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LOCAL DEVELOPMENT PLAN

PUBLIC COMMENT

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Your information is:

Being collected by Aberdeenshire Council	X
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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.

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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).

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HALLIDAY FRASER MUNRO

CHARTERED ARCHITECTS & PLANNING CONSULTANTS

Please use this form to make comments on the Proposed Aberdeenshire Local Development Plan 2020.

If you are making comments about more than one topic it would be very helpful if you could fill in a separate response form for each issue you wish to raise.

Please refer to Aberdeenshire Council's Privacy Notice at the start of this form for details of your rights under the Data Protection Act.

Your Details

Date: **30/07/2020**

Name:	Halliday Fraser Munro
Telephone Number:	██████████
Email address:	██████████
Postal Address:	████████████████████
Postcode:	██████████

Are you happy to receive future correspondence only by email? Yes

Are you responding on behalf of another person? Yes

If yes who are you representing? **Drum Property Group**

Would you like to subscribe to the Aberdeenshire LDP eNewsletter: Yes

An acknowledgement will be sent to this address soon after the close of consultation.



HALLIDAY FRASER MUNRO

CHARTERED ARCHITECTS & PLANNING CONSULTANTS

Your Comments (no more than 2000 words)

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):

Appendix 7e – Kincardine and Mearns Settlement Statements

Modification Sought: *The Maryculter KN123 site is an obvious extension to a small rural settlement and should be allocated for the proposed use – 10 homes plus rural employment.*

Reason for change:

PLEASE SEE SUPPORTING STATEMENT

Attached document:

PLDP response report

Supporting Documents:

MC1 – Bid Document

MC2 – MIR Response



KN123 – Maryculter West (Altries) PLDP Response – July 2020

10 homes and employment land

Modifications you wish to see – The Maryculter KN123 site is an obvious extension to a small rural settlement and should be allocated for the proposed use – 10 homes plus rural employment.

Reasons for Change – See Below

1.Introduction

Halliday Fraser Munro lodged an LDP bid (**MC1**) for the above site on behalf of Drum Property Group and response to the Main Issues Report (**MC2**). The Main Issues Report response took on board comments related to the original bid and amended that slightly and it is that revised proposal that is being promoted through this response. This response summarises some of that information in relation to the Proposed LDP. We remain of the view that there are good reasons to include this site in the PLDP as an allocated site. It offers an opportunity for new sustainable rural lifestyles that are generally not available under the current proposed policy stance on housing. Rural settlements are central to Aberdeenshire’s character and a small extension to an existing settlement will help support and cement that character rather than detract from it as suggested.

The Covid pandemic has shown that it is possible to work from home and access services sustainably without the absolute need to travel.

The housing strategy adopted in the MIR has significant limitations. Not enough housing land has been identified to meet the area’s housing needs, it doesn’t include enough choice of location for new homes and is inconsistent in approach. Rural Aberdeenshire supports multiple small-scale settlements that are central to the area’s character and context and a key reason why people choose to live in the area. Small scale extensions to these settlements will help to maintain the region’s rural population as it ages and help maintain a mix of working age families as well as retired and older, usually smaller households. That mix will be important for the future of the region. A separate response on housing land has been lodged on behalf of Drum Property Group.

2.KN123 Site Specific Response

Detail on the various issues are contained in the MIR response (**MC2**). The site’s location in the Countryside is not a valid justification to discount the site. The vast majority of the land area in Aberdeenshire is Countryside and other bids have been supported within the countryside/Green Belt nearby. In many locations within Aberdeenshire the settlements are characterised by housing set within or against woodland. That relationship in the landscape helps to create high quality amenity, a positive environment and takes advantage of the shelter that woodland offers benefitting sustainability and energy efficiency. The bid document and MIR responses (**MC1 and MC2**) included a range of site analysis diagrams that illustrate how housing can be integrated with the existing settlement. Those include a landscape strategy showing that the existing woodland can be protected with additional landscape provided to help create defined settlement edges and landscape buffers to the development. The proposed housing would then only be seen through a woodland filter which is common within Aberdeenshire’s Countryside settlements.



Any new allocations anywhere will impact on the landscape, the larger the more impact there will be. The real tests are whether the landscape is particularly special or unique, whether the development would do any harm to that landscape and who would be experiencing that landscape impact. In this case the landscape is not unique or special and it is only the residents of the existing housing at Maryculter West and those travelling the B979 Netherley Road who might see this development. For residents the existing woodland would help screen the development and on a day to day basis will not impact on them unduly. The housing at Maryculter West is reasonably modern and the proposal is for a further extension of a similar scale. For those travelling on the B979 the road generally rises and undulates but views of the development would always only be a glimpsed peripheral view and contours of the intervening field and the road itself would generally hide the development from view. Structural woodland planting would effectively integrate the proposed development into the existing landscape so that any glimpsed views would be limited and be very similar in nature to the existing views. Landscape impact would therefore be minimal.

The proposal also includes the option for a small-scale rural business unit (suggested uses include stabling/tack and rural supplies/small farm shop/local rural business/office), designed to reflect vernacular steading buildings and offering opportunities for people to both live and work in the hamlet. The positioning of this building partially replicates the location of a historic vernacular steading building – Pepperhillock (see OS extract below).



Figure 1 – Extract 1843-1882 1st edition Ordnance Survey Plan



Figure 2 Updated Landscape Strategy Diagram – increased woodland planting to the south

The bid and MIR responses also demonstrated how the proposed development was simply a third development pocket of the same scale as this already developed reasonably recently in the settlement.



Figure 4 – Development Pockets (1 and 2 existing, 3 proposed)

Conceptually the proposal has been altered slightly from the original bid. As a general approach the third, and final, development pocket concept remains but the scale and format of the proposed development has been reviewed in light of the MIR comments. The now bid includes:

- Smaller housing units (including 25% affordable and options for self-build plots);
- Community growing space – potentially a community orchard, space for small-holdings;
- Plots that are large enough to support home offices/garden offices to support sustainable location neutral working practices i.e. less need to travel;
- Whole site digitally connected to support home working; and
- Local-scale rural business space

The site offers a small-scale, modern interpretation of rural sustainable living that is more affordable to the wider community than has previously been the case and is in close proximity to Aberdeen offering opportunities for longer distance sustainable travel options (rail and bus). This is not a remote site in the middle of nowhere. It sits in an area that offers rural lifestyle options, opportunities for space to work from home, easy access to services and supports the traditional settlement pattern in this part of Aberdeenshire.



Figure 5 – Revised Concept Diagram

This proposed extension should be considered as a continuation of the historic Planning Authority approach to new housing at Maryculter West. In previous Local Development Plan iterations the site has been identified as a defined Rural Service Centre with associated small pockets of allocated development land. These are now developed. The current proposal reflects that approach by identifying a further small and distinct parcel of land that could accommodate 10 new homes.

