

## **RESPONSE FORM**

As part of the production of the Local Development Plan, a 'Main Issues Report' was published in January 2019. The responses from these consultations have helped to inform the content of the Proposed Local Development Plan ("the Proposed Plan").

The Aberdeenshire Local Development Plan will direct decision-making on land-use planning issues and planning applications in Aberdeenshire for the 10-year period from 2021 to 2031. The Proposed Plan was agreed by Aberdeenshire Council in March 2020 as the settled view of the Council. However, the Proposed Plan will be subjected to an independent examination and is now open for public comment.

## This is your opportunity to tell us if anything should be changed in the Proposed Plan, and why.

When writing a response to the Proposed Plan it is important to specifically state the modification(s) that you would wish to see to the Plan.

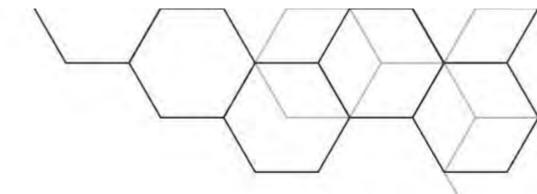
This is the only remaining opportunity to comment on the Proposed Plan. The reasons for any requested changes will be analysed and reported to Scottish Ministers. They will then appoint a person known as a Reporter to conduct a public examination of the Proposed Plan, focusing particularly on any unresolved issues and the changes sought.

Ministers expect representations (or responses) to be concise (no more than 2000 words) and accompanied by limited supporting documents. It is important to ensure that all of the information that you wish to be considered is submitted during this consultation period as there is no further opportunity to provide information, unless specifically asked.

Please email comments to ldp@aberdeenshire.gov.uk or send this form to reach us by 17 July 2020.

We recommend that you keep a copy of your representation for your own records.





## **ACCESSIBILITY**

If you need information from this document in an alternative language or in a Large Print, Easy Read, Braille or BSL, please telephone 01467 536230.

Jeigu pageidaujate šio dokumento kita kalba arba atspausdinto stambiu šriftu, supaprastinta kalba, parašyta Brailio raštu arba britų gestų kalba, prašome skambinti 01467 536230.

Dacă aveți nevoie de informații din acest document într-o altă limbă sau într-un format cu scrisul mare, ușor de citit, tipar pentru nevăzători sau în limbajul semnelor, vă rugăm să telefonați la 01467 536230.

Jeśli potrzebowali będą Państwo informacji z niniejszego dokumentu w innym języku, pisanych dużą czcionką, w wersji łatwej do czytania, w alfabecie Braille'a lub w brytyjskim języku migowym, proszę o telefoniczny kontakt na numer 01467 536230.

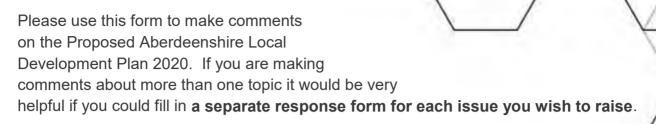
Ja jums nepieciešama šai dokumentā sniegtā informācija kādā citā valodā vai lielā drukā, viegli lasāmā tekstā, Braila rakstā vai BSL (britu zīmju valodā), lūdzu, zvaniet uz 01467 536230.

Aberdeenshire Local Development Plan Woodhill House, Westburn Road, Aberdeen, AB16 5GB

Tel: 01467 536230

Email: ldp@aberdeenshire.gov.uk Web: www.aberdeenshire.gov.uk/ldp Follow us on Twitter @ShireLDP

If you wish to contact one of the area planning offices, please call 01467 534333 and ask for the relevant planning office or email planning@aberdeenshire.gov.uk.



Please email or send the form to reach us by 17 July 2020 at the following address:

Post: Planning Policy Team, Infrastructures Services
Aberdeenshire Council, Woodhill House, Westburn Road, ABERDEEN, AB16 5GB

Email: ldp@aberdeenshire.gov.uk

Please refer to our **Privacy Notice** at the end of this form for details of your rights under the Data Protection Act.

## YOUR DETAILS

Title:	Mr		
First Name:	Michael		
Surname:	Lorimer		
Date:	24/7/20		
Postal Address:	Ryden LLP,		
Postcode:			
Telephone Number:			
Email:			
Are you happy to receive future correspondence only by email? Yes ✓ ☐ No ☐			
Are you responding on behalf of another person? Yes ✓ ☐ No ☐			
If yes who are you representing? Cabardunn Development Company Limited and Dunecht Estates			
☐ Tick the box if you would like to subscribe to the Aberdeenshire LDP eNewsletter: ✓			
An acknowledgement will be sent to this address soon after the close of consultation.			

## YOUR COMMENTS

Please provide us with your comments below. We will summarise comments and in our analysis will consider every point that is made. Once we have done this we will write back to you with Aberdeenshire Council's views on the submissions made. We will publish your name as the author of the comment, but will not make your address public.

**Modification that you wish to see** (please make specific reference to the section of the Proposed Plan you wish to see modified if possible, for example Section 9, paragraph E1.1):

Allocation of Site Ref: GR092, North of Forbes Park, Echt for 25 homes is welcomed and should be carried forward into the adopted Aberdeenshire Local Development Plan 2021.

#### Reason for change:

On behalf of Cabardunn Development Company Limited and the (Dunecht Estates), we welcome the identification of Site reference GR092, North of Forbes Park, Echt as an opportunity site 'OP1' for 25 homes to be delivered following adoption of the Aberdeenshire Local Development Plan (LDP) 2021. The allocation broadly aligns with the development bid submitted at pre-MIR stage (Appendix 1) and is hereby supported.

The Proposed Plan allocation reflects a slight deviation from what was identified as an 'Officers Preference' for the growth of the settlement at Main Issues Report (MIR) stage. In addition to Site: GR092 to the north east of the village, a further site had been promoted by Cabardunn Development Company Limited and Dunecht Estates to the south east of Echt, Site Reference: GR093. The MIR highlighted that "there is little to separate the merits of the bid proposals in Echt", however Officers identified site GR093 to the south west as their preference to be allocated for 42 homes within the next LDP. Site GR092 for 25 homes was not preferred at MIR stage but was instead identified as a Future Opportunity 'FOP' Site.

The published Schedule 4 'Issues and Actions Papers' contain Officers' responses to the MIR public consultation and provide background and further justification for the adjustments made to the allocations at Echt. A number of representations were made to both sites, both in support and objection. Having considered comments from respondents, Including Echt and Skene Community Council, it was recommended that Bid site GR092 be taken forward within the next Plan as opposed to GR093. The justification provided outlined that this approach would avoid overdevelopment and ensure an opportunity to consolidate recent growth. These recommendations were supported at Garioch Area Committee, Infrastructure Services Committee and subsequently approved at Full Council on 5<sup>th</sup> March 2020. A separate response to the Proposed Plan consultation has been prepared by Cabardunn Development Company and Dunecht Estates in respect of Site: GR093.

Notwithstanding, allocation of GR092 is firmly supported. As noted by officers at MIR stage, the site is located adjacent to the settlement boundary, is well related to recent

housing, and is within immediate walking distance to a range of services available within the village, which include the primary school, local shop, village hall, church, restaurant/pub and extensive recreation grounds. Indeed, Echt boasts a broader range of local amenities than many larger settlements and it is therefore vital that these services and facilities are sustained through continued growth of the village.

Recent development within Echt has taken place to the south and west of the site, having been allocated through the 2006 and 2012 LDPs respectively, thereby demonstrating the ability of the village to accommodate incremental growth. Being situated within the Aberdeen Housing Market Area, in close proximity to the City and employment areas at Westhill, in addition to previously allocated sites having now been built out, this demonstrates the popularity of the village and continued demand for new housing. It is therefore welcomed that the Proposed Settlement Statement for Echt recognises this demand and has proactively addressed this through a new allocation of OP1 to the north east of the settlement.

The OP1 allocation will form a natural expansion of these recent developments and creates the opportunity to establish connections through them and into the centre of the village, with its associated amenities. An indicative layout was submitted along with the Development Bid (Appendix 1) which illustrates how this would be achievable and the layout would be designed to achieve, "the same sensitive approach to development as the wider Forbes Park development". As with recent development in the village, a range of house types would be provided to ensure the development bolsters the varied and sustainable mix of housing within the village. The proposed allocation would also secure the provision of affordable homes, to meet local demand. The indicative layout submitted with the Development Bid also identifies connectivity with Forbes Way to the west and Forbes park to the south, as stipulated within the detailed text accompanying the OP1 allocation.

