a high quality, innovative development that would create a quality place, and provide a positive addition to Balmedie.

It is therefore submitted that this site be identified in the Local Development Plan for release in the 2021-2031 plan period, for up to 600 houses, a primary school and associated supporting uses and infrastructure.

Plans overleaf...





High level indicative layout, showing the relationship to the existing village, potential primary school site, and roads hierarchy