Maryculter West is centred around a traditional Primary School building that has only recently been closed as a result of the new and centralised primary school provision elsewhere. Historic maps show that Maryculter West Primary school has been located here since the 19th Century reflecting the rural and dispersed nature of Maryculter and the importance of this central location for education provision. Aberdeenshire’s rural areas are characterised by dispersed rural communities often centred around a single community or commercial facility. These locations are contextually and culturally important as they were traditionally chosen to reflect the surrounding dispersed rural settlements. They can be considered nodes or a focus for these rural communities and are often the very locations that these small hamlets and villages have grown around over the years.

The hamlet has grown organically in a phased manner characterised by small pockets of very large housing units. This proposal offers a different housing mix to increase diversity in the village, an opportunity for local services and affordable housing/self & custom build housing to meet local needs.

The proposed extension would not impact on the existing woodland which sits outside of the bid site. A buffer could be included and additional natural woodland planting would enhance the overall woodland cover and local woodland structure around the site. The sense of coherence and order of the wooded landscape would not be affected. If anything, it would be strengthened.



4. KN123 Site Specific - Access to Services

A rural location is not a justification to abandon rural communities and favour a fully centralised approach to development. Aberdeenshire’s residents want to live and work in small rural communities and with modern communication technology and it’s now easier than ever to make that a real and sustainable opportunity. 10 houses here would have a very limited impact on trips made by private car compared to larger allocations such as that at Chapelton (4,000 new homes). In considering impact the Council should take a proportionate approach and not rule out continued support of small rural communities just because of their location. This is especially true of smaller settlements within the Accessible Rural Area.

Most of Aberdeenshire Council’s area is included within the Accessible Rural classification i.e. within a 30-minute drive time from the centre of a settlement with a population of more than 10,000. Maryculter West is approximately within 15 minutes’ drive time of Aberdeen.

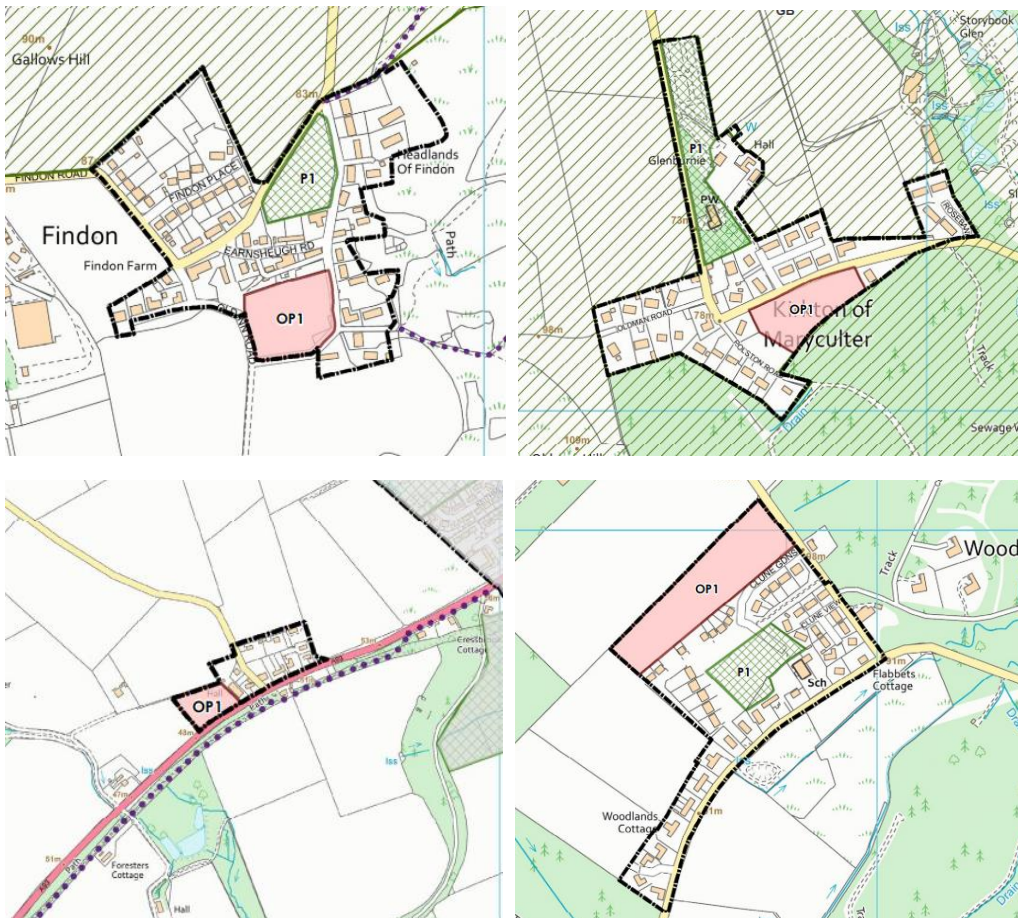
In Aberdeenshire the scale of accessible rural areas is significantly greater than the Scottish average at 35% compared to 11.2% and only comparable with island authorities of Nan Eilean Siar, Orkney Islands and Shetland Islands. Aberdeenshire therefore has a unique character on mainland Scotland with small towns and accessible rural areas set around a single large City that provides the main employment, service and civic centre for the region. The area provides good access to services on a wide-ranging basis and settlements such as Maryculter West are located in areas where access to services is convenient. This is demonstrated in Table 1 below which indicates travel times to service and employment centres and the AWPR:

Destination	Travel time by car (minutes)	Travel time by bicycle (minutes)
Milltimber	5	14
Peterculter	6	17
Aberdeen (Union Street)	17	45
Aberdeen (Bridge of Don)	13	37
Stonehaven	16	46
Netherley Primary School	4	16
Prime Four Business Park	11	48
Portlethen/Badentoy Business Park	14	30
AWPR North Deeside Junction	7	NA
Deeside Way cycle path	NA	16

Table 1 – Example Travel times from Maryculter West

The PLDP also seems to be inconsistent in its approach as it also includes allocations that adopt a more positive approach to small rural settlements. Those below are a similar scale in a similar location type in the Kincardine and Mearns area, some very close to Maryculter West, where housing allocations have been supported.

- Findon OP1 – 11 homes
- Kirkton of Maryculter OP1 – 6 homes
- Park OP1 – 13 homes
- Woodlands of Durriss OP1 – 27 homes



Above - Extracts from PLDP settlement statements

A consistent approach should be reflected in an allocation for limited housing at Maryculter West

5. Conclusion

Given the response above and the housing land supply situation Drum Property Group believe that the allocation of this small site would be positive for the Maryculter West. It would add a diversity to the settlement with differing house types and sizes, affordable housing, self-build and real opportunities to work from home, community growing spaces for food production and develop a sustainable rural lifestyle. It would have limited physical impact and should be considered an organic extension to an existing community. Locationally it fits with the wider character of Aberdeenshire's Accessible Rural Areas and the history of residential extensions to Maryculter West. The site of the proposed steading based rural business use is on land once occupied by Pepperhillock Steading. From a landscape and woodland perspective, the proposed development and associated landscape improvements will enhance the local woodland and landscape structure and will not result in significant landscape character changes.