It is noted that the north eastern corner of the Bid Site GR092 has been designated as P2, which is to be protected as an area of open space, due to an evident flood risk associated with that part of the site. This flood risk was acknowledged both within the Bid (Appendix 1) and MIR response (Appendix 2) and the P2 designation appears to reflect SEPA's indicative River & Coastal Flood Map which indicates the small part of the site to the north east is at risk of flooding. As identified within the indicative layout submitted with the Bid (Appendix 1), the area would be kept free of development and will form part of a robust landscaping and open space strategy as part of any future planning application. Any planning application will also be supported by a Flood Risk Assessment to determine the extent of any flood risk and that the proposed layout would present no risk of exacerbating said risk.

Echt Primary School has capacity for up to 47 pupils and the most up-to-date 2019 based school roll forecasts (Appendix 3) highlight that the school will be operating above capacity from 2021 and beyond. The settlement statement identifies that developer obligations may be required to contribute towards education provision, therefore the allocation of OP1 will ensure those obligations can be secured to alleviate any capacity issues. As highlighted at MIR stage, should there be a requirement to extend Echt Primary School, there is currently an extensive area of undeveloped recreational ground to the south of the school site, which is owned by the Council and could be utilised to facilitate any extension.

In summary, it is hereby welcomed that the development potential of GR092 has been recognised through the associated OP1 allocation within the Proposed Plan. The delivery of 25 homes, within the next LDP will ensure the continued incremental growth of the

village to meet identified demand through a sympathetic range of new housing. Echt benefits from a broad range of local services and facilities for its size and additional housing is therefore welcomed in order to sustain those services. Any identified constraints such as flood risk are limited to a small area of the site and it has been sufficiently demonstrated that any formal housing layout would not encroach within this area, instead reserving it as open space. On behalf of Carardunn Development Company Ltd and Dunecht Estates, it is therefore respectfully requested that OP1 is carried forward as an allocation for 25 homes North of Forbes Park, Echt, as part of the formal adoption of the next LDP 2021.

### PRIVACY NOTICE



## LOCAL DEVELOPMENT PLAN PUBLIC COMMENT

The Data Controller of the information being collected is Aberdeenshire Council.

The Data Protection Officer can be contacted at Town House, 34 Low Street, Banff, AB45 1AY.

Email: dataprotection@aberdeenshire.gov.uk

Your information is being collected to use for the following purposes:

 To provide public comment on the Aberdeenshire Local Development Plan. The data on the form will be used to inform Scottish Ministers and individual(s) appointed to examine the Proposed Local Development Plan 2020. It will inform the content of the Aberdeenshire Local Development Plan 2021.

#### Your information is:

Being collected by Aberdeenshire Council	X
Being collected by Aberdeenshire Council	X

#### The Legal Basis for collecting the information is:

Personal Data	
Legal Obligations	Χ

Where the Legal Basis for processing is either Performance of a Contract or Legal Obligation, please note the following consequences of failure to provide the information:

It is a Statutory Obligation under Section 18 of the Town and Country (Scotland) Act 1997, as amended, for Aberdeenshire Council to prepare and publish a Proposed Local Development plan on which representations must be made to the planning authority within a prescribed period of time. Failure to provide details requested in the 'Your Details' section of this form will result in Aberdeenshire Council being unable to accept your representation.

Your information will be shared with the following recipients or categories of recipient:

Members of the public are being given this final opportunity to comment on the Proposed Aberdeenshire Local Development Plan. The reasons for any changes that the Council receives will be analysed and reported to Scottish Ministers. They will then appoint a person to conduct a public examination of the Proposed Plan, focusing particularly on the unresolved issues raised and the changes sought.

Your name and respondent identification number (provided to you by Aberdeenshire Council on receipt of your

submission) will be published alongside a copy of your completed response on the Proposed Local Development Plan website (contact details and information that is deemed commercially sensitive will not be made available to the public).

In accordance with Regulation 22 of the Town and Country (Development Planning) (Scotland) Regulations 2008 where the appointed person determines that further representations should be made or further information should be provided by any person in connection with the examination of the Proposed Plan the appointed person may by notice request that person to make such further representations or to provide such further information.

Your information will be transferred to or stored in the following countries and the following safeguards are in place:

Not applicable.

The retention period for the data is:

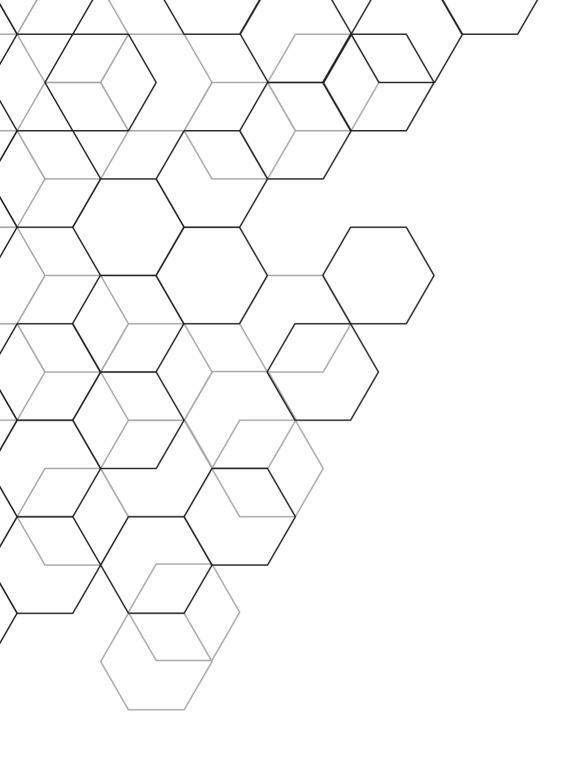
Aberdeenshire Council will only keep your personal data for as long as is needed. Aberdeenshire Council will retain your response and personal data for a retention period of 5 years from the date upon which it was collected. After 5 years Aberdeenshire Council will review whether it is necessary to continue 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.

The following automated decision-making, including profiling, will be undertaken:

Not applicable.

Please note that you have the following rights:

- to withdraw consent at any time, where the Legal Basis specified above is Consent;
- to lodge a complaint with the Information Commissioner's Office (after raising the issue with the Data Protection Officer first);
- to request access to your personal data;
- to data portability, where the legal basis specified above is:
  - (i) Consent; or
  - (ii) Performance of a Contract;
- to request rectification or erasure of your personal data, as so far as the legislation permits.





# APPENDIX 1 Development Bid

### Local Development Plan 2021





Aberdeenshire Council would like to invite you to use this form to submit a site for consideration within the next Local Development Plan (LDP 2021) for the period 2021 to 2031. A separate form should be completed for each site you wish to submit.

This is not a speculative plan. It is a fresh 'call for sites', so please re-submit any sites that do not or are not expected to have planning permission by 2021.

In order for the bids to be fully assessed, it is crucial that the questions in the bid form are answered fully and concisely with clear evidence of deliverability. The submission of a supporting statement, often known as a paper apart, should be avoided, and only assessments, such as a Flood Risk Assessment that has already been undertaken, should be submitted in support of your proposed site.

Completed forms and Ordnance Survey "Landline" site maps should be returned by email to: ldp@aberdeenshire.gov.uk

Alternatively, you can return the form and Ordnance Survey map by post to: Planning Policy, Infrastructure Services, Woodhill House, Westburn Road, Aberdeen ABI6 5GB

#### All forms must be submitted by 31 March 2018.

#### I. Your Details

Name	
Organisation (if applicable)	Ryden LLP
Address	
Telephone number	
Email address	
Do you wish to subscribe to	Yes
our newsletter?	

#### 2. If you are acting as an agent on behalf of a third party, please give their details

Name	
Organisation (if applicable)	Cabardunn Development Company Limited
Address	c/o Dunecht Estates, Estates
Telephone number	
Email address	

#### 3. Other Owners

Please give name, organisation,	
address, email details of other	(Dunecht Estates),
owner(s) where appropriate:	
Do these owners know this is	Yes
being proposed for	
development?	

For data protection purposes, please complete the rest of this form on a new page

#### 4. Site Details

Name of the site	North East Echt, Echt.	
(Please use the LDP name if the		
site is already allocated)		
Site address	Land immediately to the north east of Echt.	
OS grid reference (if available)	NJ 741 058	
Site area/size	3.0 hectares	
Current land use	Agricultural	
Brownfield/greenfield Greenfield		
Please include an Ordnance Survey map (1:1250 or 1:2500 base for larger sites, e.g. over 2ha)		
showing the location and extent of the site, points of access, means of drainage etc.		

5. Ownership/Market Interest

Ownership (Please list the owners in	(Dunecht Estates)
question 3 above)	· ·
Is the site under option to a	Yes
developer?	The land is under option to Cabardunn Dev Company Ltd.
Is the site being marketed?	No
	It is already under option.

6. Legal Issues

Are there any legal provisions in the title	No
deeds that may prevent or restrict	
development?	If yes, please give details
(e.g. way leave for utility providers, restriction	N/A
on use of land, right of way etc.)	
Are there any other legal factors that might	No
prevent or restrict development?	
(e.g. ransom strips/issues with accessing the	If yes, please give details
site etc.)	N/A

7. Planning History

V		
Have you had any formal/informal	No	
pre-application discussions with the	The site has not been the subject of any pre-application	
Planning Service and what was the	discussions. The intention is to promote it through the	
response?	appropriate Local Development Plan process.	
Previous planning applications	There have been no previous planning applications on	
	the site. However, it was promoted through the 2012	
	and 2017 Local Development Plans.	
Previous 'Call for sites' history.	Previous Bid Reference No. Ga031. Please see details at	
See Main Issues Report 2013 at	Q19.	
www.aberdeenshire.gov.uk/ldp		
Local Development Plan status	Is the site currently allocated for any specific use in the	
www.aberdeenshire.gov.uk/ldp	existing LDP? No	
	If yes, do you wish to change the site description and or	
	allocation? N/A	

### 8. Proposed Use

Proposed use		Residential Development with associated access,
		infrastructure, public open space and landscaping.
Housing	Approx. no of units	25
	Proposed mix of house	Number of:
	types	Detached:
		Semi-detached: Details at Q19
		Flats:
		Terrace:
		Other (e.g. Bungalows):
		Number of:
		I bedroom homes:
		• 2 bedroom homes: Details at Q19
		3 bedroom homes:
		4 or more bedroom homes:
	Tenure	Private and Affordable Housing
	(Delete as appropriate)	
	Affordable housing	25% or such other proportion as agreed in
	proportion	accordance with Planning Policy requirements at
		the time of development.
Employment	Business and offices	N/A
	General industrial	N/A
	Storage and distribution	N/A
	Do you have a specific	N/A
	occupier for the site?	
Other	Proposed use (please	N/A
	specify) and floor space	
	Do you have a specific	N/A
occupier for the site?		
Is the area of each proposed use noted in		N/A
the OS site plan?		

### 9. Delivery Timescales

We expect to adopt the new LDP in 2021.	0-5 years	✓
How many years after this date would you	6-10 years	,
expect development to begin? (please tick)	10+ years	
When would you expect the development	0-5 years	✓
to be finished? (please tick)	6-10 years	
	+ 10years	
Have discussions taken place with	No	1
financiers? Will funding be in place to cover	Funding is available to a	llow development of
all the costs of development within these	the site following alloca	tion and grant of the
timescales	necessary consents.	_
Are there any other risk or threats (other	No	
than finance) to you delivering your		
proposed development	If yes, please give details	
proposed development	might overcome them:	N/A

10. Natural Heritage		
Is the site located in or within 500m of a	RAMSAR Site	No
nature conservation site, or affect a	Special Area of Conservation	No
protected species?	Special Protection Area	No
	Priority habitat (Annex 1)	No
Please tick any that apply and provide	European Protected Species	No
details.	Other protected species	No
	Site of Special Scientific Interest	No
You can find details of these designations at:	National Nature Reserve	No
<ul> <li>https://www.environment.gov.scot/</li> </ul>	Ancient Woodland	No
EU priority habitats at	Trees, hedgerows and woodland	No
http://gateway.snh.gov.uk/sitelink/index	(including trees with a Tree	
<u>.jsp</u>	Preservation Order)	
UK or Local priority habitats at	Priority habitat (UK or Local	No
http://www.biodiversityscotland.gov.uk/a	Biodiversity Action Plan)	
dvice-and-resources/habitat-	Local Nature Conservation Site	No
definitions/priority/)	Local Nature Reserve	No
<ul> <li>Local Nature Conservation Sites in the</li> </ul>	If yes, please give details of how you p	lan to
LDP's Supplementary Guidance No. 5 at	mitigate the impact of the proposed	
www.aberdeenshire.gov.uk/ldp	development: N/A	
Biodiversity enhancement		
Please state what benefits for biodiversity	Rostoration of habitate	
	Restoration of habitats	_
this proposal will bring (as per paragraph	Habitat creation in public open space	✓
194 in Scottish Planning Policy),	Habitat creation in public open space Avoids fragmentation or isolation of	✓
194 in Scottish Planning Policy), http://www.gov.scot/Resource/0045/004538	Habitat creation in public open space Avoids fragmentation or isolation of habitats	,
194 in Scottish Planning Policy), http://www.gov.scot/Resource/0045/004538 27.pdf) by ticking all that apply. Please	Habitat creation in public open space Avoids fragmentation or isolation of habitats Provides bird/bat/insect boxes/Swift	<b>√</b>
194 in Scottish Planning Policy), http://www.gov.scot/Resource/0045/004538	Habitat creation in public open space Avoids fragmentation or isolation of habitats Provides bird/bat/insect boxes/Swift bricks (internal or external)	<b>✓</b>
194 in Scottish Planning Policy), <a href="http://www.gov.scot/Resource/0045/004538">http://www.gov.scot/Resource/0045/004538</a> <a href="http://www.gov.scot/Resource/0045/004538">27.pdf</a> ) by ticking all that apply. Please provide details.	Habitat creation in public open space Avoids fragmentation or isolation of habitats Provides bird/bat/insect boxes/Swift bricks (internal or external) Native tree planting	✓ ✓
194 in Scottish Planning Policy), http://www.gov.scot/Resource/0045/004538 27.pdf) by ticking all that apply. Please provide details.  See Planning Advice 5/2015 on	Habitat creation in public open space Avoids fragmentation or isolation of habitats Provides bird/bat/insect boxes/Swift bricks (internal or external) Native tree planting Drystone wall	<b>✓</b>
194 in Scottish Planning Policy), http://www.gov.scot/Resource/0045/004538 27.pdf) by ticking all that apply. Please provide details.  See Planning Advice 5/2015 on Opportunities for biodiversity enhancement	Habitat creation in public open space Avoids fragmentation or isolation of habitats Provides bird/bat/insect boxes/Swift bricks (internal or external) Native tree planting Drystone wall Living roofs	✓ ✓
194 in Scottish Planning Policy), http://www.gov.scot/Resource/0045/004538 27.pdf) by ticking all that apply. Please provide details.  See Planning Advice 5/2015 on Opportunities for biodiversity enhancement at:	Habitat creation in public open space Avoids fragmentation or isolation of habitats Provides bird/bat/insect boxes/Swift bricks (internal or external) Native tree planting Drystone wall	✓ ✓
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194 in Scottish Planning Policy), http://www.gov.scot/Resource/0045/004538 27.pdf) by ticking all that apply. Please provide details.  See Planning Advice 5/2015 on Opportunities for biodiversity enhancement at: www.aberdeenshire.gov.uk/media/19598/20 15_05-opportunities-for-biodiversty- enhancement-in-new-development.pdf	Habitat creation in public open space Avoids fragmentation or isolation of habitats Provides bird/bat/insect boxes/Swift bricks (internal or external) Native tree planting Drystone wall Living roofs Ponds and soakaways Habitat walls/fences Wildflowers in verges	✓ ✓ ✓
194 in Scottish Planning Policy), http://www.gov.scot/Resource/0045/004538 27.pdf) by ticking all that apply. Please provide details.  See Planning Advice 5/2015 on Opportunities for biodiversity enhancement at: www.aberdeenshire.gov.uk/media/19598/20 15_05-opportunities-for-biodiversty- enhancement-in-new-development.pdf  Advice is also available from Scottish	Habitat creation in public open space Avoids fragmentation or isolation of habitats Provides bird/bat/insect boxes/Swift bricks (internal or external) Native tree planting Drystone wall Living roofs Ponds and soakaways Habitat walls/fences Wildflowers in verges Use of nectar rich plant species	✓ ✓ ✓
194 in Scottish Planning Policy), http://www.gov.scot/Resource/0045/004538 27.pdf) by ticking all that apply. Please provide details.  See Planning Advice 5/2015 on Opportunities for biodiversity enhancement at: www.aberdeenshire.gov.uk/media/19598/20 15_05-opportunities-for-biodiversty- enhancement-in-new-development.pdf  Advice is also available from Scottish Natural Heritage at:	Habitat creation in public open space Avoids fragmentation or isolation of habitats Provides bird/bat/insect boxes/Swift bricks (internal or external) Native tree planting Drystone wall Living roofs Ponds and soakaways Habitat walls/fences Wildflowers in verges Use of nectar rich plant species Buffer strips along watercourses	✓ ✓ ✓
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194 in Scottish Planning Policy), http://www.gov.scot/Resource/0045/004538 27.pdf) by ticking all that apply. Please provide details.  See Planning Advice 5/2015 on Opportunities for biodiversity enhancement at: www.aberdeenshire.gov.uk/media/19598/20 15_05-opportunities-for-biodiversty- enhancement-in-new-development.pdf  Advice is also available from Scottish Natural Heritage at: https://www.snh.scot/professional- advice/planning-and-development/natural-	Habitat creation in public open space Avoids fragmentation or isolation of habitats Provides bird/bat/insect boxes/Swift bricks (internal or external) Native tree planting Drystone wall Living roofs Ponds and soakaways Habitat walls/fences Wildflowers in verges Use of nectar rich plant species Buffer strips along watercourses Show home demonstration area	✓ ✓ ✓ ✓ ✓
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194 in Scottish Planning Policy), http://www.gov.scot/Resource/0045/004538 27.pdf) by ticking all that apply. Please provide details.  See Planning Advice 5/2015 on Opportunities for biodiversity enhancement at: www.aberdeenshire.gov.uk/media/19598/20 15_05-opportunities-for-biodiversty- enhancement-in-new-development.pdf  Advice is also available from Scottish Natural Heritage at: https://www.snh.scot/professional- advice/planning-and-development/natural-	Habitat creation in public open space Avoids fragmentation or isolation of habitats Provides bird/bat/insect boxes/Swift bricks (internal or external) Native tree planting Drystone wall Living roofs Ponds and soakaways Habitat walls/fences Wildflowers in verges Use of nectar rich plant species Buffer strips along watercourses Show home demonstration area Other (please state):  If yes, please provide details: Please se	✓ ✓ ✓ ✓ ✓