Drum Property Group believes that this slightly amended proposal provides a real opportunity to deliver much needed smaller family housing to support this accessible rural settlement. It should be allocated in the Local Development Plan for 10 homes, community growing space and rural business use.



Supporting Documents

MC1 – Bid Document

MC2 – Main Issues Report Response



DRUM
PROPERTY GROUP
DEVELOPMENT & INVESTMENT

LAND AT MARYCULTER WEST

LOCAL DEVELOPMENT PLAN BID

MARCH 2018

PREPARED BY HALLIDAY FRASER MUNRO FOR DRUM PROPERTY GROUP



INTRODUCTION

The purpose of this document is to support the Local Development Plan bid submission which has been prepared on behalf of Drum Property Group Ltd by Halliday Fraser Munro Architects and Planning Consultants. We consider that the land at Maryculter West put forward through this bid is suitable for future development, is free from constraints and is viable and deliverable.

The proposals presented in this document have developed following a review of the site, planning context, an analysis of the opportunities and constraints of the site and the integration of new development as an appropriate extension of Maryculter West.



Maryculter is one of the most attractive and sought after residential locations in the North East of Scotland. Previous small scale developments similar to this proposal have successfully created a unique and special settlement. The aim is to create additional high quality homes and opportunities for rural business use.

PLANNING CONTEXT

Maryculter West is a small hamlet in the Lower Deeside area of Aberdeenshire at the entrance to Royal Deeside. The housing group lies south of the South Deeside Road and 500m west of the B979 Netherley Road, linking the area with Stonehaven.

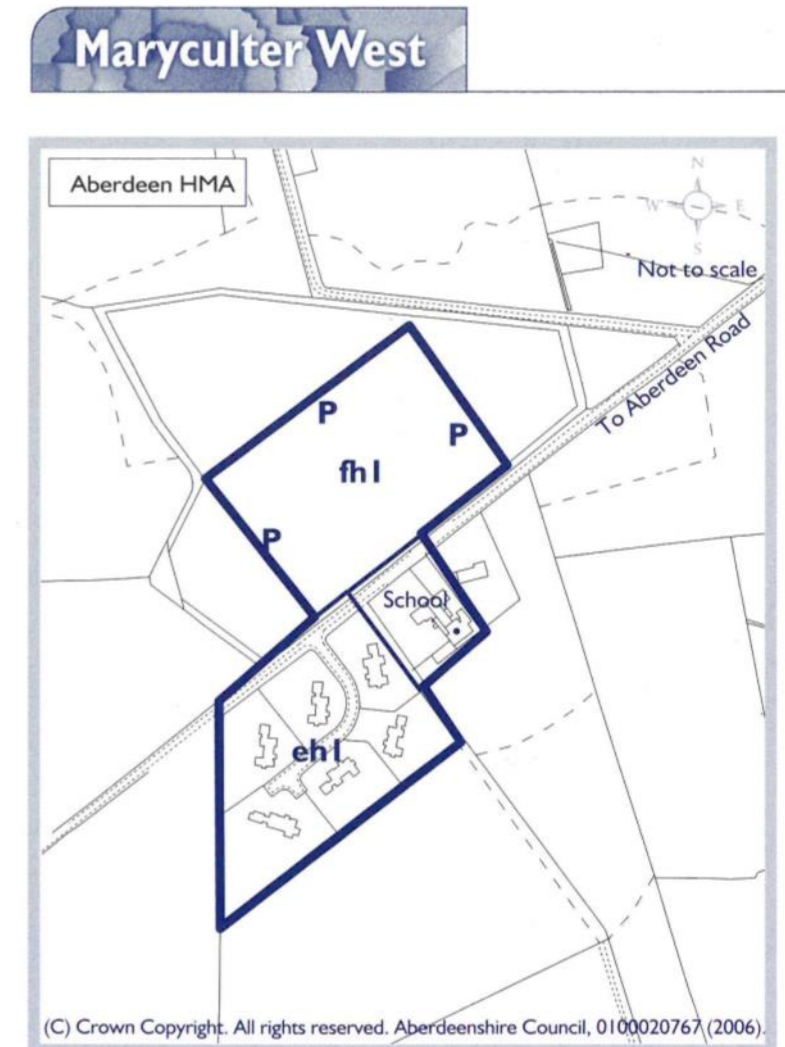
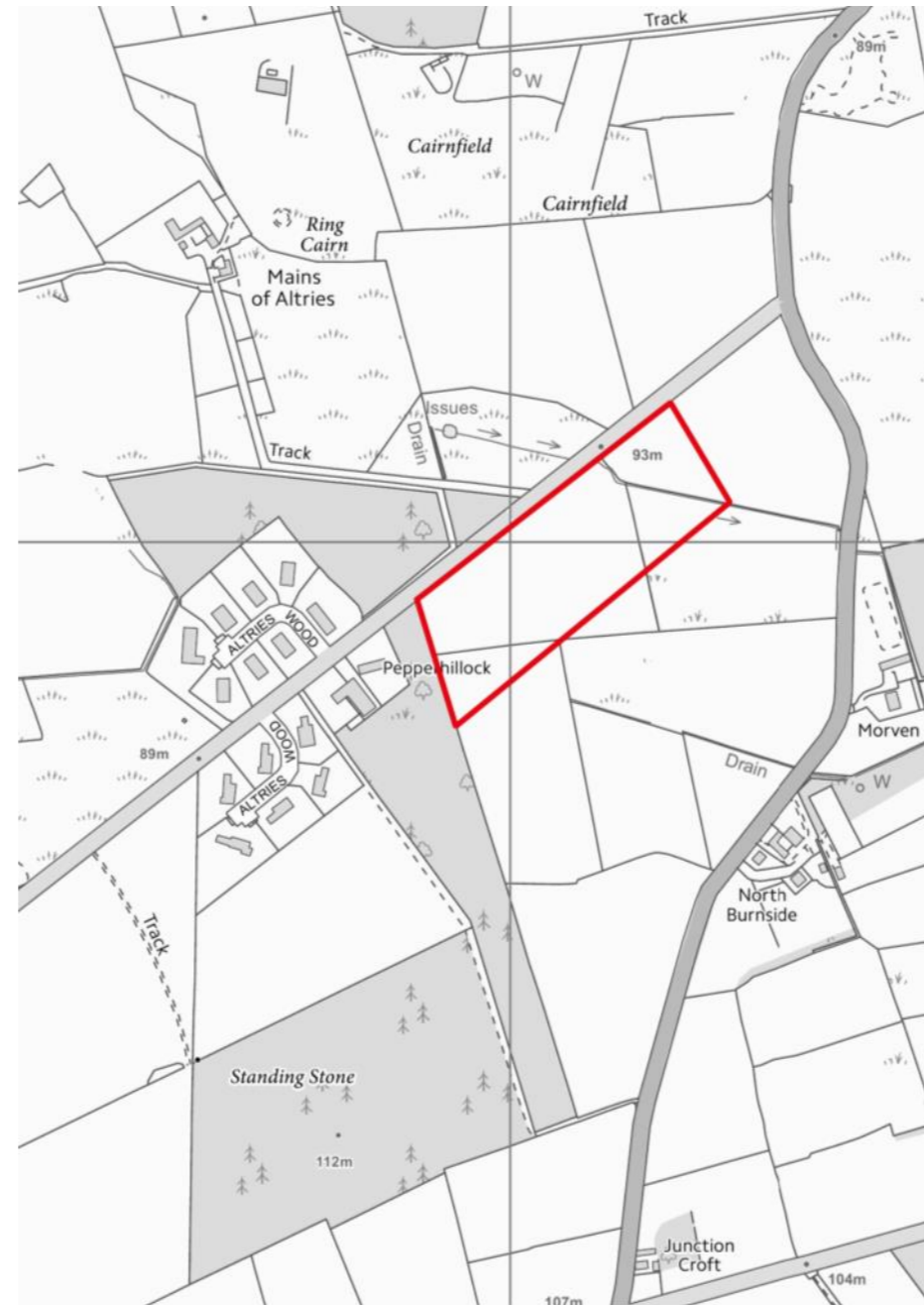
Maryculter West presently comprises two groups of attractive detached houses to the north and south of the public road. These have been developed around the Maryculter Primary School and the adjacent property of Pepperhillock. Both groups of existing housing were allocated in previous Local Plans, the first phase in the 1990s and the second phase in the 2006 Aberdeenshire Local Plan. These have both been built out and proved to be extremely popular.