#### II. Historic environment

Historic environment enhancement		
Please state if there will be benefits for the	Yes	
historic environment.	If yes, please give details: Development of this	
	site will negate the need to develop sites which	
	may impact on the historic environment.	
Does the site contain/is within/can affect any	Scheduled Monument or their	No
of the following historic environment assets?	setting	
Please tick any that apply and provide	Locally important archaeological site	No
details.	held on the Sites and Monuments	
You can find details of these designations at:	Record	
http://historicscotland.maps.arcgis.com/a	Listed Building and/or their setting	No
pps/Viewer/index.html?appid=18d2608ac	Conservation Area (e.g. will it result	No
<u>1284066ba3927312710d16d</u>	in the demolition of any buildings)	
• <a href="http://portal.historicenvironment.scot/">http://portal.historicenvironment.scot/</a>	Inventory Gardens and Designed	No
<ul> <li>https://online.aberdeenshire.gov.uk/smrp</li> </ul>	Landscapes	
ub/master/default.aspx?Authority=Aberd	Inventory Historic Battlefields	No
<u>eenshire</u>	If yes, please give details of how you plan to	
	mitigate the impact of the proposed	
	development: N/A.	

12. Landscape Impact

12. Landscape Impact	
Is the site within a Special Landscape Area	No
(SLA)?	If yes, please state which SLA your site is located
(You can find details in Supplementary	within and provide details of how you plan to
Guidance 9 at	mitigate the impact of the proposed
www.aberdeenshire.gov.uk/ldp)	development: N/A
	·
SLAs include the consideration of landscape	If your site is not within an SLA, please use
character elements/features. The	this space to describe the effects of the site's
characteristics of landscapes are defined in	scale, location or design on key natural landscape
the Landscape Character Assessments	elements/features, historic features or the
produced by Scottish Natural Heritage (see	composition or quality of the landscape
below) or have been identified as Special	character:
Landscape Areas of local importance.	
SNH: Landscape Character Assessments	Please see details at Q19.
https://www.snh.scot/professional-	
advice/landscape-change/landscape-	
<u>character-assessment</u>	
SNH (1996) Cairngorms landscape	
assessment	
http://www.snh.org.uk/pdfs/publications/	
review/075.pdf	
SNH (1997) National programme of	
landscape character assessment: Banff	
and Buchan	
http://www.snh.org.uk/pdfs/publications/	
review/037.pdf	
SNH (1998) South and Central	
Aberdeenshire landscape character	
assessment	

http://www.snh.org.uk/pdfs/publications/	
review/102.pdf	

#### 13. Flood Risk

Is any part of the site identified as being at	Yes
risk of river or surface water flooding within	If yes, please specify and explain how you intend
SEPA flood maps, and/or has any part of the	to mitigate this risk: A low lying area adjacent
site previously flooded?	to the north east of the site may be at risk of
	flooding. This area will form landscaped open
(You can view the SEPA flood maps at	space with development occupying the higher
http://map.sepa.org.uk/floodmap/map.htm)	ground to the south. Please see details at Q19.
Could development on the site result in	No
additional flood risk elsewhere?	If yes, please specify and explain how you intend
	to mitigate or avoid this risk: N/A
Could development of the site help alleviate	No
any existing flooding problems in the area?	If yes, please provide details: N/A

#### 14. Infrastructure

11. Illiasti decare		
a. Water / Drainage		
Is there water/waste water capacity for the	Water	Yes
proposed development (based on Scottish		
Water asset capacity search tool		
http://www.scottishwater.co.uk/business/Conn	Waste water	Yes
ections/Connecting-your-property/Asset-		
Capacity-Search)?		
Has contact been made with Scottish Water?	No	1
	If yes, please give details of outcome: N/A	
Will your SUDS scheme include rain gardens?	Yes	
http://www.centralscotlandgreennetwork.org/c	Please specify: Depende	ent on topography and
ampaigns/greener-gardens	ground conditions.	
b. Education – housing proposals only		
Education capacity/constraints	Capacity will be available at 2022. Please see	
https://www.aberdeenshire.gov.uk/schools/pare		
nts-carers/school-info/school-roll-forecasts/	-	
Has contact been made with the Local	No	
Authority's Education Department?	If yes, please give details of outcome: N/A	
c. Transport		
If direct access is required onto a Trunk Road	N/A	
(A90 and A96), or the proposal will impact on		
traffic on a Trunk Road, has contact been		
made with Transport Scotland?		
Has contact been made with the Local	No	
Authority's Transportation Service?	If yes, please give details of outcome: N/A	
They can be contacted at		
transportation.consultation@aberdeenshire.go		
<u>v.uk</u>		
Public transport	Please provide details o	of how the site is or
	could be served by pub	lic transport: Available
	on B9119. Please see d	etails at Q19.