Maryculter West is well connected to both Aberdeen City and the rural area south of the South Deeside Road.

This development bid proposes the allocation of land for new housing on the south side of the road running through the village, between the current eastern edge of Maryculter and B979 Netherley Road.

The site is an open grass field adjacent to existing housing and woodland. Defensible boundaries are provided by the road and established woodland to the north and west respectively.

Deliverability is the key concern through this LDP review, and sites such as this where development is clearly deliverable should be supported.



Extract from 2006 Aberdeenshire Local Plan with allocated sites shown



Traditional property close to the site



Modern bungalow in plot adjacent to the site



Recent new homes close to the site



Recent new homes close to the site

CONSTRAINTS AND ANALYSIS



LANDSCAPE STRATEGY

- Existing Woodland protected
- New Woodland introduced to produce enclosed pockets of land similar to Altries Wood development
- Existing and New Woodland will provide some screening of the settlement



MOVEMENT STRATEGY

- Access to the proposed development taken off of the existing unclassified road which runs through Maryculter West.
- New shared surface access introduced to access the properties similar to Altries Wood development.



DEVELOPMENT POCKETS

- The proposal is to create a third development pocket to the east of the settlement with a similar character and scale to Altries Wood on the west.
- Landscape and Movement Strategies will ensure that the feel of the settlement is not lost, but is expanded on a small scale.
- The opportunity exists to introduce a countryside employment use to the east closer to the B979



CONCEPT DIAGRAM

- Small scale residential development
- Rural Employment land
- Enhanced landscaping

INDICATIVE LAYOUT PLAN

The 3.4ha area of grassland at Maryculter West represents a deliverable, measured extension to the eastern side of the established hamlet of Maryculter West.

The bid site and surrounding land is under the ownership of Drum Property Group is available for development. Access can be taken into the site from the main public road through the hamlet. The site lies 140m west of the Netherley Road, providing excellent linkages with the wider area.

The development can be laid out at a plot density and manner mirroring that already existing in Maryculter East. It is anticipated that up to ten dwellinghouses can be developed.

The site also offers scope for the creation of small-scale rural business start up unit. This can be laid out to replicate a vernacular steading building and would create opportunities for people to both live and work in the hamlet.

The site comprises flat open grassland and is surrounded by existing housing and woodland. The new development creates the opportunity for a strong defensible boundary to the east, creating a gateway to the hamlet.

The site is in close proximity to the range of facilities and services. The scale of development proposed will ensure that the site is attractive to a range of developers, and there are no constraints to development delivery.

In summary we would request that the following is included as an allocation in the forthcoming Aberdeenshire Local Development Plan 2021:

'Land at Maryculter West – suitable for up to Ten Houses and Rural Employment Land.'

- **New cluster of homes on North East edge of the settlement;**
- **Opportunity for new rural business such as stables or a livery;**
- **Continuing to respect settlement setting;**
- **Additional structure planting proposed to provide shelter and privacy in keeping with other new homes in the settlement.**
- **Scope for circa 10 houses at low density.**







KN123 – Maryculter West (Altries) MIR Response – March 2019

10 homes and employment land

1. Introduction

Halliday Fraser Munro lodged an LDP bid for the above site on behalf of Drum Property Group. During the review process Aberdeenshire Council officers have suggested that the site should not be allocated for the following reasons:

- Location/Context;
- Impact on woodland/Landscape; and
- Accessibility to services.

These, we believe, are not valid reasons for discounting this site which offers an opportunity for new sustainable rural lifestyles that are generally not available to the wider public under the current proposed policy stance on housing. Rural settlements are central to Aberdeenshire's character and a small extension to an existing settlement will help support and cement that character rather than detract from it as suggested.

On a more general note the housing strategy adopted in the MIR has significant limitations. In effect not enough housing land has been identified to meet the area's housing needs, it doesn't include enough choice of location for new homes and is inconsistent in approach. Rural Aberdeenshire supports multiple small-scale settlements. These are central to the area's character and context and a key reason why people choose to live in the area. Small scale extensions to these settlements will help to maintain the region's rural population as it ages and help maintain a mix of working age families as well as retired and older, usually smaller households. Maintaining that mix will be important for the future of the region.

Each of the issues are considered below and referenced to the specific consultation issue within the MIR.

2. KN123 Site Specific - Location/Context

The MIR analysis suggests that the site is *"... situated in the Countryside and does not relate well to the neighbouring houses in Maryculter West due to the existing mature trees that are part of an ancient woodland adjacent to the site. The woodland provides a natural, definitive edge that has a role in containing the recent new housing development related to Maryculter West"*.

It's quite correct that the site is in the defined Countryside but not the case that it doesn't relate well to the neighbouring houses. Its location in the Countryside is not a justification to discount the site as the vast majority of the land area in Aberdeenshire is Countryside and other bids have been supported within the countryside/Green Belt nearby. In many locations within Aberdeenshire the settlements are characterised by housing set within or against woodland. That relationship with trees in the landscape helps to create high quality amenity, a positive environment and takes advantage of the shelter that woodland offers benefitting sustainability and energy efficiency. The bid document lodged last year included a range of site analysis diagrams that illustrated how the housing site can be integrated with the existing settlement. Those included a landscape strategy showing that the existing woodland can be protected with additional landscape provided to help create defined settlement edges and landscape buffers to the development. The proposed housing would then only be seen



through a woodland filter which is common within Aberdeenshire's Countryside settlements. The bid is indicative and clearly this woodland buffer can be increased in depth if necessary, especially as the bidder also owns the land surrounding the site.