Active travel	Please provide details of how the site can or
	could be accessed by walking and cycling:
(i.e. internal connectivity and links externally)	Development would connect with existing
	path network. Please see details at Q19.
d. Gas/Electricity/Heat/Broadband	paul lietwork. Flease see details at Q17.
Has contact been made with the relevant	Gas: The village is not served by mains gas.
utilities providers?	If yes, please give details of outcome(s): N/A.
dullides providers:	Electricity: No
	If yes, please give details of outcome(s):
	Network connection available.
	Heat: No
	If yes, please give details of outcome(s): N/A
	in yes, piease give details of outcome(s). 14/7
	Broadband: No
	If yes, please give details of outcome(s):
	Network connection available.
Have any feasibility studies been undertaken to	No
understand and inform capacity issues?	Please specify: N/A
	,
Is there capacity within the existing network(s)	Yes
and a viable connection to the network(s)?	Please specify: Utilities are available adjacent
( )	to the site and there is no constraint to
	development.
Will renewable energy be installed and used on	Appropriate technologies available at the time
the site?	will be used to deliver reduced energy
For example, heat pump (air, ground or	consumption and heat generation.
water), biomass, hydro, solar (photovoltaic	
(electricity) or thermal), or a wind turbine	
(freestanding/integrated into the building)	
e. Public open space	
Will the site provide the opportunity to	Yes
enhance the green network? (These are	Please specify: Landscaped open space will be
the linked areas of open space in settlements,	provided and will link with play areas and
which can be enhanced through amalgamating	public open space within the existing
existing green networks or providing onsite	development as well as to the public park on
green infrastructure)	the south side of the B9119. Please see further
V 6 1.1 1 1 6 1 1	details at Q19.
You can find the boundary of existing green	
networks in the settlement profiles in the LDP	V
Will the site meet the open space standards, as	Yes
set out in Appendix 2 in the Aberdeenshire	Please specify: Open space provision, and the
Parks and Open Spaces Strategy? <a href="https://www.aberdeenshire.gov.uk/media/6077/">https://www.aberdeenshire.gov.uk/media/6077/</a>	nature of that provision, will be in accordance
approvedpandospacesstrategy.pdf	with the standards set by Aberdeenshire Council. Please see further details at Q19.
Will the site deliver any of the shortfalls	Not applicable
identified in the <b>Open Space Audit</b> for	Please specify: The development will increase
specific settlements?	the range of open space available within the
https://www.aberdeenshire.gov.uk/communities	village. The Audit notes that there are no
-and-events/parks-and-open-spaces/open-	obvious deficiencies within the village. Please
space-strategy-audit/	see further details at Q19.
space strategy addition	see for their details at Q17.

f. Resource use	
Will the site re-use existing structure(s) or	Yes
recycle or recover existing on-site	If yes, please specify: Existing top soil and sub
materials/resources?	soils will be re-used as appropriate within the
	site.
Will the site have a direct impact on the water	No
environment and result in the need for	If yes, please provide details: NA
watercourse crossings, large scale abstraction	
and/or culverting of a watercourse?	

**15. Other potential constraints**Please identify whether the site is affected by any of the following potential constraints:

6 P. 100	
Aberdeen Green Belt	No
https://www.aberdeenshire.gov.uk/media/20555/appendix-3-	
boundaries-of-the-greenbelt.pdf	
Carbon-rich soils and peatland	No
http://www.snh.gov.uk/planning-and-development/advice-for-	
planners-and-developers/soils-and-development/cpp/	
Coastal Zone	No
https://www.aberdeenshire.gov.uk/media/20176/4-the-coastal-	
zone.pdf	
Contaminated land	No
Ground instability	No
Hazardous site/HSE exclusion zone	No
(You can find the boundary of these zones in Planning Advice 1/2017	
Pipeline and Hazardous Development Consultation Zones at	
https://www.aberdeenshire.gov.uk/planning/plans-and-	
policies/planning-advice/ and advice at	
http://www.hse.gov.uk/landuseplanning/developers.htm)	
Minerals – safeguarded or area of search	No
https://www.aberdeenshire.gov.uk/ldpmedia/6_Area_of_search_and	
<u>safeguard_for_minerals.pdf</u>	
Overhead lines or underground cables	No
Physical access into the site due to topography or geography	No
Prime agricultural land (grades 1, 2 and 3.1) on all or part of the site.	No
http://map.environment.gov.scot/Soil_maps/?layer=6	
'Protected' open space in the LDP (i.e. P sites)	No.
www.aberdeenshire.gov.uk/ldp and choose from Appendix 8a to 8f	
Rights of way/core paths/recreation uses	No
Topography (e.g. steep slopes)	No
Other	No
If you have identified any of the potential constraints above, please use	this space to identify how
you will mitigate this in order to achieve a viable development: N/A	•

16. Proximity to facilities

10. I Toximity to facilitie		
How close is the site to	Local shops	
a range of facilities?		<400m
	Community facilities (e.g. school, public hall)	<400m
	Sports facilities (e.g. playing fields	<400m
	Employment areas	<400m
	Residential areas	<400m
	Bus stop or bus route	<400m
	Train station	>lkm
	Other, e.g. dentist, pub (please specify)	<400m (Post Office and Restaurant/Pub)

17. Community engagement

Has the local community been given the	Not yet
opportunity to influence/partake in the design	
and specification of the development proposal?	If yes, please specify the way it was carried out
	and how it influenced your proposals: N/A
	, , ,
	If not yet, please detail how you will do so in
	the future: Public Exhibition and Meetings with
	Community Council.

18. Residual value and deliverability								
Please confirm that you have considered the	I have considered the likely 'residual value' of							
'residual value' of your site and you are	the site, as described above, and fully expect							
confident that the site is viable when	the site to be viable:							
infrastructure and all other costs, such as								
constraints and mitigation are taken into	Please tick: ✓							
account.								
If you have any further information to help demonstrate provide details.  Cabardunn Development Company Limited, hav landowners are confident that there is residual v provision of the necessary infrastructure.	ing taken an option on the land, and the							

#### 19. Other information

Please provide any other information that you would like us to consider in support of your proposed development (please include details of any up-to-date supporting studies that have been undertaken and attach copies e.g. Transport Appraisal, Flood Risk Assessment, Drainage Impact Assessment, Peat/Soil Survey, Habitat/Biodiversity Assessment etc.)

#### FURTHER DETAILS IN RESPONSE TO SPECIFIC QUESTIONS RAISED IN THE BID FORM

#### Introduction

This Development Bid is submitted in response to a call for sites by Aberdeenshire Council to be considered for inclusion within the Aberdeenshire Local Development Plan 2021. The land which is the subject of this Development Bid is owned by (Dunecht Estates) and is under option to Cabardunn Development Company Limited.

Dunecht Estates are a major landowner in the North East of Scotland with in excess of 50,000 acres of land and associated properties. Their main interests are in farming and forestry, but they are also a major provider of affordable rented housing in the Aberdeen and Aberdeenshire Housing Market Areas. They have also released land for residential development and seek to work with communities to ensure that development is sympathetically designed, sustainable, integrated with existing settlements and provides a lasting benefit for those communities.

The land is under option to Cabardunn Development Company Limited, a development company established by the Estate to promote and develop land for residential, business, and commercial uses.

The detail contained herein requires to be read in conjunction with the above responses. It expands, where necessary, on the response to each of the questions set out above, specifically where further detail is sought. An indicative Masterplan has also been prepared to accompany the Bid and requires to be referred to in conjunction with this and the Response Form.

#### Q4. Site Details

The land proposed for development lies to the north east of the village immediately abutting the existing settlement boundary formed by the recent development. Extending to approximately 3.0 hectares or thereby, it comprises the balance of a field parcel leftover from previous development. The site is capable of being accessed from those earlier developments.

In topographic terms the site is relatively flat with the land to the north beyond the site boundary rising gradually to provide a backdrop to the settlement. The west and southern boundaries of the site are formed by existing residential development whilst to the north and east the boundaries are formed by post and wire fences with agricultural land beyond. A recognised core path runs along the northern boundary providing a circular walk from the village. A drainage ditch also runs along that boundary to a low point in the north east corner of the field parcel. There are no trees within or adjoining the site and only limited vegetation along the side of the ditch.

The full extent of the site is highlighted on the Ordnance survey map attached at Appendix 1. An indicative layout, attached at Appendix 2, provides further detail.

#### Q5. Ownership/Market Interest

The site is owned by Dunecht Estates and is under option to Cabardunn Development Company Limited.

#### Q6. Legal Issues

Cabardunn Development Company Limited and Dunecht Estates confirm that there are no 'ransoms' which would restrict access to the development. A right of access has been retained through the adjoining residential developments which were acquired from Dunecht Estates and completed by Cabardunn Development Company Ltd confirm that there are no other legal impediments to the development of the site.

#### Q7. Planning History

The Aberdeenshire Local Plan 2006 identified the land immediately to the south, between the site boundary and the B9119, for the development of 25 houses in the period 2006-2010. That Plan also identified the current site and the land to the west as a potential future housing site for development in the period 2011-2016.

Following a call for sites by Aberdeenshire Council to be considered for inclusion in their 2012 Local Development Plan, Cabardunn Development Company Ltd submitted a Development Bid in November 2008. That Bid comprised the current site and the land to the west which has recently been developed.

The Main Issues Report (MIR), published in May 2009, identified the land under reference G51 and acknowledged that there were opportunities in Echt to accommodate small scale development that enhances the features of the village. Acknowledging the need to sustain local services and the primary school, part of the site lying to the west, and now developed, was identified as an Officer's preference for development. That site was allocated as Site H1 in the 2012 Local Development Plan for up to 25 houses to be developed in the period 2007-2016. That development has now been completed by

A further Bid for the balance of the site was submitted in respect of the 2017 LDP process. That Bid, for the same area as currently proposed, sought its allocation for 25 houses to allow for substantial areas of open space, strategic landscaping and land for infrastructure provision. The Main Issues Report (MIR) identified the site under Reference Ga031 and identified it as an Officer's preference for development. The MIR considered the site to be "...well located and would support local services including the primary school, which is projected to be significantly under capacity. Access would be taken through Site H1 and EH1 and development would provide a logical extension of these developments. This proposal could also take advantage of existing infrastructure delivered as part of earlier phases of development on site H1 and EH1. Extending development to the eastern field boundary would also provide a more defensible settlement boundary in this location. Although the waste water treatment works has insufficient capacity to accommodate the development, it is understood that Scottish Water are currently upgrading it". Unfortunately, Aberdeenshire Council were not in a position to allocate the site as there were considered to be sufficient effective development sites within the Aberdeen Housing Market Area to accommodate future needs for residential development. At the Examination in Public into the Plan the Reporter accepted this and consequently this site was not allocated for development through the 2017 LDP.

#### Q8. Proposed Use

The site is proposed for residential development comprising mainstream and affordable housing. The accompanying indicative layout highlights the site capable of accommodating around 25 houses with associated public open space and extensive areas of landscaping. It is anticipated that 25% will be provided as affordable housing in accordance with Planning Policy.

The development will comprise a mix of detached, semi-detached and terraced properties ranging from 2-4 bedrooms and will reflect the character of the adjoining residential developments. Exact details of the mix can only be provided at the planning application stage having regard to prevailing market conditions and demand at that time.

#### Q9. Delivery Timescales

Given the availability of infrastructure and experience of recent developments in Echt, it is anticipated that development would commence in the first 5 year period of the LDP and be built out in that first 5 year period.

#### Q10. Natural Heritage

The site is not affected by any natural heritage or nature conservation interests.

The site has most recently been in arable agricultural use and development provides an opportunity for bio-diversity enhancement. A small area to the north east of the site is at minor risk of flooding and will be planted by Dunecht Estates to form a natural amenity area enhancing the more formal open space provided as part of the development.

Taken together, extensive areas of open space and landscaping would be provided as part of the development to integrate with that provided in the adjoining residential developments. It would also provide connectivity with the core path which presently runs along the northern boundary of the site and provides a circular walk from the village. The indicative layout demonstrates the means by which this can be achieved.

#### Q11. Historic Environment

There are no Listed buildings or Scheduled Monuments within the site.

A number of buildings within the historical village core are Listed. However, given the recently completed intervening residential development, development of the proposal site will have no adverse impact on the setting of those buildings.

#### Q12. Landscape Impact

Due to the relatively flat topography of the site it is well contained within the wider landscape and not visible from distant views. It will be viewed locally from the B9119 and the B977 but, in the context of the existing residential developments to the west and south. It provides an opportunity to create landscape buffers to define the long term settlement boundaries to the east and north.

Public open space and extensive areas of landscaping will provide a focal point for development and footpaths would link with the existing core path to the north of the site. The north east corner of the site is low lying with the potential to create a wetland habitat feature associated with planting of native tree species, thereby enhancing the bio-diversity of the area.

The design of the proposed development envisages properties set around a traditional village square. The houses themselves would be expected to reflect the traditional character of housing in the area and the local vernacular. Dunecht Estates impose significant design control on development on their land and this is evident from the recent Forbes Park development to the south and west and also from the Tillybrig development in nearby Dunecht.

#### Q13. Flood Risk

SEPA's indicative River and Coastal Flood Map indicates that only a very small part of the site is at risk of flooding. The site drains naturally to this low point at the north eastern corner of the site adjoining an existing drainage ditch. This area would be kept free of development and utilised to provide landscaping and wetland habitat.

Any planning application for the development of the site will be supported by a Flood Risk Assessment in order to determine the extent of any areas of the site at risk of flooding and demonstrate that the area to be developed will not be at risk of flooding, nor create risk elsewhere.

#### Q14. Infrastructure

Adequate water supplies are available to serve the proposed development. The existing waste water treatment plant to the south east of the village has been upgraded to accommodate the recent residential developments to the south and west and is understood to have sufficient capacity to accommodate the scale of development proposed.

Provision will be made for sustainable urban drainage systems within the overall development. This will connect to the existing attenuation pond and soakaway provided for the earlier phases of development and designed to accommodate additional capacity. Consideration will also be given to the use of rain gardens depending upon the layout and orientation of gardens, as well as ground conditions.

Echt Primary School has capacity for up to 47 pupils. The 2017 school roll forecasts indicates it has a present school roll of 31 pupils. The forecasts show this to increase gradually to 42 pupils by 2022. This increase is likely to be as a consequence of the recent residential developments to the south and west. As pupils from those developments progress through the school the roll is likely to fall, thereby ensuring there is sufficient capacity to accommodate the development post-2022. Secondary education is provided at Alford Academy, which is shown to be slightly over capacity at 2022. Any constraints in primary or secondary education can be addressed by developer contributions.

Vehicular access to the site can be taken from the existing residential developments to the south and west where adequate capacity exists in the road network to serve the scale of development proposed. Public transport is available on the B9119 providing linkages to Aberdeen and the surrounding area. The nearest bus stop is approximately 100m from the boundary of the site.

No mains gas services are available within the village. Electricity and broadband connections are available and it is understood that adequate capacity is available to provide connections. Whilst it is not the intention to install site-wide renewable energy, appropriate technologies available at the time will be used to deliver reduced energy consumption and heat generation to individual properties.

Aberdeenshire Council's Open Space Audit notes that there are no obvious deficiencies within the village. Notwithstanding, generous provision will be made within the development for open space. This will connect with that of the adjoining developments and also with the core path running along the northern boundary of the site. It will also provide for safe routes to the primary school and Echt Play Park lying to the south of the B9119.

#### Q15. Other Potential Constraints

There are no other potential constraints to the development of the site.

#### Q16. Proximity to Facilities

Echt enjoys a range of facilities and services, as acknowledged previously by Aberdeenshire Council. It currently benefits from a primary school, shop, village hall, church, restaurant, and public house. It is also well served by regular public transport services to Aberdeen and Alford along the B9119.

The village is also well served by open space provision and a footpath network. Development of the site will enable the provision of additional areas of public open space and connectivity to the circular footpath network serving the village.