Any new development will impact on the landscape. The real test is whether the development would do any harm to that landscape and who would be experiencing that landscape impact. In this case it is only the residents of the existing housing at Maryculter West and those travelling the B979 Netherley Road. For residents the existing woodland would help screen the development and on a day to day basis will not impact on them unduly. The housing at Maryculter West is reasonably modern and the proposal is for a further extension of a similar scale. For those travelling south on the B979 the road generally rises and undulates but views of the development would always only be a glimpsed peripheral view to the right. The contours of the intervening field and the road itself would generally hide the development from view and structural woodland planting would effectively integrate the proposed development into the existing landscape so that any glimpsed views would be limited and be very similar in nature to the existing views. The proposal also includes the option for a small-scale rural business unit, designed to reflect vernacular steading buildings and offering opportunities for people to both live and work in the hamlet. The types of business opportunity we foresee could include: stabling/tack and rural supplies/small farm shop/local rural business/office. That building though would also limit any views of the new housing. The positioning of this building partially replicates the location of a historic vernacular steading building – Pepperhillock (see OS extract below). Historic records also show another building in the field to the south of this that pre-dates the more modern housing.



Figure 1 – Extract 1843-1882 1st edition Ordnance Survey Plan

For those travelling north the site would be seen intermittently against the backdrop of the woodland sitting to the north of the unclassified road heading west from the B979 and behind the proposed new woodland planting. Again, this view would be altered but would still constitute a partial view of limited housing set within and against new and existing woodland. The contours of the road and the intervening field and roadside walls and landscape features will block this view rendering it



intermittent. The visual and landscape impact would therefore be minimal. Woodland planting could be increased to the south as indicated on the updated landscape strategy diagram below if considered appropriate.



Figure 2 Updated Landscape Strategy Diagram – increased woodland planting to the south

The intention is to plant a defined new woodland edge around the site. The bidder is currently marketing the neighbouring land (which is also in their ownership) for its existing agricultural use which will help contain and restrict Maryculter West to limited extension only and help it remain a small rural settlement in line with its current character.

The bid also included a Movement Strategy diagram (see over) showing how access could be achieved that is similar to the other local development pockets.



Figure 3 Movement Strategy Diagram

The bid also demonstrated how the proposed development was simply a third development pocket of the same scale as this already developed reasonably recently in the settlement.



Figure 4 – Development Pockets (1 and 2 existing, 3 proposed)

Conceptually the proposal has been altered slightly from the original bid. As a general approach the third, and final, development pocket concept remains but the scale and format of the proposed development has been reviewed in light of the MIR comments. The bid includes:

- Smaller housing units (including 25% affordable and options for self-build plots);
- Community growing space – potentially a community orchard, space for small-holdings;
- Plots that are large enough to support home offices/garden offices to support sustainable location neutral working practices i.e. less need to travel;
- Whole site digitally connected to support home working; and
- Local-scale rural business space

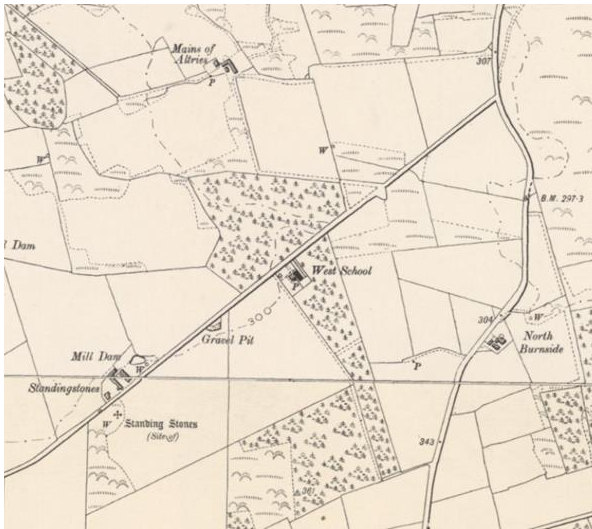
The site offers a small-scale, modern interpretation of rural sustainable living that is more affordable to the wider community than has previously been the case.



Figure 5 – Revised Concept Diagram

This proposed extension should be considered as a continuation of the historic Planning Authority approach to new housing at Maryculter West. In previous Local Development Plan iterations the site has been identified as a defined Rural Service Centre with associated small pockets of allocated development land. These are now developed. The current proposal reflects that approach by identifying a further small and distinct parcel of land that could accommodate 10 new homes.

Maryculter West is centred around a traditional Primary School building that has only recently been closed as a result of the new and centralised primary school provision elsewhere. Historic maps show that Maryculter West Primary school has been located here since the 19th Century reflecting the rural and dispersed nature of Maryculter and the importance of this central location for education provision. Aberdeenshire’s rural areas are characterised by dispersed rural communities often centred around a single community or commercial facility. These locations are contextually and culturally important as they were traditionally chosen to reflect the surrounding dispersed rural settlements. They can be considered nodes or a focus for these rural communities and are often the very locations that these small hamlets and villages have grown around over the years. This is natural incremental growth and commonplace in the development of Aberdeenshire’s rural smaller rural settlements.



1900s Ordnance Survey Plan (Pastmap)



1955-1961 Ordnance Survey Plan (Pastmap)

Later in the 20th and 21st centuries the two housing pockets were developed in two phases. The hamlet has therefore grown in a phased manner and characterised by small pockets of housing. These new houses have been very large to meet a specific housing market. This proposal offers a different housing mix to increase diversity in the village, an opportunity for local services and affordable housing/self & custom build housing to meet local needs.

3. KN123 Site Specific - Woodland Impact/Landscape Impact

The MIR suggests that the “... bid would compromise this edge effect and erode the structural integrity that this brings to the landscape. Landscape structure is important and adds a sense of coherence and order”. The proposed extension to the settlement would not impact on the existing woodland which sits outside of the bid site. A buffer could be included if required to ensure that’s the case and additional natural woodland planting would enhance the overall woodland cover. The proposed woodland would also enhance the local woodland structure around the site and create circumstances where the new development would simply be an extension to the hamlet. The sense of coherence and order of the wooded landscape would not be affected. If anything, it would be strengthened.

4. KN123 Site Specific - Access to Services

The MIR suggests that the “site is not within walking distance from all of the main services and community facilities and would encourage car dependency”. This is not unusual in rural areas but is not a justification to abandon opportunities in rural communities and favour a fully centralised approach to development. People do want to live and work in small rural communities and with modern communication technology it’s easier than ever to make that a real and sustainable opportunity. The overall scale of development in these areas is limited and the associated impact will also be limited. 10 houses here would have a very limited impact for example on trips made by private car compared to larger allocations such as that at Chapelton (4,000 new homes). In considering impact the Council should take a proportionate approach and not rule out continued support of small rural communities just because of their location. This is especially true of smaller settlements within the Accessible Rural Area (see below).

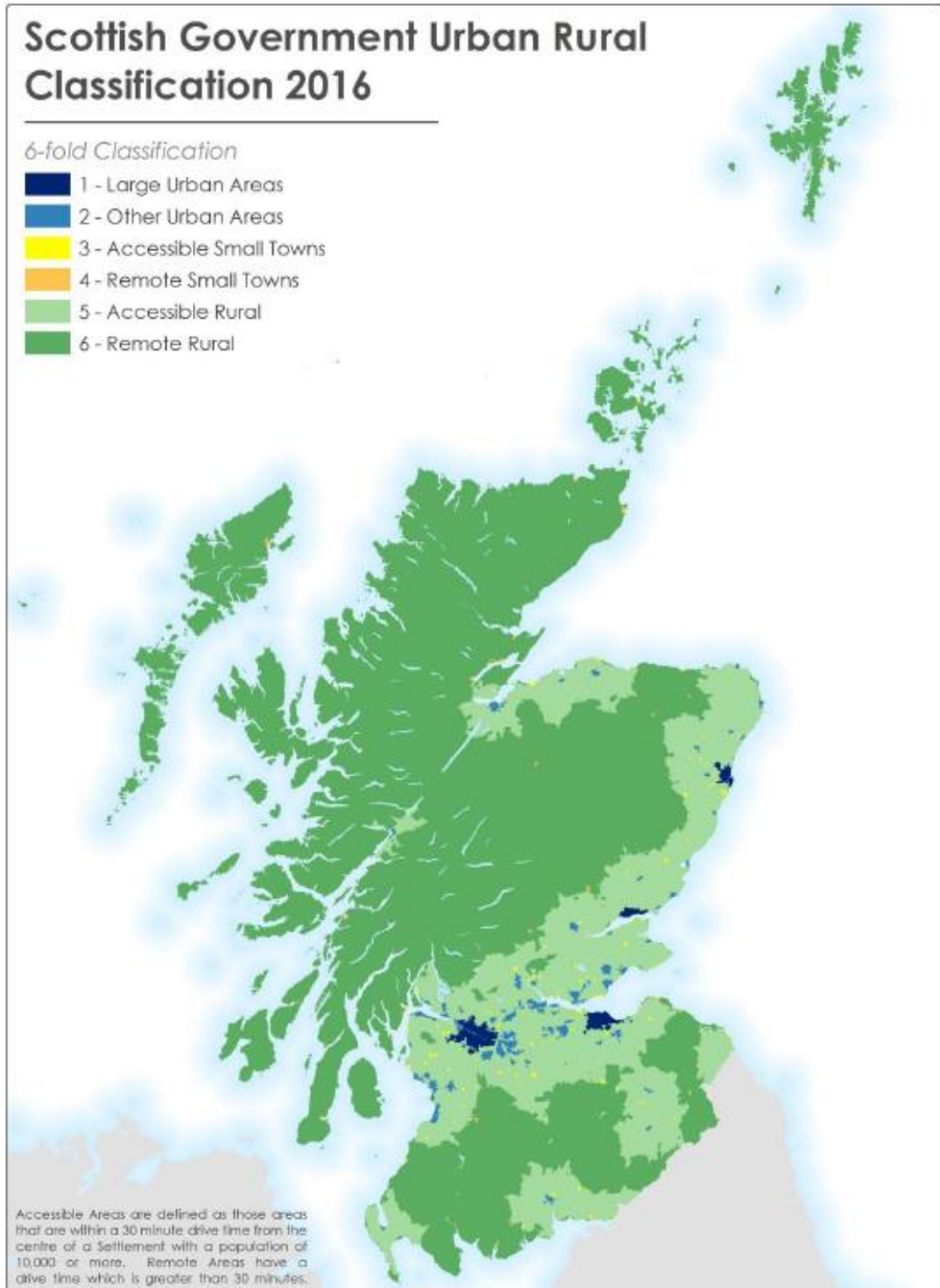
The MIR also proposes to adopt the Scottish Government’s 6-fold Urban Rural Classification. That classification essential categorises all areas of Scotland depending on their location and accessibility.



The maps ref 2.3 & 2.4 show the 6-fold classification and a more detailed 8-fold classification. Both indicate quite clearly that most of Aberdeenshire Council's area is included within the Accessible Rural classification. Accessible areas are those within a 30-minute drive time from the centre of a settlement with a population of more than 10,000. Maryculter West is approximately within 15 minutes' drive time of Aberdeen.



Map 2.3: Scottish Government 6-fold Urban Rural Classification 2016



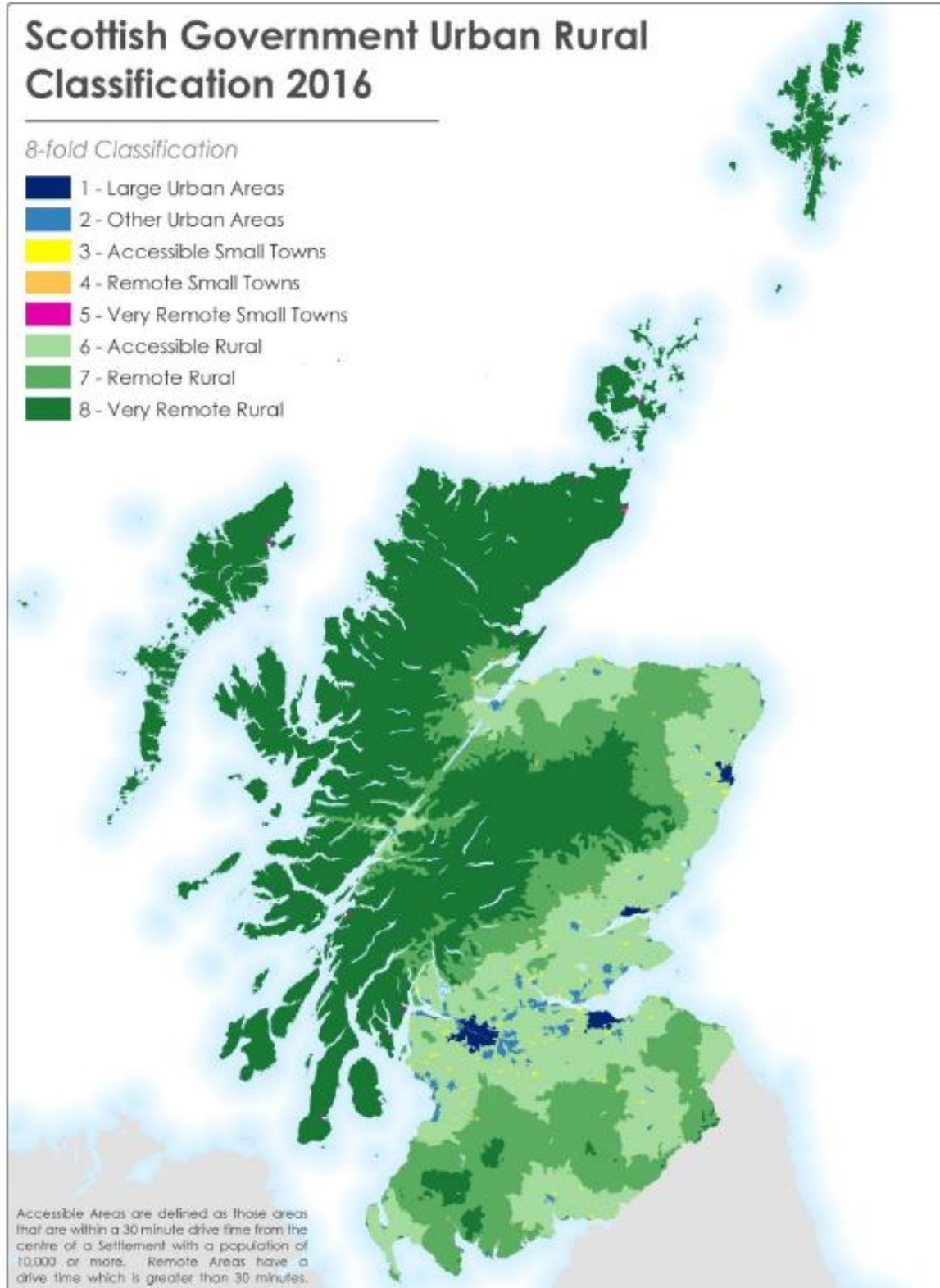
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Scottish Government
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Map 2.4: Scottish Government 8-fold Urban Rural Classification 2016