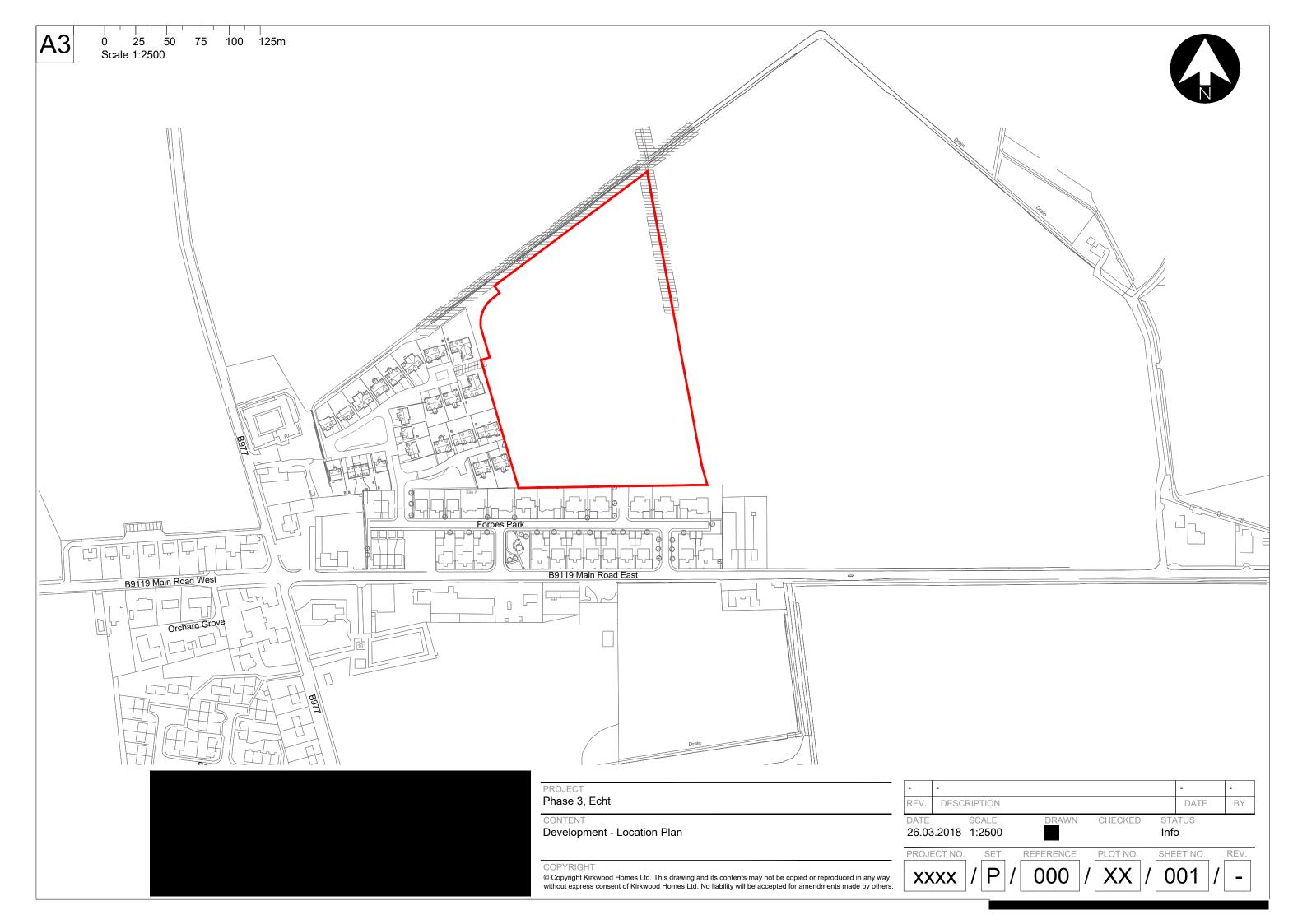
#### Q17. Community Engagement

To date, there has been no community engagement held in relation to this Bid. Both Dunecht Estates and Cabardunn Limited recognise the importance and benefits that can be gained from public engagement and are committed to undertaking public consultation in respect of the development proposals.

Should the site be preferred for development through the Main Issues Report, Cabardunn would intend to meet with the Community Council to explain their proposals and to hold a Public Consultation Event. This would be held in the village hall and take the form of an exhibition of the indicative proposals. This would allow the public to make informed comment at the Main Issues Report stage and prior to publication of the proposed Plan.
Please tick to confirm your agreement to the following statement:

By completing this form I agree that Aberdeenshire Council can use the information provided in this form for the purposes of identifying possible land for allocation in the next Local Development Plan. I also agree that the information provided, other than contact details and information that is deemed commercially sensitive (questions I to 3), can be made available to the public.

## Appendix 1



## Appendix 2

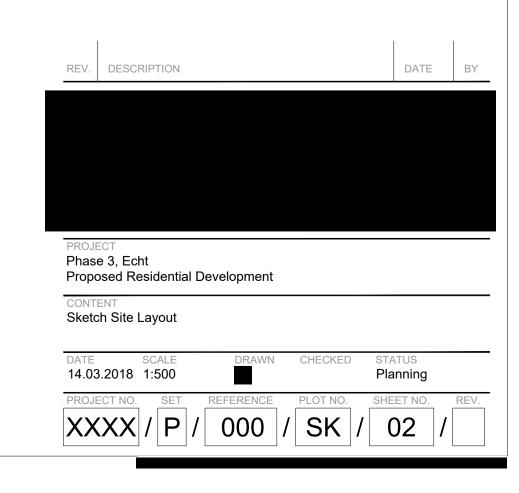
Site A

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NOTES

Unit Reference			Unit Type	Plo			Total floor area				
		Unit Name		LH	RH	Bedrooms	Min Parking Spaces	No. of storeys	Total No.	m²	sq. ft
	91	Low Cost	Semi-Detached	20, 22, 24	21, 23	3	2	1.75	5	455	4,898
	102	Low Cost	Semi-Detached	25	-	3	2	1.75	1	102	1,098
	118	Craig	Detached house	17	5, 13, 16, 18	3	2	1.5	5	590	6,351
	136	Birse	Detached house	19	1	3	2	1.75	2	272	2,928
	148	Carnie	Detached house	11, 12	2	4	3	1.75	3	444	4,779
	160	Crovie	Detached house	3, 15	4, 10	4	3	1.5	4	640	6,889
	191	Marr	Detached house	9, 14	7	4	3	1.5	3	573	6,168
	217	Strathdon	Detached house	8	-	5	3	1.5	1	217	2,336
	220	Drumallan	Detached house	6	-	5	3	1.5	1	220	2,368
		1				-		Total	25	3,513	37,814



# APPENDIX 2 MIR Representation

For internal use only



## Aberdeenshire Local Development Plan 2021: Main Issues Report 2019 Main Issues Report Response Form

#### Important Information: Please Read

The Main Issues Report (MIR) is a key stage in preparing the Aberdeenshire Local Development Plan 2021 (LDP 2021). The MIR sets out options for how the LDP 2021 could be improved both in terms of the policies that Aberdeenshire Council will use to determine planning applications as well as identifying land allocations for development. The MIR has been published along with a Monitoring Report and Interim Environmental Report of the Strategic Environmental Assessment. These, along with other supporting documents are available at: <a href="https://www.aberdeenshire.gov.uk/planning/plans-and-policies/ldp-2021/main-issues-report/">https://www.aberdeenshire.gov.uk/planning/plans-and-policies/ldp-2021/main-issues-report/</a>.

Comments are sought on the MIR and Interim Environmental Report, or indeed any other matter that you feel that we need to consider, by 5pm on Monday, 8 April 2019. Responses can be emailed to us at <a href="mailto:ldp@aberdeenshire.gov.uk">ldp@aberdeenshire.gov.uk</a> or received via post, <a href="Polanning Policy Team">Planning Policy Team</a>, <a href="mailto:lnfrastructure">Infrastructure</a> Services, Aberdeenshire Council, Woodhill House, Westburn Road, Aberdeen, AB16 5GB.

Please note that in order for comments to be considered as valid you must include your contact details.

We will use these details to confirm receipt of your comments and to seek clarification or request further information as required. Should you have any concerns regarding the holding of such information please contact <a href="mailto:ldp@aberdeenshire.gov.uk">ldp@aberdeenshire.gov.uk</a>. Anonymous comments will not be considered as part of the consultation process. Petitions will only be noted in the name of the person submitting the document.

All comments received will be carefully assessed and will be used to inform the preparation of the Proposed Aberdeenshire Local Development Plan. There will be a further opportunity to comment on the Proposed Plan when it is published in December 2019.

Name	
Organisation (optional)	Ryden LLP
On behalf of (if relevant)	Cabardunn Development Company Limited and Dunecht Estates
Address	
Postcode	
Telephone (optional)	
E-mail (optional)	



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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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<ul> <li>Data Protection Officer, Aberdeenshire Council, Business Services, Town House, 34 Low Street, Banff, AB45 1AY</li> </ul>
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Which	Main Issues Report	✓
document(s) are you	Draft Proposed Aberdeenshire Local Development Plan	<b>✓</b>
commetning	Strategic Environmental Assessment Interim Environmental Assessment	
on?	Other	

#### Your comments

Representations to the Main Issues Report on behalf of Cabardunn Development Company Limited and Dunecht Estates in relation to Site Ref; GR092, North of Forbes Park, Echt.