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In Aberdeenshire the scale of accessible rural areas is significantly greater than the Scottish average at 35% compared to 11.2%. Aberdeenshire’s scale of accessible rural areas is only comparable with island authorities of Nan Eilean Siar, Orkney Islands and Shetland Islands. Aberdeenshire therefore has a unique character on mainland Scotland with small towns and accessible rural areas set around a single large City that provides the main employment, service and civic centre for the region. The area provides good access to services on a wide-ranging basis and settlements such as Maryculter West are located in areas where access to services is convenient. This is demonstrated in Table 1 below which indicates travel times to service and employment centres:

Destination	Travel time by car (minutes)	Travel time by bicycle (minutes)
Milltimber	5	14
Peterculter	6	17
Aberdeen (Union Street)	17	45
Aberdeen (Bridge of Don)	13	37
Stonehaven	16	46
Netherley Primary School	4	16
Prime Four Business Park	11	48
Portlethen/Badentoy Business Park	14	30

Table 1 – Example Travel times from Maryculter West

The MIR however seems to be inconsistent in its approach as it also includes allocations that adopt a more positive approach to small rural settlements. At Kirkton of Maryculter, just along the road from the Maryculter West site and in a similar location (except that example is Green Belt land so more protected than Countryside), the officers have supported a small-scale hamlet extension (5 homes – KN040). The justification is that the site is a logical extension to the settlement, its small-scale and location provides an appropriate extension to the hamlet, and it would provide an opportunity for much needed low-cost homes in the area. This is in a hamlet with known infrastructure constraints (waste water and education) but the limited scale of the development, and therefore limited impact on the local infrastructure, has allowed these constraints to be discounted. A consistent approach should be reflected in an allocation for limited housing at Maryculter West.

SEPA flood maps do not indicate that the site would be prone to flooding as suggested incorrectly in the MIR SEA. See Figure 6 over.

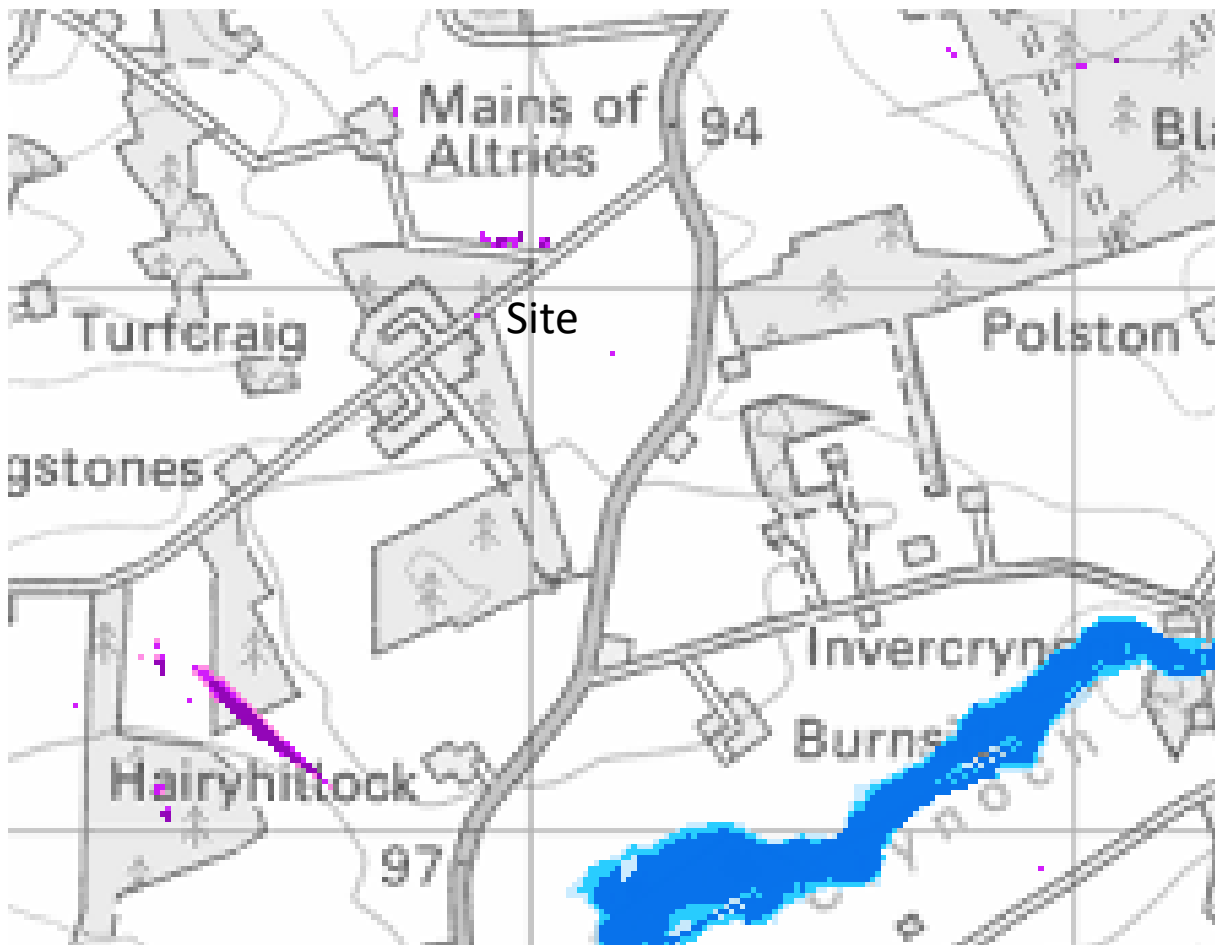


Figure 6 – Extract from SEPA Floodmap (All intellectual property rights for Flood Maps are owned by SEPA or its licensors and are shown for information purposes only)

5.Summary – KN123 Site Specific

Given the response above Drum Property Group do not believe that the criticisms of this site are justifiable or insurmountable. Locationally it fits with the wider character of Aberdeenshire’s Accessible Rural Areas and the history of residential extensions to Maryculter West. The site of the proposed steading based rural business use is on land once occupied by Pepperhillock Steading. From a landscape and woodland perspective, the proposed development and associated landscape improvements will enhance the local woodland and landscape structure and will not result in significant landscape character changes.