On behalf of Cabardunn Development Company Limited and (Dunecht Estates) objection is taken to the failure of the Main Issues Report (MIR) to identify Site Reference GR092 North of Forbes Park, Echt as a preferred option for residential development in the proposed Local Development Plan (LDP) 2021. This representation requires to be considered in the context of the Development Bid submitted at the pre-MIR stage. It should also be considered in conjunction with the Development Bid and representation submitted in respect of Site GR093, which is identified to the south east of Echt and preferred through the MIR for development in the first Plan period.

Both sites are owned by Dunecht Estates and are under option to Cabardunn Development Company Limited. Site GR092, to which this representation relates, is not preferred for development through the MIR and it is the position of Cabardunn and Dunecht Estates that this site should be reserved for future development in the second period of the Plan following its mid-term review.

The MIR Site Assessment notes that the site is situated adjacent to the settlement boundary, is well related to recent housing, and is in close proximity to a range of services available within the village. Those same characteristics apply to the preferred site and the MIR conclusion notes that there is little to separate the merits of the Bid proposals in Echt. On this basis, there is a clear acceptance of the development potential of this site and as such, given the range of services and facilities in the village, including the primary school, shop, village hall, church, restaurant/pub and extensive recreation grounds, it would be logical and prudent to reserve it for future development to allow the continued growth of the village in the longer term. Indeed, the village benefits from more amenities than many larger settlements and it is important that these services and facilities are sustained through continued growth.

The recent development to the south, of which it would form a seamless extension, has proved extremely attractive to house buyers with the sites allocated through the 2006 Aberdeenshire Local Plan and the 2012 Local Development Plan now fully built out. As well as the range of services within the village, it lies within the Aberdeen Housing Market Area and is easily accessible to the main services, facilities, and places of employment at Aberdeen, Westhill, and Banchory. There are also regular public transport services available between the various locations. Echt is an example of a rural village which has benefitted greatly from residential development and the village has the capacity to accommodate further incremental growth, which will integrate closely with the village.

The site is well contained within the wider landscape being relatively flat in topographic terms and as such, is not visible from distant views. It will be viewed locally from the B9119 and the B977 but, in the context of the existing residential developments to the west and south. It also provides an opportunity to create landscape buffers to define the long term settlement boundaries to the east and north. The MIR Site Assessment highlights that an area of the bid site is identified as being at risk from flooding. This was acknowledged in the Development Bid. SEPA's indicative River & Coastal Flood Map indicates that only a very small part of the site is at risk of flooding. It drains naturally to a low point at the north eastern



corner of the site adjoining an existing drainage ditch. This area would be kept free of development and utilised to provide landscaping and wetland habitat as shown on the sketch layout which accompanied the Development Bid.

Any planning application for the development of the site will be supported by a Flood Risk Assessment in order to determine the extent of any areas of the site at risk of flooding and demonstrate that the area to be developed will not be at risk of flooding, nor create risk elsewhere.

The site was also promoted through the 2017 LDP process and favourably considered for development. Unfortunately, Aberdeenshire Council were not in a position to allocate the site at that time as there were considered to be sufficient effective development sites within the Aberdeen Housing Market Area to accommodate the strategic housing requirement. Nevertheless, the MIR considered the site to be "...well located and would support local services including the primary school, which is projected to be significantly under-capacity. Access would be taken through Site H1 and EH1 and development would provide a logical extension of those developments. This proposal could also take advantage of existing infrastructure delivered as part of earlier phases of development on Site H1 and EH1. Extending development to the eastern field boundary would also provide a more defensible settlement boundary in this location".

Echt Primary School has capacity for up to 47 pupils and the most recent (2018 based) school roll forecasts indicate that this will be exceeded post 2020 and will continue to grow through to 2023. It will begin to fall once pupils from the recent developments progress through the school thereby enabling the early allocation of site GR093, South East Echt with construction work commencing as the school roll falls.

Should it be necessary the school could be extended, through developer contributions, to accommodate that development and the subsequent release of this site through a mid-term review of the LDP. Whilst the school grounds are limited in size, the school backs onto Echt Recreation Ground. This would enable the extension of the school within the existing grounds and the use of part of the recreation ground as a play area for the school. This approach has been utilised successfully elsewhere in Aberdeenshire.

The site clearly has significant development potential and this has been recognised, both in the current MIR, and in the MIR relative to the LDP 2017. The village benefits from a much greater range of services and facilities than many larger settlements, which makes it an attractive location for house buyers. This is evident from the fact that earlier allocations have been completely built out. Accordingly, it is prudent to identify further land for development in order to sustain those services and facilities by allowing the continued growth of the village. As such, it is respectfully requested that this site be reserved in the Proposed Plan for future development following a mid-term review of the LDP.

## APPENDIX 3 2019 School Roll Forecasts Extract

School	Area	Capacity	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	Current % Capacity	% Capacity 2024
Aboyne Academy	Marr	750	707	691	705	719	722	686	652	613	572	537	92%	87%
Aboyne PS	Marr	342	301	313	313	296	286	287	285	290	269	262	92%	83%
Ballater	Marr	145	80	70	73	69	66	71	80	80	84	80	48%	55%
Braemar	Marr	50	30	31	35	38	41	44	43	40	40	35	62%	86%
Crathie	Marr	47	9	9	10	8	8	8	7	8	8	7	19%	16%
Finzean	Marr	71	51	45	38	35	32	28	26	27	26	26	63%	36%
Kincardine O'Neil	Marr	69	24	24	27	25	28	30	29	28	28	26	35%	42%
Logie Coldstone	Marr	47	19	19	16	16	14	15	13	11	13	11	40%	28%
Lumphanan	Marr	100	60	39	37	38	42	43	44	42	44	43	39%	44%
Tarland	Marr	155	87	90	91	88	73	68	64	60	61	55	58%	41%
Torphins	Marr	200	163	166	153	158	153	164	156	151	142	137	83%	78%
Alford Academy	Marr	700	655	680	699	712	718	714	677	627	569	543	97%	97%
Alford PS	Marr	372	328	333	350	370	365	366	369	371	363	338	90%	99%
Cluny	Garioch	96	90	81	76	82	79	74	78	76	72	70	84%	81%
Craigievar	Marr	47	29	33	27	29	26	23	23	22	21	20	70%	48%
Dunecht	Garioch	75	60	43	48	48	53	54	52	50	48	44	57%	70%
Echt	Garioch	47	34	38	41	49	50	57	59	61	63	61	81%	126%
Keig	Marr	50	28	25	19	15	13	11	11	11	10	9	50%	21%
Lumsden	Marr	50	12	12	11	10	9	10	11	13	15	15		22%
Midmar	Garioch	75	42	38	32	32	30	27	27	24	24	24	51%	36%
Monymusk	Marr	75	58	62	66	61	62	64	63	59	58	51	83%	84%
Strathdon	Marr	50	24	28	22	23	25	27	24	23	19	20	56%	47%
Tough	Marr	60	34	29	26	23	18	20	18	18	19	17	48%	30%
Towie	Marr	50	51	51	53	48	51	49	49	51	50	48	102%	99%
Tullynessle	Marr	50	21	15	15	12	13	14	13	14	15	15	30%	26%
Banchory Academy	Marr	900	817	813	855	858	874	902	896	879	846	807	90%	100%
Banchory PS	Marr	550	409	406	406	405	412	405	408	400	389	384	74%	74%
Crathes	Marr	50	34	39	38	43	49	51	55	59	59	58		109%
Drumoak	Kincardine & Mearns	155	119	124	129	140	125	128	126	119	116	109	80%	81%
Durris	Kincardine & Mearns	60	40	47	49	49	45	46	48	45	41	37	78%	79%
Hill of Banchory	Marr	434	377	376	359	347	348	352	350	346	327	314	87%	81%
Strachan	Marr	50	0	0	5	8	14	18	20	22	23	21	0%	40%