From a land-use perspective the proposal now includes:

- 10 homes –with 25% affordable, including options for self and custom build plots;
- Smaller housing units with a larger garden space to help support home working (home office spaces within the plots);
- A dedicated community growing space (allotments, small-holding, community orchard etc.) to support increased self-sufficiency;
- Rural business space on the site of a historic steading building; and



- Enhanced woodland planting to complement the existing woodland outside the site.

Drum Property Group believes that this slightly amended proposal now addresses all the concerns raised in the MIR and provides a real opportunity to deliver much needed smaller family housing to support this accessible rural settlement. It should be allocated in the Proposed Local Development Plan for 10 homes, community growing space and rural business use.



6. MIR Housing Strategy Response, Policy H1 & Main Issue 10 (Housing Numbers on Sites)

On a macro scale the strategy adopted by the MIR for the scale and location of housing allocations does not reflect the facts or the character of the region. We understand why larger allocations are located closer to services and better public transport but a general removal of allocated opportunities for limited housing around existing rural settlements is not supported. The justification for the lack of allocated small sites seems to be based on two elements – sustainability and a lack of requirement to allocate additional sites.

6.1 Sustainability

On sustainability the MIR strategy is simplistic. It relates sustainability to location and the need to travel to access services. Historically that approach may have had some credence but as the need to travel to access services becomes less important (with the advent of online services – banking, telephone and online medical consultations, viable tele-conferencing over the internet, high speed broadband and flexible working) the locational need is less important. Historically too the locational aspect of sustainability related to the use of the private car and substantially on its contribution to environmental pollution and congestion. Automotive technology has also moved on and with the advent of electric and hybrid cars short journeys can be supported on a non-polluting basis. Even petrol and diesel cars are significantly less polluting than in the recent past. Location then is less of a concern where the opportunity for this more sustainable lifestyle is available. In Aberdeenshire the Accessible Rural Areas provide this opportunity as the drive-time distances are less to major centres an access to high-speed broadband is simpler. The Proposed Plan should rethink its strategy on these accessible rural areas and support housing allocations in or adjacent to settlements where the scale of the allocation is appropriate.

6.2 Housing Strategy and Allocations

The housing strategy contained within the Aberdeenshire Council Main Issues Report (MIR) relies heavily on existing allocated sites, a generic densification across sites within the AHMA and some limited small-scale allocations across the area to meet expected Strategic Development Plan (SDP) housing requirement. This do-minimum strategy raises concerns on the range and scale of housing that can be actually be delivered, on the practicality of delivering significantly increased densities as proposed by the MIR and the relationship between that strategy, the SDP in its final form when approved later this year and national policy on delivering more housing more effectively.

The MIR (on Policy H1) indicates that it sets out to comply with Scottish Planning Policy (SPP), “... especially paragraph 110 that requires development plans to identify a generous supply of land across all tenures and to maintain at least a 5-year supply of effective housing land at all times”. More specifically the MIR is very clear that “**a sharp focus on delivery is required**” (p19). Drum Property Group is concerned that the Plan as proposed does not provide that sharp focus and will not improve housing delivery across Aberdeenshire as:

The MIR is based on the 2016 Housing Land Audit (HLA). Figures from the more recent 2018 Aberdeenshire Housing Land Audit show that effective housing land supply, a key component in calculating the extent of housing land allocations, is already lower than the 2016 HLA by some 800 units. Additional sites should at least be allocated to address this shortfall.

A review of housing trends across the last four HLAs in Aberdeenshire identified evidence of:

- Housing delivery on currently allocated sites falling below medium-term HLA predictions;
- Over-optimism on housing delivery that becomes less accurate the further in the future it predicts, especially beyond 5 years; and
- A need, therefore, for a greater supply and range of housing allocations to supplement existing allocated sites and help deliver more housing over the life of the Plan.

Over the period from 2021-2025, this equates to a potential shortfall in housing delivery of 2,765 homes. The MIR strategy of limiting future allocations therefore doesn't reflect historical trends in housing delivery. Evidence from HLAs indicates quite clearly that a realistic approach to deliver SDP housing requirements would need to allocate additional land in a variety of marketable locations.

Drum Property Group is also concerned that the blanket approach proposed by the Council to increase densities across allocated and preferred sites is unrealistic and creates an artificially inflated housing land supply. The principle of the development bids was such that those making the bids considered their sites in some detail, considered context and constraints and, in some cases, provided indicative layouts that took all of these into account. The MIR approach of applying a generic increased density across the board in that scenario is unlikely to be achievable and can only suggest, at best, a maximum development capacity which ignores context and site-specific circumstances. This creates a mathematical and theoretical housing capacity that is not based on real development opportunities. The actual development capacity is likely to be significantly less. This, therefore presents an unrealistic housing supply figure which overplays the impact of increasing densities as a policy response.

We estimate that the proposed uplift in site capacity by increasing the site density on bid sites could be in the region of 550 houses. This is an almost 50% increase in housing numbers over that proposed by bidders on the affected sites. Most of those bids were based on indicative site layouts which have taken cognisance of the site conditions, local context and the local market, and layouts have been developed with a view to ensuring deliverable developments. This theoretical uplift in site capacity is considered undeliverable resulting in an artificially inflated housing land supply. In that scenario the MIR housing allocations will not meet the requirement of the Strategic Development Plan.

Between these 3 basic criticisms of the MIR approach there seems to be a potential shortfall of just over 4,000 homes based on:

- Difference in effective housing land supply between 2016 Housing Land Audit and 2018 Housing Land Audit = 800 homes;
- Shortfall in projected actual housing delivery when compared to historic trends in HLA medium-term predictions i.e. a realistic view of what will be achieved = 2,765 homes; and
- Impracticality of delivering the MIR proposed theoretical increase in housing density = 550 homes

Even accepting that there is some leeway in these figures as they are also estimates they are clear evidence that the proposed MIR allocations are **very unlikely to provide the sharp focus on delivery** that the MIR sets out to achieve. The area clearly needs other credible development options if the



Council is serious about addressing housing delivery shortfalls and meeting housing requirements in the area as required by NPF3, SPP and the Strategic Development Plan. The only solution to that is allocate additional sites across the region, including within the Accessible Rural Areas and Aberdeen's Housing Market Area.